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TO: Board of Water Commissioners

FROM: Debra N. Pospiech, Esq., Chief General Counsel

RE: Lifeline Plan Amendments

DATE: April 18, 2023

I forwarded the proposed amended Lifeline Plan to We the People of Detroit (WTPOD) and met with them virtually on Friday, April 14, 2023. WTPOD offered friendly amendments, which I believe are appropriate for the Board's consideration. I intend to use the attached version for our discussion on Wednesday. WTPOD's proposed revisions are highlighted in yellow on the actual policy and I will summarize them below:

Section 2.1 – rephrasing the purpose of service interruptions.

Section 2.2 – using the word “shall” regarding the percentage of water burden at 1.8% and that affordability programs “shall” include plumbing repairs.

Section 3 – Definitions – Definitions added for “affordability” and “assistance” to explain the difference between the two types of programs. The Lifeline Plan includes both. Also, there is a conversion of CCFs to gallons.

Section 5.5 – WTPOD has several clients who have no access to technology and will need all communication to be in writing. The previous version of Lifeline Plan said *all* customers must agree to using technology, so we have reworded this section. Also, WTPOD wanted to codify that Lifeline Plan communications will be offered in other languages as needed.

Section 5.3.1. – easier to understand language that Lifeline Plan enrollees are protected against service interruption.

Section 6.2.1 – easier to understand language providing guidance as to who may be eligible for the program—recipients of SNAP, LIHEAP and Medicaid will most likely qualify for Lifeline Plan.

Section 6.3.1. – a much easier explanation of the tiered, capped rates and the breakdown for each tier.

Section 6.4.1. – clarification of “non-peak” hours.

Section 6.4.3. – language inserted to advise enrollees that Wayne Metro may have access to other resources to pay a customer's bill if their water usage exceeds the allocated amount allowed at the capped rate.

Section 6.6.1. – WTPOD believes this paragraph regarding hardship exemptions is confusing. They asked to simply state the customer must apply for a hardship exemption before the next month's bill arrives—not a deadline of “x” days as was previously mandated by DWSD's billing team. The goal is for the customer to act quickly when a household faces an unexpected hardship, otherwise they will start to receive delinquent bills. Having to count the days might lead to confusion.

Section 6.6.5. – The Ombudsman can intervene on behalf of a customer at any time. The 14 day deadline to appeal to Ombudsman conflicted with the Ombudsman's charter-mandated duties.

Thank you for your attention. I hope you found this helpful.

DNP

cc: Gary A Brown, Director
Istakur Rahman, Chief Financial Officer
Matthew Phillips, Chief of Staff
Monica Lewis-Patrick, We The People of Detroit
Mark P. Fancher, Esq., ACLU
Alice Jennings, Esq.