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September 17, 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 responses to the questions contained within the Vermont Public Utility Commission’s (“Commission”) September 03, 2020 Order.

As a public power utility owned by its ratepayers, SED is committed to supporting its customers during these difficult times. SED continues to communicate with all ratepayers with past due utility bills and provide them with information on how to access financial assistance during the COVID-19 pandemic. SED continues to offer payment arrangements for customers with arrearages during these difficult times.

SED staff participated in training sessions hosted by the Department of Public Service for the covid-19 arrearages payment portal and SED staff are processing applications submitted by SED customers. As of the date of this filing,

SED has not received any funding set aside for the Vermont covid-19 arrearage assistance program.

SED reiterates a concern that extending the moratorium beyond September 30th, 2020 will make it difficult to structure repayment plans that will allow ratepayers with arrearages to successfully pay of their past due balances. Repayment plans are paramount to help customers restore their accounts to good standing in a manner both beneficial to the customer and the utility. 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.

Would utilities apply consumer protections to both residential and non-residential customers?

SED already applies customer protections to all customer classes and will continue to work with customers on an individual basis to work out a payment plan to bring any past due account current. SED will work with each customer to make sure SED is doing all it can to keep customers from falling further behind in their past due amounts.

Will SED impose a disconnection moratorium even if the Commission's moratorium is no longer in place?

As of the date of this filing, SED does not intend to self-impose a disconnection moratorium beyond September 30, 2020. Without further guidance from the Commission, SED will follow the standard disconnection policy and the disconnection procedures in Rule 3.304 (winter disconnection).

Will SED offer payment arrangements of substantial lengths?

SED has a policy to offer a payment plan of up to twelve (12) months to our customers. SED will remain flexible with any payment plan entered into with a customer in 2020, because we understand these are unique economic times.

Will SED waive any fees and deposits and allow deposits to go toward arrearages?

SED has not assessed any late fees since March 15th. SED will not apply finance charges on residential customers with arrearages for the remainder of 2020. SED also will not apply finance charges on any commercial customer with an active pay agreement for the remainder of 2020.

SED will apply any customer deposit to a customer's arrearage at the request of the customer. SED will not automatically apply a deposit to a customer's past due amount.

Will SED consider streamlining enrollment into any existing consumer assistance program?

SED already offers streamlined consumer assistance programs and will continue to work with our consumers to take advantage of these programs. SED also works closely with our customers and partners to inform customers about heating and utility assistance programs offered through community action agencies.

Comments on the 18 Recommendations Offered by DPS

In SED's July 27, 2020 filing with the Commission SED stated:

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.

In response to the Commission's request in the Order dated September 03, 2020, SED now offers more specific responses to the recommendations from the Department of Public Service.

Recommendation 1: SED does not agree that the most effective way to handle arrearages is to automatically enroll a customer in a payment plan. SED will continue to follow a strategy to outreach to customers about contacting SED to talk about payment plans and payment options. This direct communication will be more effective and will allow for better customer service.

Recommendation 2: SED does not feel this recommendation will lead to the best outcome for SED or the customer. SED believes a better strategy is to continue to outreach with those customers in arrearages, take advantage of the funding set aside by the Legislature under Vermont Covid-19 Arrearage Assistance Program to bring eligible accounts current, and follow the disconnection procedures enumerated in Commission Rule 3.300.

Recommendation 3: SED already satisfies the intent of this recommendation and has a policy to offer payment plans to all customer classes.

Recommendation 4: SED agrees with this recommendation.

Recommendation 5: SED agrees with this recommendation.

Recommendation 6: SED agrees with this recommendation.

Recommendation 7: SED already has a policy to waive all late fees that are a result of the covid-19 pandemic and Governor's emergency order until January 01, 2021.

SED does not agree with the recommendation to waive all fees associated with disconnection and would retain the right to apply a fee on a case by case basis.

Recommendation 8: SED agrees with this recommendation

Recommendation 9: SED agrees with this recommendation.

Recommendation 10: SED already satisfies the intent of this recommendation and has a drop box at the SED office and one at the Town offices.

Recommendation 11: SED already satisfies the intent of this recommendation.

Recommendation 12: SED agrees with this recommendation.

Recommendation 13: SED agrees with this recommendation.

Recommendation 14: SED agrees with this recommendation to the extent it applies to our customers.

Recommendation 15: SED agrees with this recommendation.

Recommendation 16: SED does not agree with this recommendation. SED will work with any customer to enter into a payment plan and adjust or extend the payment plan to make sure the customer does not fall further behind on a past-due amount.

Recommendation 17: SED already satisfies the intent of this recommendation.

Recommendation 18: SED already satisfies the intent of this recommendation and has a policy to not disconnect any customer under this scenario under any circumstance.

