



December 14, 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,

In response to Vermont Legal Aid's Request to Reinstate the Temporary Moratorium that it filed with the Public Utility Commission ("Commission") on December 11, 2020, Burlington Electric Department ("BED") provides the following comments.

As noticed to the Commission in BED's October 15, 2020 letter in response to the Commission's Order lifting the State's temporary moratorium of involuntary utility service disconnections for nonpayment, BED continued its moratoria on such involuntary disconnections of service for nonpayment and assessment of customer late fees until further notice, and these moratoria remain in effect. 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 mentioned in the Department of Public Service's December 14, 2020 comment letter, "Governor Scott and other leaders are warning that the pandemic's worst challenges still lie ahead for us this winter," and that even with wide distribution of vaccines likely by mid-2021, "health experts urge caution that the number of COVID-19 infections will rise further before dropping." The ongoing COVID-19 pandemic continues to create significant financial hardship for utilities and their customers. Utilities' financial hardships are a consequence of lost revenues from customers with account arrearages, unanticipated cost impacts from delayed capital projects, difficulty obtaining

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needed repair service, and simply the increased utility costs of implementing all necessary COVID-19 precautions while continuing to provide the same high-quality, reliable electric service.

In recognition of hardships faced by both utilities and their customers, BED's moratoria will remain in effect until further notice. BED also supports Vermont Legal Aid's request for reinstatement of the State disconnection moratorium so long as such a reinstatement by the Commission is implemented in conjunction with pursuit of a second legislative allocation of Vermont COVID-19 Arrearage Assistance Program funds to be distributed to customers in need during and following any reinstated moratorium. BED commits to supporting and engaging on such a proposal as needed in the Legislature and applicable regulatory proceedings.

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