



Erika P. Smith
 Director – Legislative & Regulatory
 266 Main Street
 Burlington, VT 05401
 802-951-8008

March 1, 2021

VIA ePUC

Ms. Holly Anderson, Clerk
 Public Utility Commission
 112 State Street, Drawer 20
 Montpelier, Vermont 05620-2701

**Re: Consolidated Communications Comments
 Case No. 20-0703-PET – Vermont Legal Aid request for moratorium on utility
 and telecommunications shutoffs during State of Emergency**

Dear Ms. Anderson,

Consolidated Communications of Vermont Company, LLC and Consolidated Communications of Northland Company, both d/b/a Consolidated Communications ("Consolidated") submit the following comments as requested by the Public Utility Commission ("Commission") in its December 22, 2020 Order in the above-referenced Case.

The Order reestablished a temporary moratorium on involuntary disconnections of natural gas, electric, and traditional landline service to consumers of regulated utilities in Vermont through March 31, 2021. Additionally, the Order directed utilities to file information on their customer arrearages and levels of payment arrangements no later than March 1, 2021.

In response to this request, Consolidated offers the following responses to the specific questions posed:

a. The magnitude of customer balances that are more than 60 days past due, the number of customers with balances that are more than 60 days past due, and how these data compare with the same time period in 2020 (broken out into residential and non-residential customers).

		Number of Customers More Than 60 Days Past Due	Total Amount of Balances More Than 60 Days Past Due
Residence			
2020		1,572	153,493
2021		3,638	955,886
Business			
2020		815	529,512
2021		1,754	1,362,308

b. The number of customers with whom the utility has interacted to set up a payment agreement between the date of the issuance of this Order and March 1, 2021.

Answer: Consolidated does not track conversations surrounding the establishment of payment arrangements, rather we track actual arrangements entered into as requested in part c. of this inquiry.

c. The number of payment agreements entered into between the date of the issuance of this Order and March 1, 2021.

Answer: Consolidated Communications of Vermont Company's payment arrangements are part of a larger collection process which has been suspended as the result of the required disconnection moratorium. We are making efforts to proactively reach out to customers to make payments when they are able, and discuss informal payment arrangements. Informal agreements are not tracked by our systems in the same way a formal payment arrangement would be.

Consolidated Communications of Northland Company's systems work differently and allow for formal payment arrangements at the same time that involuntary disconnections of service are on hold. In the specified time period, sixty-six (66) customers have established payment arrangements.

d. The number of payment agreements successfully adhered to by the customer between the date of the issuance of this Order and March 1, 2021.

Answer: As indicated above, Consolidated Communications of Vermont Company is not currently establishing formal payment arrangements. Informal arrangements are not tracked in a way such that we can provide information on the number of agreements successfully adhered to.

Records indicate that forty-three (43) Consolidated Communications of Northland Company customers successfully completed their established payment arrangements during this time period.

e. Comments on whether the moratorium should be extended beyond March 31, 2021

Answer: As discussed in previous filings, Consolidated understands that many Vermonters continue to face hardships as the result of the COVID-19 pandemic and supports the Commission's efforts to ensure ongoing essential services are available to customers. We also respect the Department of Public Service's (Department) hard work in developing and implementing the COVID-19 Arrearage Assistance Program.

Despite our efforts, as well as those of the Department and other utilities, to advertise and promote the available programs, only a very small percentage of Consolidated's customers applied for the Arrearage Assistance Program. While the benefits to those customers are invaluable, it leaves a high volume of customers who have past due balances over 60 days which continue to grow. As indicated in the totals provided in part a. of this inquiry, residential balances over 60 days have multiplied more than six times over the same time period last year. Balances for business customers have increased over 2.5 times. In the absence of additional methods of assistance, and an inability to take proactive

Ms. Holly Anderson
Page 3
March 1, 2021

collection activity, we expect the balances to continue to grow. This will make it increasingly difficult for customers to pay back the accrued charges when the moratorium is lifted.

Consolidated's position remains unchanged on the question of extending the moratorium beyond March 31, 2021. We believe that our customers and our company will be best served if we are able to assist customers in managing their past due balances on an individual basis, rather than with the extension of the disconnection moratorium.

Consolidated appreciates this opportunity to provide comments to the Commission. Please feel free to contact me with any questions.

Regards,

A handwritten signature in black ink, appearing to read "EP Smith". The signature is written in a cursive, flowing style.

Erika P. Smith