

**STATE OF NEW YORK
PUBLIC SERVICE COMMISSION**

Proceeding on Motion of the)	
Commission to Examine Programs to)	Case 14-M-0565
Address Energy Affordability for Low)	
Income Utility Customers)	

Proceeding on Motion of the)	Case 20-M-0266
Commission Regarding the Effects of)	
COVID-19 on Utility Service.)	

**JOINT UTILITIES' ENERGY AFFORDABILITY PROGRAM SELF-CERTIFICATION
PROCESS AND TEMPLATE**

I. Introduction

On August 12, 2021, the New York State Public Service Commission (Commission) issued its *Order Adopting Energy Affordability Policy Modifications and Directing Utility Filings*¹ (EAP Order), which addressed 20 recommendations from Department of Public Service Staff's (Staff) February 4, 2021 EAP Whitepaper.² The Order directs Staff, the Joint Utilities,³ and other stakeholders to continue to improve and standardize many aspects of utility EAP

¹ Case 14-M-0565, Proceeding on Motion of the Commission to Examine Programs to Address Energy Affordability for Low-Income Utility Customers (EAP Proceeding) et al., Order Adopting Energy Affordability Policy Modifications and Directing Utility Filings (August 12, 2021) (EAP Order).

² EAP Proceeding, Staff Report on New York State's Energy Affordability Policy (February 4, 2021) (EAP Whitepaper).

³ The Joint Utilities are Central Hudson Gas & Electric Corporation (Central Hudson), Consolidated Edison Company of New York, Inc. (Con Edison), National Fuel Gas Distribution Corporation (National Fuel), New York State Electric & Gas Corporation (NYSEG), The Brooklyn Union Gas Company d/b/a National Grid NY (KEDNY), KeySpan Gas East Corporation d/b/a National Grid (KEDLI), and Niagara Mohawk Power Corporation d/b/a National Grid (NMPC, collectively with KEDNY and KEDLI, National Grid), Orange & Rockland Utilities, Inc. (Orange & Rockland), and Rochester Gas and Electric Corporation (RG&E).

programs. In particular, the EAP Order directs the Joint Utilities to file a uniform, statewide customer self-certification process for participation in EAP programs (Ordering Clause 5) and develop and file a uniform statewide template for customer self-certification applications with appropriate documentation within 90 days of the Order (Ordering Clause 6).⁴ The Secretary subsequently granted an extension until December 17, 2021 to comply with these Ordering Clauses.⁵ The Joint Utilities make this filing to fulfill these two Ordering Clauses from the EAP Order.

II. Customer Self-Certification Process

The process for customers to contact the Joint Utilities to self-certify that they qualify for enrollment in the EAP is based on existing utility practices, modified to align with the guidance from the Commission in the EAP Order. The self-certification process begins when a customer contacts its utility and notes that they participate in one of the EAP-eligible programs but are not enrolled in the utility's EAP and, therefore, are not receiving a monthly bill discount. Each of the Joint Utilities will accept participation in any of the government-sponsored programs noted in the EAP Order that establish eligibility.⁶ In addition to the standardized list of programs identified in the EAP Order, certain utilities have existing programs that establish eligibility beyond the standardized list.

⁴ EAP Proceeding, EAP Order, p. 52.

⁵ EAP Proceeding, Ruling on Extension Request (issued Nov. 10, 2021).

⁶ EAP Proceeding, EAP Order, p. 52 (Ordering Clause 8). The Joint Utilities also note that on page 20 the EAP Order states that "utilities shall enroll utility customers who can provide documentation of proof of their enrollment in public assistance programs associated with the federal Lifeline program."

The customer must fill out an EAP application and return it with the required documents to demonstrate eligibility. A uniform, statewide template for the application form, which appears in Attachment 1, will be used by the Joint Utilities and made available to customers on utility websites or via mail, as stipulated in Ordering Clause 6 of the EAP Order.⁷ Certain aspects of the statewide template, such as program terminology and the list of qualifying programs, will necessarily vary based on utility service territory. Customers will be able to submit application forms initially via email, fax, or direct mail. Once each utility has developed the necessary capability, the application will be made available through an online webform.⁸ The Joint Utilities will continue to refine Attachment 1 with input from the EAP Working Group and make adjustments to the template over time as necessary to accommodate changes in qualifying programs, application submission options, etc. Once the utility receives and processes a completed application with the appropriate documentation, the customer will be enrolled in the utility's EAP program.

When a customer self-certifies and is enrolled in the EAP, the customer will be provided a written acknowledgment of their enrollment. The utility will send a reminder letter or bill message (approximately one year after enrollment) to alert the customer that they must recertify for EAP participation by providing current documentation or they will be removed from the program. Customers that are de-enrolled due to failure to submit proof of continued enrollment in a government-sponsored program that establishes EAP eligibility will be notified of their change in status either by letter or on their bill. In some cases, the identification of low-income

⁷ EAP Proceeding, EAP Order, p. 52.

⁸ The Joint Utilities each plan to implement a web-based solution that will allow eligible customers to complete and submit an application form on the utility's website.

customers through data sharing and file matching between utilities and the Office of Temporary Disability Assistance (OTDA) will facilitate automated reenrollment. If a customer is identified as EAP-eligible through an OTDA file match and not already enrolled in the EAP, the customer will be enrolled at that time.⁹

III. Conclusion

The Joint Utilities appreciate the input and collaboration with stakeholders that has informed this EAP self-certification process. The Joint Utilities look forward to implementing this process for the benefit of eligible customers throughout New York State.

Dated: December 17, 2021

Respectfully submitted,

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⁹ A similar process will apply to eligibility that is established through a New York City Human Resources Administration file match.

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Attachment 1: Uniform Statewide EAP Application Template

Energy Affordability Program Application

Discount for eligible residential customers

Please complete this form and return to [Utility] by email, fax, or direct mail:

E-mail: [email submission address]

Mail: ATTN: Energy Affordability Program

Fax: [Fax #]

[Company]

[Address] [City], NY [ZIP]

Last Name:		First Name:					
Mailing Address:			Apartment #:				
City:		State:		Zip:		Phone:	
Account Number:			Email:				

Please check the program from which you now receive assistance:

- | | |
|---|---|
| <input type="checkbox"/> Home Energy Assistance Program (HEAP) | <input type="checkbox"/> Bureau of Indian Affairs General Assistance (if living on tribal lands) |
| <input type="checkbox"/> Lifeline Telephone Service Program (Lifeline) | <input type="checkbox"/> Head Start (if living on tribal lands) |
| <input type="checkbox"/> Supplemental Nutrition Assistance Program (SNAP) | <input type="checkbox"/> Tribal TANF (if living on tribal lands) |
| <input type="checkbox"/> Medicaid | <input type="checkbox"/> Food Distribution Program on Indian Reservations (if living on tribal lands) |
| <input type="checkbox"/> Veterans Disability or Survivors Pension | <input type="checkbox"/> Utility Guarantee / Direct Vendor programs |
| <input type="checkbox"/> Supplemental Security Income (SSI) | <input type="checkbox"/> Temporary Assistance for Needy Families (TANF) |
| <input type="checkbox"/> Federal Public Housing Assistance | <input type="checkbox"/> Safety Net Assistance |

Eligibility Requirements

To prove participation in one of the above programs, customers must submit an award letter or a document that includes their name or the name of their benefit qualifying person (BQP), the name of the qualifying program, and the government, Tribal entity or program administrator that issued the document. All documentation must have an issue date within the last 12 months or a future expiration date that aligns with the benefit period.

Customer Certification and Authorization

I certify that the above information is correct. I authorize [Utility] to disclose and verify any information contained in my application or other documents submitted for participation in the Program with any Third Party as part of processing my application and for ongoing Program participation and compliance. I authorize Utility to share information regarding my application and program participation and to obtain information on me from any such Third Party regarding my application, eligibility, and program participation. I also hereby authorize any such Third Party to provide to Utility, or any representative or agency of the federal, state, or local government any information and documentation that they may request, including but not limited to, information and documentation on utilities, payment history, employment history and income and application, status and award information regarding any benefits or utilities assistance.

Signature: _____

Date: _____

Contact [Utility]'s Energy Affordability Program Administrators at: [INSERT TEL #]