

April 11, 2024

Ms. Shonta Dunston
Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

**RE: Customer Assistance Program, Annual and Semiannual Reporting Requirements,
Docket Nos. E-2, Sub 1300 and E-7, Sub 1276**

To the Commission:

The undersigned members of the North Carolina Affordability Stakeholder Group (“ASG”) wish to express our support for the Customer Assistance Program (“CAP”) data reporting requirements that Duke Energy Progress (“DEP”) and Duke Energy Carolinas (“DEC”) (collectively, “the Companies” or “Duke”) presented in their March 19, 2024 filing. We write separately to inform the Commission of additional data reporting recommendations, which a significant number of ASG members support, to ensure a more comprehensive evaluation of the CAP pilot. Principal among these recommendations is the inclusion of customer arrearage data in the reporting requirements. We further ask the Commission to allow Duke to provide CAP data to all ASG members quarterly and to file the CAP annual and semi-annual reports publicly. We look forward to continuing to work within the ASG to refine our data collection and analysis.

In 2019, the NC Department of Environmental Quality reported that approximately 1.4 million people in North Carolina could not afford to pay their energy bills.¹ Five years later, that number has surely increased. Since 2019, residents have faced an unprecedented pandemic, economic uncertainty, rising inflation, and volatile natural gas prices. Now, as electric rates rise, Duke customers face mounting energy insecurity and affordability challenges. Some residents’ monthly bills have doubled; others’ have tripled. And some “[say] the rise is forcing them to choose between feeding the family or paying the power bill.”²

¹ North Carolina Clean Energy Plan, Supporting Document Part 3: Electricity Rates & Energy Burden, North Carolina Department of Environmental Quality at 14 (Oct. 2019), <https://files.nc.gov/ncdeq/climate-change/clean-energy-plan/3.-Electricity-Rates-and-Energy-Burden-FINAL.pdf>.

² Ken Lemon, “‘Kind of monopolizing’: Duke Energy faces pushback over higher electricity bills,” WSOC-TV Channel 9 (Feb. 16, 2024), <https://www.wsoc.com/news/local/kind-monopolizing-duke-energy-faces-pushback-over-higher-electricity-bills/ENXDVUATRNB23I5MBTAG54S4RI/>; see Shelle Jackson, “Duke Energy customers say bills are skyrocketing,” WRAL News (Feb. 2, 2024), <https://www.wral.com/video/duke-energy-customers-say-bills-are-skyrocketing/21265329/>; “Customers say bills doubled after Duke Energy rate increase,” WSOC-TV Channel 9 (Feb. 4, 2024), <https://www.wsoc.com/news/local/customers-say-bills-doubled-after-duke-energy-rate-increase/NDACUNWHCFE7ZHSBMXNB6RH2VY/>; Ashley Balsavias, “Is your energy bill skyrocketing? Duke Energy provides some answers,” WECT News (Feb. 12, 2024), <https://www.wect.com/2024/02/12/why-has-your-duke-energy-bill-increased-its-not-necessarily-because-rider-adjustment-fee/>; Lisbeth Ramirez, “Rates increase for Duke Energy customers,” ABC45 (Feb. 15, 2024), <https://abc45.com/news/local/rates-increase-for-duke-energy-customers-triad-north-carolina-josh-stein-kernersville-winston-salem/>; Taylor Thompson, “‘I’m just blown away’: Duke Energy customers shocked over skyrocketing January bills,” ABC13 News (Feb. 15, 2024), <https://wlos.com/news/local/duke-energy-customers-shocked-skyrocketing-january-bills-costs-charges-mcdowell->

Developing an effective, long-term bill payment assistance program is more important than ever. And access to comprehensive energy affordability data is critical for a thorough evaluation of the CAP pilot over the next three years. We appreciate the Commission’s improvements in the level of detail of the data collection and reporting relating to customer delinquencies and disconnections in Docket No. M-100, Sub 179. The data reporting requirements that ASG members have recommended build from that improved data reporting for jurisdictional utilities with a specific focus on providing the Commission and the public with the information they need to evaluate the CAP pilot.

1. A comprehensive evaluation of the CAP pilot is essential to developing an effective, long-term program.

We support the proposed data reporting requirements that the Companies presented in their filing on March 19, 2024. Without access to these data, particularly zip code level data,³ the ASG will be hard-pressed to evaluate the CAP pilot effectively; however, we also believe that these reporting requirements represent only the first step toward a robust evaluation of the CAP pilot. Access to a wider variety of data is critical to assessing the nature and extent of energy poverty in North Carolina communities and improving the CAP pilot to address those challenges more effectively.

During the past several months, ASG members have expressed support for the collection of additional datapoints to enable a more comprehensive assessment of the CAP and identify opportunities to improve the program. For example, as noted in Duke’s March 19th filing, the Southern Environmental Law Center (“SELC”) circulated data reporting recommendations to the ASG on December 8, 2023, and presented its recommendations during the second ASG meeting on January 18, 2024.⁴ Several ASG members expressed support for SELC’s recommendations, including the Charlotte Area Fund, Crisis Assistance Ministry, Natural Resources Defense Council, the North Carolina Conference of the NAACP, North Carolina Justice Center, Sierra Club, Southern Alliance for Clean Energy, and Vote Solar, among others—whose support SELC relayed

[county-impact-a-lot-of-people-struggle-groceries-bills-high-usage-months-winter](#); Jennifer Emert, “Surge in Duke Energy bill complaints prompts clarity from NC Utilities Commission,” ABC13 News (Feb. 21, 2024), <https://wlos.com/news/local/duke-energy-bill-complaints-surge-clarity-from-nc-utilities-commission-rate-increases-high-usage-time-year-january-february>.

³ We would like to emphasize the importance of reporting both zip code level and county level data. While county level data allow stakeholders to compare CAP pilot outcomes with existing county information (such as North Carolina’s County Development Tier Designations), such data also mask sub-county level trends. Durham County, for example, is designated as a Tier 3 county, meaning it is one of the least economically distressed counties in the state, but several communities *within* Durham County face severe economic distress. To assess energy poverty in North Carolina, identify communities in greatest need, and target CAP effectively, zip code level data are essential. See County Distress Rankings (Tiers), <https://www.commerce.nc.gov/grants-incentives/county-distress-rankings-tiers> (last visited Mar. 22, 2024); Vivian Do, et al., “Spatiotemporal distribution of power outages with climate events and social vulnerability in the USA,” *Nature Communications* (2023) 14:2470 (Apr. 29, 2023); County Distress Rankings (Tiers), North Carolina Department of Commerce, <https://www.commerce.nc.gov/grants-incentives/county-distress-rankings-tiers> (last visited Mar. 22, 2024); “Poverty in the Region,” Durham County Profile, Healthy Communities NC, <https://healthycommunitiesnc.org/profile/geo/durham-county> (last visited Apr. 10, 2024).

⁴ Duke’s filing mistakenly states that the Companies held a meeting with ASG members on December 8, 2023, but the Companies held only one ASG meeting in 2023: the group’s kickoff meeting on November 9. Stakeholders provided feedback on Duke’s proposed data reporting requirements via email on December 8, 2023, and the second ASG meeting took place on January 18, 2024.

to the full ASG on February 15, 2024. Since then, additional ASG members have expressed support, including Advance Carolina, Appalachian Voices, North Carolina Housing Coalition, and Rowan Helping Ministries.

In addition to the datapoints included in Duke's recent filing, the undersigned ASG members support the following data reporting requirements. We respectfully ask the Commission to include this information under the limited waiver of the Code of Conduct, if required, so that it too may be collected and reported in the future.

Arrearage Data: In addition to data on nonpayment disconnections, information on customer arrearages is equally important. A disconnection for nonpayment is an extreme event, signaling severe energy insecurity. But many customers experience energy poverty long before facing the threat of a disconnection. Without arrearage data, ASG members would be unable to meaningfully assess the range of customer affordability challenges affecting North Carolina residents. This recommendation further aligns with the Commission's 2023 DEP Rate Case Order, directing Duke to report on "the observed impacts of CAP on *arrearage management* and disconnections for nonpayment."⁵ For ASG members to help inform this report on CAP's impacts on arrearage management, access to arrearage data is essential.

Furthermore, consistent with the Commission's CAP pilot directives, ASG members may decide to recommend incorporating arrearage management into the CAP framework. As expert witness John Howat testified during the 2019-2020 DEP rate case, "To sustain participants' affordability and home energy security, [customer assistance] program design must be comprehensive in its approach to dealing with *both* participants' current bills *and* *arrearage balances*."⁶ Furthermore, "incorporating arrearage management helps ensure that a portion of the household energy burden reductions that come from discounted current bills is not simply 'given back' as customers pay off outstanding balances."⁷ Reporting both disconnections *and* arrearage data allows for a more complete, comprehensive assessment of the CAP pilot, including whether and how to incorporate an arrearage management component.⁸ Specific arrearage datapoints may include:

- Number of CAP customers and residential customers in arrears by zip code.
- Dollar amount of total CAP customer and residential customer arrears by zip code.
- Number of CAP customers, by zip code, who meet the Low-Income Affordability Collaborative's definition of "arrears struggling," meaning the customer is:

⁵ *Order Accepting Stipulations, Granting Partial Rate Increase, and Requiring Public Notice*, In the Matter of Application of Duke Energy Progress, LLC For Adjustment of Rates and Charges Applicable to Electric Service in North Carolina and Performance Based Regulation, Docket No. E-2, Sub 1300 (Aug. 18, 2023) ("DEP Rate Case Order"), ordering paragraph 38, at 240.

⁶ *Direct Testimony and Exhibits of John Howat*, In the Matter of Application of Duke Energy Progress, LLC, for an Adjustment of Rates and Charges Applicable to Electric Utility Service in North Carolina, Docket No. E-2, Sub 1219 (Apr. 13, 2020) ("Howat 2020 Testimony"), at 11, lines 1-3 (emphasis added).

⁷ An example of an arrearage management program is one that allows CAP customers "to write down one-twelfth (1/12) of a pre-program overdue balance with each timely payment of a current bill." Howat 2020 Testimony at 12, lines 11-14.

⁸ For similar reasons, data on the number of CAP customers and residential customers enrolled in a payment plan, by zip code, would be valuable.

- Six or more months behind in paying their regular/average bill amount, or
- Behind on their bills by at least twice the amount of their regular/average bill for two or more months.

These arrearage data also could mirror the past-due reporting that Duke already compiles on a monthly basis for its reports in Docket No. M-100, Sub 179.

Poverty Level Data: The Commission’s 2023 DEP rate case order directs the ASG to develop a tiered CAP, which would allocate the highest percentage bill reductions to CAP customers with the lowest incomes.⁹ To fulfill this directive, the ASG would need access to income-specific data, which Duke does not currently record. We look forward to discussing with ASG members potential sources and best practices for collecting and reporting this information, which could include:

- Number of CAP customers below 50% of the Federal Poverty Level by zip code.
- Number of CAP customers at 50-100% of the Federal Poverty Level by zip code.
- Number of CAP customers between 100% and 150% of the Federal Poverty Level by zip code.

Demographic Data: To assess differences in program implementation and impact among various groups of customers, demographic data are essential. Such data inform program outreach and development to better ensure equitable access to CAP assistance. Specific demographic datapoints may include geographic region, race, ethnicity, nationality, gender, age, disability, language, occupation, education level, housing type, and/or heating source.

Data on Duration of Disconnections: Tracking the duration of disconnections for both CAP customers and residential customers provides insight into the range and extent of energy affordability challenges facing Duke’s customers. This information would allow parties to assess potential disparities in disconnection outcomes across Duke’s service territory. Specific datapoints may include:

- The average and median duration (e.g., hours or days) of disconnection for CAP customers by zip code.
- The average and median duration (e.g., hours or days) of disconnection for residential customers by zip code.

Baseline Historical Data: Comparing historical data to current CAP-specific data would help the ASG assess the effectiveness of the program.¹⁰ A comparison of historical nonpayment disconnections and arrears among residential customers, for example, compared to CAP disconnections and arrears would indicate whether affordability outcomes have improved, remained unchanged, or worsened under the CAP pilot. Specific baseline historical datapoints may include:

⁹ DEP Rate Case Order at 113.

¹⁰ Including historical baseline data on customers’ enrollment in payment plans also would be beneficial. Such data may include the number of residential customers, by zip code, enrolled in a payment plan, annually from 2018-2023.

- Number of residential customers by zip code, annually from 2018-2023.
- Number of residential disconnections for nonpayment by zip code, annually from 2018-2023.
- Number of residential customers in arrears by zip code, annually from 2018-2023.

Energy Intensity Data: Many low-income North Carolina residents live in older, less energy-efficient housing and, as a result, use more energy per square foot (even as lower income households on average use less energy overall than their higher income counterparts). Data on energy intensity—the amount of energy required to produce a given level of output or activity—would provide insight into the potential impact of weatherization and energy efficiency referrals on alleviating CAP households’ energy burdens.

Household Data: The following datapoints indicate (a) how energy affordability challenges vary for smaller and larger households, (b) the extent to which children are exposed to energy insecurity, and (c) potential disparities in access to CAP for owner-occupied and renter-occupied households.

- Household Size
 - Number of CAP customers, by zip code, with a household size of 1-2.
 - Number of CAP customers, by zip code, with a household size of 3-4.
 - Number of CAP customers, by zip code, with a household size of 5+.
- Children in Household
 - Number of CAP households, by zip code, with 1-2 children.
 - Number of CAP households, by zip code, with 3-4 children.
 - Number of CAP households, by zip code, with 5+ children.
- Owner/Renter Status
 - Number of owner-occupied CAP households by zip code.
 - Number of renter-occupied CAP households by zip code.
 - Number of renter-occupied CAP households, by zip code, that pay a landlord for electric service.

The Commission directed Duke and stakeholders to “[identify] any challenges as well as opportunities for improving the CAP program” and “examine whether the CAP credit meets the [program’s] public policy objectives,” including “reducing low-income energy burdens”—which Duke acknowledged and reiterated in its March 19th filing.¹¹ We believe that this objective will be best fulfilled with access to the wide variety of energy affordability data, particularly the arrearage data, that we have recommended above.

¹¹ DEP Rate Case Order at 111, 113; *Duke Energy Carolinas, LLC and Duke Energy Progress, LLC’s Reporting Requirements for the Affordability Stakeholder Group and Request for Limited Waivers of Section III, A.2.(B) and (G) of the Companies’ Code of Conduct – Update*, Docket Nos. E-7, Sub 1276 and E-2, Sub 1300 (Mar. 19, 2024) (“Duke’s March 19, 2024 Filing”).

2. CAP data reporting requirements should promote transparency while protecting customer privacy.

Transparency is essential to ensuring a fair, thorough review of the pilot program.¹² Without access to CAP data, ASG members would be unable to meaningfully evaluate the effectiveness of the pilot program or identify opportunities for improvement. But ASG members are not the only parties with an interest in these data. In Duke's recent filing, "the Companies request[ed] guidance from the Commission on whether to provide [the CAP] annual report confidentially, or whether to file the report publicly."¹³ We urge the Commission to allow Duke to file the report, and semi-annual reports, publicly. Disclosing these data in a public filing allows customers, advocates, policymakers, and other stakeholders to gain a deeper understanding of energy poverty in North Carolina, assess the costs and benefits of the CAP pilot, and even identify complementary programs to address energy insecurity in our state.

Most important, disclosure of these CAP data poses no material risk to customer privacy. All data to be disclosed are aggregated and anonymous "with no specific individual customer identifiers, such as account numbers or specific mailing or residence addresses."¹⁴ These data concern only residential customers, meaning "the potentially sensitive, competitive information of the Companies' commercial and industrial customers will not be disclosed, even in the aggregate."¹⁵ And as Duke confirmed in its recent filing, these data "will not lead to any competitive advantage for DEC's or DEP's affiliates."¹⁶ Furthermore, the Companies have agreed to share aggregated zip code and county level data only for "zip codes or counties that have no fewer than 15 residential customer accounts and no one customer makes up more than 15% of the load."¹⁷ Data from zip codes and counties with fewer than 15 accounts will be added together and reported as "Other." Given that these data do not implicate any identifiable customer or group of customers, the Commission also may wish to clarify that this kind of data collection and reporting does not implicate the Code of Conduct and could be reported without the need for seeking a waiver.

In short, the public disclosure of CAP data, essential to ensuring greater transparency during the pilot period, will not jeopardize customer privacy—as Duke has confirmed,¹⁸ as experts agree,¹⁹ and as utilities in other states have shown through monthly public reports with geographically granular data, including zip code level data.

¹² The undersigned do not agree that the proposed disclosures of CAP data require a limited waiver of the Code of Conduct, since the underlying data do not clearly constitute "Customer Information," as defined by the Code.

¹³ Duke's March 19, 2024 Filing at 11.

¹⁴ *Id.*

¹⁵ *Id.* at 11-12.

¹⁶ *Id.* at 12.

¹⁷ *Id.* at 10-11.

¹⁸ *Id.* at 10-12.

¹⁹ See, e.g., *Direct Testimony and Exhibits of John Howat*, In the Matter of Application of Duke Energy Progress, LLC, for and Adjustment of Rates and Charges Applicable to Electric Utility Service in North Carolina, Docket No. E-2, Sub 1300 (Mar. 27, 2023).

3. North Carolina should join other states in allowing utility companies to publicly report comprehensive, geographically granular data on energy affordability.

Investor-owned electric utilities in other jurisdictions publicly report similar—and often even more granular—energy affordability data, such as nonpayment disconnections, arrearages, and payment-plan enrollment data, broken down by zip code, demographics, or service type, among other categories. The ASG should look to these utilities for proven data collection models that ensure customer privacy and advance transparency.

In Arizona, Tucson Electric Power and Arizona Public Service Company—among other investor-owned public utilities—file quarterly public reports with monthly data on the number of residential disconnections by zip code, the number of residential customers in arrears by zip code, the dollar amount of residential customer arrears by zip code, and the number of residential customers enrolled in a deferred payment arrangement, among other information.²⁰

Utilities in California and Connecticut fulfill similar requirements. In California, the Public Utilities Commission requires investor-owned utilities—including Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas and Electric Company, and Southern California Gas Company—to file public reports with granular monthly disconnections, arrearage, and other affordability data, including the rate and number of disconnections by zip code, the number of customers requesting bill assistance, the number of customers in arrears, the dollar amount of those arrears, and the number of customers enrolled in a payment plan, among other data.²¹ In Connecticut, the Public Utilities Regulatory Authority requires utilities to file a public report containing various affordability data on disconnections, arrearages, and payment plan enrollment categorized by customer hardship, town, and/or zip code.²²

Illinois has taken data reporting a step further. There, public utilities, such as Commonwealth Edison and Ameren, file monthly reports containing zip code level data on the number of residential customers in arrears, residential disconnections for nonpayment, and

²⁰ Arizona Corporation Commission Rule R14-2-215; see Arizona Corporation Commission Docket No. E-99999A-22-0088, available at <https://edocket.azcc.gov/search/docket-search/item-detail/26308>. Recent utility data reports include: Arizona Public Service Company, 2023 Quarter 4 Termination of Service Report (Jan. 12, 2024), <https://docket.images.azcc.gov/E000033106.pdf?i=1710877370766>; Tucson Electric Power, January 2024 Quarterly Report (Jan. 15, 2024), <https://docket.images.azcc.gov/E000033128.pdf?i=1710875693607>.

²¹ *Decision Adopting Interim Rules to Reduce Residential Customer Disconnections For California-Jurisdictional Energy Utilities*, Attachment B, California Public Utilities Commission Decision 18-12-013 (Dec. 19, 2018), <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M252/K025/252025563.PDF>. For an example of a recent California disconnect data report, see Southern California Edison, Monthly Disconnect Data Report (Jan. 2024), <https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M526/K506/526506641.PDF>.

²² *Order Nos. 47-66*, Application of the Connecticut Light and Power Company and Yankee Gas Services Company, Each Individually D/B/A Eversource Energy, the United Illuminating Company, Connecticut Natural Gas Corporation, and the Southern Connecticut Gas Company for Approval of Arrearage Forgiveness Program, Public Utilities Regulatory Authority Docket No. 21-07-01 (Apr. 20, 2022), [https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/7a4863c58dbf9ccb8525882a005b0335/\\$FILE/210701-042022.pdf](https://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d/7a4863c58dbf9ccb8525882a005b0335/$FILE/210701-042022.pdf). For an example of a Connecticut utility data report, see “Service Terminations, Disconnections, and Reconnections by Customer Class, Hardship Status, Zip Code, & Town,” Excel Spreadsheet, <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.dpuc.state.ct.us%2Fdockcurr.nsf%2F8e6fc37a54110e3e852576190052b64d%2F6f235a395004b078525893600534d90%2F%24FILE%2F2023-01-13%2520%2520Order%2520%252047%2C%252049%2C%252051%2C%252053%2C%252054%2C%252056%2520CNG-SCG-UI%2520Attachment%25201%2520%252321-07-01.xlsx&wdOrigin=SHEET2>.

customer enrollment in deferred payment arrangements, among other data.²³ In addition, the Illinois Commerce Commission—applying a set of best practices from the National Association of Regulatory Utility Commissioners²⁴—makes monthly energy affordability data publicly available on its website through the Credits, Collections, and Arrearages Reports Monthly Dashboard. The dashboard provides the public with up-to-date information on customer disconnections, arrears, and more, by month, by zip code, and by utility.²⁵

The data reporting requirements that Duke has proposed, along with the additional information that other stakeholders have recommended, are even less granular than the reporting requirements in other jurisdictions. Allowing Duke to report these data publicly is an important first step toward bringing the Companies in line with industry best practices.

If, however, the Commission chooses not to require a public filing, it is imperative that all ASG members, at a minimum, gain access to these data each quarter. Currently, no ASG member, except Duke, has access to most of these data. If ASG members were unable to obtain this information, conducting a meaningful review of CAP would be all but impossible. Siloing data access to a single ASG sub-team, for example, would be unnecessarily complicated—especially given the overlap in participation and responsibilities among the sub-teams—and would seriously impair the ASG’s ability to perform its duties.

4. Conclusion

We respectfully ask the Commission to allow Duke to report the data outlined in the Companies’ March 19, 2024 filing, as well as any additional data the Commission deems proper at this time. We further ask the Commission to allow the Companies to disclose all CAP data to all ASG members quarterly and to the general public in the CAP annual and semi-annual reports. We understand, however, if the Commission does not wish to rule on these issues at this time, and we remain committed to working with fellow ASG members to conduct as thorough an evaluation of the CAP as possible.

²³ See *Order*, In the Matter of Moratorium on Disconnection of Utility Services during the Public Health Emergency Declared on March 9, 2020 pursuant to Sections 4 and 7 of the Illinois Emergency Management Agency Act, Illinois Commerce Commission Docket No. 20-0309 (Jun. 18, 2020), <https://www.icc.illinois.gov/docket/P2020-0309/documents/300566/files/524008.pdf>; *Stipulation*, Illinois Commerce Commission Docket No. 20-0309 (Jun. 10, 2020), <https://www.icc.illinois.gov/docket/P2020-0309/documents/300566/files/524009.pdf>; *Docket Sheet*, Illinois Commerce Commission Docket No. 20-0309, <https://www.icc.illinois.gov/docket/P2020-0309/docket-sheet> (last visited Mar. 22, 2024). To view data reporting by Illinois utilities, see Credits, Collections, and Arrearages Reports Monthly Dashboard, Illinois Commerce Commission, <https://www.icc.illinois.gov/industry-reports/credit-collections-and-arrearages-reports/monthly-dashboard> (last visited Mar. 22, 2024).

²⁴ *Resolution on Best Practices in Data Collection and Reporting for Utility Services Delinquencies in Payments and Disconnections of Service*, NARUC (Nov. 19, 2019), <https://pubs.naruc.org/pub/9392BD1E-D055-4A2C-9677-AAD00FEA7527> (recommending “work[ing] with all stakeholders, including utility companies, to collect and share data on arrearages and disconnections” and “requiring utilities to (1) collect monthly data that tracks...number of payment arrangements,...disconnections, reconnections, duration and frequency of disconnections, and other relevant data points; (2) make the data publicly available on a monthly basis, delineated by general residential customers and those receiving low-income assistance; and (3) file the data with State public utility commissions to be published on the...commission’s website so that policy makers might have access to sufficient, objective and granular data for forming public policy aimed at protecting the public health, safety and welfare”).

²⁵ See <https://www.icc.illinois.gov/industry-reports/credit-collections-and-arrearages-reports/monthly-dashboard>.

Thank you for your attention to this important matter and for your consideration of this letter. We look forward to further engagement with the Companies and fellow ASG members as we develop, evaluate, and improve the CAP pilot over these next three years.

Respectfully submitted this the 11th day of April 2024, on behalf of the following organizations:

- Advance Carolina
- Appalachian Voices
- Charlotte Area Fund
- Crisis Assistance Ministry
- Natural Resources Defense Council
- North Carolina Conference of the NAACP
- North Carolina Housing Coalition
- North Carolina Justice Center
- Rowan Helping Ministries
- Sierra Club
- Southern Alliance for Clean Energy
- Southern Environmental Law Center
- Vote Solar

CERTIFICATE OF SERVICE

I certify that all parties of record have been served with the foregoing letter either by electronic mail or by deposit in the U.S. Mail, postage prepaid.

This the 11th day of April 2024.

s/ Thomas Gooding

Thomas Gooding

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