

June 29, 2020

Judith Whitney, Clerk  
Vermont Public Utility Commission  
112 State Street, Montpelier, VT

Re: Case 17-4999-INV – Investigation into rules 3.300, 3.200, & 3.400

Dear Ms. Whitney:

On March 16, 2020, the Department of Public Service (“DPS”) submitted a draft comprehensive rule incorporating aspects of existing Commission Rules 3.200, 3.300, and 3.400 in PUC Case 17-4999. The DPS draft rule covers billing, arrearages, collections, disconnections, and customer information. The Public Utility Commission (“PUC”) issued a memorandum on May 4, 2020 extending the deadline to comment on the DPS’ proposed rule to July 1, 2020.

The utilities have spent time reviewing the draft rule and engaged in a productive dialogue with the DPS around its proposed changes via webinar on May 7th. However, in recent months the utilities have been largely focused on the impacts of the current disconnect moratorium. Given the extensive scope of the DPS’ proposed rule and magnitude of changes proposed, the utilities believe that more time for review is warranted. We apologize for not filing this request three days in advance of the filing date as requested due to staffing limitations. We’d note that the experience with the emergency disconnect moratorium may ultimately inform this broader review of Rule 3.300.

VPPSA has reached out to the other utilities and can represent that Burlington Electric Department, Green Mountain Power, Vermont Electric Cooperative, Vermont Gas Systems, and Washington Electric Cooperative support an extension to the current comment deadline. The utilities request that the PUC grant an extension until July 24, 2020.

Thank you for your consideration.

Sincerely,



Melissa Bailey  
Manager of Government and Member Relations  
Vermont Public Power Supply Authority