

New Jersey

Via electronic mail

May 24, 2019

Aida Camacho-Welch, Board Secretary
New Jersey Board of Public Utilities
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**Re: Docket No. EO19030308
Universal Service Fund Program - Periodic Review**

Dear Secretary Camacho-Welch,

Please accept the following AARP comments in reference to the Board's periodic review of the Universal Service Fund Program.

A. Introduction

AARP commends the Board of Public Utilities ("Board") for initiating a review of New Jersey's Universal Service Fund ("USF" or "Program").¹ The USF is critically important to assist those ratepayers with limited means pay their electric and gas bills.

AARP represents approximately 1.3 million members in New Jersey. Those AARP members with limited incomes benefit from the Program, and, therefore, have an interest in ensuring that the USF successfully helps them pay rising utility bills and avoid disconnection.

As ratepayers, AARP members subsidize the USF Program² and, therefore, have an interest in ensuring that the Program is administered effectively, prudently, and does not unduly burden non-participants.

¹ Board of Public Utilities "Notice," Docket No. EO19030308, Universal Service Fund Program - Periodic Review, April 10, 2019 ("Notice").

² <https://www.nj.gov/dca/divisions/dhcr/faq/usf.html>

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Also, because all electric and gas ratepayers subsidize defaulted bills, AARP members have an interest in ensuring that the USF helps prevent defaults.³

AARP has a strong interest in the Board's evaluation of the USF Program because the program helps not only the most vulnerable households pay rising energy costs but also helps the entire body of ratepayers by limiting the amount of uncollectible bills. Also, assisting consumers pay electric and gas bills has other societal benefits, such as minimizing health risks.⁴ Lack of heat and cooling can pose health risks for many.⁵

As is stated in AARP's April 15th letter to Governor Murphy, the Board, and Rate Counsel (cites omitted):

³ Defaults lead to expenses that all utility customers must pay through the utilities' rates. Gas customer defaults are included in gas distribution base rates, while electric customer defaults are included in the Social Benefit Charge. See N.J.S.A. 48:3-60.

⁴ A recent study came to this conclusion:

Exposure to cold is one reason that mortality peaks in winter, and a higher heating price increases exposure to cold by reducing heating use. It also raises energy bills, which could affect health by decreasing other health-promoting spending. Our empirical approach combines spatial variation in the energy source used for home heating and temporal variation in the national prices of natural gas versus electricity. We find that a lower heating price reduces winter mortality, driven mostly by cardiovascular and respiratory causes "Inexpensive Heating Reduces Winter Mortality," National Bureau of Economic Research Working Paper 25681, Janjala Chirakijja, Seema Jayachandran, Pinchuan Ong, March 2019, <http://www.nber.org/papers/w25681>⁵ NOAA National Centers for Environmental Information, "State Climate Summaries, New Jersey," <https://statesummaries.ncics.org/nj>. The study predicts that heat waves will become more intense and cold waves less intense. Extremely hot days are becoming more common. Research shows that annual temperatures in New Jersey have increased approximately 3° F since the beginning of the 20th century, that nine of the ten hottest calendar years on record for the state have occurred since 1990, and that the number of very hot days (daytime high temperatures above 95° F) has been above average since the early 2000s. Over the past 25 years many more unusually warm months than unusually cold months have occurred in the state and, over the period 2000-2015, there were no top 5 coldest months but 32 top 5 warmest months.

⁵ NOAA National Centers for Environmental Information, "State Climate Summaries, New Jersey," <https://statesummaries.ncics.org/nj>. The study predicts that heat waves will become more intense and cold waves less intense. Extremely hot days are becoming more common. Research shows that annual temperatures in New Jersey have increased approximately 3° F since the beginning of the 20th century, that nine of the ten hottest calendar years on record for the state have occurred since 1990, and that the number of very hot days (daytime high temperatures above 95° F) has been above average since the early 2000s. Over the past 25 years many more unusually warm months than unusually cold months have occurred in the state and, over the period 2000-2015, there were no top 5 coldest months but 32 top 5 warmest months.

The New Jersey Department of Human Services report, *Living Below the Line 2017*, finds that nearly six in ten NJ retired elder-only households' lack sufficient annual incomes to insulate them against poverty as they age. \$19,000 is the average annual Social Security payment for NJ retirees. In 2012, nearly one in four older New Jersey citizens relied on Social Security for 90% or more of their income. Poverty rates are increasing in New Jersey and the wealth gap is widening. The level of increases being considered by the Board – in some cases resulting in utility bills that will devour 20% of a resident's income - will have a devastating impact on these and other residents already struggling to make ends meet.

In 2006, APPRISE conducted a comprehensive examination of New Jersey's USF Program.⁶ Among other things, APPRISE determined that:

- “About 43 percent [of USF eligible households] have a head of household that is 60 or older.”⁷
- “About 37 percent of USF participants have an elderly head of household.”⁸
- “Households with an elderly head of household are less likely than other eligible households to receive benefits.”⁹

The Board's deliberations in this proceeding directly affect the well-being of older ratepayers.

B. Background on New Jersey's Universal Service Program and the Periodic Review of the Program

The Board seeks comment on and discussion of the Universal Service Fund Energy Assistance Program (“USF”), which was established as a result of state law, enacted in 1999 (“The Electric Discount and Energy Competition Act, N.J.S.A. 48:3-49 et seq” (“EDECA”).¹⁰ The EDECA, among other things, directed the Board to determine:

⁶ Applied Public Research Institute for Study and Evaluation, “Impact Evaluation and Concurrent Process Evaluation of the New Jersey Universal Service Fund, Final Report,” prepared for the New Jersey Board of Public Utilities, April 2006 (“APPRISE Report”).

⁷ Id., page vii.

⁸ Id., page vii.

⁹ Id., page viii.

¹⁰ Notice.

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- 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 should 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 P.L. 1979, c. 197 (C.48:2-29-15 et seq.), the “Tenants’ Lifeline Assistant Program” established pursuant to P.L. 1981, c. 210(C. 48:2-29.31 et seq.), the funds received pursuant to the Low-Income Home Energy Assistance Program established pursuant to 42 U.S.C.s. 8621 et seq., and funds collected by electric and natural gas utilities, as authorized by the Board, to off-set uncollectible electricity and natural gas bills should be deposited in the fund; and
- Whether new charges should be imposed to fund new or expanded programs.¹¹

As explained in the *Notice*, the Board established eligibility requirements for the USF Program on April 30, 2003, in its Order in Docket No. EX10020091 (“April 2003 Order”), as well as in subsequent Board orders. In its *Notice*, the Board also explains that the *April 2003 Order* stated that USF would be “an on-going, evolving program, subject to review, and amended as necessary.”

New Jersey’s seven regulated natural gas and electric companies participate in the USF.¹² All electric and natural gas customers contribute funding for the USF program through a charge to their electric and gas rates.¹³

The USF is one of several energy assistance programs available to New Jersey households.¹⁴ The Low Income Home Energy Assistance Program (“LIHEAP”) income guidelines are based on 200% of the Federal Poverty Level (FPL) (in comparison with the gross monthly income limit for the Universal Service Fund (USF), which is set at 175% FPL). Households that are not eligible for either of these two programs may be eligible for temporary assistance from the “PAGE” program (Payment Assistance for Gas and Electric) administered by the Affordable

¹¹ *Notice*.

¹² The seven regulated natural gas and electric utilities include New Jersey Natural Gas Company, Elizabethtown Gas Company, South Jersey Gas Company, PSE&G, Rockland Electric Company, Jersey Central Power & Light and Atlantic City Electric Company.

¹³ <https://www.nj.gov/dca/divisions/dhcr/faq/usf.html>

¹⁴ <http://www.njcommunityresources.info/njenergy.html>. See also, “LOW INCOME HOME ENERGY ASSISTANCE PROGRAM UNIVERSAL SERVICE FUND FFY 2019 FACT SHEET.”

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Housing Alliance on behalf of the Board of Public Utilities. New Jersey SHARES, a statewide nonprofit, also provides assistance through a network of more than 250 agencies at more than 300 sites. Weatherization services, promoting energy conservation, are available from Comfort Partners or the Weatherization Assistance Program.¹⁵

C. Improving the USF Program’s Effectiveness Would Help Customers Pay Bills and Would Likely Reduce the Frequency of Shut-Offs

As a matter of sound public policy, the Board should modify the USF as is necessary to reduce the frequency of shut-offs of New Jersey consumers. Accordingly, in addition to making any appropriate modifications to the USF in the four aspects of the Program that the Board identifies in its *Notice*, **the Board should also evaluate utilities’ outreach programs to ensure that barriers to enrollment are few and public awareness of USF is widespread.**

The following, based on information provided during Board investigations of utility rate cases, provides examples that illustrate the importance of improving the USF Program, not only in its guidelines, but also in its outreach and enrollment practices, which, in turn, would help more customers pay bills and minimize the likelihood of residential disconnections.

1. After declining between 2014 and 2015, shut-offs of ratepayers by Public Service Electric and Gas Company (“PSE&G”) increased by more than 5 percent between 2015 and 2017 (from 149,969 to 157,901), an annual increase of 2.6 percent.¹⁶
2. In 2017, shutoffs in the three poorest cities in PSE&G’s service territory greatly exceeded the territory-wide shutoff average of 8 percent of electric households: in Camden, 26 percent of the 24,989 households were shut off; in Newark, 21 percent of the 91,768 households were shut off; and in Passaic City 14 percent of the 18,741 households were shut off. Camden, Newark, and Passaic City are the 1st, 3rd, and 4th poorest cities in New Jersey. (See Baldwin PSE&G Testimony, page 27, footnote 84.)
3. Despite increasing shut-offs, participation by PSE&G customers in the USF Program has been declining steadily since its high of 171,319 participants in 2011. In 2017,

¹⁵ <http://www.njcommunityresources.info/njenergy.html>

¹⁶ In the Matter of the Petition of Public Service Electric and Gas Company for Approval of an Increase in Electric and Gas Rates and for Changes in the Tariffs for Electric and Gas Service, B.P.U.N.J. No. 16 Electric and B.P.U.N.J. No. 16 Gas, and for Changes in Depreciation Rates Pursuant to N.J.S.A. 48:2-18, N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1 and for Other Appropriate Relief, New Jersey Board of Public Utilities Docket Nos. ER18010029 and GR18010030, OAL Docket No. PUC 01151-18, testimony of Susan M. Baldwin on behalf of New Jersey Division of Rate Counsel, August 6, 2018 (“Baldwin PSE&G testimony”), at 22-23 (cites omitted).

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participation by PSE&G ratepayers in the USF Program was only 133,166, a decline of 38,153 households (22 percent) relative to the participation level in 2011.¹⁷

4. Atlantic City Electric Company ratepayers' participation in the USF program decreased from 30,843 in 2012 to only 25,993 in 2016, a decline of 4,850 ratepayers, that is, a 16 percent decrease.¹⁸

D. Primary Recommendation

AARP responds in later sections of these comments to the questions that the Board poses in its *Notice*. First, however, it is important to acknowledge that the issues are complex and any decisions about the Program's modification should be informed by comprehensive data and analysis. AARP welcomes the opportunity to participate in these important public policy discussions, and urges the Board to obtain and to make available to stakeholders comprehensive information about the USF so that AARP and other stakeholders can contribute to the discussion based on detailed information about the Program's strengths and weaknesses. In 2006, the Board engaged APPRISE to conduct an in-depth assessment of the USF.¹⁹

AARP urges the Board to seek a similarly detailed assessment of the USF before taking steps to modify the program. Later in these comments, AARP identifies some of the aspects of the Program about which additional information would be useful for considering any modifications.

E. Context for the Board's Review of the USF

Energy markets have evolved since 2003, when the USF was first established. Consumers now confront substantial and widespread rate increases (related to, among other things, clean energy

¹⁷ Id., Table 6, included as Appendix A to these comments.

¹⁸ In the Matter of the Petition of Atlantic City Electric Company for Approval of Amendments to its Tariff to Provide For an Increase in Rates and Charges for Electric Service Pursuant to N.J.S.A. 48:2-21 and N.J.S.A. 48:2-21.1, and for Other Appropriate Relief (2017), New Jersey Board of Public Utilities Docket No. ER 17030308, testimony of Susan M. Baldwin on behalf of New Jersey Division of Rate Counsel, August 1, 2017 ("Baldwin ACE testimony"), page 47, footnote 19, citing Response to RCR-CI-55, Attachment 1. See also id., at page 20, Table 3, included as Appendix B to these comments.

¹⁹ APPRISE Report.

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initiatives, grid modernization and electric vehicle infrastructure), with approximately \$12 billion in proposed utility price hikes.²⁰

There is evidence of shut-offs increasing yet participation in low-income energy assistance programs is declining,²¹ suggesting a need for the Board to broaden its review of the USF Program to examine the adequacy of outreach and sufficiency of utilities' efforts to facilitate vulnerable customers' enrollment in energy assistance programs, including USF. Many eligible customers are not availing themselves of the existing benefit.

Also, New Jersey consistently ranks high on the cost of living index, and so although the federal poverty ("FPL") guidelines are updated using the CPI-U each year (and so theoretically take inflation into account), the FPL does not account for New Jersey's high costs.²² Improving the

²⁰ As is stated in AARP's April 15th Letter to Governor Murphy, the Board, and Rate Counsel (cites omitted):

The New Jersey Department of Human Services report, *Living Below the Line 2017*, finds that nearly six in ten NJ retired elder-only households' lack sufficient annual incomes to insulate them against poverty as they age. \$19,000 is the average annual Social Security payment for NJ retirees. In 2012, nearly one in four older New Jersey citizens relied on Social Security for 90% or more of their income. Poverty rates are increasing in New Jersey and the wealth gap is widening. The level of increases being considered by the Board – in some cases resulting in utility bills that will devour 20% of a resident's income - will have a devastating impact on these and other residents already struggling to make ends meet.

²¹ AARP has not comprehensively surveyed participation rates. Appendix A and Appendix B provide examples of two utilities for which USF participation has been declining. AARP recommends that the Board compile and report corresponding information for New Jersey's other utilities.

²² The U.S. Department of Commerce, Bureau of Economic Analysis publishes Regional Price Parities. 2016 Regional Price Parities ("RPP") by State (US=100): New Jersey is ranked 5th highest at 113.2 (US Bureau of Economic Analysis, <https://www.bea.gov/news/2018/real-personal-income-states-and-metropolitan-areas-2016>). In addition, "Large metropolitan areas with the highest RPPs were San Francisco-Oakland-Hayward, CA (124.7), New York-Newark-Jersey City, NY-NJ-PA (122.0), and Washington-Arlington-Alexandria, DC-VA-MD-WV, (119.1)." Regional Price Parity definition: "Allows comparisons of buying power across the 50 states and the District of Columbia, or from one metro area to another, for a given year. Price levels are expressed as a percentage of the overall national level."

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USF Program would help customers pay bills and further the goals of minimizing interrupted utility service and defaults.

F. AARP's Preliminary Recommendations

AARP provides its preliminary responses to the Board's four questions, and looks forward to contributing further to this important public policy discussion in upcoming months.

Income Ceiling. In its first question, the Board seeks comment on whether it should change the USF Income Ceiling, which is used to determine eligibility for the program.

AARP recommends that the eligibility standard be reviewed including if an increase from 175% FPL to at least 200% FPL (to be consistent with the LIHEAP Program) would be beneficial and not unduly burden other customers. This would also assist those having a hard time paying their bills while also confronting New Jersey's high cost of living.

AARP recognizes that under the current program all ratepayers bear the cost of the USF program. Increasing the income eligibility standard could increase costs for all ratepayers and any rate impacts should be analyzed. However, the potential benefits of such a change are the potentially lower costs of uncollectables and the increased societal benefits associated with reduced health risks. Moreover, increasing the universe of USF eligible ratepayers -- those who are least able to afford the USF subsidy -- would be precisely those ratepayers gaining access to the program. Finally, we recommend the Program evaluation explore sharing program costs between shareholders and ratepayers.

Energy Affordability Threshold. The Board's second question seeks comment on the Energy Affordability Threshold, which is used to compute, on an individual basis, the USF subsidy granted to the eligible household -- a maximum electric burden and a maximum gas burden are computed by multiplying 3 percent by the household income. The amount that the household actually pays (net of any LIHEAP benefit) that exceeds that burden is subsidized through the USF Program.

In no event should the current levels (3 percent applied to gas, and 3 percent applied to electricity) be increased, that is, the household burden should not increase. Instead, the Board should carefully consider whether the burden should be decreased. It is critically important to continue to cap the energy burden on the state's most vulnerable households and make energy affordable for households with low and limited incomes.

\$1,800 Cap on USF Grant. In its third question, the Board seeks comment on whether the existing \$1,800 cap should be modified.

Especially if the Board has not examined the merits of the existing cap since the completion of the APPRISE Report in 2006, AARP recommends that the Board seek additional information from utilities about the distribution of the size of existing USF grants,

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including the theoretical sizes that, but for the cap, would be provided to vulnerable ratepayers.

This information would enable stakeholders to assess how many grants would be higher based on the USF benefit calculations if they were not capped at \$1,800. It would also help inform policy making to have data about those grants that, but for the cap, would exceed \$1,800, and the distribution of those computed amounts that exceed \$1,800. If many households would otherwise receive more than \$1,800 (perhaps because of rising utility prices) the cap should be increased. Vulnerable households should not be penalized for rising energy costs as a result of an outdated cap.²³

²³ The Consumer Price Index – All Urban Consumers – Electricity has increased from 198.4 in January 2013 to 214.5 in April 2019. Or, comparing April to April of each year, the price index has risen from 198.8 to 214.5 in April 2013 to April 2019, an 8% increase. U.S. Bureau of Labor Statistics, Consumer Price Index - All Urban Consumers - Electricity [CUSR0000SEHF01], retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/CUSR0000SEHF01>, May 19, 2019. Index 1982-1984=100, Seasonally Adjusted.

The last time that AARP is aware that the Board examined the USF Program was in 2006 (see the APPRISE Report). The Consumer Price Index – All Urban Consumers – Electricity has increased from 167.9 in April 2006 to 214.5 in April 2019, a nearly 28% increase. U.S. Bureau of Labor Statistics, Consumer Price Index - All Urban Consumers - Electricity [CUSR0000SEHF01], retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/CUSR0000SEHF01>, May 19, 2019. Index 1982-1984=100, Seasonally Adjusted.

By comparison, Natural Gas Prices (Dollars per Thousand Cubic Feet) in New Jersey, Residential Price was \$10.89 in 2013 and \$9.11 in 2018. Prices are in nominal dollars. U.S. Energy Information Administration, U.S. Department of Energy, https://www.eia.gov/dnav/ng/ng_pri_sum_dcu_SNJ_a.htm. Source: Form EIA-857, "Monthly Report of Natural Gas Purchases and Deliveries to Consumers"; Form EIA-910, "Monthly Natural Gas Marketer Survey."

Because of the differing patterns in electric and gas prices, it is that much more important to obtain information that is specific to USF participants' actual energy burdens by computing and examining the USF grants that would be provided if the \$1,800 cap were raised.

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Incentive Credit. The Board, in its fourth question, seeks comment on whether a one-time USF “incentive credit” should be provided as a USF bill credit to households who participate in either the Board’s Comfort Partners program or the Department of Community Affairs’ Weatherization Assistance Program.

Assisting low-income households with adopting energy efficiency measures results in an immediate long-term benefit to households by reducing the size of their energy bills and also results in multiple societal benefits including helping the state to achieve its energy efficiency goals, reducing carbon emissions, and reducing the likelihood of unpaid utility accounts.

AARP urges the Board first to seek more information about any barriers that may now exist to participation in these energy efficiency programs before implementing modifications that could improve participation.

Other Topics. In addition to its four specific questions, the Board also invites comment on “any other topics related to the USF program the public would like to discuss.”²⁴

As is discussed earlier in these comments, the Board should ensure that all utilities are undertaking adequate and effective outreach programs²⁵ and implementing best practices to facilitate ratepayers’ enrollment in the USF.²⁶

G. Key Aspects of the Program About Which Information Should Be Gathered and Reported to Stakeholders

²⁴ *Notice.*

²⁵ Among other things, it is important that there be sufficient outreach in other languages – in 2006 about one in three households spoke a language other than English as the primary language:

“For about 17 percent of the households, Spanish is the primary language spoken in the household. “ APPRISE Report, at page vii.

“For about 16 percent of the households, a language other than English or Spanish is the primary language spoken in the household.”

APPRISE Report, at page vii.

²⁶ In 2006, the APPRISE Report determined that:

Overall, about 49 percent of eligible households have received USF benefits. About 44 percent of households eligible for electric USF benefits have received them and about 52 percent of households eligible for gas USF benefits have received them.

APPRISE Report, at page viii.

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Sound public policy decisions depend critically on relevant and up-to-date information. AARP's primary recommendation is that the Board conduct the level of in-depth assessment that was conducted on its behalf by APPRISE in 2006. Absent such an assessment (or as part of such an assessment), AARP urges the Board to compile and report to stakeholders, at a minimum, the following information:

General Background information

- Separately by utility and separately for each of years 2010 through present: (a) the numbers of USF participants; (b) best estimates of the numbers of households eligible to participate; and (c) average USF grants.
- Separately for each of the past three years, and separately by utility:
 - Numbers of USF customers that have entered into deferred payment arrangements (DPAs) with the utility;
 - Total net write-offs.
- Whether the Board implemented any changes as a result of the 2006 APPRISE Report, and, if so, which ones and when?
- Separately by utility, separately for each of the past five years:
 - number of residential disconnections;
 - total number of USF grants disbursed;
 - total USF dollars disbursed;
 - estimated participation level (number of actual participants divided by best estimate of number of eligible participants); and
 - assessment on ratepayers, expressed on a per-ratepayer basis.
- Copies of reports submitted to the Board by utilities regarding USF for each of past three years.
- Copies of reports prepared by or on behalf of Board regarding USF for each of past three years.

Income Threshold (Board Question 1)

- How many additional households would be eligible if the income threshold were set at 200% of FPL rather than 175% of FPL?
- What is the energy burden now experienced by those between 175% and 200% of FPL? Those between 200% and 250% of FPL; those between 250 and 300% of FPL (for example, is it more than 3 percent)?

Energy Affordability Threshold (Board Question 2)

- At this time, AARP has no recommended questions regarding the Board's second question.

\$1,800 Cap on USF Benefit (Board Question 3)

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- Is the \$1,800 cap the original cap (i.e., dating back 15 years)?
- By how much (in percentage and dollar terms) have gas and electric bills for USF participants increased during the past 15 years (or whenever the \$1,800 cap was set)?
- What is the present distribution of USF grants (knowing the average grant is helpful but not sufficient for determining whether the cap should be raised)?²⁷ The following data would be useful for at least three years of Program information:

Separately by Utility				
Grant Assuming No Cap		Number of USF Grants that would be at this level assuming no cap		
		2016	2017	2018
>	< or =			
\$ -	\$ 200			
\$ 200	\$ 400			
\$ 400	\$ 600			
\$ 600	\$ 800			
\$ 800	\$ 1,000			
\$ 1,000	\$ 1,200			
\$ 1,200	\$ 1,400			
\$ 1,400	\$ 1,600			
\$ 1,600	\$ 1,800			
\$ 1,800	\$ 2,000			
\$ 2,000	\$ 2,200			
\$ 2,200	\$ 2,400			
\$ 2,400	\$ 2,600			
\$ 2,600	or more			

Incentive Credit (Board’s Question No. 4)

- What are the current barriers to participation in energy efficiency programs?
- For each of past three years, separately by utility, how many USF customers participated in the (a) Comfort Partners program and (b) Weatherization Assistance Programs?
- Are there sufficient resources to meet existing demand by USF households (does anyone get turned away? Is there a waiting line? How much time transpires between when a household seeks to participate and the requested assistance is provided? Is information provided in languages other than English regarding these programs?).

²⁷ In 2006, the APPRISE Report estimated that “[a]bout 66,000 of the 361,000 households that are eligible for a USF benefit have a combined need that exceeds the \$1,800 annual cap on USF benefits.” APPRISE Report, at page vi.

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H. Conclusion

In summary, AARP welcomes the Board's initiation of an examination of New Jersey's USF Program and looks forward to working with all stakeholders to evaluate and improve this critical bill payment assistance program. AARP members, as contributors to and beneficiaries of the USF Program, have a significant stake in the outcome of this proceeding. AARP's primary recommendation is that the Board gather and report data and analyses that can inform stakeholders' participation in this important public policy discussion. Further, AARP urges the BPU to see how those eligible for these programs are made aware of them. Finally, we have suggested areas where the programs could be expanded.

Thank you for your consideration of AARP's comments on Universal Service Fund. Please contact me at eliebman@aarp.org if you have any questions or would like additional information.

Sincerely,



Evelyn Liebman
AARP NJ Director of Advocacy

Cc: George Helmy, Chief of Staff to NJ Governor Phil Murphy
Kathleen Frangione, Chief Policy Advisor to NJ Governor Phil Murphy
Stefanie Brand, Director, NJ Division of Rate Counsel
Sarah Steindel, NJ Division of Rate Counsel
Maureen Clerc, Energy Assistance Programs, NJ Board of Public Utilities

AARP is the nation's largest nonprofit, nonpartisan organization dedicated to empowering Americans 50 and older to choose how they live as they age. With nearly 38 million members and offices in every state, the District of Columbia, Puerto Rico, and the U.S. Virgin Islands, AARP works to strengthen communities and advocate for what matters most to families with a focus on health security, financial stability and personal fulfillment. AARP also works for individuals in the marketplace by sparking new solutions and allowing carefully chosen, high-quality products and services to carry the AARP name. As a trusted source for news and information, AARP produces the world's largest circulation publications, AARP the Magazine and AARP Bulletin. To learn more, visit www.aarp.org or follow @AARP and @AARPadvocates on social media.