

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 20-0703-PET

Vermont Legal Aid request for moratorium on utility and telecommunications shutoffs during State of Emergency

Green Mountain Power's Responses to Vermont Legal Aid's Request to Reinstate the Temporary Moratorium and to the Commission Requests for Information

Green Mountain Power (GMP) submits the following in support of Vermont Legal Aid's December 11, 2020 Request to Reinstate the Temporary Moratorium and in response to the Public Utility Commission's (PUC or Commission) October 8, 2020 Order requesting information from utilities regarding disconnections, the Vermont COVID-19 Arrearage Assistance Program (VCAAP), and repayment plans.

Response in Support of Request to Reinstate the Temporary Moratorium

GMP supports Vermont Legal Aid's request to reinstate a moratorium on disconnection activity through this difficult period for so many Vermonters. Since the pandemic first hit Vermont, GMP has not disconnected a single customer for non-payment due to COVID-19 and we intend to continue our customer-focused approach with or without a formal moratorium. To the extent a formal moratorium would give our customers added assurances, we support it.

GMP has taken steps to provide relief whenever possible because we know the social and economic toll COVID-19 has placed on customers. After the Commission lifted the moratorium in October, GMP continued to suspend collections activities and late fees. We also focused on helping eligible customers access our Energy Assistance Program and the State's arrearage assistance program. We view this work as a part of the flexible staged approach we laid out in

our plan submitted June 19, 2020 in this docket. Compassion and flexibility continue to be our guide and what is needed to meet these times.

While normal winter rules help limit disconnection activity in any year, extra steps are still warranted to help customers during this ongoing pandemic. We talk to our customers frequently and know many find themselves in an unfamiliar place, behind on bills for the first time because they lost their jobs or are not able to make ends meet with their businesses. Others who have struggled before the pandemic to cover expenses are finding it even more difficult to do so now. A measure of the continued concern is evident in GMP's arrearage numbers: Despite the State aid made available through the VCAAP, there are now more GMP customers in arrears with a higher total balance owed than before the program started. We expect this is true for other utilities too; these increasing balances present a financial challenge for all of us.

GMP therefore supports Legal Aid's request to formally reinstate the temporary moratorium. GMP also asks that the Commission allow and encourage utilities to continue to work with customers during this period on flexible payment arrangements, and to develop and present if they choose a plan for automatic payment arrangements for customers to spread out past-due balances and reduce "current" bills. These steps will allow customers to find a predictable and more achievable path out of debt once the immediate crisis has passed.

Response to Commission Information Requests

GMP also appreciates the opportunity to provide updated information on how the economic challenges caused by the COVID-19 pandemic are affecting our customers:

1. How lifting the moratorium has affected our disconnection numbers:

After the PUC lifted the moratorium on October 15, 2020, GMP continued to suspend shutoff notices and disconnections for nonpayment. We also continued to suspend collection

agency work and late fees during this time so GMP has not shut off any customer for non-payment, instead focusing on connecting them to assistance programs like VCAAP.

2. How many GMP customers have made use of VCAAP funding?

As of December 14, 2020, 6,517 customers have already received assistance through VCAAP. While these funds have been critical to customers who have received them, there were at month end still more than 27,100 GMP customers in arrears, with now over \$14 million more than 60 days past due. This is an increase in both customer count and arrearage even after the VCAAP funding became available and is substantially higher than we experienced before the pandemic. For context, at the end of November 2019, we had about 12,600 customers in arrears with a total balance just under \$2.8 million.

3. What percentage of GMP customers who have arrearages are actively participating in or seeking to participate in, discussions about repayment plans?

Of the approximately 27,100 GMP customers in arrears, 1169 customers (~4.3%) currently have payment arrangements. Of those, 67 customers (~0.2%) have payment arrangements after receiving VCAAP funding. It is important to note that we have not yet sought to put many customers on payment plans because of concern that would make them ineligible for VCAAP funding. Now that the VCAAP application period is set to end on December 15, 2020, we hope to implement our plan to actively enroll customers in payment arrangements.

Starting in January, we expect to create thousands of payment arrangements for customers to help them through this situation. We plan to help customers get current by offering longer payback periods and other strategies to assist in this extraordinary time. We will also continue to monitor future COVID-19 assistance programs to be sure our customers can access

any new opportunities that develop for relief. Additionally, we continue to offer our Energy Assistance Program for customers who qualify.

Our work will also include commercial customers that normally are not offered payment arrangements. We have a dedicated team working with commercial customers to create custom payment plans to help them become current over time. We also have an online system for residential customers to create their own payment arrangements. We believe that efforts to put customers on payment plans should be permitted to continue whether or not a formal disconnection moratorium is in place because it is in the best interest of both customers in arrears and our other customers to set a path to lower the significant overdue balance that has grown during the pandemic.

We hope these responses help inform the Commission of the impact the pandemic continues to have on our customers. We know it will take time to emerge from this crisis along with a commitment to work together to do so. With or without a formal moratorium, GMP will continue to work with all customers and the Commission to address past-due balances and the impacts they create with flexibility, patience, and empathy.

Respectfully submitted this 14th day of December 2020.

Green Mountain Power:

A handwritten signature in blue ink, appearing to read "Steve Costello", is written over a horizontal line.

Steve Costello, Vice President
Customer Care