

VERMONT LEGAL AID, INC.

264 NORTH WINOOSKI AVE.
BURLINGTON, VERMONT 05401
(802) 863-5620 (VOICE AND TTY)
FAX (802) 863-7152
(800) 747-5022

OFFICES:

BURLINGTON
RUTLAND
ST. JOHNSBURY

OFFICES:

MONTPELIER
SPRINGFIELD

March 16, 2020

Public Utility Commission, Anthony Z. Roisman, Chair.
c/ o Judith Whitney
Clerk of the Commission
112 State Street
Montpelier, VT 05620-2701

Sent via electronic mail to: June.tierney@vermont.gov

Re: Moratorium on Utility and Telecommunications Shutoffs During State of Emergency

Dear Chairman Roisman,

On March 14, 2020, Governor Scott declared a state of emergency in response to the Coronavirus ("COVID-19"). In light of the unprecedented public health concerns posed by COVID-19, Vermont Legal Aid, on behalf of the low-income, disabled and elderly residents of the state, requests that the Department of Public Service (DPS) impose a moratorium on gas, electric and telecommunication shutoffs for all residential ratepayers until the state of emergency in Vermont is lifted.

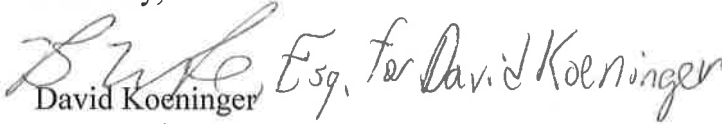
Public health experts have advised Vermont residents to stay home, public events and gatherings have been cancelled, and schools are closed throughout the state until April 6, 2020. As Vermonters follow these instructions, many will lose their jobs and only source of income due to no fault of their own. Under these circumstances, when Vermonters have been ordered to stay hunkered down at home, shutoffs would put the health and safety of vulnerable individuals and families at particularly grave risk. No one should be going to work in order to avoid being without heat, electricity, or a method to communicate with the outside world. Service is necessary for proper communication between the government, Vermonters, and family members who may be at risk. Imposing a moratorium on shutoffs will further the public health while also sending the message among utilities and ratepayer advocates that proper risk management protocols have been taken to prevent the spread of the COVID-19 virus. We know that some companies have agreed to suspend shut-offs voluntarily. However, Vermont Legal Aid requests that the Public Utility Commission direct gas, electric and telecommunication companies to refrain from initiating the termination process on any residential customer until the state of emergency is lifted.

As you are aware, PUC Rule 3.300 already mandates that utilities refrain from shutting off service under certain circumstances when such shutoffs would be particularly harmful to sick or

elderly household members. Similarly, a moratorium for the duration of the state of emergency would help to ensure the health and safety of vulnerable Vermont residents. Given the extenuating circumstances of the COVID-19 outbreak, the Massachusetts Department of Public Utilities and the Connecticut Public Utilities Regulatory Authority have already taken the proactive step of directing gas and electric utilities to refrain from terminating service during the pendency of their states of emergency. We simply ask that the Vermont PUC follow suit and take similar action to further the public interest and protect utility consumers in Vermont.

Thank you in advance for your consideration.

Sincerely,


David Koening
Deputy Director, Vermont Legal Aid

cc:

Deb Wolf on behalf of Governor Phil Scott

Commissioner June Tierney, Vermont Department of Public Service

Representative Stephen Carr, Chair, House Energy and Technology Committee

Senator Christopher Bray, Chair, Senate Natural Resources and Energy Committee