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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

Comments by Vermont Electric Cooperative, Inc.

Vermont Electric Cooperative, Inc. (VEC) submits the following comments in response to the Order Granting Temporary Moratorium on Involuntary Service Disconnections, issued by the Public Utility Commission (PUC or Commission) on March 18, 2020. The PUC has asked for comments as to whether the temporary moratorium should remain in place beyond the current expiration date of April 30, 2020, and if so for how long. The PUC has also asked whether further process it should take going forward.

VEC has received positive feedback from members about how meaningful this action has been during this time. VEC is happy to be able to provide this temporary support for our members and recommends that the PUC continue the current moratorium for now and seek comments closer to the April 30 date. At that time all stakeholders will have a better understanding of the nature of the health emergency and the need to continue a moratorium on disconnections. In addition, the utilities will have a better understanding of the impacts of the moratorium on them and on their customers – including the financial consequences to both customers (in the form of increasing arrearages) and utilities -- which can help inform the Commission's decision. VEC recommends that the Commission set a new deadline, for example April 25, for further comments.

As to further process going forward, while not directly relevant to disconnections, VEC supports additional dialogue between the PUC, the Department of Public Service, and the utilities to consider regulatory relief in other areas that might further reduce financial burdens on our member ratepayers.

Dated at Essex, Vermont, this 25th day of March, 2020.

Respectfully submitted,

VERMONT ELECTRIC COOPERATIVE, INC.



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