

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF COLORADO**

DOCKET NO. 08I-113EG

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IN THE MATTER OF THE INVESTIGATION OF REGULATORY AND RATE  
INCENTIVES FOR GAS AND ELECTRIC UTILITIES.

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**RESPONSE OF ENERGY OUTREACH COLORADO (EOC) TO COMMISSION  
DECISION NO. C08-0448 REQUESTING COMMENTS**

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**I. INTRODUCTION**

Energy Outreach Colorado (EOC) appreciates the opportunity to participate in the Commission's investigatory docket regarding regulatory and rate incentives for gas and electric utilities. In today's environment, we agree that it is important to review and understand various alternative regulatory approaches to meet the legitimate needs of utilities and all customer segments while at the same time balancing other societal imperatives.

**II. BACKGROUND**

EOC is a Colorado nonprofit corporation established by legislation in 1989. EOC's mission is to help all Coloradans afford home energy. We do this by providing direct bill payment assistance to low-income households, installing energy efficiency improvements in low-income housing, delivering an energy education program to fourth and fifth grade students, and advocating on behalf of low-income households for policies and programs that consider the needs of this population in regards to home energy.

In the 2007 Colorado General Assembly, Senate Bill 22 provided clarification regarding certain advantages and preferences that may be offered to low-income

households with regard to rates, consumer rules and policies. This legislation authorizes the Colorado Public Utilities Commission to consider the unique needs of low-income utility customers and allows the Commission to establish preferential rates and policies for these households. Previous to this legislation becoming law, such preferences were not possible in Colorado.

### **III. EMPHASIS**

EOC respectfully requests that the Commission include in this investigation discussion and consideration of the implementation of a generic approach to Senate Bill 07-22. Under existing conditions, any consideration of low-income policies and programs must be dealt with on a filing-by-filing basis. In essence, each utility filing, whether in the form of cost adjustments, base rates, or programs, are viewed individually. We believe that looking at the total impact of all pricing mechanisms on low-income households in aggregate would be a better approach in considering potential applications of Senate Bill 07-22.