



Filed VIA E-PUC

September 17, 2020

VERMONT PUBLIC UTILITY COMMISSION
People's United Bank Building, 4th Floor
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 Commission:

On September 3, 2020, the Commission issued an order requesting comments on three issues: extending the disconnection moratorium, to whom the extension should apply, and consumer protection measures. Vermont Gas Systems, Inc. ("VGS") supports an extension of the disconnection moratorium beyond the current end date of September 30, 2020. With such an extension, VGS continues to believe that it is in our customers' best interests to continue to conduct outreach regarding prospective repayment plans to avoid creating potentially unmanageable past due balances and to encourage customers to seek financial assistance as soon as possible.

With respect to the Commission's other questions, VGS states as follows:

To whom moratorium should apply: VGS does not have an opinion on whether the disconnection moratorium should apply to all regulated telecommunications, electric, gas, and water utilities in Vermont.

Utilities' own moratorium: In light of the impact of COVID-19, VGS does not intend to pursue any disconnections through the winter season. Our current plan is to resume sending disconnection notices and calling on accounts in January 2021, but we will not pursue disconnections until after the winter season. If the disconnection moratorium is not extended, we will, however, reserve the right to disconnect in extreme cases, but expect that those will be rare, if any at all.

Payment arrangements: VGS has already begun implementing 12-month repayment options for impacted customers and will extend up to 18 or 24 months if needed to assist a customer.

Fee/deposit waiver: VGS will continue to waive late fees for our non-residential accounts through the end of the year. We are trying to be very judicious about charging deposits, and are largely limiting it to accounts that pose a credit risk. We would consider allowing deposits to be applied towards arrearages on a case-by-case basis, but have not received any requests to do so to date.

Streamlining enrollment into consumer assistance programs: VGS is open to this and will follow any guidance provided by the Commission.

We appreciate the efforts of the Commission as we all work together to keep Vermonters safe during these unprecedented times.

Sincerely,

Matthew Allen
Customer Care Manager