



Stowe Electric Department
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July 27, 2020

Ms. Judith 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 the State of Emergency

Dear Ms. Whitney:

The Town of Stowe Electric Department (“SED”) offers the following response to the July 10th, 2020 Comments of the Department of Public Service (“DPS”) in the above referenced matter.

As a public power utility owned by its ratepayers, SED remains committed to helping its customers during the COVID-19 pandemic by any means possible. SED ratepayers are as diverse as any customer base in Vermont and ranges from homeowners and residential renters to commercial business providing essential services and recreational opportunities. SED will continue to work with each customer class to develop payment plans specific to their needs. SED will continue to share information with all ratepayers regarding funding opportunities to help cover all their expenses, not just utility bills.

Utility Ratepayer Arrearages

SED continues to share information with DPS the magnitude of customer arrearages. SED participated in conversations with DPS regarding how appropriations to the utilities will get distributed and we look forward to additional conversations. While, SED understands the eight million-dollar set aside for Vermont utilities will not cover

industry wide customer arrearages, any amount of funding for our customer base helps. SED looks forward to reviewing DPS guidance on customer eligibility and learning how DPS intends to distribute funds fairly among customer classes and utilities.

Order Extending the Moratorium and the 18 DPS Recommendations.

SED does not object to extending the moratorium on involuntary disconnections to September 30, 2020. SED also does not object to any of the 18 recommendations offered by DPS in its July 10th, 2020 filing. However, making all or any of the 18 recommendations mandatory once the moratorium is lifted should be considered thoughtfully and after further consultation with the utilities, DPS, and stakeholders.

SED remains concerned that extending the moratorium beyond September 30th, 2020 will make it difficult to structure repayment plans with those ratepayers with arrearages. SED believes repayment plans are paramount to help customers restore their accounts to good standing before the winter disconnection rules take effect. Extending the moratorium beyond September 30th, 2020 will make it increasingly difficult for commercial and residential customers to manage their arrearages, and will increase pressure on Vermont utilities financial condition. SED feels strongly that DPS and PUC must pursue all possible scenarios before determining the transition out of the moratorium and into a post-moratorium plan that allows the utilities flexibility to work cooperatively with ratepayers.

SED will continue to keep customers updated and informed on changes related to the Governor's COVID-19 State of Emergency and financial support available to all customer classes. SED recognizes the complexity DPS and PUC employees are facing and appreciates their effort in coordinating with the utilities to share information.

Dated at Stowe, Vermont, this 27th day of July, 2020.

Town of Stowe Electric Department

By: /s/ MNL _____
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