

**Jacob Veauhn**

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**From:** Jacob Veauhn on behalf of Records Clerk  
**Sent:** Friday, October 2, 2020 2:23 PM  
**To:** 'Shakhea Hinton'  
**Cc:** Consumer Contact  
**Subject:** RE: Comments entered on Docket 20200219-EI

Good afternoon, Shakhea Hinton

We will be placing your comments below in consumer correspondence in Docket No. 20200219 and forwarding your comments to the Office of Consumer Assistance and Outreach.

**Jacob Veauhn**

Commission Deputy Clerk I  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, Florida 32399  
[Jacob.Veauhn@psc.state.fl.us](mailto:Jacob.Veauhn@psc.state.fl.us)  
850.413.6656

**From:** Shakhea Hinton <shakhea@organizeflorida.org>  
**Sent:** Friday, October 2, 2020 2:12 PM  
**To:** Records Clerk <CLERK@PSC.STATE.FL.US>  
**Subject:** Comments entered on Docket 20200219-EI

Dear Florida Public Service Commission Chairman Gary Clark:

On behalf of the Florida Housing Justice Alliance, please find a letter attached regarding Docket 20200219-EI.

The intersections of housing and utility security cannot be understated. Such costs are essential, yet far out of the reach in midst of a global pandemic that has triggered extreme joblessness and suffering at the hands of a criminally rigged unemployment system. We have also witnessed landlords illegally threaten to cut power and water, in an effort to remove vulnerable tenants. **It is for these reasons that the Florida Housing Justice Alliance urges the PSC to order investor-owned utilities to suspend disconnections for 90 days** in line with the Petition submitted by the League of United Latin American Citizens (LULAC) in Docket No. 20200219-EI.

You can find our letter attached.

Respectfully,

**Shakhea Hinton**  
**Campaigns Coordinator**

*she/her/hers*

**ORGANIZE FLORIDA**

A 134 E Colonial Dr., Orlando, FL 328012

O [321.800.2095](tel:321.800.2095) C [352.602.6876](tel:352.602.6876)

W <http://www.OrgFL.org>



Chairman Gary F. Clark  
Florida Public Service Commission  
2540 Shumard Oak Boulevard  
Tallahassee, FL 32399-0850

[Commissioner.Clark@psc.state.fl.us](mailto:Commissioner.Clark@psc.state.fl.us)  
[clerk@psc.state.fl.us](mailto:clerk@psc.state.fl.us)



**RE: Comments entered on Docket 20200219-EI**

Dear Florida Public Service Commission Chairman Gary Clark:

The intersections of housing and utility security cannot be understated. Such costs are essential, yet far out of the reach in midst of a global pandemic that has triggered extreme joblessness and suffering at the hands of a criminally rigged unemployment system. We have also witnessed landlords illegally threaten to cut power and water, in an effort to remove vulnerable tenants. **It is for these reasons that the Florida Housing Justice Alliance urges the PSC to order investor-owned utilities to suspend disconnections for 90 days** in line with the Petition submitted by the League of United Latin American Citizens (LULAC) in Docket No. 20200219-EI.

On July 29, 2020, the Florida Public Service Commission (PSC) held a workshop on the impacts the COVID-19 pandemic has had on Florida's utilities. At this event, representatives from the State's largest regulated utilities informed regulators that hundreds of thousands of Florida residents are falling behind on their utility payments, and may be subject to large overdue bills. Many of these bills exceed 90 days of non-payment, representing millions of dollars in outstanding payments looming over Florida's families.

Several investor-owned utilities, including Duke Energy Florida, Tampa Electric Company, and Florida Power & Light Co. have indicated that they are starting to disconnect customers for non-payment of utility bills. Given the ongoing emergency, we ask that you order the investor-owned utilities to suspend disconnections for 90 days in line with the Petition submitted by the League of United Latin American Citizens (LULAC) in Docket No. 20200219-EI.

The options and programs Florida's utilities have proposed for customers struggling to get by amid the COVID-19 pandemic and its associated economic and social impacts are insufficient, especially in light of the failure of the U.S. Congress to pass another round of coronavirus relief. Florida is still experiencing thousands of new cases of COVID-19 every day, and at the time of this writing, the State has exceeded 13,000 COVID-19 related deaths. Our economy and our residents will need time to recover from the impacts of the pandemic. The State of Florida needs strong state-level leadership from responsible institutions to protect Florida's residents and families health, safety, and economic well-being. Now is the time for action.

**We support LULAC's Petition seeking a 90-day moratorium on disconnections, and submit the following additional recommendations for consideration:**

- 1. The PSC should identify and implement additional avenues to order** Florida utilities to extend stays or reinstate stays on disconnections through June 1, 2021 at the earliest.
- 2. The PSC should mandate utilities to reconnect customers disconnected from power from March 9, 2020 through the present, especially residential households.**

While we call for forward-looking protections, we cannot ignore that the gears of disconnections have already begun to turn in some parts of our state. To ensure that protective measures do not leave any customers behind, we call on the PSC to recommend that utilities reconnect any previously disconnected customers, especially residential households, dating back to the beginning of the state of emergency. Some customers will have moved or left service territories, but utilities should at least send notice that reconnection without fee and enrollment in a balance management plan is available.

**3. The PSC should mandate utilities to waive fees and fines for customers through June 1, 2021.**

Punitive measures to ensure compliance are inappropriate during the present crisis. Utilities should suspend fines that they normally charge for late payment, return payment, credit or debit card payment, and service reconnection until the State has achieved a full recovery.

**4. The Commission should open a docket that covers both utilities' and customers' financial challenges arising due to COVID-19, and in particular, should hold additional workshops centered on the experiences and needs of vulnerable ratepayers, community stakeholders, and utility customers impacted by the COVID-19 pandemic.**

The July 29, 2020 workshop on COVID-19 impacts to utilities did not allow for public comment. As a result, crucial voices have been left out of the conversation. The PSC has not consulted with anyone who can credibly speak specifically on behalf of the low income, Black, Latino, and Indigenous communities that have been most impacted by the COVID-19 pandemic. These communities face burdens and barriers to participation in programs that PSC members and staff must take into consideration. The customers themselves are the ones best suited to determine whether utility programs are sufficient to meet their needs.

**5. The PSC should urge utilities to extend debt forgiveness to households facing unemployment, ALICE constrained households, and energy-debt burdened households.**

Residents seeking assistance with their bills have found that available support falls into two general categories: deferment through repayment plans and third-party agency bill assistance. For residents struggling under the current economic crisis, deferment is not relief, and the limited availability of funds means that many residents will never see relief from third-party bill assistance. Direct bill forgiveness is necessary to the survival of households experiencing unemployment, ALICE (Asset Limited Income Constrained but Employed) households, and low-income energy burdened households (households that pay over 6% of their income on utilities). The PSC should do everything within its power to strongly urge utilities to pass savings and profits on to residential customers in the form of debt forgiveness. Such practices are a moral imperative at this time. The PSC should send a clear message that they will view such programs as strong evidence of prudent customer debt management practices.

**6. The PSC should establish and strongly recommend guidelines for utility balance management programs (alternatively referred to as "arrearage management programs") that meet Floridians' needs based on best practices established in other parts of the country.**

Balance Management Programs should not impose up-front costs, should automatically enroll eligible customers, should allow for sufficient time-frames to ensure customers do not become energy-burdened, and should include a debt forgiveness element for participating customers. We provide additional details on best practices identified in other states in Attachment A.

**7. The PSC should require utilities to share additional data beyond that which was disclosed at the July 29 PSC workshop and should require utilities to provide updated data related to the COVID-19 crisis every month.**

The information offered by utilities at the July 29 meeting was well appreciated, but was not sufficient and will quickly become outdated without further updates. We provide additional details regarding the information both the public and our elected officials need to engage in responsible decision-making in Attachment B.

**8. The PSC should mandate utilities to set robust energy efficiency goals and programs, specifically those aimed at assisting low-income customers.**

For many years, Florida's largest utilities have under-invested in low income energy-efficiency programs critical to addressing the pervasive high energy burden so many Florida families face. The result of this long-standing failure to adequately invest in these programs has played a major contributing role in deepening the utility debt crisis we are encountering today. The PSC should recognize this and insist that utilities establish robust energy efficiency programs.

9. **The PSC should urge Governor Ron DeSantis direct financial assistance for rent, mortgages, and utilities:** According to the [National Low Income Housing Coalition](#), Florida would need \$5.4-\$6.25 billion dollars in direct assistance to stabilize Florida's housing crisis. This amount does not include utility costs. Even with moratoriums on eviction, foreclosure, and utility shut-offs, struggling Floridians will owe thousands in unpaid debt when these protections end. The state must provide direct relief, and negotiate between banks, public utility companies, and landlords to provide relief to Floridians adversely impacted by COVID-19.

**No one should face eviction or loss of utility services due to inability to pay during the COVID-19 pandemic.** In the midst of a global pandemic, hurricane season, extreme joblessness and a state unemployment system that continues to deny Floridians the funds rightfully theirs, this is a matter of life or death. The working poor, Black Floridians, and immigrant communities are disproportionately at risk. Housing and utility security for the most marginalized Floridians is not only a moral imperative, but critical to the health, safety, and economic well being of our entire state. **We urge the Florida Public Service Commission to consider and adopt these recommendations.**

Sincerely,

**The Florida Housing Justice Alliance**

*Florida Housing Justice Alliance is a movement of renters, mobile homeowners, people experiencing homelessness, advocates, and allies calling for housing justice. We are coming together to protect renters, promote community stabilization, and ensure healthy, affordable housing for all. [floridahousingjusticealliance.com](http://floridahousingjusticealliance.com)*