Questions for Consideration

The following questions are the result of conversations from the Nov. 4 low income and equity workshop. You are invited to provide comment beyond the scope of these questions and are not required to answer all the questions provided. The purpose of these public comments is to help Commerce develop guidelines to provide definitions and data and assessment requirements necessary for compliance with RCW 19.405.120.

Email comments to ceta@commerce.wa.gov by Dec. 6, 2019.

Relevant Definitions from RCW 19.405.020

1. Please provide comment on whether Commerce should include donation based programs in the definition of energy assistance, in addition to ratepayer funded programs.

2. Should Commerce use one value to baseline energy assistance need (e.g. 6% energy burden and above) for all utilities or determine a value (e.g. median energy burden and above) for each utility? You are invited to propose a level of energy burden that should be included within the definition of “energy assistance need.” Please include references and citations as appropriate.

3. There were many comments at our Nov. 4 workshop about what was included in the definition of “energy burden.” Based on the definition provided in RCW 19.405.020(17), please comment on which words need to be clarified or defined in guidelines:

   Energy burden’ means the share of annual household income used to pay annual home energy bills (RCW 19.405.020(17)).

4. Please provide comment on the benefits, or drawbacks, of using area median income versus federal poverty level for the definition of low income in RCW 19.405.020.

Data Requirements

5. What types of households should be included in the definition of “type of households” in section 19.405.120(3)(b)? For example, the DOE LEAD tool distinguishes between renter-occupied and owner-occupied and number and types of units (e.g., 1 unit detached, 1 unit attached, 2 units, 3 - 4 units, 5 - 9 units, 10 - 19 units, 20 - 49 units, 50+ units and other). We invite you to propose household types that will be used to collect this data.
6. Are there issues or conflicting data cycles if, for compliance in 2020, Commerce requested data from January-December 2019 for section 19.405.120(3)(b)?