Agenda Date: 6/18/25
Agenda Item: 7A

STATE OF NEW JERSEY
Board of Public Utilities
44 South Clinton Avenue, 1st Floor
Trenton, New Jersey 08625-0350
www.nj.gov/bpu/

CUSTOMER ASSISTANCE

IN THE MATTER OF A RATE DESIGN AND POLICY STUDY REGARDING DRIVING EQUITY IN THE CLEAN ENERGY TRANSITION	))))	ORDER MODIFYING USF PROGRAM DOCKET NO. QO24110853

Parties of Record:

Brian O. Lipman, Esq., Director, New Jersey Division of Rate Counsel
Fidel Ekhelar, Universal Service Fund Program Manager, New Jersey Department of Community Affairs
James Austin Meehan, Esq., Jersey Central Power & Light Company
Stacey Mickles, Esq., Public Service Electric and Gas Company
Kenneth Wan, Esq., Atlantic City Electric Company
Andrew McNally, Esq., South Jersey Industries, on behalf of South Jersey Gas Company and Elizabethtown Gas Company
John Carley, Esq., Rockland Electric Company
Andrew Dembia, Esq., New Jersey Natural Gas Company

BY THE BOARD:

By this Decision and Order, the New Jersey Board of Public Utilities ("Board" or "BPU") considers Board Staff's ("Staff") recommended updates to the Universal Service Fund ("USF") program to address energy affordability for New Jersey's low- and moderate-income ("LMI") residential customers.

BACKGROUND

On February 9, 1999, Governor Whitman signed the Electric Discount and Energy Competition Act, N.J.S.A. 48:3-49 *et seq.* ("EDECA" or "Act"), into law. In part, the Act provides:

> There is established in the Board of Public Utilities a non-lapsing fund to be known as the "Universal Service Fund." The [B]oard shall determine: the level of funding and the appropriate administration of the fund; the purposes and programs to be funded with monies from the fund; which social programs shall be provided by an electric public utility as part of the provision of its regulated services which provide a public benefit; whether the funds appropriated to fund the "Lifeline Credit Program" established pursuant to L. 1979, c. 197 (N.J.S.A. 48:2-29.15 *et seq.*), the "Tenants' Lifeline Assistance Program" established pursuant to L. 1981, c. 210 (N.J.S.A. 48:2-29.30 *et seq.*), the funds received

> pursuant to the Low Income Home Energy Assistance Program established pursuant to 42 U.S.C. § 8621 *et seq.*, and funds collected by electric and gas utilities, as authorized by the [B]oard, to offset uncollectible electricity and natural gas bills should be deposited in the fund; and whether new charges should be imposed to fund new or expanded social programs.
>
> [N.J.S.A. 48:3-60(b)]

By Order dated April 30, 2003, pursuant to EDECA, the Board established the USF program to ensure low-income electric and natural gas customers have access to more affordable energy.[1] By the April 2003 Order, the Board explained that the USF would be "an ongoing, evolving program, subject to review and amended as necessary."[2] The Board ordered that the program be operated on a State-wide basis and funded through uniform charges on customers' electric and natural gas bills through the Societal Benefits Charge, pursuant to N.J.S.A. 48:3-60(a). The USF is currently administered by the New Jersey Department of Community Affairs ("DCA") on behalf of the Board.

The Board has continued to update the USF since its inception to adjust to ratepayers' economic needs and to account for changes to other social assistance programs linked to the USF program. Currently, USF monthly benefits are awarded to any household at or below the income limits of sixty percent (60%) State Median Income ("SMI"), which is determined by household size. The USF benefit amounts are individually calculated for gas and electricity based on an energy burden calculation, known as a Percentage of Income Payment Program ("PIPP"). Specifically, the USF covers any amount spent on energy that is over a certain percentage of income ("Energy Burden Threshold") up to a cap of $180.00 per month for gas and electric combined.[3] For gas and non-heating electric customers, the Energy Burden Threshold is two percent (2%) of annual household income; for electric heating customers, the Energy Burden Threshold is four percent (4%) of annual household income. The current monthly USF benefit amount is between a minimum $5.00 benefit up to a cap of $180.00.

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[1] In re the Establishment of a Universal Service Fund Pursuant to Section 12 of the Electric Discount and Energy Competition Act of 1999 Order, BPU Docket No. EX00020091, Order dated April 30, 2003 ("April 2003 Order").

[2] Ibid.

[3] If a customer receives the maximum $180.00 monthly benefit on one (1) account and has a second utility account, they will receive the minimum $5.00 monthly benefit on the second account.

On December 6, 2023, the Board approved the release of a Request for Quotation ("RFQ") to retain a consultant to conduct a rate design and policy study ("Study") to look at options to reduce the energy burden for LMI New Jersey households and ensure equity in the clean energy transition. The Board subsequently engaged The Brattle Group ("Brattle") to conduct the Study. On December 9, 2024, Brattle submitted *An Assessment of Energy Affordability in New Jersey and Alternative Policy and Rate Options* ("Report") to Staff for review. At its regular agenda meeting on March 19, 2025, the Board accepted the Report for filing and made the Report publicly available via the Board's website. In the Report, Brattle concluded that, while New Jersey is positioned ahead of many of its peers by offering a wide variety of programs addressing needs through different mechanisms, more opportunities exist for New Jersey to improve its assistance programs.[4]

After reviewing the Report, Staff prepared three (3) recommendations for public comment. Staff released a Notice of Public Stakeholder Meeting and Straw Proposal ("Straw") on March 20, 2025, seeking public input on Staff's proposed modifications to the Board's USF program and other recommendations.[5]

The proposals contained in the Straw included: 1) increasing minimum and maximum benefits provided to residential gas and electric customers through the USF energy assistance program; 2) increasing utility engagement with LMI customers through targeted utility outreach and enrollment efforts; and 3) requiring the State's electric and gas public utilities ("Utilities") to promote the USF program to households receiving assistance through the New Jersey Comfort Partners program ("Comfort Partners") and promote Comfort Partners to USF-participating households that meet specific Comfort Partners priority targets. Public comments were due by 5:00 p.m. EDT on April 10, 2025.

On April 1, 2025, Staff held a stakeholder meeting to solicit public input on proposed modifications to the USF program. The Board received comments from the following parties and individuals:

- New Jersey Division of Rate Counsel ("Rate Counsel")
- Assemblywoman Luanne M. Peterpaul (Legislative District 11)
- Assemblywoman Margie M. Donlon (Legislative District 11)
- Assemblyman William F. Moen Jr. (Legislative District 5)
- Assemblywoman Andrea Katz (Legislative 8)
- AARP
- American Council for an Energy Efficient Economy ("ACEEE")
- New Jersey League of Conservation Voters ("LCV")
- Natural Resources Defense Council ("NRDC")
- New Jersey Future ("NJ Future")
- The Glover Group
- New Jersey Utilities Association ("NJUA")
- South Jersey Utilities, Inc., South Jersey Gas Company, and Elizabethtown Gas Company ("SJIU, SJG, ETG")
- New Jersey Natural Gas Company ("NJNG")
- Takeena Deas (Resident)

[4] The Brattle Group, *An Assessment of Energy Affordability in New Jersey and Alternative Policy and Rate Options*, December 9, 2024 ("Report").

[5] Notice_StakholderMeeting_Comment_AffordabilityStraw.pdf

- Herb Mordkoff (Resident)
- Mercedes Bailey (Resident)

Comments made at the stakeholder meeting were generally supportive of Staff's recommendations with some commenters stating that the proposals are not aggressive enough to keep utility rates affordable and reach eligible ratepayers. Others identified that utility enrollment targets should be more flexible while also providing more parameters to the utilities for application intake. Several suggested that automatic enrollment be further expanded to increase USF enrollment. Other commenters provided feedback unrelated to Staff's proposals including: water affordability; using USF enrollment for automatic enrollment into water assistance programs; energy infrastructure; energy supply; electrification; and support for transitioning to clean energy resources to mitigate rising utility costs.

The Board also received timely written comments from the following parties and individuals:

- Assemblywoman Shama A. Haider, 37th District
- Rate Counsel
- AARP-NJ
- NRDC
- ACEEE
- LCV
- NJ Future
- Waterspirit
- East Trenton Collaborative
- Lead Free New Jersey ("Lead Free NJ")
- Glover Group
- NJUA
- SJIU, SJG, ETG
- NJNG
- Public Service Electric and Gas Company ("PSE&G")
- Atlantic City Electric Company ("ACE")
- Jersey Central Power & Light Company ("JCP&L)
- Rockland Electric Company ("RECO")
- Takeena Deas (Resident)
- Robert Kreszswick (Resident)
- Sign on statement from the following parties:
    - Clinton Hill Community Action
    - Clean Water Action
    - Healthy Schools Now
    - NRDC
    - NEW Caucus
    - NJ Future
    - LCV
    - New Jersey Work Environment Council
    - Waterspirit

Comments are summarized below in the order of Staff's recommendations contained in the Straw:

<u>Staff's Recommendation 1</u>*: By October 1, 2025, increase the USF minimum benefit from its current $5 per month ($60 per year) to $20 per month ($240 per year); and increase the USF maximum benefit from $180 per month ($2,160 per year) to $200 per month ($2,400 per year).

Public Comments Regarding Staff's First Recommendation:

<u>Rate Counsel</u>:

Rate Counsel voiced its support for the minimum $20 per month USF benefit, with the added proposal of phasing in a reduction in minimum benefit to $10 per month, coupled with using income disregards, or "countable income" over the following two (2) years. Rate Counsel further proposed increasing the maximum USF benefit amount to $250 per month to account for the anticipated future price increases; bifurcating the benefit cap for gas and electric, which currently applies to gas and electric combined; a periodic review of the maximum USF benefit to adjust in light of future rate increases relative to incomes; increasing the amount of time between required recertifications, from one (1) year to two (2) or more; the maximum bill credit be established as an annual bill credit rather than a monthly bill credit; and that USF participants receive timely notice from their respective utility company when their usage or bill places them in danger of exceeding the maximum USF credit.

Staff Response: Staff appreciates Rate Counsel's thoughtful and well-researched input. While Staff believes the recommended increase to benefit caps is sufficient at this time, Staff will periodically review the effectiveness and cost of the minimum and maximum USF benefits in light of future energy costs in relation to income as well as any changes to federal Low-Income Home Energy Assistance Program ("LIHEAP") benefits. Although Staff understands the benefits of longer recertification periods for seniors, and the use of income disregards for significant household expenses, there must remain consideration for federal audit requirements applicable to LIHEAP, with which the USF shares an application and program infrastructure. However, Staff will investigate the potential for these changes in the future. Staff notes that annual energy costs in relation to annual household income are used to calculate an annual USF benefit, which is then divided into twelve (12) equal benefits applied to utility accounts each month. The Board designed the USF to help customers more easily meet their monthly obligations by providing firm USF credit calculations. Flat monthly credits also help USF customers enrolled in the Fresh Start program meet their monthly payment obligations. Staff further notes that the USF does not cover a customer's full bill, only energy costs that exceed the required percentage of income up to the cap.

<u>AARP</u>: AARP indicated that it supports Staff's recommendation to increase USF benefits due to rising utility costs and suggested that utility shareholders bear the burden of paying for increased costs to USF for this endeavor.

Staff Response: Staff appreciates the commenter's support and has considered these modifications in its final recommendation to the Board.

<u>NJ Future</u>: NJ Future expressed support for expanding the reach of the USF energy assistance program.

Staff Response: Staff appreciates the commenter's support and input.

LCV: LCV indicated it supports increasing benefits and recommends further exploring automatic enrollment opportunities to increase enrollment in USF as well as water assistance programs.

Staff Response: Staff appreciates the commenter's support and has considered these modifications in its final recommendation to the Board.

Robert Kreszswick: This resident stated that rate increases affect everyone in the State, not only LMI residents, and suggested, rather than increasing the amount of assistance to those already being assisted, raising the income threshold for eligibility to include more residents.

Staff Response: Staff thanks the commenter for his input and notes that the Board's Payment Assistance for Gas and Electric ("PAGE") program is available to moderate income households over the USF income limits. More information is available on the Board's website, and on the New Jersey Shares website at: www.sharesnation.org or by calling the New Jersey Shares at 866-657-4273.

NJUA: NJUA and its member utilities indicated support for expanding the USF program's benefit limits, citing the importance of helping more customers to a greater extent. NJUA noted the current success of the USF program in serving hundreds of thousands of customers and identified that it views increased benefits as a sensible and necessary enhancement, especially given the potential decline in federal assistance.

Staff Response: Staff appreciates the commenter's support.

NRDC: NRDC stated that increasing both the minimum and maximum USF benefits is an equity-focused and cost-effective strategy. NRDC indicated that it supports the proposed benefit levels and also supports a higher maximum electric benefit to better support electrification and the energy transition. NRDC also noted that benefits can help prevent vulnerable residents from needing other forms of assistance.

Staff Response: Staff appreciates the commenter's support and input.

The Glover Group: The Glover Group indicated that it supports this recommendation, emphasizing the need to address low-income households' disproportionate energy burdens, noting that the lowest income quintiles can spend up to thirty percent (30%) of their income on energy.

Staff Response: Staff appreciates the commenters' support and recommendation.

PSE&G: PSE&G indicated that it supports the proposal to increase the USF minimum and maximum benefits from its current levels. PSE&G is also sensitive to the impact that increasing the USF benefits will have on all customers but believes that the projected $0.37 monthly residential ratepayer impact noted in the straw proposal to all customers is reasonable.

Staff Response: Staff appreciates the commenter's support.

JCP&L: JCP&L indicated it supports the proposed enhancements to USF benefit levels.

Staff Response: Staff appreciates the commenter's support and input.

<u>RECO</u>: RECO indicated it is supportive of the increased benefit amounts and expansion of the USF program. However, RECO cautioned that the cost to ratepayers could increase with increased enrollment and the uncertainty of federal LIHEAP funds, which are included in the USF energy burden calculation.

Staff Response: Staff appreciates the commenter's input. Staff shares the commenter's concern about the uncertainty of federal funds and the impact on the USF program.

<u>SJIU, SJG, and ETG</u>: The commenters indicated that they are supportive of the expansion of the USF program and increasing the benefit amount. The commenters cautioned that expanding USF eligibility will lead to increased costs for customers who are not covered by the program.

Staff Response: Staff appreciates the commenters' support and is striving to balance the needs of low- income households with the costs of supporting the program. All ratepayers bear the cost of utility uncollectibles, which USF funding reduces. Staff also notes that low-income households spend a much greater percentage of household income on energy than higher income households and the USF program improves energy equity.

<u>ACE</u>: ACE indicated that it agrees that increasing the minimum and maximum benefits would benefit customers and is a reasonable adjustment as a result of current economic conditions.

Staff Response: Staff appreciates the commenter's support and input.

<u>Staff's Recommendation 2</u>: Increase Utility engagement with LMI customers through targeted outreach and enrollment efforts.

To increase utility engagement with LMI customers, Staff proposed requiring the Utilities to increase USF enrollment by five percent (5%) in program year one (1) compared to the prior program year of October 1, 2024-September 30, 2025 ("Base Year"); three percent (3%) in year two (2) compared to the prior program year of October 1, 2025-September 30, 2026; and two percent (2%) in year three (3) compared to the prior program year of October 1, 2026-September 30, 2027. Staff notes that this recommendation would increase enrollment by ten percent (10%) over a three (3)-year period.

Staff further recommended requiring the Utilities to assist customers with USF application intake at payment centers, in-person events, and mobile units, or any other such events and locations as may apply. Staff recommended requiring the Utilities to submit complete, pre-screened applications to the DCA, the USF program administrator, for final approval, with DCA providing training and access to the application system for the Utilities. Staff recommended requiring the Utilities to collaborate with the DCA for access to trainings on application intake and submissions to the online USF application portal and for real time reporting so that the Utilities can track their efforts statewide.

Additionally, Staff recommended the Board require the Utilities to file Annual Outreach Plans on or before September 30 each year, beginning September 30, 2025. The Annual Outreach Plan would include how each Utility plans to meet their enrollment targets and the results of internal analysis to understand more about customers who potentially qualify for assistance, a plan to promote all federal, State and other energy assistance programs available in the Utility's service territory and as cross-promotion of the Comfort Partners energy efficiency program, among other things.

Staff further recommended the Board require the Utilities to file Annual Outreach Reports on or before November 30 each year, beginning November 30, 2026. The Annual Outreach Report would include details regarding the Utility's success in meeting its enrollment targets in the prior year, how the aspects of the Outreach Plan were carried out in the prior year, any lessons learned or recommendations for the Board to update the USF program as well as Comfort Partners statistics.

Staff also recommended that the Utilities be permitted to recover administrative costs through USF rates or base rates.

Public Comments Regarding Staff's Second Recommendation:

Rate Counsel: Rate Counsel indicated support for setting Utility enrollment targets but suggested the Board not prescribe the activities by which the Utilities should engage in outreach and instead measure their effectiveness through metrics. Rate Counsel further noted that employing more grassroots organizations, rather than the Utilities, would be a more effective approach for engaging LMI customers.

Staff Response: Staff appreciates the commenter's support and input. BPU and DCA provide funding to numerous local grassroots organizations throughout the State for outreach efforts in their respective communities and approve applications for USF and LIHEAP benefits. However, despite this investment, only twenty percent (20%) of the income-eligible population is enrolled in the USF program. Staff notes that the Utilities are a resource that can provide not only payment arrangements to customers in arrears, but an access point to benefits that will help the household avoid disconnection or result in a reconnection of service. This partnership between the Utilities, the State and local non-profit organizations will result in many new applicants and quicker processing time, which will benefit both customers and the Utilities by reducing shutoffs and uncollectibles.

AARP: AARP indicated that it supports enhanced outreach to ensure greater participation among eligible households and recommends establishing more aggressive enrollment targets for the Utilities by disallowing recovery of costs incurred if targets are not met. AARP also encouraged the Board to explore automatic enrollment strategies for related assistance programs to increase enrollment, including low-income water discount programs.

Staff Response: Staff appreciates the commenter's support and recommendations. Approximately sixty percent (60%) of USF enrollees are automatically enrolled through other means-tested programs. However, Staff will continue to explore opportunities for automatic enrollment in future USF program modifications. Utility performance will be monitored for compliance and may impact recovery.

NJ Future: NJ Future emphasized the need for better outreach and enrollment, using automatic enrollment via utility data sharing.

Staff Response: Staff appreciates the commenter's recommendations and will continue to investigate opportunities for automatic enrollment in future USF program modifications.

NRDC: NRDC indicated that it supports measurable outreach mandates including interim participation goals, Utility staff participation in direct intake, and required outreach plans and reporting. NRDC recommended using arrears and shutoff data to better target outreach to high-need households. NRDC further suggested that enrollment targets should be based on percentage of eligible customers rather than year-over-year growth and calls for more collaboration with DCA to improve auto-enrollment systems.

Staff Response: Staff appreciates the commenter's support and recommendations and will continue to investigate opportunities for automatic enrollment with DCA. Staff agrees that arrears and shutoff data are good metrics for the Utilities to use for targeted outreach to increase awareness of the help that is available. Regarding participation rates, USF currently only has a twenty percent (20%) participation rate. However, the Utility enrollment targets are achievable and, absent unknown circumstances, should increase enrollment over a three (3)-year period. Staff estimates that some Utilities will far exceed the targets depending on how much they engage in this effort.

LCV: LCV indicated it supports Staff's recommendation and recommends Utilities automatically qualify customers in order to reduce barriers to enrollment in the USF program.

Staff Response: Staff appreciates the commenter's recommendation and will continue to investigate methods to remove program barriers while also maintaining program integrity.

NJUA: NJUA indicated that it values past collaborative outreach efforts with the Board and supports continued joint work to promote utility assistance programs. NJUA stressed that utilities operate in different socioeconomic territories and that enrollment in USF is influenced by these external factors. NJUA recommended that USF enrollment targets be framed as goals, not requirements and that each Utility needs a tailored strategy based on their service territory to meet these goals.

Staff Response: Staff appreciates the commenter's support and considered these factors in its recommendations. However, Staff believes that its recommended targets are achievable for each Utility.

PSE&G: PSE&G noted that it supports this recommendation and agrees with maintaining the DCA as the decisionmaker for approval of USF grants. PSE&G indicated that meeting the October 1, 2025, deadline will depend on DCA providing access and sufficient training and reporting prior to that deadline. It will also take time for PSE&G to ramp up to full staffing over time. Additionally, PSE&G stated that it would like the BPU to consider the ability for a Utility to subcontract some of this work. PSE&G noted that it partners with organizations that work in the community several days a week, and allowing the Utility to subcontract and oversee the intake application process would allow another opportunity to support PSE&G customers' participation in USF.

Regarding Staff's proposed enrollment increase targets, PSE&G recommended that, rather than using year-over-year performance, the Base Year period be utilized for purposes of calculation of the year one (1), year two (2) and year three (3) participation increases. Specifically, PSE&G suggested that the total participation increase of ten percent (10%) be calculated using the Base Year enrollments.

Regarding cost recovery, PSE&G requested authorization for the Utilities to recover incremental administrative costs associated with the additional staffing, technology and modifications needed.

Staff Response: Staff appreciates the commenter's support and input. Staff agrees that subcontracting may be necessary for some Utilities to fulfill the requirements of this recommendation, however, the Utilities should not subcontract with organizations currently under contract with the DCA for work on the USF program to avoid duplicate charges. Regarding the enrollment increases, comparing each year to the Base Year would result in a smaller target number of enrollments than comparing each year to the prior year. Staff believes that the targets are achievable.

JCP&L: JCP&L noted that it is eager to continue its collaborative relationship with the Board, DCA, and the local outreach agencies to increase enrollment. However, JCP&L argued that requirements for meeting specific, required target levels for participation may be challenging to achieve, given numerous variables beyond the Utilities' control, such as DCA approving payments rather than the Utilities. If participation targets are established, JCP&L posited that the targets should be considered goals during a pilot period while JCP&L determines effective methods and avenues to most efficiently drive program participation. Additionally, JCP&L indicated that it supports the use of the USF rider recovery which would afford Utilities full and timely recovery of all program costs, including incremental costs.

Staff Response: Staff appreciates this feedback and took these recommendations under consideration. Staff analyzed what the increases would require and has determined that the Utility enrollment targets should be achievable.

SJIU, SJG, and ETG: SJIU, SJG, and ETG support this recommendation. However, the commenters indicated that the enrollment targets proposed in the Straw should be eliminated because there has been no analysis conducted regarding under-participation of eligible customers in the USF program. If targets are implemented, the commenters suggested that they should be tied to applications received, rather than those approved, because the Utilities have no control over the application approval process. Additionally, the commenters proposed that the Utilities should be allowed to establish specified times when customers could visit payment centers seeking help with assistance applications. Considerations should also be made to align new USF rates, effective October 1 each year, with the expected increases in costs related to administering additional USF applications.

Staff Response: Staff appreciates this feedback and took these recommendations under consideration. However, Staff notes that, based on Staff's analysis of the estimated enrollment increases, the enrollment targets should be achievable. Staff has discussed with the DCA and DCA has committed to working collaboratively with the Utilities on developing any necessary reporting to track metrics and provide an accurate picture of efforts being made by each Utility.

RECO: RECO expressed concern over its ability to achieve a five percent (5%) increase in participation in the USF program due to the small service territory and the income levels in the territory and suggests using "Area Median Income" as a metric. Furthermore, RECO suggested that the USF enrollment efforts be supported by the existing contracting network established to support the New Jersey Comfort Partners Program and Utility income qualified programs. Additionally, RECO commented that the Utilities should not be obligated to retain customer income information and other sensitive Personally Identifiable Information and that all responsibility for processing applications and following up with customers in the event of incomplete or missing information must remain with the DCA.

Staff Response: Staff appreciates the concerns raised. However, Staff has determined that the enrollment increase targets should be achievable. Regarding using NJ Comfort Partners to enroll customers into USF, each Utility may submit its unique outreach plan for hitting its targets. Regarding higher income areas, the income ceiling for USF for a family of five (5) persons is over $100,000 per year. The Utilities should also promote the availability of the Board's PAGE program to customers that are in arrears and are over the USF income limits because the PAGE income limits are State Median Income.

ACE: ACE proposed a Utility-led working group as a platform to discuss current strategies and practices leveraged to achieve their current enrollment and outreach levels. The information shared in the working group can be utilized to better assess strategies that can be used across the State or in specific regions to increase outreach and enrollment.

Staff Response: The Utilities, Staff, and the DCA Staff currently have two (2) working groups that meet monthly: 1) one to discuss technical and programmatic developments with the USF and federal LIHEAP program; and 2) one to discuss utility-specific and statewide outreach efforts.

The Glover Group: The Glover Group recommended custom community segmentation, leveraging life experience insights and tracking dropout rates. The commenter further recommended promoting these programs through trusted community messengers and language-specific, culturally sensitive materials, noting that evaluation and impact reporting is essential. The Glover Group further suggested establishing a Community-Based Energy Program Education Initiative focused on raising awareness and understanding of available assistance programs, eligibility criteria, energy efficiency benefits, and how programs can work together to reduce both energy burden and usage.

Staff Response: Staff appreciates the commenter's recommendations and agrees that following up with customers who used USF support in the past is vitally important. Staff also agrees that promoting programs to eligible recipients is also important and, therefore, included this requirement in the Outreach Plan. Staff agrees that coordinated statewide outreach and education is key to addressing affordability.

NJNG: NJNG indicated it supports the Straw and plans to expand existing outreach activities. NJNG requested the Board consider circumstances beyond the Utilities' control when imposing targets such as: funding uncertainty; customer hesitation to share personal information; and potential delays in DCA approval of applications which may increase customer complaints to the Board. NJNG also recommended: 1) allowing the Utilities a base year to establish feasibility of application intake; 2) basing performance targets on application intake and not customers approved or benefits provided; 3) giving the Utilities the discretion to implement application intake to account for prudent use of resources; and 4) providing the Utilities with flexibility as they take on this new responsibility to allow for continuous improvement over time.

Staff Response: Staff appreciates the commenter's support for assisting residents and advocacy for new strategies to support the USF assistance program. The Utilities have discretion in how they achieve their targets and may adopt approaches that are most useful and impactful for their unique service territories. Metrics such as the difference between application intake and applications approved can be included in the Utilities' Annual Outreach Report to the Board. In regard to using the upcoming USF program year as the "Base Year", Staff believes the base year should be a year when the Utilities did not participate in application intake for a fair comparison in what the Utilities efforts on behalf of their customers can achieve. Staff considers the recommended targets to be achievable.

ACE: ACE asserted that "targeted outreach" needs to be better defined. ACE further identified that, if it is not provided access to specific household-by-household income data throughout its territory, it will be unable to effectively conduct targeted customer outreach and marketing. ACE further noted that, without fully understanding the reasons why only twenty percent (20%) of eligible NJ customers are currently enrolled in USF, setting effective targets presents a difficult challenge. According to ACE, a lack of understanding could result in inappropriately set targets and proposed solutions that may not be best suited to closing the gap.

Staff Response: Staff appreciates the commenter's feedback and notes that household by household income data is not necessary for targeted outreach, as other metrics such as Utility arrearages; age of arrearages; and past enrollment in utility assistance programs may also be used. Utilities are most informed about the demographics of their service territories and have discretion in what customers to target for outreach and the best methods for reaching them. Staff believes the enrollment targets are achievable.

Staff's Recommendation 3: Better align energy assistance with energy efficiency efforts by requiring the Utilities to promote the USF program to households receiving Comfort Partners assistance and requiring the Utilities to promote the Comfort Partners program to USF-participating households that meet specific Comfort Partners priority targets.

Staff also recommended the Utilities report annually the methods they will use to achieve the outreach efforts contained in this recommendation in their Outreach Plans described above in Recommendation 2 and also report statistics of those reached in the Annual Outreach Report such as: the number and percentage of Comfort Partners households served in the past year that were also USF households, the number of USF households serviced for Comfort Partners in the prior year; and energy savings achieved.

Public Comments Regarding Staff's Third Recommendation:

LCV: LCV indicated support for Staff's recommendation and recommended increasing the Comfort Partners budget to help the program address inflation-driven cost increases. LCV also recommended ensuring a more equitable distribution of funding between gas and electric services.

Staff Response: Staff appreciates the commenter's recommendation and sees energy efficiency and energy assistance as complementary. The Comfort Partners budget was referenced in the Fiscal Year 2025 Clean Energy True Up Budget.[6]

AARP: AARP indicated its support for Staff's recommendation and urges the Board, collaborating with sister state agencies and the industry, to maximize enrollment in the USF program and Comfort Partners through automatic enrollment between programs with similar eligibility requirements.

Staff Response: Staff appreciates the commenter's support and recommendations and will continue to investigate automatic enrollment opportunities and data sharing between programs.

Rate Counsel: Rate Counsel indicated its support for this recommendation. However, Rate Counsel cautioned overstating this method as a primary way of achieving energy savings. In addition, Rate Counsel noted that New Jersey lacks the resources to fully treat the homes of all LMI participants.

Staff Response: Staff appreciates the commenter's support and feedback and agree with the commenter's concerns.

ACEEE: ACEEE suggested that the Board align both the USF and Comfort Partners programs by requiring automatic enrollment in the USF program from categorically eligible households and doubling the budget for Comfort Partners to take full advantage of the opportunity for cross-promotion. ACEEE identified that this investment will help to reduce the USF budget by reducing energy burdens.

Staff Response: Staff thanks the commenter and considered this input in its final recommendation. The Comfort Partners budget was referenced in the Fiscal Year 2025 Clean Energy True Up Budget.

NJ Future: NJ Future strongly endorsed cross-program promotion and automatic enrollment methods.

Staff Response: Staff appreciates the commenter's support and will consider opportunities for implementing these methods.

NRDC: NRDC indicated its support for cross-promotion between the USF and Comfort Partners programs as a way to improve efficiency. NRDC noted there is room for expansion through further study.

[6] In re Clean Energy Programs and Budget for Fiscal Year 2025 – True Up, Revised Budgets and Program Changes, BPU Docket No. QO24040224, Order dated April 23, 2025.

Staff Response: Staff appreciates the commenter's support and will continue to explore opportunities for cross-collaboration.

The Glover Group: The Glover Group recommended better integration of energy efficiency programs, including community-based education to improve program awareness.

Staff Response: Staff appreciates the commenter's recommendation and has taken this under consideration.

NJUA: NJUA noted that some member-utilities are already implementing this recommendation by promoting the USF program to Comfort Partners participants and supports efforts to expand this cross collaboration.

Staff Response: Staff appreciates the commenter's continued efforts and support.

PSE&G: PSE&G suggested considering adjusting income eligibility of Comfort Partners (250% Federal Poverty Level) to align with the USF program eligibility [sixty percent (60%) of SMI] or utilize SMI. PSE&G and the other utilities could then also adjust their eligibility threshold for the moderate-income energy efficiency programs to align with SMI. To encourage customers to benefit from the Comfort Partners program by lowering their energy usage, PSE&G recommended that DCA pre-screen and enroll customers in the Comfort Partners program when DCA applies USF credits.

Staff Response: Staff appreciates the commenter's suggestions and will take them under consideration for better program alignment. Currently, DCA administers the federal Weatherization Assistance Program while the Utility contractors administer the New Jersey Comfort Partners program. However, Staff will explore, with the DCA, the possibility of data sharing to aide in outreach efforts.

JCP&L: JCP&L indicated it will continue to cross-collaborate with the USF and Comfort Partners programs.

Staff Response: Staff thanks the commenter for this information.

SJIU, SJG, and ETG: SJG and ETG expressed that companies already target customers for Comfort Partners based on USF eligibility, however the companies are willing to expand these outreach efforts.

Staff Response: Staff appreciates the commenter's efforts in this area.

RECO: RECO encouraged Staff to consider USF program criteria to align with the Area Median Income ("AMI") for the Passaic Bergen region and not a level based upon SMI. RECO noted that they currently promote the NJ Comfort Partners program to existing USF program participants and encourages better income eligibility alignment between the programs. Furthermore, RECO identified that the USF and Comfort Partners programs should additionally incorporate other income qualified energy efficiency programs administered by Utilities in the State such as the Home Weatherization for the Income Qualified Program. Additionally, RECO recommended incorporating an electronic referral from the utility to the Comfort Partners Program that contains the customer's historical usage.

Staff Response: Staff appreciates the commenter's recommendations and has taken them into consideration. However, a Statewide income level aligned with the federal LIHEAP program is most efficient, cost effective, and fair to all New Jersey residents.

ACE: ACE noted that it agrees it is beneficial to educate customers about energy efficiency, in addition to energy assistance programs to reduce a customer's energy burden as well as provide bill assistance. ACE routinely educates customers about energy efficiency measures as well as energy assistance programs.

Staff Response: Staff appreciates this feedback and the efforts being made on cross program promotion.

Takeena Deas: This resident expressed concern about expansion and promotion of the Comfort Partners program and noted that poor service delivery made through Comfort Partners program damaged her home, citing response delays. The commenter urged increased budget, improved outcome monitoring, a more expedited decision-making process, and audit of reduced energy costs.

Staff Response: Staff acknowledges the concerns regarding Comfort Partners expressed by the commenter. Staff is aware of this matter and has been actively working with program partners to find a resolution within the scope and capabilities of the program.

Additional Comments

Assemblywoman Haider: Assemblywoman Haider encouraged the Board to: explore automatic enrollment opportunities though other low-income programs such as Supplemental Nutritional Assistance Program and Medicaid, simplifying application processes and enhancing outreach, especially through trusted community partners. The commenter encouraged the Board to consider policies that reduce shutoffs and consider reconnection fees which burdens struggling households.

Staff Response: Staff appreciates the commenter's support and recommendations and will continue to explore ways to reduce enrollment barriers. Currently, approximately sixty percent (60%) of USF households are automatically enrolled through other low-income programs.

Rate Counsel: Rate Counsel indicated support for NRDC's comments on the importance of water affordability.

Staff Response: Staff appreciates the commenter's input on this matter.

AARP: AARP recommended that the Board require data-matching between the Utilities and New Jersey-American Water Company, Inc. ("NJAW") to enable automatic enrollment of income-qualified USF and/or LIHEAP customers into NJAW's Universal Affordability Tariff without the need for those customers to submit a separate application.

Staff Response: Staff appreciates the commenter's concerns about water affordability and its recommendation.

Lead Free NJ: Lead-Free New Jersey recommended that the Board more holistically address utility affordability by leveraging enrollment in the USF program to increase enrollment in low-income water assistance programs. Additionally, the commenter recommended data matching between Utilities and NJAW to enable automatic enrollment of income-qualified water customers who participate in the USF program.

Staff Response: Staff appreciates the comments and shares concerns regarding utility affordability.

LCV: LCV recommended adjusting LMI income eligibility thresholds in accordance with electricity price fluctuations to ensure more residents qualify for assistance as costs rise. Also, LCV recommended that funding for ratepayer assistance programs scale appropriately to meet growing demand. LCV noted it supports the enhancement of the Board's Residential Energy Assistance Program to mitigate the significant financial impacts of anticipated extreme summer heat and upcoming rate hikes on LMI households. LCV also recommended several long-term energy affordability strategies, as well as establishing programs specifically designed to address LMI customers' water payment assistance needs.

Staff Response: Staff appreciates the commenter's recommendations and has taken them under consideration.

NJ Future: NJ Future recommended leveraging enrollment in the USF program to increase participation in water assistance programs such as the Universal Affordability Tariff by New Jersey American Water. NJ Future identified a significant gap between eligible customers and enrolled participants (only three percent (3%) enrollment among 88,000 eligible NJAW customers) and proposed using USF participation as a gateway to enroll more customers in water affordability initiatives.

Staff Response: Staff appreciates the commenter's support and input and has taken this information into consideration in its final recommendation.

NRDC: NRDC commented that the BPU should use this proceeding to improve water affordability for households that participate in energy affordability programs, by facilitating data sharing and automatic enrollment in low-income water discounts. Additionally, NRDC urged the Board to explore the creation of a water affordability program akin to the USF program that would apply to customers of all BPU-regulated water and wastewater utilities. NRDC also encouraged the Board to work with other State agencies and the Legislature to develop a program covering all of the State's water and wastewater utilities, both publicly- and privately-owned.

Staff Response: Staff shares this concern regarding water affordability and has taken into consideration the commenter's detailed input on this matter.

East Trenton Collaborative: East Trenton Collaborative recommended that the USF program should be extended to help Trenton's LMI households pay water and sewer bills.

Staff Response: Staff thanks the commenter for this input. However, Staff notes that USF funding can only be used for gas and electric bill relief and can only be applied to the accounts of the Utilities under the Board's jurisdiction.

Waterspirit: Waterspirit urged the Board to align its energy affordability efforts with action on water affordability and require automatic enrollment in low-income water discount programs for any household enrolled in the USF program and other energy assistance programs. Waterspirit also recommended that the Board adopt affordability criteria rooted in the Asset Limited, Income Constrained, Employed framework developed by United Way.

Staff Response: Staff thanks the commenter for this input and resourceful information.

Sign-on statement from multiple parties on water affordability: The commenters indicated that the Board must meet the challenge of ensuring affordable gas and electric bills, while also providing clean energy and safe water for all. The commenters noted that the Board should leverage enrollment in the USF program and other energy assistance programs to drastically increase enrollment in low-income water discount programs that are under BPU jurisdiction through data-matching and automatic enrollment.

Staff Response: Staff appreciates the commenters' support and agrees that affordability is a top concern across all Utility jurisdictions. Staff has taken these comments under consideration in its final recommendation.

STAFF RECOMMENDATIONS

After careful consideration of the record in this matter, including the Report and all comments received, Staff recommends the Board adopt the following USF requirements to be implemented by the start of the next USF program year, October 1, 2025, on a permanent basis:

1. An increase in the USF minimum benefit from $5.00 per month to $20.00 per month for both gas and electric accounts separately.

2. An increase in the USF maximum benefit from $180.00 per month to $200.00 per month for gas and electric accounts combined.

3. That Staff be required to periodically review, as Staff may determine is appropriate, cooperatively with the DCA, the minimum and maximum USF benefit amounts, as well as explore alternative calculations of household income and longer recertification periods, to determine their cost and effectiveness while maintaining program integrity and alignment with the federal LIHEAP program.

4. That the Utilities be required to:

    a. Increase USF enrollment in their service territories by:

        i. Five percent (5%) in program year one (1) compared to the prior program year of October 1, 2024-September 30, 2025 ("Base Year");
        ii. Three percent (3%) in year two (2) compared to the prior program year of October 1, 2025-September 30, 2026; and
        iii. Two percent (2%) in year three (3) compared to the prior program year of October 1, 2026-September 30, 2027.

    The Board may consider Utility achievement of enrollment targets when reviewing future cost recovery for administration of USF application intake activities.

b. Assist customers with USF application intake at payment centers, in-person events, and/or other customer-accessible outreach endeavors the respective Utility pursues based on the unique needs of their service territory.

c. Provide tablets and scanners and other equipment necessary to Utility personnel and/or subcontractors for completing application intake in an efficient manner.[7]

d. Invest in the necessary staffing to pre-screen customers for USF income eligibility, walk the customer through the application process, upload any required application documents and submit applications to the DCA, the USF program administrator, for final benefit approval. Each Utility should endeavor to assist customers to the point of application completion through methods it deems best. While the Utilities may need to subcontract to comply with these recommendations, Staff recommends the Utilities be prohibited from subcontracting with organizations currently under contract with the DCA for work on the USF program to avoid duplicate charges.

e. Participate in all DCA and BPU trainings, conferences, and meetings to enable appropriate and sufficient personnel the necessary access, knowledge transfer, and reporting capabilities to efficiently carry out the requirements of this order.

f. File annual USF outreach plans ("Annual Outreach Plan") by September 30 each year, under this docket, beginning September 30, 2025. The Annual Outreach Plan shall include: 1) the results of any internal or third party analysis on the Utility's customers targeted for outreach including, but not limited to, customers in arrears for a certain amount of time, customers with arrears over a certain dollar amount, customers who have received a disconnect notice, customers who have submitted but not completed their USF application in the past, or past USF enrollees; 2) how the Utility plans to meet its USF enrollment targets in the coming year; and 3) a plan for how the Utility plans to promote all energy assistance and energy efficiency programs available in the Utility's service territory. All outreach materials shall be made available to customers, at a minimum, in the languages of English and Spanish.

g. File annual USF outreach reports ("Annual Outreach Report") by November 30 each year, under this docket, beginning November 30, 2026. The Annual Outreach Report shall include details including, but not limited to: 1) the Utility's success in meeting its enrollment targets in the prior year; 2) any performance gaps; 3) how the aspects of the Annual Outreach Plan were carried out in the prior year; 4) improvement goals; 5) processes in need of improvement; and 6) process improvement techniques.

h. File any *ad hoc* reports requested by Staff in regard to the Utilities' administration of USF application intake efforts.

5. With respect to Utility USF administrative cost recovery, the Utilities may petition the Board for authority to defer costs.

[7] Equipment that operates with Microsoft Windows operating systems is required for application intake with the USF program.

6. Recognizing that Comfort Partners reduces low-income energy burdens, carbon emissions and program costs for the USF program, the Utilities shall promote Comfort Partners and USF across eligible populations and shall include any applicable Comfort Partners statistics in the Annual Outreach Report, such as the number of Comfort Partners households served, the percentage that are also USF households, and energy savings.

Based upon the recommendations, Staff estimated the annual budget impact would be approximately $28.5 million. Staff will be evaluating other available funding sources not recovered by the Utilities, to be determined in a future proceeding, in order to reduce or alleviate the impact of any USF program updates on ratepayers' bills.

DISCUSSION AND FINDINGS

Pursuant to N.J.S.A. 48:3-60(b), the Board has the authority to determine the level of funding, administration, use of funds, social programs to be provided by Utilities for public benefit, and other conditions related to the USF. In accordance with such authority, the Board periodically updates certain aspects of the USF, including the yearly program budget, affordability thresholds, monthly benefit caps, and others.[8]

Here, considering increasing energy costs and the related burden on all residents, especially LMI customers in the State, Staff recommended numerous updates to the USF program to ease the energy burden on those customers in the form of bolstered assistance programs.

The Board, having considered Staff's recommendations and the comments received in response to the Straw, **HEREBY FINDS** that Staff's recommended modifications to the USF program, and to the Utilities' outreach, enrollment, and reporting methods, seek to directly benefit the State's low- and moderate-income residents as customers continue to contend with higher energy costs brought on by market conditions. The Board **FURTHER FINDS** Staff's recommendations to be reasonable and consistent with the State's policy goals. These actions will enhance the reach and effectiveness of the USF program, streamline and improve enrollment access, and increase energy affordability for LMI households, while promoting equitable participation in the State's clean energy transition. The Utilities' efforts to increase enrollment will ultimately benefit the customer as well as the companies, by reducing utility uncollectibles and increasing energy affordability.

As such, the Board, in light of the above considerations, **HEREBY ADOPTS** Staff's recommendations in their entirety. The Board **HEREBY DIRECTS** the DCA to make the applicable changes to the Board's USF program database system and online application portal in accordance with this Order before the start of the next USF program year, beginning on October 1, 2025, including providing access, training, and reporting to the Utilities and Staff necessary to effectuate the requirements of this Order.[9] The Board **FURTHER DIRECTS** the Utilities to make the applicable changes to payment centers, outreach plans, staffing resources, equipment purchases, and reporting requirements in accordance with this Order prior to the start of the next USF program year, on October 1, 2025.

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[8] See, e.g., In re the New Jersey Board of Public Utilities' Response to the COVID-19 Pandemic, BPU Docket No. AO20060471, Order dated June 29, 2023.

[9] Administrative costs incurred by the DCA for this effort were addressed in a separate order: In re the Department of Community Affairs' State Fiscal Year 2025 Universal Service Fund Administrative Cost Budget Order, BPU Docket No. EO24090718, Order dated June 18, 2025.

The Board recognizes that while some of the Utilities may wish to subcontract for outreach and application intake activities, the Board **HEREBY DIRECTS** that the Utilities that employ subcontractors for these activities must employ subcontractors not under contract with the DCA for administration of the USF.

The Board **FURTHER DIRECTS** Staff to review the required Utility USF Outreach Plans and Utility USF Outreach Reports to ensure the Utilities' compliance with this order.

Further, the Board **HEREBY NOTES** that it will consider other funding sources not recovered by the Utilities, to be determined in a future proceeding, in order to reduce or alleviate the impact of any USF program updates on ratepayers' bills.

The Utilities' costs will remain subject to audit by the Board. This Decision and Order shall not preclude nor prohibit the Board from taking any actions determined to be appropriate as a result of any such audit.

This Order shall be effective on June 25, 2025.

DATED: June 18, 2025

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BY:

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DR. ZENON CHRISTODOULOU
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ATTEST:

SHERRI L. LEWIS
BOARD SECRETARY

I HEREBY CERTIFY that the within document is a true copy of the original in the files of the Board of Public Utilities.

IN THE MATTER OF A RATE DESIGN AND POLICY STUDY REGARDING DRIVING EQUITY IN THE CLEAN ENERGY TRANSITION

DOCKET NO. QO24110853

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