



July 27, 2020

Judith C. Whitney, Clerk  
Vermont Public Utility Commission  
112 State Street  
Montpelier, VT 05620-2701

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

Dear Ms. Whitney,

Burlington Electric Department ("BED") submits the following letter in response to the Public Utility Commission's ("PUC") July 22, 2020 Order Requesting Comments on the Department of Public Service's Motion to Extend the Temporary Moratorium on Involuntary Utility Service Disconnections Until September 30, 2020.

BED supports the proposed extension of the moratorium on involuntary utility service disconnections until September 30, 2020. For BED's planning purposes, if the PUC approves the proposed extension, we request that the DPS be asked to provide guidance to the utilities on how it will determine the need to request further extensions of the moratorium, or alternately, how it will determine that the moratorium should be lifted as of November 1, 2020.

Thank you for the opportunity to comment. Should you have any questions or concerns, please feel free to contact us at any time.

Sincerely,

A handwritten signature in black ink, appearing to read "Amber Widmayer".

Amber Widmayer  
Regulatory Specialist  
Burlington Electric Department  
(802) 735-6918

**Burlington Electric Department**  
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Phone 802.658.0300



## BED's Budget Billing, Payment Plans, Late Fees, Interruptions and Collections

### Definitions

- Deficit: a positive (owed) account balance resulting from participating in an electric utility budget plan due to discrepancy between estimated monthly bill and actual bill
- Delinquency: failure of ratepayer to tender payment for valid bill or charge including an amount owed under a budget or payment plan (1) within 30 days of the postmark date of that bill or charge, or (2) by a "due date" at least 30 days after mailing, which date shall be printed on the bill
- Interruption/Disconnection: deliberate interruption, limitation, or disconnection of utility service to a ratepayer by the serving utility, not including disconnection at the request or with the permission of the ratepayer

### Residential accounts

- **Budget Billing**
  - Existing practice
    - 12-month budget plan
    - Plan trued up at end of 6 months, and budget payment amount adjusted for remaining 6 months at that time to minimize any deficit.
      - Plan trued-up again after 12 months.
      - If deficit exists at end of 12 months, deficit can be rolled into following 12-month budget plan.
    - Delinquencies (that exist at time customer enters budget plan) – concurrent 12-month payment plan for delinquent amount at time of budget plan initiation available if customer requests.
- **Payment Plan**
  - Existing practice
    - Must pay 50% of delinquency plus enter into payment plan by which customer pays current bill plus equal portions of delinquency for next 3 months to avoid disconnection.
    - Payment plan may be extended for up to 6 months for customers reporting hardship.
  - **Proposed COVID-19 Payment Plan as of a final date to be determined (to avoid disconnection)**
    - Must make between 6 and 12 equal, monthly payments with 1<sup>st</sup> payment due at time plan established.
    - After 1<sup>st</sup> payment, customers required to pay their monthly bills in addition to making payment plan payments.
    - Rely on customers' self-certifications of COVID-19 financial impacts.
- **Late Fees**
  - Existing practice
    - Not assessed under residential tariffs

## Commercial accounts

- **Budget Billing**
  - Prior to COVID-19 response, no existing opportunity. Made available to commercial customers in good standing during COVID-19 response, as of April 7, 2020.
  - **Proposed COVID-19 Plan (to avoid disconnection)**
    - 12-month budget plan
    - Plan trued up at end of 12 months
      - If deficit exists at end of 12 months, it must be paid within 30 days.
      - Unlike residential accounts, budget billing for commercial accounts is a one-time opportunity.
    - Delinquencies (that exist at time customer enters budget plan) – concurrent 12-month payment plan for delinquent amount at time of budget plan initiation available if customer requests.
    - Rely on customers’ self-certifications of COVID-19 financial impacts.
- **Payment Plan**
  - No existing opportunity
  - **Proposed COVID-19 Payment Plan, as of a date to be determined (to avoid disconnection)**
    - Must make between 6 and 12 equal, monthly payments with 1<sup>st</sup> payment due at time plan established.
    - After 1<sup>st</sup> payment, customers required to pay their monthly bills in addition to making payment plan payments.
    - Rely on customers’ self-certifications of COVID-19 financial impacts.
- **Late Fees**
  - Existing practice
    - Assessed only under commercial tariffs.
  - **Proposed COVID-19 plan**
    - Late fees suspended in late March 2020 until further notice.
    - Continue with suspension of late fees for all commercial accounts until an undetermined date.

## Residential and Commercial accounts

- **Interruptions/Disconnections**
  - Resume interruptions due to delinquency not resolved by a payment plan on a date to be determined
    - Unless PUC extends moratorium, PUC moratorium currently scheduled to end on July 31
  - Resume mailing interruption and final warning notices with at least 30 days’ notice before any interruptions
  - Actual interruptions based on scheduling and availability
  - While not required by PUC Rules or BED Tariff, prior to interruptions/disconnections, Customer Care team will call customers in attempt to reach payment plans to avoid interruptions/disconnections – BED to engage in this practice for at least 3 months from time interruptions/disconnections are resumed
- **Collections** – resume collections on closed accounts as of a date to be determined.