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January 31, 2019

To: State Water Resources Control Board

Re: Draft Options for Implementation of a Statewide Low-Income Water Rate Assistance Program



Central Coast Energy Services, Inc. ("CCES") is the Low Income Home Energy Assistance Program (LIHEAP) Provider for Utility Payment Assistance in Monterey, Santa Cruz and San Mateo Counties and in the City and County of San Francisco. LIHEAP is a federal program administered by the California Department of Community Services (CSD) and Development and implemented by community-based organizations in every county. The design of this program is parallel to what is envisioned in Assembly Bill 401 (AB 401), as noted in the report. Eligibility is based on 60% of the state median income. The LIHEAP program offers a once a year benefit up to \$1000 for the 2019 program year and the state wide allocation is \$71 million. Most of that goes to IOUs and of that most goes to PG&E. In our agency alone, we have helped people with \$5 million of assistance in the previous 12 months. In regard to disconnection payments, we are many times the last resort for people facing shutoffs.

The proposed LIRA Program draft ("PD") put forth by the California Water Resources Control Board ("Board") provides an adequate framework for the development of a LIRA Program. However, the specifics and proposed implementation of the program design require further discussion.

The proposed program design does not consider the most relevant California program funded by the state – The Drought Water Assistance Program - that was available to eligible low-income households in select counties in California in 2014 and 2015. This very successful program paralleled the LIHEAP program and was administered by CSD, a small department in California Health and Human Services. This program design should be considered as a cost-effective equitable way for the state to implement water rate assistance program.

We delivered assistance services under the Drought Water Assistance Program in the County of Monterey. We are happy to share our data and analyses with the State Water Resources Control Board. One consideration is essential in program design is that when you speak of giving benefit household, unless a state warrant is issued, the benefit amount credited to the water account holder, as is the case with LIHEAP. This means that you must identify the entity that actually collects payment for the water received. We found that there were limited number of water suppliers in the county, many more vendors of water. While one district

actually supplies the water, another district or entity may buy it and pass the charge on to their customers.

Strongly urge your consideration of the California Drought Water Assistance Program as a feasible and cost-effective Option for Implementation of a Statewide Low-Income Water Rate Assistance Program.

We appreciate the opportunity to comment and look forward to helping low income communities in California with the State Water Resources Control Board.

Sincerely,



Dennis Osmer

Executive Director

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