



December 18, 2020

Ms. Judith C. Whitney, Clerk
Vermont Public Utility Commission
112 State Street, Drawer 20
Montpelier, VT 05620

Case No. 20-0703-PET - Vermont Legal Aid request for moratorium on utility and telecommunications shutoffs during State of Emergency

Dear Ms. Whitney:

Through a December 14 Order, the Public Utility Commission ("Commission") requested comments on whether to reinstate the *Temporary Moratorium on Involuntary Utility Service Disconnections* ("Moratorium"). The Vermont Public Power Supply Authority ("VPPSA") member utilities remain concerned that the Moratorium acts as a disincentive for customers to communicate with their utilities about unpaid balances and will result in customers accruing balances that they are ultimately unable to pay.

The VPPSA members share the concern surrounding interruption of electric service for vulnerable Vermonters, especially in light of the financial challenges brought on by COVID. As community-owned and operated utilities, the VPPSA municipals are acutely concerned with the well-being of their customers. Non-profit entities such as the VPPSA municipals do not have other financial resources from which to recover the costs of unpaid utility bills. If electric bills go unpaid by some, that money needs to be collected from other members of the community who may also be struggling financially.

The VPPSA members continue to believe that the most effective way to help customers through this difficult time is to provide a structure that encourages open communication and lets the utility work directly with the customer on repayment options and terms. The VPPSA utilities are making every effort to implement payment plans that work for their customers. Disconnection of electric service is always a last resort for the VPPSA municipals.

The Vermont COVID Arrearage Assistance Program ("VCAAP") was successful in dispersing more than \$8 million to aid customers that have incurred financial harm as a result of the COVID pandemic. However, not all customers that have utility arrearages were eligible to receive funds through VCAAP, and thus substantial unpaid balances remain. If the decision to prohibit utility disconnects is made at the state level, it should be accompanied by another



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commitment of funds to avoid pushing additional costs onto other utility customers. The VPPSA utilities are supportive of increased emergency financial assistance for those in need, and we are working through our regional and national public power associations to advocate for federal support through the Low-Income Home Energy Assistance Program ("LIHEAP") and other means. While we understand the viewpoint that a blanket Moratorium will provide immediate relief, the VPPSA members' view remains that such a Moratorium would not be in our customers' long-term best interest.

The State has appropriately imposed stringent criteria around when disconnection of electric service may occur during the winter months. Emergency Rule 2.600 provides expanded customer protections. If the Commission ultimately finds that these restrictions are inadequate and instead elects to reinstate the blanket Moratorium, VPPSA would support the request made by Vermont Electric Cooperative to provide the ability for utilities to seek exceptions on a case-by-case basis.

Thank you for your consideration of these comments.

Sincerely,

Melissa Bailey
Manager of Government and Member Relations
Vermont Public Power Supply Authority