



VILLAGE OF HYDE PARK

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SHIRE OF LAMOILLE COUNTY
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STATE OF VERMONT PUBLIC UTILITY COMMISSION

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 Village of Hyde Park ("HPE") offers our responses to the July 10th, 2020, Comments of the Department of Public Service ("DPS").

The Village of Hyde Park Electric ("HPE") does not object to continuance of the disconnection moratorium for those entities receiving federal pandemic relief funds. HPE requests that the disconnection moratorium end for utilities who do not receive federal pandemic relief funds.

HPE has continued to work with customers who are willing to utilize payment agreements. The number of the willing declines over time. HPE is concerned that continuation of the disconnection moratorium is not in the long-term best interest of our customers. If the payment burden becomes insurmountable, the customer suffers ultimate disconnection and the resulting debt falls to the utility and its customers. HPE believes that managing the collection of arrears by payment agreements is a vital service to our customers. The longer the disconnection moratorium lasts, the greater the risk to both customer and utility.

The disconnection moratorium impacts customer willingness to pay and/or enter into payment agreements, which adds to HPE's financial risk. Without federal pandemic relief funds and without residual cash funds, HPE pandemic cost and un-collectibles will ultimately be recovered in rates. Therefore, HPE requests that you consider a distinction between utilities receiving federal pandemic relief funds and those who do not receive these funds. We believe that

extending the disconnection moratorium for utilities who have not received pandemic federal relief funds puts these utilities at greater financial risk relative to entities receiving federal funds.

We look forward to the financial support offered by pandemic arrearages plans coming from the legislature, yet are concerned to hear that the amount of financial support is much less than today's statewide need. Further, HPE believes that there should be a fair balancing of federal funds to the various utilities and entities, whether those funds come directly to the entity or through the state. We appreciate the opportunity to comment and hope that our comments have been useful.

Sincerely,

Carol Robertson

A handwritten signature in cursive script that reads "Carol Robertson".

General Manager

Village of Hyde Park

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