



October 15, 2020

Judith C. Whitney
Clerk of the Commission
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 State of Emergency
Case No. 20A-0711 BED temporary suspension of involuntary disconnections
Case No. 20A-0735 BED temporary suspension of assessment of late fees

Dear Ms. Whitney,

Burlington Electric Department ("BED") submits this letter to provide the Public Utility Commission ("Commission") with notice that BED will continue its moratoria on involuntary disconnections of service for nonpayment and assessment of customer late fees until further notice, and will not recommence its disconnection and late fee policies before January 1, 2021. In mid-December 2020, BED will evaluate the best timing for recommencing its disconnection and late fee policies and provide the Commission with an update at that time. BED first provided the Commission with notice of these temporary policy changes in its March 16, 2020 and March 18, 2020 letters, and the Commission assigned those notifications with case numbers 20A-0717 and 20A-0737, respectively.

As noted in its September 17, 2020 letter to the Commission in Case No. 20-0703-PET, BED's continuation of its moratoria will provide the time necessary for funds from the Vermont COVID-19 Arrearage Assistance Program ("VCAAP") to reach participating BED customers and for BED to evaluate remaining customer needs. BED is encouraging eligible customers to take advantage of these VCAAP funds through notifications on BED's website, emails, customer calls, on bill messaging, news media and various social media channels.

At this time, BED plans to restart collections for closed accounts and to provide extended payment plan terms for both residential and commercial customers. Prior to the COVID-19 response period, budget billing and payment plan programs were available only to residential BED customers. As of

Burlington Electric Department
585 Pine Street Burlington, VT 05401
burlingtonelectric.com

Phone 802.658.0300

April 7, 2020, BED made budget billing available to commercial customers in good standing in addition to residential customers. BED also now offers payment plans to commercial customers impacted by COVID-19 and extended payment plan terms for both residential and commercial customers.

Thank you for the opportunity to provide comments. Should you have any questions or concerns, please feel free to contact us at any time.

Sincerely,

A handwritten signature in black ink, appearing to read 'AW', is positioned above the typed name.

Amber Widmayer
Regulatory Specialist
Burlington Electric Department
(802) 735-6918

BED's Budget Billing, Payment Plans, Late Fees, Interruptions and Collections

Definitions

- Deficit: a positive (owed) account balance resulting from participating in an electric utility budget plan due to discrepancy between estimated monthly bill and actual bill
- Delinquency: failure of ratepayer to tender payment for valid bill or charge including an amount owed under a budget or payment plan (1) within 30 days of the postmark date of that bill or charge, or (2) by a "due date" at least 30 days after mailing, which date shall be printed on the bill
- Interruption/Disconnection: deliberate interruption, limitation, or disconnection of utility service to a ratepayer by the serving utility, not including disconnection at the request or with the permission of the ratepayer

Residential accounts

- **Budget Billing**
 - Existing practice
 - 12-month budget plan
 - Plan trued up at end of 6 months, and budget payment amount adjusted for remaining 6 months at that time to minimize any deficit.
 - Plan trued-up again after 12 months.
 - If deficit exists at end of 12 months, deficit can be rolled into following 12-month budget plan.
 - Delinquencies (that exist at time customer enters budget plan) – concurrent 12-month payment plan for delinquent amount at time of budget plan initiation available if customer requests.
- **Payment Plan**
 - Existing practice
 - Must pay 50% of delinquency plus enter into payment plan by which customer pays current bill plus equal portions of delinquency for next 3 months to avoid disconnection.
 - Payment plan may be extended for up to 6 months for customers reporting hardship.
 - **Proposed COVID-19 Payment Plan as of a final date to be determined (to avoid disconnection)**
 - Must make between 6 and 12 equal, monthly payments with 1st payment due at time plan established.
 - After 1st payment, customers required to pay their monthly bills in addition to making payment plan payments.
 - Rely on customers' self-certifications of COVID-19 financial impacts.
- **Late Fees**
 - Existing practice
 - Not assessed under residential tariffs

Commercial accounts

- **Budget Billing**
 - Prior to COVID-19 response, no existing opportunity. Made available to commercial customers in good standing during COVID-19 response, as of April 7, 2020.
 - **Proposed COVID-19 Plan (to avoid disconnection)**
 - 12-month budget plan
 - Plan trued up at end of 12 months
 - If deficit exists at end of 12 months, it must be paid within 30 days.
 - Unlike residential accounts, budget billing for commercial accounts is a one-time opportunity.
 - Delinquencies (that exist at time customer enters budget plan) – concurrent 12-month payment plan for delinquent amount at time of budget plan initiation available if customer requests.
 - Rely on customers’ self-certifications of COVID-19 financial impacts.
- **Payment Plan**
 - No existing opportunity
 - **Proposed COVID-19 Payment Plan, as of a date to be determined (to avoid disconnection)**
 - Must make between 6 and 12 equal, monthly payments with 1st payment due at time plan established.
 - After 1st payment, customers required to pay their monthly bills in addition to making payment plan payments.
 - Rely on customers’ self-certifications of COVID-19 financial impacts.
- **Late Fees**
 - Existing practice
 - Assessed only under commercial tariffs.
 - **Proposed COVID-19 plan**
 - Late fees suspended in late March 2020 until further notice.
 - Continue with suspension of late fees for all commercial accounts until an undetermined date.

Residential and Commercial accounts

- **Interruptions/Disconnections**
 - Resume interruptions due to delinquency not resolved by a payment plan on a date to be determined
 - Unless PUC extends moratorium, PUC moratorium currently scheduled to end on July 31
 - Resume mailing interruption and final warning notices with at least 30 days’ notice before any interruptions
 - Actual interruptions based on scheduling and availability
 - While not required by PUC Rules or BED Tariff, prior to interruptions/disconnections, Customer Care team will call customers in attempt to reach payment plans to avoid interruptions/disconnections – BED to engage in this practice for at least 3 months from time interruptions/disconnections are resumed
- **Collections** – resume collections on closed accounts as of a date to be determined.