

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

**WASHINGTON ELECTRIC COOPERATIVE, INC.'S COMMENTS ON  
REINSTATING THE MORATORIUM, AND  
ANSWERS TO THE COMMISSION'S OCTOBER 8 QUESTIONS**

By Order dated December 14, 2020, the Commission requested comments on reinstating the moratorium on involuntary utility service disconnections. The Commission's October 8, 2020 Order terminating the moratorium also directed utilities to answer three questions. Answers to the questions follow WEC's comments regarding reinstating the moratorium on involuntary disconnections.

**I. COMMENTS ON REINSTATING THE MORATORIUM**

Washington Electric Coop (WEC) supports reinstatement of the moratorium. WEC recognizes that during these continuing unprecedented times the pandemic is creating financial hardship for many of its members, including the inability to pay bills. WEC wishes to do what it can to assure its members' safety and wellbeing and to lessen the distress caused by the inability to pay an electric bill.

WEC asserts that care should be taken: (1) to assure that members work with WEC to make best use of the moratorium and assure access to assistance and resources that can help members pay bills, and (2) so that the overall duration of the moratorium does not create arrearages that become large enough to create other longer-term hardships and credit issues. The PUC should

strongly encourage immediate outreach between utilities and clients making use of the moratorium so that they can be directed to available aid and appropriate budget plans and other resources. This would also allow utilities to distinguish clients suffering pandemic impacts from those who, historically or otherwise, have not been current with their bills.

Unpaid bills ultimately increase rates for WEC members. Through November 2020, accounts 60 days or more in arrears totaled \$226,910 -- equivalent to a 1.6% rate impact. While WEC expects to receive help from the State's VCAAP program, it is not expected that all eligible members will apply, and significant arrears will continue after the VCAAP program ends. It is important to help those impacted by the pandemic, but WEC wishes to also be mindful of the impacts to all other members as unpaid accounts grow. And as indicated below in response to Question 1, below, member contact with WEC, either through the disconnection process or through other means, allows WEC to direct members to available aid and establish appropriate budget plans.

WEC further suggests that the PUC, as it did with the initial moratorium, set the reinstated moratorium for a specified period of time and seek comments on whether it should be extended. That would allow WEC to continue assessing financial and member impacts and provide updated information to the Commission.

## **II. RESPONSES TO COMMISSION'S OCTOBER 8 QUESTIONS**

WEC responds to the PUC questions from the October 8, 2020 Commission Order: as follows:

### **(1) How has lifting the moratorium affected disconnection numbers?**

WEC began sending disconnection notices in November after the moratorium ended. This effort motivated members to reach out to WEC for help and enabled WEC to advise struggling members of the VCAAP program and to establish budget plans.

**(2) How many of their customers have made use of VCAAP funding?**

WEC had 237 members make use of VCAAP funding for a total of \$214,491.28. Of these 237 members, two were commercial members (\$4,445.48) and 235 were residential members (\$210,045.80)

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

WEC has 45 active payment arrangements and 870 members in arrears 60 days or greater as of the end of November 2020. This represents only 5% of those in arrears at the end of November.

Dated at Montpelier, Vermont this 15<sup>th</sup> day of December, 2020.

TARRANT, GILLIES, RICHARDSON & SHEMS



by:

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