

**STATE OF VERMONT  
PUBLIC UTILITY COMMISSION**

Case No. 20-0703-PET

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Vermont Legal Aid request for moratorium on utility and telecommunications shutoffs during State of Emergency	
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**GREEN MOUNTAIN POWER REPLY COMMENTS**  
**ON THE JULY 10, 2020 DEPARTMENT OF PUBLIC SERVICE**  
**RECOMMENDATIONS**

On July 10, 2020, the Department of Public Service (“Department”) reported on the Vermont Legislature’s appropriation to help Vermonters with financial hardship caused by COVID-19. The Department also commented on post-moratorium collections plans filed by utilities in this matter, and made several recommendations regarding post-moratorium disconnection and repayment procedures. Green Mountain Power (“GMP”) looks forward to working with the Department and our customers to help implement the COVID-19 bill relief, and submits the reply comments below on a few of the Department’s specific recommendations:

**Department Recommendation # 3:**

*Reasonable payment arrangements, considering COVID-19 as an unforeseen circumstance, shall be offered for nonresidential and residential customers alike and shall be at least of twelve months duration.*

**GMP Response:** GMP agrees that reasonable payments arrangements should be offered but believes the length of the payment arrangement should remain flexible and responsive to what is best for each customer. Not all customers with a past-due amount may need or want a 12-month timeframe to pay off a past-due balance, and some may need longer. A three-month plan may meet one customer’s need and desire to pay the past-due balance and so is a reasonable

timeframe for that customer. Another customer may want or need more time. We recommend that the length of payment arrangements be flexible for the benefit and choice of our customers.

**Department Recommendation # 4:**

*Customers may elect to apply their deposit to an arrearage/account balance.*

**GMP Response:** GMP agrees with this recommendation. GMP already had started looking at how this might work, and we think it may be a good idea for some customers.

**Department Recommendation # 5:**

*Customers who have failed to honor a payment arrangement for a deposit shall not be disconnected if the current amount due on the account is paid.*

**GMP Response:** Payment arrangements for deposits and/or past due balances should be treated the same, with the flexibility that meets the customer need. If a payment arrangement is broken, regardless of debt type, there are processes in place for next steps, including disconnection.

**Department Recommendation #6:**

*Customers who have broken a payment arrangement must be provided a conventional notice of disconnection with at least 14 days-notice. Suspend 3.305 Notice Under Repayment Plan so that a utility may not disconnect rapidly with only 72 hours-notice for a broken payment arrangement.*

**GMP Response:** GMP currently does not send out disconnect notices for broken payment arrangements even though this is allowed under Rule 3.305. However, we would agree with the Department's suggestion during this time period as it allows for increased communication between the customer and the utility to ensure success.

**Department Recommendation # 9:**

*New account holders who elect to make a payment arrangement for a deposit shall be afforded the opportunity to pay their deposit in equal installment payments over six months.*

**GMP Response:** Payment arrangements for deposits or past due balances should be treated the same. They should be flexible to meet the needs and choice of the customer. Some customers may not want to pay the debt or deposit over 6 months, and shorter arrangements should continue to be allowed. See GMP Response to Department Recommendation #3.

**Department Recommendation # 10:**

*Install drop boxes to receive checks for payment on accounts, if not already available.*

**GMP Response:** GMP has drop boxes in the lobbies of both the Rutland Operations Headquarters and the Colchester headquarters, which are open during business hours even now while many of our employees are working remotely.

**Department Recommendation # 14:**

*Provide heating customers resuming service in the fall after a seasonal voluntary disconnection the opportunity to pay arrearages over a minimum of six months.*

**GMP Response:** All payment arrangements should be focused on what works for best for the customer. See GMP Responses to Department Recommendations Nos. 3 and 9.

**Department Recommendation # 16:**

*Suspend increases to a budget billing plan that resulted from increased usage during the Stay at Home/Stay Safe Executive Order until January 1, 2021.*

**GMP Response:** GMP has three concerns about this recommendation. First, it would be virtually impossible to determine the budget billing impacts of the Stay at Home/Stay Safe

Executive Order on an individual-customer basis. Some customers have used more energy because they are staying home more. Others may have added new equipment, new roommates or family members to their households, whether or not because of the pandemic. The very hot weather for the past two months also may have substantially affected energy usage. Second, budget billing was designed to reduce fluctuations in a customer's monthly billing, and customers who enrolled chose to enroll for that reason. By periodically reviewing and adjusting a monthly budget based on projected energy consumption, we are able to ensure there is little to no over- or under-payment at the time of annual true-up, and generally maintain relatively flat bills which is very beneficial for customers on these plans. Stopping these adjustment runs counter to the reason customers enrolled in the first place. Third, not adjusting budget billing for customers who are now using more energy, and can be expected to do so for the foreseeable future given the ongoing pandemic, will likely harm a customer who may well incur a very large increase in their bill at the time of the eventual true-up.

**Department Recommendation #18:**

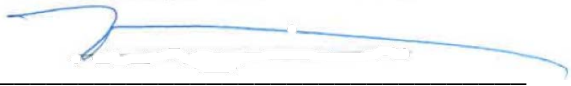
*Suspend disconnections to any home with a terminally ill household member or a household member relying on life sustaining equipment.*

**GMP Response:** More detail and clarification would be needed to implement this suggestion, which could be provided at a workshop. Preliminarily, the requirement does not seem to be needed, as even in normal collections times we work with all customers to understand their issues with empathy and collaboration.

GMP appreciates the Department's efforts and looks forward to continuing our work with the Department, Commission, our customers and other stakeholders to help our customers in these difficult times.

Dated this 28th day of July, 2020.

Green Mountain Power Corporation:

By:   
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