



May 24, 2019

Aida Camacho-Welch, Board Secretary
New Jersey Board of Public Utilities
44 South Clinton Avenue
Post Office Box 350
Trenton, New Jersey 08625-0350
board.secretary@bpu.nj.gov

**Re: Docket No. EO19030308
Universal Service Fund Program – Periodic Review**

Dear Secretary Camacho-Welch,

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

Introduction:

New Jersey SHARES, Inc. (NJS) is a nationally recognized 501(c)(3) non-profit that provides guidance and help to individuals and families living in New Jersey who are in need of temporary assistance. Our mission is to serve as a safety net for households that face an unexpected emergency or crisis situation and are not eligible for other forms of assistance. We connect low- and moderate-income households with available resources to meet their ongoing needs through advocacy, community outreach, education, information, referral and the utilization of our multilingual call center.

We partner with more than 300 human service agencies and legislative offices operating out of 325 sites statewide to provide assistance to families that are not eligible for other programs.

We work with the 7 regulated utilities in New Jersey to provide assistance to their clients struggling with utility overburden. Our grants must restore or maintain service and are provided directly to the utility company on a client's behalf. Our grants start at \$1 over the LIHEAP income eligibility limit – currently a family of 4 is eligible for LIHEAP with gross monthly income of no more than \$4184 (200% FPL).

As enumerated in Docket No. EO19030308 – Universal Service Fund Program – Periodic Review, several topics related to the USF program were included for comment and addressed herewith:

A. Should the USF Income Ceiling be increased from 175% fpl to 185%?

It is NJ SHARES recommendation that the USF Income Ceiling should be increased from 175% FPL to at minimum, 200% FPL – by raising the ceiling you will help more of the lower income population – but will put more of the income burden on New Jersey. While the benefits of fewer shut offs and

lower uncollectables is clear, research should be conducted, and data collected to determine the true cost/benefit ratio of this change.

B. Should the USF Energy Affordability Threshold and/or screening process be re-examined?

It is NJ SHARES recommendation that the affordability threshold should NOT be changed from the current levels – increasing the maximum gas and maximum electric burden from 3% of household income would negatively impact this already vulnerable population.

C. Should the USF benefit cap be adjusted from \$150/month (\$1800 per year) or be changed for certain heating types?

Data needs to be collected on the cost/benefit of the current cap before a fair determination can be made in adjusting it going forward.

In lieu of raising the \$1800/year cap we would suggest there be a “crisis fund” set up specifically for this low-income population. We currently have an extensive network of social service agencies in place anxious to provide just this type of assistance to the most vulnerable of populations – where budgets are so tight that any emergent financial set back can be disastrous. A “crisis fund” set up specifically for the USF income eligible customers would meet a growing demand and need.

D. Should a one-time USF “incentive credit” 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? If so, what would a reasonable credit amount be?

NJ SHARES would very much like to see increased utilization of/access to weatherization efforts – anything that can be done to reduce a households energy consumption will help reduce their utility overburden – however we have heard from many of our partner agencies that access to these weatherization opportunities is extremely under-utilized especially by this low income population. Further research should be conducted to determine how to increase accessibility and participation.

Sincerely,



Cheryl Stowell
CEO, NJ SHARES