



May 8, 2020

Ms. Judith C. Whitney, Clerk
Vermont Public Utility Commission
112 State Street, Drawer 20
Montpelier, VT 05620

Case No. 20-0703-PET - Vermont Legal Aid request for moratorium on utility and telecommunications shutoffs during State of Emergency

Dear Ms. Whitney:

On March 27, 2020, the Public Utility Commission (“Commission”) issued an *Order Expanding Temporary Moratorium on Involuntary Utility Service Disconnections to Non-Residential Ratepayers and Certain Water Companies and Establishing Additional Process* and set a comment deadline of April 24. On April 29, the Commission extended the deadline for parties to submit requests for hearings or additional process and to submit comments until May 8, 2020.

Vermont Public Power Supply Authority (“VPPSA”) believes it is premature to explore further process related to the disconnect moratorium at this time. The effects of the State’s disconnect moratorium are just starting to emerge and the full financial impacts to Vermont utilities are not yet known. In addition, the states expect to receive federal funds to alleviate the impacts of the COVID pandemic; Vermont’s legislature is currently determining how these federal funds will be spent.

VPPSA suggests that once the Governor’s stay at home order is lifted and the moratorium on disconnects expires, utilities, regulators, and other parties will be better positioned to have an informed discussion regarding additional process. In order to identify the most appropriate methods for addressing the impact on utilities of the COVID pandemic in general and the disconnect moratorium specifically, parties will need to have an understanding of the magnitude of unpaid bills and also what federal funds might be available to help mitigate these impacts.

Sincerely,
s/Melissa Bailey

Melissa Bailey
Manager of Government and Member Relations
Vermont Public Power Supply Authority