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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

Vermont Electric Cooperative Response to October 8, 2020 and December 14, 2020 Orders Regarding Arrearages Status and Petition to Reinststate the Temporary Moratorium

Vermont Electric Cooperative (VEC) offers the following information in response to the questions in the October 8, 2020 Commission Order:

1. How lifting the Covid-19 related disconnection moratorium has affected VEC's disconnection numbers?

It is difficult to decouple the availability of arrearage assistance funds (August 15) from the lifting of the disconnection moratorium (October 8). We believe the lifting of the moratorium did incentivize members to contact us to arrange payment plans and to seek available assistance.

As indicated in the chart below, the number of accounts in the over 60-day and over 90-day categories stayed relatively stable from the end of August through the end of October. There was a meaningful drop in number of members in those categories in November which we surmise was due to the lifting of the moratorium supported by the availability of funding and continued outreach.

2. How many VEC members have made use of VCAAP funding?

By the morning of December 15, VEC had 51 non-residential members and 695 residential members that had been verified or approved for financial assistance. The total amount of arrearages covered by these applications totals \$412,937 (\$47,388 non-residential and \$365,550 residential). The VCAAP program has been incredibly helpful to the individual applicants and the Co-op overall during these difficult times. If there is any possibility of additional or new funding to support this effort, we would be very supportive and would continue to be an active implementation partner.

3. What percentage of VEC members that have arrearages are actively participating in or seeking to participate in discussions about repayment plans.

There are currently 399 active payment arrangement plans with VEC members which equates to approximately 30% of the number of over 60-day arrearage accounts. VEC continues to encourage members to contact us to arrange feasible payment arrangements.

Arrearages June 2019	60-90 Days		90 + Days		Total \$
	Count	Amount	Count	Amount	
Residential		\$77,176		\$46,594	
Non-Residential		\$18,970		\$6,319	
Total	985	\$96,146	259	\$52,913	\$149,059
Arrearages End of June 2020					
	60-90 Days		90 + Days		
	Count	Amount	Count	Amount	
Residential	1084	\$144,677	509	\$127,415.00	
Non-Residential	98	\$35,561	50	\$17,280	
Total	1182	\$180,238	559	\$144,695	\$324,933
Arrearages End of July 2020					
	60-90 Days		90 + Days		
	Count	Amount	Count	Amount	
Residential	1167	\$140,594	570	\$175,141.00	
Non-Residential	106	\$22,030	49	\$24,353	
Total	1273	\$162,624	619	\$199,494	\$362,118
Arrearages End of August 2020					
	60-90 Days		90 + Days		
	Count	Amount	Count	Amount	
Residential	1209	\$160,978	622	\$236,065.00	
Non-Residential	95	\$17,621	50	\$24,880	
Total	1304	\$178,599	672	\$260,945	\$439,544
Arrearages End of Sept 2020					
	60-90 Days		90 + Days		
	Count	Amount	Count	Amount	
Residential	1219	\$150,299	586	\$200,414	
Non-Residential	93	\$20,122	41	\$16,526	
Total	1312	\$170,421	627	\$216,941	\$387,362
Arrearages End of Oct 2020					
	60-90 Days		90 + Days		
	Count	Amount	Count	Amount	
Residential	1267	\$147,809	567	\$202,492	
Non-Residential	102	\$22,897	41	\$20,029	
Total	1369	\$170,706	608	\$222,521	\$393,227
Arrearages End of Nov 2020					
	60-90 Days		90 + Days		
	Count	Amount	Count	Amount	
Residential	1211	\$126,470	478	\$155,356	
Non-Residential	83	\$14,895	35	\$10,020	
Total	1294	\$141,365	513	\$165,376	\$306,741

Vermont Electric Cooperative Position Regarding Reinstatement of the Temporary Involuntary Disconnection.

VEC appreciates that these are unprecedented times and the pandemic has imposed severe financial and other stresses on so many in our community. We have continued to work on behalf of our members, even at times pushing people to obtain assistance and supports when they have been hesitant to do so. VEC has continued to provide flexibility in the hope of not only securing immediate solutions but a path forward that will help ensure longer-term sustainability for the member.

Our preferred option at this time would be to retain that flexibility and be allowed to develop and implement appropriate criteria as to what circumstances, if ever, would cause power to be suspended. VEC has been in operation since 1938, has risen from difficult financial circumstances, and we know our members well. We have learned from experience that different strategies and incentives can be effective depending on individual circumstances. If additional arrearage assistance funds are made available, we will continue to direct members to that opportunity. If additional funds are not forthcoming, we would want to make sure these members do not experience escalating debt. Climbing debt will not only have an adverse effect for the individual but as a non-profit cooperative that debt would need to be covered by other VEC members, many of which are not able to afford that. Notwithstanding this preferred approach, VEC will not object if the Commission ultimately determines to reinstate a temporary moratorium.

If the Commission reinstates a temporary moratorium, VEC requests that the Commission allow for limited exceptions. One such exception should be in the case of an unoccupied property provided the notification requirements of rule 3.300 has been properly applied. We also recommend that there be a mechanism whereby other exceptions could be made by the Department or Commission on a case by case basis for special situations if petitioned by a utility.

Thank you for the opportunity to comment. VEC will continue to take all available actions to support our membership during this difficult time.

Dated at Montpelier, Vermont, this 15th day of December 2020.

Respectfully submitted,
VERMONT ELECTRIC COOPERATIVE, INC.



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