

7/9/2014

Members of the Task Force:

I sent you a detailed letter yesterday criticizing the Equity section of your draft report. As it stands, a number of its facts and recommendation are questionable.

Given the short time I have, I will name 6 revisions that are the most important. If I were you, I would take more time to get everything right. After all, its going to have your name on it.

1. Remove the specific income levels that define the "working poor." Trying to call a household making \$95,000 a year the working poor would be funny if it weren't so embarrassing.

2. Remove the requirement for 10% of demand to be met by serving low and moderate income people. If you define this in terms of Austin's Free Weatherization program, it would result in a dramatic increase in global warming emissions. The 10% figure has been justified by convoluted comparisons between Austin Energy and other utilities that have much less aggressive goals.

3. Remove or alter the proposal for sliding scale rebates. This has a host of potential problems, and has probably not been vetted by the contractors, who are the major sales force for residential programs.

4. Insert a phrase that all new funding for low and moderate income programs above the current level of funding for Free Weatherization be cost effective for both participants and non-participants. Most economically disadvantaged ratepayers will never go through the Free Weatherization Program, and if the new program funding has a Benefit/Cost ratio of less than 1.0, they lose money.

5. Remove or alter language implying that residential programs besides Free Weatherization do not serve low and moderate income people. At this point, this assumption is not proven.

6. Remove the gratuitous dig about low performing low-income programs. On a historical basis, I do not believe this is the case. Personal grudges have no place in your report.

Paul Robbins