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September 17, 2020

Judith Whitney, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, Vermont 05602

Filed in ePUC

Re: Vermont Legal Aid request for moratorium on utility and telecommunications shutoffs during State of Emergency
Docket Number 20-0703

Dear Mrs. Whitney:

On September 3, 2020, the Public Utility Commission (“Commission”) issued an order requesting comments on whether to extend the moratorium beyond September 30, 2020 and other matters. Green Mountain Power (“GMP”) appreciates the opportunity to comment.

GMP supports the continuance of the moratorium beyond September 30, 2020, and we are continuing to work with our customers during these difficult times. GMP remains very concerned about the impact COVID-19 is having on Vermonter’s health, well-being and finances, and believes it is important to continue to provide relief to customers facing financial hardships due to this crisis. GMP has taken many steps to help customers, including promoting the Vermont COVID-19 Arrearage Assistance Program. Regarding the Commission’s question on whether certain other utilities should be exempt from the moratorium, GMP has no comments.

Regarding the Commission’s consumer protection questions, GMP provides the following responses:

1. The current moratorium applies to both residential and non-residential programs, but many consumer protections apply only to residential customers. After the moratorium, would utilities apply consumer protections (such as extended payment arrangements) to both residential and non-residential customers?

GMP will continue to work with all of our customers after the moratorium and will work on extended payment arrangements for commercial customers as needed.

2. Will any utilities impose on themselves a disconnection moratorium even if the

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Commission's moratorium is no longer in place? If so, how long would such a moratorium last?

GMP intends to continue to work with our customers after the moratorium has ended. We do not intend to disconnect customers this winter, and will continue to monitor the situation and our customers' needs into the spring. Empathy will be our guide.

3. Will the utilities offer payment arrangements of substantial lengths (such as 12 or even 24 months)?

Yes, and GMP already is doing so.

4. Will the utilities waive any fees and deposits and allow deposits to go toward arrearages?

Yes, and GMP already is doing so.

5. Will the utilities consider streamlining enrollment into any existing consumer assistance programs (e.g., auto-enrollment, allowing self-certification, etc.)?

Yes. GMP is committed to working with our customers, the Department of Public Service and following any guidance provided by the Commission.

Thank you, and if you have any questions, please feel free to call.

Sincerely,



Carolyn Browne Anderson
CBA