



Jeffrey B Austin
Director-Government Relations
266 Main Street
Burlington, VT 05401
802-951-8009

July 27, 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 July 22, 2020 Order in the above-referenced Case seeking comments on the request of the Department of Public Service ("Department") to extend the moratorium until September 30, 2020.

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 expresses our commitment to work with customers to address their arrearages during these unprecedented times.

At the same time, Consolidated believes it is important to reiterate our concern that a further extension of the moratorium will result in larger arrearage amounts for customers, which will ultimately make it more difficult for these customers to pay off past due amounts. The growing amount of arrearages impacts Consolidated directly and indirectly. First, the delayed cash flow is significant and Consolidated expects it will face even greater challenges once the moratorium is lifted to collect past due balances. Indirectly, the delayed cash flow from the growing arrearage amounts and uncertainty around when the moratorium will be lifted has the potential to interfere with Consolidated's ability to fund operations and our ability to invest in infrastructure buildouts and improvements. Consolidated would like to actively participate in the Department's "Call to Action" to broadband companies to invest and expand internet services to unserved locations in Vermont. However, the financial reality is that Consolidated cannot both continue to defer collections of significant arrearages for services already provided as a critical infrastructure provider, and make further infrastructure investment.



Jeffrey B Austin
Director-Government Relations
266 Main Street
Burlington, VT 05401
802-951-8009

H.966 was signed into law on July 2, 2020 by Governor Scott which appropriates \$8 million in financial support to utility ratepayers to cover arrearages for regulated services included in the Commission's Utility Disconnection Moratorium. This program will assist some customers that subscribe to regulated utility services that have experienced arrearages due to a financial hardship caused by the COVID-19 pandemic and will be extremely beneficial for those customers. However, it is unlikely that all customers who have experienced this financial hardship will be aware of the program, have the capacity to apply for assistance or will receive arrearage support in the event the program funds are depleted. Consolidated plans to work closely with the Department to coordinate on developing a process for distributing the H.966 funds in a way that is fair and efficient for customers and Consolidated.

There has been a heightened awareness of the need for internet connectivity due to the impacts of the COVID-19 pandemic and it is important to note that the arrearage program does not include financial support for internet related services according to recent guidance from the Department. This creates a potential gap in available financial support and the need for an essential service for distance learning, work at home and telehealth needs.

The State of Vermont has done an incredible job managing through this pandemic and because of that, the majority of the state is now re-opened for business. The Federal Government, Governor Scott and his Administration, the Vermont Legislature and countless others have worked hard to provide financial support to residents of the State with programs like the Federal financial stimulus support and increased unemployment insurance benefits. As the State continues to reopen, it is important for all business sectors to be in a position to manage their businesses. Consolidated respectfully encourages the Commission to allow the Utility Disconnection Moratorium to expire on July 31, 2020. This will encourage customers with arrearages to work with the utilities that are providing these essential services to address their arrearages and ensure continued services.

Please feel free to contact me with any questions.

Regards,

A handwritten signature in black ink that reads "Jeffrey B. Austin". The signature is written in a cursive, flowing style.

Jeffrey B. Austin