



**VILLAGE OF HYDE PARK**

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*SHIRE OF LAMOILLE COUNTY*  
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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 Village of Hyde Park Electric Department (“HPE”) offers the following responses to the questions requested in the Vermont Public Utility Commission’s (“Commission”) September 03, 2020 Order.

HPE is deeply concerned about long-term impacts of the pandemic to both customers and utility. HPE staff has learned how to use the Department of Public Service arrearages portal. Each customer on the past-due accounts list was sent a letter informing them of the program. We have attempted to call each customer as well. HPE has experienced multiple staff out of work due to illness and surgery. At the same time, the Village is under construction replacing water mains and wastewater systems. HPE continues to provide quality service because of the abilities and commitment of our staff.

HPE has lost communication with some of our customers with a history of difficulty paying their bill on time and relied on payment arrangements. HPE continues to work with customers to establish payment arrangement, yet there is less motivation for the customer

during the moratorium. It is a hard task for an HPE employee is to disconnect a customer or go to their door and ask for payment. Payment arrangements are good for all. As a small local utility, disconnection is especially hard when it happens to your friend or neighbor. We are very concerned about the depth of arrears for many of our customers.

HPE has not received any funding assistance due to the pandemic and we are concerned that extending the moratorium beyond the current September 30, 2020 deadline will make financial recovery more difficult for our customers and utility.

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

Yes, HPE does and will continue to do so.

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

HPE does not now intend to self-impose a disconnection moratorium.

Will HPE offer payment arrangements of substantial lengths?

HPE will offer a payment plan of up to twelve (12) months to our customers, and use greater flexibility during the declared state of emergency period.

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

HPE is not in a financial position to waive fees and deposits and allow deposits to go toward arrearages. HPE will allow a customer deposit to go toward their past due amount in order to prevent their disconnection.

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

Yes.

HPE responds to the recommendations from the Department of Public Service.

Recommendation 1: HPE does not agree that the most effective way to handle arrearages is to automatically enroll a customer in a payment plan.

Recommendation 2: HPE does not believe this recommendation will lead to the best outcome. HPE believes in communication with customers with past due accounts, taking advantage of the funding set available in the Vermont Covid-19 Arrearage Assistance Program to bring eligible accounts more current, and following Commission Rule 3.300.

Recommendation 3: HPE agrees with this recommendation.

Recommendation 4: HPE agrees with this recommendation.

Recommendation 5: HPE agrees with this recommendation.

Recommendation 6: HPE agrees with this recommendation.

Recommendation 7: HPE does not agree to waiving all late fees that are a result of the pandemic and Governor's State of Emergency Declaration until January 01, 2021.

Recommendation 8: HPE agrees with this recommendation

Recommendation 9: HPE agrees with this recommendation.

Recommendation 10: HPE agrees with this recommendation.

Recommendation 11: HPE agrees with this recommendation.

Recommendation 12: HPE agrees with this recommendation.

Recommendation 13: HPE agrees with this recommendation.

Recommendation 14: HPE agrees with this recommendation.

Recommendation 15: HPE agrees with this recommendation.

Recommendation 16: HPE does not agree with this recommendation. HPE offers any customer a payment arrangement and works with that customer with the intent to assist that the customer so

that they are able to restore their account to good standing within the payment arrangement timeline, and to be flexible in the event that an extension of time becomes necessary.

Recommendation 17: HPE agrees with this recommendation.

Recommendation 18: HPE agrees with this recommendation.

Sincerely,

*Carol Robertson*

Carol Robertson

General Manager

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