

**Congress of the United States**  
**Washington, DC 20510**

December 2, 2019

Brandon Lipps  
The Honorable Deputy Under Secretary  
Food, Nutrition, and Consumer Service  
U.S. Department of Agriculture

Certification Policy Branch  
Program Development Division  
Food and Nutrition Service  
3101 Park Center Drive  
Alexandria, VA 22302

Re: Docket FNS- 2019-0009

Dear Deputy Under Secretary Lipps:

We write in strong opposition to the Revision of Standardization of State Heating and Cooling Standard Utility Allowances (SUA) in the Supplemental Nutrition Assistance Program (SNAP), and urge you to abandon this proposal. If implemented, 45 percent of our constituents would lose or see a decrease in their SNAP benefits.<sup>1</sup> FNS's own analysis shows that this rule will have a net negative impact, with an average decrease in benefits of \$31.<sup>2</sup> In addition, households with elderly or disabled members would take an even larger hit as they are not subject to the shelter cap.

The ability for SNAP recipients to deduct certain costs, like utility expenses, is an important part of accurately and fairly determining an individual's SNAP benefits. For years, Congress has recognized that utility costs vary across states and has allowed states flexibility in determining a more localized standard utility deduction that reflects the state's true utility costs. This fact is particularly important in Connecticut, which has the third highest energy costs in the nation, behind only Hawaii and Alaska.<sup>3</sup> Low-income residents in Connecticut spend a large portion of their income on heat and electricity. The average residential electricity customer in the state spent \$1,706 for electricity in 2016, \$355 more than the U.S. average.<sup>4</sup>

Unfortunately, this proposed rule removes states' flexibility to set SUAs based on differences in utility costs and rates. Instead, it standardizes the SUA calculations according to survey data and caps the assistance that low-income residents in high-energy cost states may receive. The proposed rule would limit the SUA to the 80th percentile of low-income households' utility costs in the state. This change would mean that many SNAP recipients in areas with high utility costs

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<sup>1</sup> Supplemental Nutrition Assistance Program: Standardization of State Heating and Cooling Standard Utility Allowances, Regulatory Impact Analysis, 7 CFR Part 273, Federal Register, October 3, 2019.

<sup>2</sup> Ibid.

<sup>3</sup> U.S. Energy Information Administration, "Electricity prices are highest in Hawaii but expenditures are highest in South Carolina," February 13, 2018.

<sup>4</sup> Ibid.

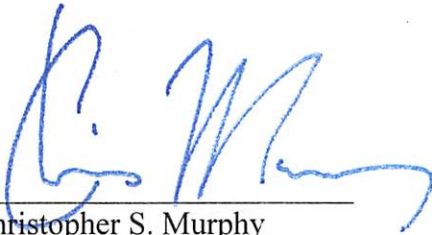
would no longer be eligible for benefits, with no explanation for why this threshold was set. The lack of explanation is particularly worrisome considering that 22 states, including Connecticut, have SUAs exceeding the 85th percentile estimates.<sup>5</sup>

Asking families to choose between food and heat is cruel and runs in direct contrast to SNAP's mission to increase self-sufficiency to help low-income families better deal with unexpected expenses or other financial challenges. SNAP is a critical lifeline for low-wage workers, families with young children, those who are in-between jobs, and families that have high expenses that leave them with little income available for food.

This proposed rule dramatically undermines Connecticut's ability to assist families in need and will disproportionately impact our state's most vulnerable populations, including seniors and people with disabilities.

As members of the Connecticut delegation, we strongly urge you to maintain the current SUA procedure which permits state flexibility and to abandon this proposed rule.

Sincerely,



Christopher S. Murphy  
United States Senator



Richard Blumenthal  
United States Senator



Joe Courtney  
Member of Congress



Rosa L. DeLauro  
Member of Congress



John B. Larson  
Member of Congress



Jahana Hayes  
Member of Congress



James A. Himes  
Member of Congress

<sup>5</sup> "Methods to Standardize State Standard Utility Allowances," Food and Nutrition Service, July 28, 2017.