

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Petition of Washington Electric)
Cooperative, Inc. ("WEC"), for approval)
of Rate Design Changes and a Change)
in Rate Schedules Pursuant to 30)
V.S.A. § 225 and 226)
effective June 17, 2019)

Case No. 19-1270-TF

WEC'S MOTION TO AMEND ORDER OR ENLARGE TIME

Washington Electric Cooperative, Inc. (WEC), pursuant to PUC Rule 2.207 and V.R.C.P. 6(b) moves to amend and enlarge the time for complying with ¶ 4 of the Commission's Order Approving Rate Design with Implementation in Three Phases (12/19.2019) ("Order").

Paragraph 4 of the Order provides that:

WEC shall consult and collaborate with the Department on developing a program to support low-income members. WEC shall report back to the Commission on these efforts within 12 months after the issuance of this Order. This filing shall be made in a new case in ePUC.

On February 3, 2020, and in an effort to effectively reach a state-wide equivalent to ¶ 4 of the Order, the Commission opened an investigation into "whether to extend the potential implementation of best practices for providing discounted rates to low-income residential ratepayers of all Vermont retail electric utilities." Investigation into the establishment of reduced rates for low-income residential ratepayers of Vermont electric utilities, Case No. 20-0203-INV (2/3/20) at 2 ("Investigation"). On April 1, 2020, the Commission issued an Order Establishing Schedule & Noticing Workshop in this investigation. The Commission stayed the

Investigation until January 1, 2021. Order Staying Proceeding, Case No. 20-0203-INV (8/13/2020).

It makes more sense for ¶ 4's goal to be met through the Investigation rather than a solitary WEC effort that could, depending on the Investigation's outcome, be subject to conflict or change. Addressing the needs of low-income rate payers is a state-wide issue that spans all utilities. Funding a low-income program should also be addressed on a state-wide basis because WEC's rural-residential membership, a significant amount of which are low-income, may not provide an adequate base. The Investigation also presents low-income advocates with a single forum instead of a piecemeal approach with each utility. In short, it is inefficient and unnecessarily costly to have WEC duplicate the Investigation.

Further, tying ¶ 4 to the investigation would not significantly delay efforts to develop a program supporting WEC's low-income members. WEC has actively participated and submitted comments in the Investigation, and will remain active. See Washington Electric Cooperative, Inc.'s Answers to Questions in April 1, 2020 Order Establishing Schedule & Noticing Workshop, Case No. 20-0203-INV (5/27/2020). WEC has and continues to take measures to best serve its members adversely affected by the COVID-19 state of emergency and these efforts will continue at least through the 2020-21 winter season. See Order Ending the Temporary Disconnection Moratorium and Ordering Protections for Utility Customers Facing Economic Hardship, Case No. 20-0703 (10/8/2020) at 11, n. 78 ("Washington Electric Cooperative, Inc. ("WEC") stated in its July 29, 2020, comments that it does not intend to pursue any disconnections before November 1, 2020, when the

Commission's more stringent rules on winter disconnections apply and it is thus "less likely that disconnections can take place due to temperature limitations." WEC Comments of 7/29/20 at 2.").

The undersigned consulted with the Department of Public Service legal staff regarding this motion and anticipates that the Department will be prepared to respond to this motion.

For the above reasons, WEC respectfully requests that ¶ 4 of the Order be struck and replaced as follows:

WEC shall consult and collaborate with the Department on developing a program to support low-income members. WEC may accomplish this consultation and collaboration through its good-faith participation in the Commission's Investigation into the establishment of reduced rates for low-income residential ratepayers of Vermont electric utilities, Case No. 20-0203-INV (2/3/20). Alternatively, WEC shall report back to the Commission on these efforts within 12 months after the Investigation in Case No. 20-0203-INV is closed. This filing shall be made in a new case in ePUC.

November 4, 2020

WASHINGTON ELECTRIC
COOPERATIVE, INC.



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