

**PREPARED TESTIMONY OF NICOLIE BOLSTER ADDRESSING THE CONCERNS
OF THE DISABILITY COMMUNITY REGARDING SAN DIEGO GAS & ELECTRIC'S
PROPOSALS FOR RESIDENTIAL RATE DESIGN
A.11-10-002**

SUBMITTED ON BEHALF OF THE CENTER FOR ACCESSIBLE TECHNOLOGY

CENTER FOR ACCESSIBLE TECHNOLOGY

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June 12, 2012

I. Introduction

1. This testimony is presented on behalf of the Center for Accessible Technology (CforAT) by Nicolie Bolster of the Disability Rights Education and Defense Fund (DREDF). Ms. Bolster's qualifications are set forth as Appendix A to this testimony. CforAT represents the interests of residential households in San Diego Gas & Electric's (SDG&E's) service territory, many of whom are low income, and all of whom will be subject to residential energy rates as determined in this proceeding.

II. Overview

2. In my work at DREDF, I see general information about people with disabilities, and I am aware of the needs of this community. People with disabilities, including many elderly people, often live on fixed incomes and are disproportionately low-income. At the same time, many people with disabilities consume greater than average levels of energy due to their disability, and also bear a disproportionately heavy energy burden. I am aware of the Medical Baseline program, which can reduce the energy cost burden on some individuals with disabilities by providing greater amounts of energy at lower tier costs. However, not all people with disabilities qualify for, or are aware of, the Medical Baseline program.
3. In addition, even for those on Medical Baseline, the fact that it keeps program participants in the lower tiers means that these customers will be substantially affected by a rate design that increases the burden on lower tier energy consumption (such as tier consolidation, which would also allow for greater increases in CARE rates).
4. In preparing this testimony, I conducted direct outreach to organizations that serve the disability community in the service territory of SDG&E, such as Independent Living Centers, as well as other organizations. I received responses from individuals with

disabilities who are SDEG&E customers. Through this outreach, I confirmed that many people with disabilities and others on low or fixed incomes are barely able to pay their utility bills now, and many are forced to juggle any combination of vital living expenses such as: rent, energy utility payments, other utility bills, medicine, transportation to doctors, and food.

5. I understand that CforAT's role in this proceeding is to advocate on behalf of vulnerable populations who would suffer harm and face a disproportionate burden if SDG&E's proposed rate design were adopted. The purpose of this testimony is to describe the potential harms and to relay the fears and sentiments expressed by low-income individuals with disabilities that would result if SDG&E's proposed rate design were adopted.

III. Nature of Outreach

6. In order to understand the disability community's concerns about SDG&E's rate design proposals, I reached out to disability-oriented CBOs, including Independent Living Centers and other organizations to collect information regarding the needs of their clients.¹ I also reached out to individuals with disabilities who I identified as being served by SDG&E. A copy of the notices sent to organizations and individuals is attached to this testimony as Appendix B.

¹ Because of the relatively small size of SDG&E's service territory, the list of disability-related CBOs and other organizations serving people with disabilities is smaller than the list in the service territory of other IOUs. The targeted organizations in SDG&E's service territory include: California Foundation for Independent Living Centers, Access to Independence of San Diego, Dale McIntosh Center for the Disabled, California Council of the Blind, Californians for Disability Rights, Inc. (CDR), Lighthouse for the Blind and Visually Impaired, Braille Institute of America, National Federation of the Blind of California, San Diego Chapter of American Council of the Blind, Greater Los Angeles Agency on Deafness, Inc. (GLAD), Goodwill Industries of Southern California, ADAPT-CA, and Team of Advocates for Special Kids San Diego (TASK).

IV. Concerns of the Disability Community

7. The responses that I received to my outreach show the concerns of the disability community that rising rates and changes in rate design will harm low-income customers. People with disabilities and the people who work with them have expressed anxiety and despair about rate increases and rate design impacts, telling stories of how changes to rates that disproportionately impact low-income or low use households will cause severe hardship. People with disabilities who are already struggling to pay for energy while also paying for other necessities such as rent, food, and medical care are already forced to make extreme and difficult choices; this will only get worse if these consumers are asked to pay more for energy.
8. The Program Manager at Access to Independence of San Diego, the largest ILC in SDG&E's territory, reports receiving approximately 8 calls per month seeking assisting with utility bills and describing a lack of ability to pay. This represents approximately 3% of their total calls. The program manager noted that the ILC's consumers tend to be on the lower economic scale and rely solely on public benefits or Social Security. The average benefit amount in San Diego for an individual receiving Social Security is \$850 and the average rent price for a 1 bedroom apartment is \$1,148.00 (source: US Casden Forecast, Union-Tribune). Clearly, even rent is well above the monthly benefit amount for someone with a disability living on benefits.
9. The Community Organizer for Access to Independence of San Diego provided input from several clients about potential changes to SDG&E's rate structure and the hardship it would cause. In emails, the clients said the following:

- A higher electricity bill would be bad for me because I pay a minimum of \$140 a month for my medicines. In the past the rates of my medicine have gone up and they will continue to do so. I am on a fixed budget have very little money left after paying the bills. Oftentimes I pay for something that is not included in my monthly budget for example a doctor's visit. The summer is around the corner and I am worried about paying for my air conditioning. There are a lot of people I know that would be financially hurt by the higher cost of electricity.
- A raise in my electricity bill would be very harmful to me because I have a lot of monthly bills and am on a fixed budget. Besides the regular monthly payments due of rent, utilities, food, medicine and doctor's visits I also pay for a cemetery plot. My situation with money is very tight and I have very little left at the end of the month. I need new shoes [sic] and cannot afford to buy a pair at the moment. I hope the you seriously take into consideration those of us who are barely paying their bills and make a decision to not raise the cost of electricity.
- I receive \$800 a month from Social Security. I have a lot of bills including a payment of \$160 to the dentist. I often need go [sic] to the dentist. The last two months I've received assistance from the MAAC project to help pay for my gas and electricity bill. Prior to receiving their assistance I have to make payments to my electricity bill in order to show that I need the help. I have been forced to decide whether to pay for food or the electricity bill. I do not have any money left at the end of the month. I have to wait until the following month to see any money will be left over for things like cloths and shoes. Any additional costs to my electricity bill will serious hurt my monthly needs in order to survive.

10. The Housing Coordinator from the Dayle McIntosh Center for The Disabled with the Laguna Niguel Satellite Center estimated that she receives calls from approximately five clients per month who need assistance because of their bills from SDG&E.

11. She provided a detailed example from a client in her 50s who is deaf and who has a pacemaker for her heart as well as other physical disabilities including diabetes. This woman lives alone in San Clemente, and reports that she has mental health issues from the stress of being unable to pay her bills. She also reports that she is unable to eat well due to

financial pressures including her utility bills, and this aggravates both her physical conditions and her mental health.

12. I also communicated directly with a SDG&E customer who is blind and who has suffered traumatic brain injury. He reports that he has skimmed on his SDEG&E bill in order to pay for life-saving medication that was not covered by Medicare Part D. He said in an email to me: “I don’t know how the proposed rate increase will shrink my household budget. I already spend every Penny that comes in each month. I’ve got no savings, no money set aside for an emergency, travel, or a rainy day. I may have to visit a nonprofit organization or church for help with higher utility bills.”
13. I am aware that three public participation hearings on SDG&E’s application have been scheduled, but have not yet been held. Based on my experience in reviewing public input in other similar proceedings, I expect that more members of the public, including low-income disabled and/or elderly customers, or people who work with such customers, will come forth at these hearings to describe the hardships that SDG&E’s proposals will create for people who are already vulnerable.

V. Conclusion

14. Low income households, including disabled households, are already struggling to pay their utility bills, and are already facing difficult and harmful choices between housing, food, medical care, transportation, and utility service. The people in these households are afraid of what will become of them if their SDG&E rates increase, and these fears are well-founded. The hardships that these households are currently experiencing are severe and heart wrenching; and they will become worse if energy rates for low income and low use households are approved.