

arrearages. Particular emphasis for supports should be focused on customers that are small businesses, those with medical concerns or whose households with low to moderate incomes, and those who lost their jobs due to the COVID-19 pandemic.

Residential customers of electric, natural gas or water utilities are afforded the opportunity to establish a reasonable repayment plan when under threat of disconnection under PUC Rule 3.302. This protection is optional for nonresidential customers, at the utility's election (PUC Rule 3.400). This may be an important consumer protection that could be extended to small business customers. PUC Rule 3.302 does not set defined terms for repayment. Rule 7.600 does establish repayment terms of at least three months. Customers whose arrearages built during the moratorium could be afforded up to twelve months to pay back their debt. Disconnections could be suspended until September 30, 2020 to any residential account with a critically ill household member. Electric, natural gas and water utilities could review their tariffs to consider if additional supports could be offered their customers for relief from fees such as that charged for disconnection notices or late payments.

Utilities mentioned the need in their comments for utility relief funds to assist their customers with repaying arrearages. A workshop process could be useful to assist with understanding the extent of arrearages incurred during the period of the moratorium on involuntary disconnections. This process could give utilities, the Department and the PUC the opportunity to work together to consider what federal resources might be available to assist customers with paying their bills and what federal resources such as LIHEAP or other funds will be of assistance. Perhaps two workshop tracks might be optimal with the first to address telecommunications utilities including internet services and a second for electric, natural gas and water utilities.

Utilities' comments indicate interest in discussing how to address costs incurred during the COVID-19 pandemic. The Department recommends opening an investigation to consider how to manage such items as costs incurred by utilities to respond to the COVID-19 pandemic and identifying COVID-19 related cost reductions when evaluating utility requests to defer COVID-19 cost increases as a regulatory asset.

This document has been filed electronically via ePUC

Dated this 8th day of May, 2020.

VERMONT DEPARTMENT OF PUBLIC SERVICE

By: /s/ James H. Porter
James H. Porter, Director for Public Advocacy
112 State Street
Montpelier, VT 05620
(802) 828-4003
james.porter@vermont.gov