



Jeffrey B Austin
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June 19, 2020

VIA ePUC

Ms. Judith Whitney, Clerk
Public Utility Commission
112 State Street, Drawer 20
Montpelier, Vermont 05620-2701

**Re: Consolidated Communications Comments
Case No. 20-0703-PET – Vermont Legal Aid request for moratorium on
utility and telecommunications shutoffs during State of Emergency**

Dear Ms. Whitney:

Consolidated Communications of Vermont Company, LLC and Consolidated Communications of Northland Company, both d/b/a Consolidated Communications ("Consolidated") submit the following comments as requested by the Public Utility Commission ("Commission") in its May 28, 2020 Order in the above-referenced Case. As requested, Consolidated responds to the Commission's request for a concrete and detailed plan on how Consolidated will address service-disconnection activities once the current disconnection moratorium expires on July 31, 2020.

As of the date of these comments, the Vermont Legislature continues to work on an allocation recommendation from the Coronavirus Relief Fund to assist with utility arrearages. One of the proposed allocations would provide \$20 million for ratepayer utility arrearage assistance. Consolidated's comments do not account for the ratepayer utility arrearage assistance but it fully supports this potential assistance and will modify its arrearage collection plans appropriately if that budget proposal is approved.

Consolidated continues to support the Commission's efforts to ensure ongoing essential services to Vermonters experiencing financial hardships related to the COVID-19 pandemic and appreciates the opportunity to provide the Commission details related to service disconnection activities once the current moratorium expires on July 31, 2020. Consolidated provides responses to the Commission's specific questions as requested in its May 28, 2020 Order as follows:

- What is the magnitude of past-due balances and how many customers have past-due balances? How does this compare with the same time period last year? Please break out this data into residential and non-residential customers.

Residential:

- 20% of our residential Vermont receivables or trade accounts receivables and 5,600+ accounts are past due.
- Past due is higher by 14%, as compared to July, 2019.

Non-Residential:

- 44% of our non-residential Vermont receivables or trade accounts receivables and 1,100+ accounts are past due.
- Past due is higher by 109%, as compared to July, 2019.

- *How will past-due balances accrued during the moratorium be addressed with customers and how will past-due balances accrued before or after the moratorium be addressed with customers?*

All past due balances, regardless of when accrued, will be addressed in the same manner and follow the requirements of PUC Rule 7.600. Consolidated understands the financial hardships that some of its customers have experienced due to the COVID-19 pandemic and will work with customers to discuss payment arrangement options.

- *Will reasonable payment arrangements be made available? If so, of what duration?*

As a normal business practice, Consolidated offers reasonable payment arrangements as outlined in PUC Rule 7.600. Consolidated encourages customers that are unable to pay their bills to contact Consolidated as soon as possible which will allow for discussions that provide the most flexible payment arrangement options. As noted in Consolidated's May 22, 2020 response to the Commission's May 15, 2020 Order, "the larger these balances grow, it becomes increasingly difficult to establish some type of payment arrangement that will allow a customer to pay their current charges while making incremental payments toward the back balance that has accrued."

- *Will late fees be imposed or waived for past-due balances accrued before, during or after the moratorium?*

Consolidated customers will start incurring late fees after the expiration of the Commission's disconnect moratorium, currently scheduled to expire on July 31, 2020. The late fees will be assessed for all past due balances. Consolidated will work with each customer and any specific considerations will be provided on a case-by-case basis.

- *Is the utility seeking outside funds (e.g., federal or private monies) to help offset the past-due balances accrued as a result of the moratorium? If so, and if such funds are received, how will the utility apply the funds to its customers' arrearages.*



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Consolidated is not seeking outside funds to help offset the past-due balances accrued as a result of the moratorium.

In addition to the responses to the specific questions from the Commission, Consolidated wants to express our commitment to work with customers to address their arrearages during these unprecedented times. Consolidated has encouraged its customers, through supportive calls and letters, that have experienced financial hardships due to the COVID-19 to call and discuss payment options. Consolidated will continue to support our customers through this challenging time. Consolidated appreciates the opportunity to provide comments to the Commission. Please feel free to contact me with any questions.

Regards,

A handwritten signature in black ink that reads "Jeffrey B. Austin".

Jeffrey B. Austin