

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	
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Order entered: 09/03/2020

**ORDER REQUESTING COMMENTS ON EXTENDING DISCONNECTION MORATORIUM,
TO WHOM AN EXTENSION SHOULD APPLY, AND CONSUMER PROTECTIONS**

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 that is set to expire on September 30, 2020.

On August 18, 2020, the Vermont Department of Public Service (“Department”) announced a new program to help Vermonters suffering economic hardship from COVID-19.¹ The program provides financial support to residential and non-residential customers of regulated utilities with past-due balances. This program will distribute up to \$8 million from a grant through the federal CARES Act and the State of Vermont Coronavirus Relief Fund on a first-come, first-served basis until funding runs out or the program ends in December 2020.

II. REQUEST FOR COMMENTS

The Commission seeks comments on three topics. First, the Commission seeks comments on whether to extend the moratorium beyond September 30, 2020. Second, the Commission seeks comments on whether any extension should apply to the same group of

¹ Interested entities can find information about the Department’s assistance program on the Department’s website at: <https://publicservice.vermont.gov/content/vermont-covid-19-arrearage-assistance-program-0>.

utilities currently covered by the moratorium. Finally, the Commission seeks comments on what consumer protection measures should be in place at the end of the temporary moratorium.

Moratorium Extension

The Commission seeks comments on whether to extend the temporary disconnection moratorium beyond the current September 30, 2020, deadline. The Commission recognizes that in recent comments in this proceeding, several utilities did not support any further moratorium extensions—mainly because they believed that extending the moratorium would add to the escalating debt incurred by customers. We now observe that the Department has opened a program to distribute up to \$8 million in arrearage relief funding. We expect that these grant funds will help mitigate the arrearage debt burden being carried by customers and utilities. For commenters objecting to an extension because of debt burden, we would appreciate comments on whether the Department’s new program will ease the debt burden and whether this affects their support or opposition to an additional extension.

Covered Utilities

The Commission also seeks comments on whether any extension of the temporary disconnection moratorium should apply to all regulated telecommunications, electric, gas, and water utilities in Vermont. The Commission observes that some commenters have argued that not all these utilities should be subject to an extended moratorium on disconnections. For those arguing that certain utilities should be exempt from a moratorium extension, the Commission requests detailed comments on why an exemption is appropriate and what additional consumer protections would be offered to customers once the moratorium ends.

Consumer Protections

The Commission observes that states across the country are proposing and implementing innovative consumer protections for utility customers in the face of COVID-19’s unprecedented impact. We now ask commenters to file with the Commission any updated recommendations on the consumer protections that utilities should have in place when our disconnection moratorium

ends. We request that commenters respond to the specific suggestions already provided by the Department in earlier comments.² We also ask commenters to address the following questions:

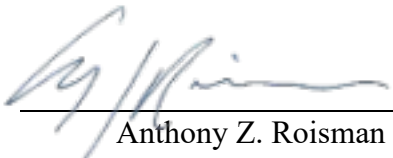
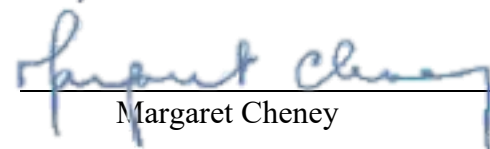
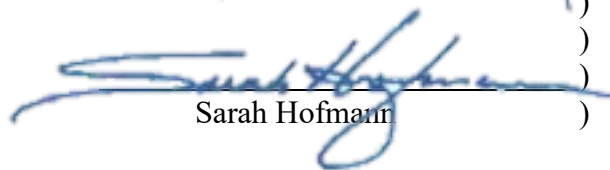
- The current moratorium applies to both residential and non-residential programs, but many consumer protections apply only to residential customers. After the moratorium, would utilities apply consumer protections (such as extended payment arrangements) to both residential and non-residential customers?
- Will any utilities impose on themselves a disconnection moratorium even if the Commission's moratorium is no longer in place? If so, how long would such a moratorium last?
- Will the utilities offer payment arrangements of substantial lengths (such as 12 or even 24 months)?
- Will the utilities waive any fees and deposits and allow deposits to go toward arrearages?
- Will the utilities consider streamlining enrollment into any existing consumer assistance programs (e.g., auto-enrollment, allowing self-certification, etc.)?

We ask that any comments on the above matters, including any objections and any requests for a hearing or for any other process, **be filed no later than September 17, 2020.**

SO ORDERED.

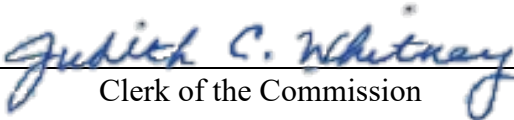
² See Department Comments, Case No. 20-0703-PET, filed on 7/10/2020, at 2-3.

Dated at Montpelier, Vermont, this 3rd day of September, 2020.

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

OFFICE OF THE CLERK

Filed: September 3, 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

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