

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 20-0703-PET

Vermont Legal Aid request for moratorium on utility and telecommunications shutoffs during State of Emergency	
---	--

Order entered: 07/30/2020

**ORDER EXTENDING TEMPORARY MORATORIUM
OF INVOLUNTARY UTILITY DISCONNECTIONS**

I. INTRODUCTION

This proceeding concerns a petition from Vermont Legal Aid to the Vermont Public Utility Commission (“Commission”) requesting the temporary halt of involuntary utility disconnections during the current state of emergency in Vermont because of the COVID-19 pandemic. In earlier orders, the Commission granted Vermont Legal Aid’s request and put in place a temporary disconnection moratorium. Under those previous orders, the temporary moratorium is set to expire on July 31, 2020.

On July 22, 2020, in response to a request from the Vermont Department of Public Service (“Department”) to extend the moratorium until September 30, 2020, the Commission sought comments from entities interested in this proceeding. We also directed that “[a]ny entity wishing to object to our decision, request a hearing in this matter, or seek further process in this case do so at their earliest convenience.”¹ No parties raised formal objections, requested a hearing, or sought further process, but many filed comments.

In today’s Order, after considering the comments we received and examining the ongoing COVID-19 impacts on Vermont, we extend the temporary moratorium until September 30, 2020.

II. COMMENTS

The Commission received many comments from interested entities. Some were in favor of extending the moratorium and others were not.

¹ Order of 7/22/20, at 1.

Comments in Support of the Extension

Vermont Gas Systems (“VGS”),² Green Mountain Power Corporation,³ Washington Electric Cooperative (“WEC”),⁴ Vermont Legal Aid,⁵ Burlington Electric Department (“BED”),⁶ Stowe Electric Department (“SED”),⁷ and Vermont Electric Cooperative, Inc. (“VEC”) ⁸ filed comments supporting an extension of the temporary moratorium on disconnections.

VGS,⁹ GMP,¹⁰ and Vermont Legal Aid¹¹ all support the Department’s request to extend the temporary moratorium until September 30, 2020. Vermont Legal Aid notes that the pandemic has impacted many vulnerable Vermonters and that the temporary moratorium “has provided an important health and safety protection during this period of uncertainty, which will continue to exist well after July 31, 2020.”¹²

WEC filed comments stating that the current state of emergency in Vermont already has been extended until August 15, 2020, and WEC supports extending the moratorium to that date. Further, WEC expects that the Governor will extend the state of emergency beyond August 15, 2020, and supports extending the Commission’s disconnection moratorium end date so that it is concurrent with the end date of the state of emergency, should the Governor extend it.¹³

BED filed comments in response to the Department’s request, stating:

BED supports the proposed extension of the moratorium on involuntary utility service disconnections until September 30, 2020. For BED’s planning purposes, if the [Commission] approves the proposed extension, we request that the [Department] be asked to provide guidance to the utilities on how it will determine

² Letter from Eileen Simollardes, Vice President Regulatory Affairs, to Judith C. Whitney, Clerk of the Commission, filed on 7/22/20.

³ Letter from Carolyn Browne Anderson, Esq., to Judith C. Whitney, Clerk of the Commission, filed on 7/23/20.

⁴ Letter from Ronald A Shems, Esq., to Judith C. Whitney, Clerk of the Commission, filed on 7/27/20.

⁵ Letter from W. David Koeninger, Deputy Director, to Judith C. Whitney, Clerk of the Commission, filed on 7/27/20.

⁶ Letter from Amber Widmayer, Regulatory Specialist, to Judith C. Whitney, Clerk of the Commission, filed on 7/27/20.

⁷ Letter from Michael Lazorchak, Manager of Regulatory Compliance, to Judith C. Whitney, Clerk of the Commission, filed on 7/27/20.

⁸ Letter from Victoria J. Brown, General Counsel, to Judith C. Whitney, Clerk of the Commission, filed on 7/27/20.

⁹ Simollardes Letter at 1.

¹⁰ Browne Anderson Letter at 1.

¹¹ Koeninger at 1.

¹² *Id.* at 1.

¹³ Shems Letter at 1.

the need to request further extensions of the moratorium, or alternately, how it will determine that the moratorium should be lifted [at a later date].¹⁴

SED comments that it “does not object to extending the moratorium on involuntary disconnections to September 30, 2020.”¹⁵ SED also states that “extending the moratorium beyond September 30th, 2020, will make it difficult to structure repayment plans with those ratepayers with arrearages.”¹⁶

VEC comments that it “does not object to the extension of the moratorium on involuntary service disconnections through the end of September 2020, but VEC will be hesitant to support future extensions.”¹⁷

Comments Opposing the Extension

Vermont Public Power Supply Authority (“VPPSA”),¹⁸ the eight Vermont rural local exchange carriers (“Eight RLECs”),¹⁹ the Village of Hyde Park Electric (“HPE”),²⁰ and Consolidated Communications of Vermont Company, LLC and Consolidated Communications of Northland Company, both doing business as Consolidated Communications (“Consolidated”),²¹ all oppose the Department’s request. These utilities seek an end to the temporary moratorium on July 31, 2020, at least as applied to their companies.

VPPSA opposes the Commission granting a blanket extension of the disconnect moratorium through September 30, 2020. Instead, VPPSA recommends that the Commission lift the moratorium and direct utilities to begin implementing the provisions of the utilities’ post-moratorium disconnection plans.²² VPPSA makes this recommendation because “VPPSA and

¹⁴ Widmayer Letter at 1.

¹⁵ Lazorchak Letter at 2.

¹⁶ *Id.*

¹⁷ Brown Letter at 1.

¹⁸ Letter from Melissa Bailey, Manager of Government and Member Relations, to Judith C. Whitney, Clerk of the Commission, filed on 7/27/20.

¹⁹ Letter from Paul J. Phillips, Esq., to Judith C. Whitney, Clerk of the Commission, filed on 7/27/20. The Eight RLECS are comprised of Franklin Telephone Company, Inc.; Ludlow Telephone Company doing business as TDS Telecom; Northfield Telephone Company doing business as TDS Telecom; Perkinsville Telephone Company, Inc. doing business as TDS Telecom; Shoreham Telephone LLC doing business as Otelco; Topsham Telephone Company, Inc.; Vermont Telephone Company, Inc. doing business as VTel; and Waitsfield-Fayston Telephone Company, Inc. doing business as Waitsfield Telecom, doing business as Champlain Valley Telecom.

²⁰ Letter from Carol Robertson, General Manager, to Judith C. Whitney, Clerk of the Commission, filed on 7/27/20.

²¹ Letter from Jeffrey B. Austin, Director – Government Relations, to Judith C. Whitney, Clerk of the Commission, filed on 7/27/20.

²² Bailey Letter at 1.

its members are concerned that arrearage levels are reaching the point that the customers will not be able to recover financially.”²³

The Eight RLECs oppose the Department’s request on two bases. First, the Eight RLECs argue that the Department’s request lacks a factual basis in violation of Vermont Rule of Civil Procedure 7(b)(1), which is made applicable to Commission proceedings by Commission Rule 2.103.²⁴ Second, the Eight RLECs contend that extending the moratorium will cause customer confusion and damage the RLECs’ business reputations because the Eight RLECs already have begun reaching out to customers with arrearages to work with them on establishing payment agreements to avoid disconnections after July 31, 2020.²⁵

HPE states that it does not object to the continuance of the temporary moratorium on disconnections for those utilities receiving federal aid, but “requests that the disconnection moratorium end for utilities who do not receive federal pandemic relief funds.”²⁶ HPE voices its concern that the continuation of the disconnection moratorium is not in the long-term best interest of its customers. According to HPE, if arrearages continue to build up and the payment burden becomes insurmountable for HPE customers, then those customers will eventually still experience disconnection and the resulting debt will fall on the utility and its customers.²⁷

Consolidated states that it “continues to support the Commission’s efforts to ensure ongoing essential services to Vermonters experiencing financial hardships related to the COVID-19 pandemic.”²⁸ However, Consolidated claims that extending the moratorium will make it harder to collect past due balances once the moratorium is lifted. Consolidated is concerned that the resulting delay in cash flow from the growing arrearage amounts has the potential to interfere with Consolidated’s ability to fund operations and invest in infrastructure buildouts and improvements, including internet services for unserved areas.²⁹ As such, Consolidated encourages the Commission to deny the Department’s request and allow the moratorium to expire.³⁰

²³ Bailey Letter at 1.

²⁴ Phillips Letter at 1 and 2-4.

²⁵ *Id.* at 1 and 4-6.

²⁶ Robertson Letter at 1.

²⁷ *Id.*

²⁸ Austin Letter at 1.

²⁹ *Id.*

³⁰ Austin Letter at 1-2.

III. DISCUSSION & ORDER

After considering the comments we received (most of which supported or did not oppose the Department's request) and examining the current situation regarding COVID-19 in Vermont, we extend the existing temporary disconnection moratorium until September 30, 2020.

Extending the moratorium will give the Department time to implement a program for disbursing the \$8 million that it recently received from the Vermont General Assembly to address the impacts of COVID-19 on ratepayers. On July 10, 2020, the Department filed with the Commission a letter informing us that "[t]he Department will receive an appropriation from the Vermont General Assembly of \$8,000,000.00 to minimize the financial hardship caused by the COVID-19 pandemic and mitigate the potential for utility rate increases."³¹ Given the importance of these funds to utilities and customers, we believe that the Department needs time to produce a successful program, and that the success of that program will alleviate many of the concerns raised by those utilities that oppose an extension of the temporary moratorium on disconnections.

We further observe that the Department, utilities, and others continue to search for more funding for utilities and their customers. These entities are looking to the Federal government, the State, and other places for assistance to offset the impact of the pandemic. It makes sense, for this short extension, to see if these worthwhile efforts bear fruit.

Regarding VPPSA's concerns, we recognize that VPPSA represents eleven municipal utilities in Vermont, and we understand that these utilities tend to have some of the most financially challenged customers in the state. We agree with VPPSA that some of its utilities' customers may not be able to recover financially to the point where they can pay back all of the arrearages that have built up during the pandemic. However, despite VPPSA's concerns, we find it in the public good to extend the temporary disconnection moratorium until September 30, 2020. The Department recently obtained an \$8 million appropriation from the Vermont General Assembly to "minimize the financial hardship caused by the COVID-19 pandemic and mitigate the potential for utility rate increases."³² While it is currently unclear how the \$8 million will be distributed, or whether it will be enough to mitigate COVID-19 impacts on customers, we have

³¹ Letter from James Porter, Esq., Director for Public Advocacy, to Judith C. Whitney, Clerk of the Commission, filed on 7/10/20, citing H. 966, Sec. 20, citing H.966, Sec. 20.

³² Porter Letter at 1.

decided to extend the moratorium to allow time until it becomes clear what impact the \$8 million will have on utilities and customers and whether the Department seeks and receives additional funds.

The Eight RLECs also object to the Department's request. Regarding the allegation that the Department does not have a factual basis for its request, we disagree. It is a matter of public record that the Department just obtained an \$8 million appropriation to help utilities and customers. Providing the Department with time to plan for and disburse these funds is in the public good. Further, we do not believe that consumers will be unduly confused by our decision to extend the moratorium. On the contrary, extending the moratorium will give utilities more time to work with customers and help them receive assistance from the Department to pay for arrearages. Finally, we do not believe the Eight RLECs' reputations will suffer from extending the moratorium. It seems unlikely that customers receiving more time to pay off their arrearages will be upset with their utility company.

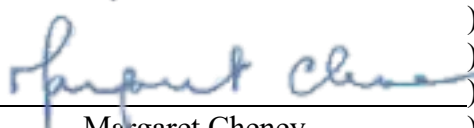
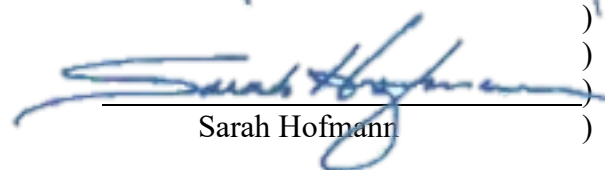
Regarding HPE's concerns about insurmountable payment burdens, we think this concern is premature for the same reasons noted above in our analysis of VPPSA's comments. We conclude that the Department should have more time to carefully craft a plan for the disbursement of the \$8 million fund to alleviate the financial concerns raised by utilities like HPE.

Finally, regarding Consolidated's arguments, we are not convinced that arrearages will reach a critical level if we extend the moratorium for a brief time while the Department crafts a plan for the distribution of the \$8 million fund. Further, we are not convinced that a short extension of the moratorium will have a serious or long-term effect on Consolidated's ability to invest in infrastructure buildouts and improvements.

For all the reasons stated above and in previous orders, we grant the Department's request. The temporary disconnection moratorium is extended until September 30, 2020.

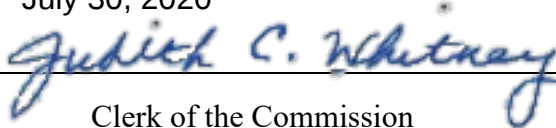
SO ORDERED.

Dated at Montpelier, Vermont, this _____ 30th day of July, 2020 _____.

	)	
Anthony Z. Roisman	)	PUBLIC UTILITY
	)	
	)	
Margaret Cheney	)	COMMISSION
	)	
	)	
Sarah Hofmann	)	OF VERMONT

OFFICE OF THE CLERK

Filed: July 30, 2020

Attest: 
Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made (e-mail address: puc.clerk@vermont.gov).

PUC Case No. 20-0703-PET - SERVICE LIST

Parties:

Carolyn Browne Anderson, Esq. (for Green Mountain Power Corporation)
Green Mountain Power Corporation
2152 Post Road
Rutland, VT 05702
carolyn.anderson@greenmountainpower.com

Kevin Babic (for Mountain Water Company)
Mountain Water Company
1840 Sugarbush Access Road
Warren, VT 05674
kbabic@sugarbush.com

Christopher Bean (for MCI Communications Services, Inc.)
Verizon
Christopher.e.bean@verizon.com

Christopher Bean (for MCImetro Access Transmission Services LLC)
Verizon
Christopher.e.bean@verizon.com

Reginald Beliveau, Jr. (for Swanton Village, Inc. Electric Department)
Swanton Village, Inc. Electric Department
P.O. Box 279
120 First Street
Swanton, VT 05488
rbeliveau@swanton.net

Sue Benedek (for Level 3 Communications, LLC) (for
CenturyLink Communications, LLC) (for Broadwing Communications, LLC) (for
240 N. Third Street TelCove Operations, LLC) (for Global
Suite 300 Crossing Local Services, Inc.) (for
Harrisburg, PA 17101 CenturyLink Communications, LLC) (for
sue.benedek@centurylink.com Wiltel Communications, LLC) (for Global
Crossing Telecommunications, Inc.) (for
Level 3 Telecom Data Services, LLC)

Meredith Birkett (for Village of Johnson Water & Light Department)
Village of Johnson Water & Light Department
P.O. Box 603
Johnson, VT 05656
vojmanager@townofjohnson.com

Alexandre Bonneville
Vermont Water Utilities, Inc..
60 Robin Lane
Georgia, VT 05468
info@vwui.com

(for Vermont Water Utilities, Inc.)

Victoria J. Brown, Esq.
Vermont Electric Cooperative, Inc.
42 Wescom Road
Johnson, VT 05656
vbrown@vermontelectric.coop

(for Vermont Electric Cooperative Inc.)

Mary Burgess
FirstLight Fiber
mburgess@firstlight.net

(for FirstLight Fiber, Inc.)

Ellen Burt
Town of Stowe Electric Department
P.O.Box 190
Stowe, VT 05672
eburt@stoweelectric.com

(for Town of Stowe Electric Department)

James Bushey
854 Tri-Town Road
Addison, VT 05491
tooshort1941@gmail.com

(for KO's Farm, LLC)

Bill Cairns
Bromley Water Company
PO Box 1130
Manchester Center, VT 05255
BC@Bromley.com

(for Bromley Water Company, Inc.)

Ronald Colton
Chalet Village Water System, Inc.
P.O. Box 662
Pittsfield, VT 05762
recwaterbaron@aol.com

(for Chalet Village Water System, Inc.)

Sandra M. Conklin
Pines Water Company/Conklin Marital Trust
717 Fontaine Hill Road
Morrisville, VT 05661
sconklin1125@gmail.com

(for Pines Water Company/Conklin Marital Trust)

Lindsay DesLauriers
Bolton Valley Community Water and Sewer,
LLC
26 Wentworth Road
Bolton Valley, VT 05477
lindsay@lmdcapitolstrategies.com

(for Bolton Valley Community Water and
Sewer, LLC)

William F. Ellis
McNeil, Leddy & Sheahan
271 South Union Street
Burlington, VT 05401
wellis@mcneilvt.com

(for City of Burlington Electric Department)

Jonathan Elwell
Village of Enosburg Falls Water & Light
42 Village Drive
Enosburg Falls, VT 05450
jelwell@enosburg.net

(for Village of Enosburg Falls Water & Light
Department Inc.)

Elijah D Emerson, Esq.
Primmer Piper Eggleston & Cramer PC
PO Box 1309
Montpelier, VT 05601
eemerson@primmer.com

(for Village of Johnson Water & Light
Department) (for Town of Northfield Electric
Department) (for Village of Enosburg Falls
Water & Light Department Inc.) (for Town of
Hardwick Electric Department)

Gary Endicott
Burke Mountain Water Company
223 Sherburne Lodge Road
East Burke, VT 05832
genticott@leisurehotel.com

(for Burke Mountain Water Company)

Steven R Farman
Vermont Public Power Supply Authority
5195 Waterbury-Stowe rd
Waterbury Center, VT 05766
sfarman@vppsa.com

(for Vermont Public Power Supply Authority)

Linda Fawcett
Westminster Aqueduct Society
PO Box 205
3505 US RT 5
Westminster, VT 05158
lbfawcett@comcast.net

(for Westminster Aqueduct Society)

James Gibbons
City of Burlington Electric Department
585 Pine Street
Burlington, VT 05401
jgibbons@burlingtonelectric.com

(for City of Burlington Electric Department)

Deane Hedges
111 Freedom Drive
Montpelier, VT 05602
RayleneHedges@gmail.com

(for Berlin Water Company, Inc)

Deane Hedges
111 Freedom Drive
Montpelier, VT 05602
RayleneHedges@gmail.com

(for Crystal Springs Water Co)

Jeremy D. Hoff
Stackpole & French
P.O. Box 819
Stowe, VT 05672
jhoff@stackpolefrench.com

(for Town of Stowe Electric Department)

Bill Humphrey
Village of Lyndonville Electric Department
P.O. Box 167
20 Park Avenue
Lyndonville, VT 05851
bhumphrey@lyndonvilleelectric.com

(for Village of Lyndonville Electric Department)

James A. Huttenhower, Esq.
225 West Randolph Street, Floor 25D
Chicago, IL 60606
jh7452@att.com

(for AT&T Corporation)

James A. Huttenhower, Esq.
225 West Randolph Street, Floor 25D
Chicago, IL 60606
jh7452@att.com

(for Teleport Communications America, LLC)

Penny Jones
Village of Morrisville Water & Light
Department
857 Elmore Street
Morrisville, VT 05661
pjones@mwlvt.com

(for Village of Morrisville Water & Light Department)

W. David Koeninger
Vermont Legal Aid
264 North Winooski Ave.
Burlington, VT 05401
DKoeninger@vtlegalaid.org

(for Vermont Legal Aid)

Michael Lazorchak
Town of Stowe Electric Department
PO Box 190
Stowe, VT 05672
mlazorchak@stoweelectric.com

(for Town of Stowe Electric Department)

Kevin Mack
Burke Mountain Water Company
223 Sherburne Lodge Road
East Burke, VT 05832
kmack@skiburke.com

(for Burke Mountain Water Company)

William T. Matteson
Colonial Estates Water System
95 Georgeanna Boulevard
Rutland, VT 05701
william832@comcast.net

(for Colonial Estates Water System)

Mari McClure
Green Mountain Power Corporation
163 Acorn Lane
Colchester, VT 05446
ceo@greenmountainpower.com

(for Green Mountain Power Corporation)

Alexander W. Moore, Esq.
Verizon
6 Bowdoin Square, 9th Floor
Boston, MA 02114
alexander.w.moore@verizon.com

(for MCI Communications Services, Inc.)

Alexander W. Moore, Esq.
Verizon
6 Bowdoin Square, 9th Floor
Boston, MA 02114
alexander.w.moore@verizon.com

(for MCImetro Access Transmission Services
LLC)

Pamela Moore
Village of Jacksonville Electric Company
P.O. Box 169
Jacksonville, VT 05342
pmoore@jacksonvilleelectric.net

(for Village of Jacksonville Electric Company)

John Morley
Village of Orleans Electric Department
Municipal Building
One Memorial Square
Orleans, VT 05860
jmorley@villageoforleansvt.org

(for Village of Orleans Electric Department)

Ken Nolan
Vermont Public Power Supply Authority
P.O. Box 126
Waterbury Center, VT 05677
knolan@vpssa.com

(for Vermont Public Power Supply Authority)

Jessica Patterson
Town of Hardwick Electric Department
PO Box 516
Hardwick, VT 05843
jess@hardwickelectric.com

(for Town of Hardwick Electric Department)

Kelly Pembroke
The Housing Foundation, Inc.
One Prospect Street
Montpelier, Vermont 05602
kelly@vsha.org

(for The Housing Foundation, Inc.)

Thomas Petraska
Village of Ludlow Electric Light Department
9 Pond Street
Ludlow, VT 05149
tpetraska@tds.net

(for Village of Ludlow Electric Light Department)

Paul J. Phillips, Esq.
Primmer Piper Eggleston & Cramer PC
100 East State Street
P.O. Box 1309
Montpelier, VT 05601-1309
pphillips@primmer.com

(for Topsham Telephone Company) (for
Vermont Telephone Company, Inc.) (for
Perkinsville Telephone Company) (for
Waitsfield-Fayston Telephone Company, Inc.)
(for Ludlow Telephone Company) (for
Franklin Telephone Company) (for Shoreham
Telephone LLC)

Paul J. Phillips, Esq.
Primmer Piper Eggleston & Cramer PC
100 East State Street
P.O. Box 1309
Montpelier, VT 05601-1309
pphillips@primmer.com

(for Northfield Telephone Company)

James Porter, Esq.
Vermont Department of Public Service
112 State St
Montpelier, VT 05620
james.porter@vermont.gov

(for Vermont Department of Public Service)

Donald Rendall, Jr., Esq.
Vermont Gas Systems, Inc.
85 Swift Street
South Burlington, VT 05403
drendall@vermontgas.com

(for Vermont Gas Systems, Inc.)

Patricia Richards
Washington Electric Cooperative, Inc.
P.O. Box 8
East Montpelier, VT 05651
patty.richards@wec.coop

(for Washington Electric Cooperative Inc.)

Evan Riordan
Barton Village, Inc. Electric Department
P.O. Box 519
Barton, VT 05822
electricmanager@bartonvt.com

(for Barton Village Inc. Electric Department)

Carol Robertson
Village of Hyde Park Electric Department
P.O. Box 400
Hyde Park, VT 05655
carol.robertson@hydeparkvt.com

(for Village of Hyde Park Electric Department)

Jeffrey Schulz
Town of Northfield Electric Department
51 South Main Street
Northfield, VT 05663
jschulz@northfield.vt.us

(for Town of Northfield Electric Department)

Ronald A. Shems, Esq.
Tarrant, Gillies, Richardson & Shems
P.O. Box 1440
Montpelier, VT 05601-1440
rshems@tarrantgillies.com

(for Washington Electric Cooperative Inc.)

Pamela Sherwood
CenturyLink
4625 West 86th Street, Suite 500
Indianapolis, IN 46268
pamela.sherwood@centurylink.com

(for Level 3 Communications, LLC) (for
Broadwing Communications, LLC) (for
TelCove Operations, LLC) (for Global
Crossing Local Services, Inc.) (for Global
Crossing Telecommunications, Inc.) (for
Witel Communications, LLC) (for
CenturyLink Communications, LLC) (for
Level 3 Telecom Data Services, LLC)
(for Vermont Gas Systems, Inc.)

Eileen Simollardes
Vermont Gas Systems, Inc.
85 Swift Street
South Burlington, VT 05403
esimollardes@vermontgas.com

Erika Smith
266 Main Street
Burlington, VT 05401
erika.smith@consolidated.com

(for Consolidated Communications of Vermont
Company, LLC)

Darren Springer
City of Burlington Electric Department
585 Pine Street
Burlington, VT 05401
dspringer@burlingtonelectric.com

(for City of Burlington Electric Department)

Emily Stebbins-Wheelock
City of Burlington Electric Department
585 Pine Street
Burlington, VT 05401
estebbins-wheelock@burlingtonelectric.com

(for City of Burlington Electric Department)

Brian Stevens
Smugglers' Notch Water Company
4323 VT RTE 108 South
Jeffersonville, VT 05646
bstevens@smuggs.com

(for Smugglers' Notch Water Company)

Michael Sullivan
Town of Hardwick Electric Department
P.O. Box 516
Hardwick, VT 05843
msullivan@hardwickelectric.com

(for Town of Hardwick Electric Department)

Amber L. Thibeault
Bauer Gravel Farnham, LLP
401 Water Tower Circle
Suite 101
Colchester, VT 05446
athibeault@vtlawoffices.com

(for Champlain Broadband LLC)

Rebecca Towne
Vermont Electric Cooperative, Inc.
42 Wescom Road
Johnson, VT 05656
rtowne@vermontelectric.coop

(for Vermont Electric Cooperative Inc.)

George R. Wagner
Wagner Water System
P.O. Box 23
West Burke, VT 05871

(for Wagner Water System)

Jireh Billings
Woodstock Aqueduct Company
16 Elm Street
P.O. Box 441
Woodstock, VT 05091
jirehsr@gmail.com

(for Woodstock Aqueduct Company)