

From: Whitney Cassell
To: [PUC - Clerk](#)
Cc: [Travis Poulin](#); [Demers, J](#)
Subject: Case 17-4999-INV
Date: Monday, December 11, 2017 12:10:16 PM

Hello Vermont Public Utility Commission Members,

My name is Whitney Cassell and I am the Crisis Fuel Coordinator for CVOEO. I appreciate that you are taking comments from interested parties regarding a workshop to explore issues and concerns related to the PUC rules around disconnections of service. Having worked with CVOEO's fuel and utility program for almost 20 years, I have worked with many families facing disconnection of their utilities. On behalf of myself, the crisis fuel staff of CVOEO and the clients we serve, here are our thoughts in response to the specific issues you outlined in your memorandum:

1) Remote disconnects:

With the technology and smart meters available it is reasonable to think that remote disconnects would be feasible. While this seems like a possibility when disconnecting for reasons other than non-payment, this practice would do a large disservice to our Vermonters being disconnected for non-payment. They should have the courtesy of an in person contact with clear information on what is required to restore power. This seems especially important for our New Americans who may have a language barrier, may not have received or understood a disconnect notice, or may be learning to navigate our system of utility payments and social service agencies. The requirement to have someone physically visit the home when power is disconnected for non-payment should continue to be in place, with the current practice of waiving that requirement on a case by case basis in the event of a personal safety issue for the utility representative.

2) The use of Physician's certificate to prevent disconnect:

In the case of a medical necessity, the use of a Physician's certificate to defer disconnections is sometimes the only option while someone deals with a medical issue. I would feel it inappropriate for the commission to impose its own rules or standards upon the criteria of that Physician's certificate, as it is the Physician who has the personal knowledge of the individual circumstances. Those of us in an advocacy role are familiar with the option of a Physician letter and we often find ourselves educating individuals about the fact that its use puts the customer at a larger disadvantage in thirty days when that deferment runs out and they are faced with an even larger disconnect notice. If there could be more discussion between the patient, the physician, and the utility about the use of those certificates, it would be more helpful for the customer in the long run. Also, I feel there is often confusion around the seven day promise of a Physician's certificate. There are inconsistencies whether it is business days or calendar days and some clarification around this would be very beneficial.

3) Actual practice of accepting payments lower than that of the delinquent:

The CAPS around the state have worked hard to create and maintain a good rapport with the utilities we work with day after day. In most cases, we are able to avoid disconnection by paying half of the past due and the customer agrees to make a payment arrangement.

Here is where I think it gets difficult. When a client makes an arrangement it should hold off a

disconnect being issued while the arrangement is in place, instead there are often times when there is a payment arrangement and a new disconnect running simultaneously so the customer has to pay the agreement and also deal with the current disconnect notice they are facing. Then comes in broken agreement notices when a customer fails to keep up with their arrangement. It's questioned if utilities are required to send these or can they shut off immediately after a missed payment on a previous agreement. Also, after a certain number of broken arrangements utilities will ask for the full amount of the delinquent before canceling a disconnect notice. Across the board utilities seem to have different practices and procedures which make the whole process of payment arrangements very confusing. Furthermore, while the CAPS have a good relationship with most of the utilities, customers are often fearful or intimidated by calling their utility company. This makes the arrangement process even more confusing at times. Also, we cannot be sure that the information given to us as advocates is always the same as the information given directly to customers.

4) Actual practice of utilities in the winter months:

My only comment in regards to this is simply the fact that as of April 1st, there is an influx of utility disconnects that have been held off through the winter months solely due to the winter rules. This often creates a backlog of phone calls to the utilities while customers try to get power restored. Last year we had several problems with calls going to an overflow call center that was only able to take our information and have the reps call us back. Essentially this left customers with power disconnected and no means of contacting a representative to get it back on. This was a problem.

5) Early identification of high usage:

In recent years, I have seen what seems to be an increase in very high electric bills. The reasons for this are varied, however it seems very difficult to refer customers to any concrete solutions to find out why their usage is so high. Getting an audit through many utilities seems either very difficult or at the expense of the customer, which our low income clients simply do not have the means to pay. Property owners are unwilling to investigate their buildings in order to discover what is causing high usage. Weatherization programs are invaluable to increasing efficiency but we all know those programs are limited in what they can do and how timely they are able to do it. A concerted effort to identify and address high usage and efficiency is necessary to make utility bills affordable for customers as well as reduce Vermont's electricity usage over all. Can weatherization programs do more to incorporate solar energy into the work they do, can property owners be mandated to address high usage in their buildings, and how do we make energy audits more accessible for our customers facing challenges paying their bills? GMP and VGS both have the Energy Assistance Program, which can be extremely helpful but they simply don't do enough to cover the cost of extremely high bills and the fact that they are the only two utilities in the state currently offering them leaves customers of other utilities without those options.

6) Utilities seeing payment only after a disconnect is issued:

Most social service agencies can only assist with utilities after a disconnect is issued, this is a large part of why utilities find payments made only after a disconnect is issued. The sheer volume of clients the Statewide CAPS serve is an indicator of how many low income Vermonters are in need of assistance. They are required to wait until after they are in disconnect status, even if they are trying to be proactive and avoid that disconnect in the first place. An additional cause of this is simply the

timing of billing schedules. We frequently find that if a person receives their income on the 1st or the 3rd of the month, yet they are expected to pay their utility bill in the middle of the month, they will inevitably receive that disconnect notice when their bill goes past due. In winter months with the requirement of extra disconnect dates, those notices seem to come back to back. A customer will barely be able to take care of one notice before a new one is issued. They don't have the means to pay this until the beginning of the following month, leaving them in continual disconnect status. If utilities can be aware of this, making arrangements based more closely on the customer's ability to pay, giving at least a billing cycle before issuing a new notice, or even be able to adjust a billing cycle based on an income schedule, this could change that trend.

Thank you for taking the time to read my comments and I look forward to hearing what initiatives come out of the workshop.

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