

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Docket No. 20-0703-PET

Vermont Legal Aid request for moratorium on)
Utility and telecommunications shutoffs during)
State of Emergency)

COMMENTS OF THE DEPARTMENT OF PUBLIC SERVICE

The Public Utility Commission (“Commission”) issued Orders creating a Temporary Moratorium on Involuntary Utility Service Disconnections on March 18, 2020, and March 27, 2020. The second order requested comments including requests for a hearing or for any other process.

The Department supported the temporary moratorium suspending disconnections for residential customers, supported extending this relief to nonresidential customers, and supported the extension of the temporary moratorium on involuntary utility disconnections from April 30, 2020, to May 31, 2020.

The Commission’s order of May 15, 2020 requests comments about an additional extension to July 31, 2020. The Department supports an extension of the temporary moratorium to run concurrently with Governor Scott’s Extension of State of Emergency Declared March 13, 2020; Be Smart/Stay Safe and for the moratorium to expire at the conclusion of the State of Emergency.

Utilities continue to stay disconnections and other measures such as waiving fees to support their customers affected by COVID-19 and the ensuing economic devastation, as is clear in Burlington Electric Department’s (“BED”) filing in support of the extension. However, some utilities have implemented reminder calls or notices while others wait for direction or guidance on these issues. Prior comments indicate interest in discussing how to address costs incurred during the COVID-19 pandemic. Arrearages are mounting. GMP alone reports an increase of

\$3,746,129 in arrearages greater than 60 days as of April 30, 2020, representing an increase of over 7,000 delinquent customers.

customer	04/30/20 AR>60 Days	04/30/19 AR>60 Days	This Year to Last Year \$ Inc/(Dec)
Res	\$ 5,051,650.15	\$ 2,448,488.90	\$ 2,603,161.25
Comm	\$ 1,426,154.30	\$ 283,186.33	\$ 1,142,967.97
Total	\$ 6,477,804.45	\$ 2,731,675.23	\$ 3,746,129.22

Figure 1 Email Response from GMP 5/19/2020

Additional funds, resources and options are needed to assist customers with repaying the debt they are incurring. BED’s filing also suggests the need for guidance from the PUC regarding an orderly and clear path for addressing arrearages in advance of the expiration of the moratorium on disconnections.

The Department continues to recommend a workshop process to discuss and address temporary guidance regarding Rule 3.300 and Rule 3.400 to ensure adequate guidance and consumer protections in the wake of the expiration of the moratorium on disconnections. 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.

The Department continues to recommend 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.

Dated this 22nd day of May 2020.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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