From: Tamar Bouchard <tbouchard@cvoeo.org>
Sent: Friday, December 1, 2017 2:32 PM
To: PUC - Clerk
Cc: Whitney Cassell; Demers, J; Rob Meehan
Subject: Case 17-4999-INV

Good Afternoon Vermont Public Utility Commission Members –

My first comment concerning PUC Rule 3.300, which I am sure you will hear repeatedly, is that low income fuel assistance eligible utility consumers are only eligible for our emergency/crisis fuel assistance services AFTER they have a disconnection notice in hand. We absolutely are not allowed to assist until they have an actual disconnect notice. So, the assertion that utility bills are only paid after receipt of a disconnect notice is somewhat self-fulfilling for low income consumers. When income eligible consumers come for assistance without an active disconnection notice we have to turn them away, even when they are acting proactively, knowing they don't have the funds before the due date.

Last winter, when I was a Crisis Fuel Worker for CVOEO in Burlington, we had very good responses from utility service providers and also very poor ones. We established very good working relationships with GMP, BED and VT Gas as well as several local fuel dealers. When we had this good rapport, these energy providers would encourage low income consumers to come and get assistance ahead of a disconnection and reassure them that we were a resource for them. They would kindly forward a disconnect notice through fax or email after speaking with a consumer they sent our way or, in the case of GMP, gave us access to their online portal, so no time was wasted in serving those in need. This went a long way toward preventing disconnections and avoiding racking up additional consumer fees.

The limitations we, as service providers, had involved the sheer volume of low income consumers we worked with. There were often not enough hours in the day to see everyone who came for assistance in a given day. If we knew we were only going to be able to serve a limited number of those in our waiting room, we would let them know that as soon as we were able. This meant that sometimes, even when good faith was employed by the low income consumer, they still had to await our ability to serve them. There were also times when we were in between assistance programs or had exhausted our assistance budget with a given consumer. Programs like Power Partners and WARMTH were invaluable and often limited.

There were many low income consumers who got to November with utility bills that were extremely high – over $800 balances and monthly bills in excess of $300/month. Many times these consumers lived in homes with old wiring, including older mobile homes and poorly insulated houses that could be rented cheaply, but heated exorbitantly. Often fuel assistance grants did not coincide with actual utility usage levels. The idea of working with high usage low income consumers with economic assistance is a good one, because an energy audit and repair assistance might save a great deal of heartache as well as reducing the energy demand during the high usage winter months.

Many low income consumers have additional stressors that make managing mail and bills difficult. The number of workers who are employed full time and still are eligible for assistance is extremely high. Utility shut off courtesy phone calls and door hangers during cold snaps often were enough to get someone busy and overwhelmed to seek assistance. Also, the more complete the information on the door hanger, the easier it is to assist them. At minimum, customer name, address, account number, disconnect date and disconnect balance should be required on each door hanger.

Having a doctor's note would stay a disconnection, but would also lead to very high overdue balances. It would be helpful if someone with a doctor's note and low income could be immediately referred for assistance, even with a stay on their disconnection. Since having an active disconnection notice is the only means of receiving assistance from us, the doctor's note could actually result in a larger problem as time went on.

Charging high disconnect/reconnect fees for something done remotely is not reasonable. It's one thing if a service must be disconnected in person and there is labor and expense involved in reconnection. It is quite another to have someone remotely manage the process. We also have a diverse community of non-English speakers, those with limited reading ability and also those who just don't get the notices for a variety of reasons. Having someone physically required to be present for a disconnection and even someone who must come before the disconnection to give in person notice should continue to be required.

If some type of sliding fee scale or waiving of disconnection fees could be established for low income consumers who are eligible for and receive assistance that would conserve assistance funds and also help consumers to manage their monthly budgets. It would also provide incentive for energy providers to make sure they make every effort to AVOID disconnections.

In my experience, when energy providers and service providers work together with the best interests of the consumer foremost we can avoid most disconnections. There will always be a few consumers coming through the door at closing time or during emergency overnight hours who come home to a cold and/or dark home after a disconnection, but that should be an exception and not the normal mode of operation for low income assistance eligible consumers. Poverty is already not much fun, there is no need to make it impossible.

With Warmest Regards,

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