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STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Docket No. 20-0703-PET

Vermont Legal Aid Request for Moratorium on)
Utility and Telecommunications Shutoffs During)
State of Emergency)

COMMENTS OF THE DEPARTMENT OF PUBLIC SERVICE

By Order of September 3, 2020, the Commission sought comments on whether to extend the Moratorium beyond September 30, 2020, and whether any extension should apply to the same group of utilities currently covered by the Moratorium. In addition, the Commission asks for comments on what consumer protection measures should be in place at the end of the temporary moratorium. Comments are due to be filed on September 17, 2020.

The Department recommends extending the Moratorium until October 15, 2020, consistent with the Governor’s most recent extension of the state of emergency. The Department believes the Moratorium should be applied to the same group of utilities that are currently subject to the Moratorium. The Department further respectfully requests that it be permitted to submit comments on the September 17, 2020 utility submissions on September 23, 2020.

The Department is especially concerned that consumer protection measures remain in place when the Moratorium is lifted. The Vermont COVID-19 Arrearages Assistance Program will provide roughly \$8 million in payments to customers who have utility arrearages resulting from hardship due to the COVID-19 pandemic. Customers may apply for these monies until November 30, 2020, and engagement with each utility may assist in the number of these applications being received. While the application rate for arrearage money is brisk, the Department has heard from certain utilities the belief that until the Moratorium is lifted some customers are not going to interact with their electric utility in setting up repayment terms.

It appears that if and until conditions warrant otherwise, it may be an appropriate time for the Moratorium to be lifted, perhaps on October 15, 2020. Some utilities have indicated to the Department that voluntary moratoriums on disconnections will be continued through the end of the year. The Department does see value in facilitating customer discussions moving forward with the utilities. Extending the Moratorium until October 15 and allowing the Department to file detailed comments and recommendations on each utility submission will give the necessary time for the PUC to consider any actions that it needs to order in conjunction with lifting the Moratorium, thus ensuring that consumer protections will remain in place.

Dated at Montpelier, Vermont this 17th day of September, 2020.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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