

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

**Green Mountain Power Utility Plan and Responses to Commission
Requests for Information**

Green Mountain Power (GMP) submits the following in response to the Public Utility Commission (PUC or Commission) December 20, 2020 Order requesting that each utility file information on their customer arrearages and levels of payment arrangements.

Since the pandemic hit Vermont, GMP has worked with customers to support them through this difficult and unprecedented time. GMP has not disconnected any customer for non-payment due to COVID-19, and we intend to continue our customer-focused approach. GMP appreciates the opportunity to provide updated information on how the economic challenges caused by the pandemic are affecting our customers, and our plans for helping them as we move into spring.

Q1. 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).

A1. The number of customers with past-due bills over 60 days old continues to grow as the pandemic lingers. As of the end of February, 28,250 customers had balances more than 60 days past due, totaling \$16.4 million. By comparison, at the same time in 2020, only 11,319

customers had balances over 60 days old, totaling \$3.1 million. The chart below breaks the current totals down by residential, commercial, and industrial customers

	Arrears>60 Days@ 2/28/21		Arrears>60 Days@ 2/28/20	
	Count	Amount	Count	Amount
Res	25,508	\$13,329,292.50	10,491	\$2,496,319.48
Comm	2,742	\$3,063,051.53	828	\$557,449.60
Total	28,250	\$16,392,344.03	11,319	\$3,053,769.08

Q2. The number of customers with whom the utility has interacted to set up a payment agreement between December 20, 2020 and March 1, 2021.

A2. We sent a total of 19,317 letters to past-due customers in January to offer help with the EAP, arrearage forgiveness, and payment arrangements, and another round of letters is going out soon. While it is difficult to track a precise number of responses and other contact on this subject, we do know we received 12,000 credit-related calls during this period, and it is our standard practice to offer a payment arrangement to anyone who might benefit.

Q3. The number of payment agreements entered into between December 20, 2020 and March 1, 2021.

A3. GMP entered into 1,190 payment arrangements between Dec. 20, 2020 and March 1, 2021. We entered into 4,190 payment arrangements between Dec. 20, 2019 and March 1, 2020. We believe the more recent numbers are lower, despite the greater number of customers in arrears, because of the disconnection moratorium. Still, we do not believe the moratorium should be lifted at this time; once it is lifted, GMP will continue to use empathy as a guide as we work with customers to reduce past-due balances. Customers need further relief, and GMP will continue to help advocate for critical customer funding to reduce debt.

Q4. The number of payment agreements successfully adhered to by the customer between December 20, 2020 and March 1, 2021.

A4. Of 1,190 payment arrangements entered into between Dec. 20, 2020 and March 1, 2021, 950, or 80 percent, remain in place. These payment arrangements involve \$658,484. A total of 240, or 20 percent, of the arrangements made during that time period have been broken.

Q5. Comments on whether the moratorium should be extended beyond March 31, 2021.

A5. GMP believes the moratorium should continue to be extended past March 31, 2021. We will continue to advocate strongly for arrearage relief for our customers, as the need is great and continues to grow. While relief for lower income renters adopted by Congress will be helpful, it will not provide assistance for many of our customers who have seen substantial increases in their debt since the start of the pandemic. At this time, we suggest that the Commission keep the moratorium in effect for an additional 60 days to May 31, 2021. That extension should provide time for more clarity on the availability of new federally and state-funded debt relief programs for utility customers.

We believe this brief additional period of relief from disconnection is warranted because the effects of the pandemic, including the spike of cases experienced in the past few months, are continuing to unfold. Many customers are behind on bills for the first time because they lost their jobs or are not able to make ends meet with their businesses. Others who struggled to cover expenses before the pandemic are finding it even more difficult to do so now. While the recovery from the immediate effects of the pandemic is in sight, the economic fallout will take longer to improve. GMP will join with our customers, other utilities, and all of the other stakeholders committed to helping customers access relief funds for their debt.

GMP also plans to continue to work with customers during this period on flexible payment arrangements. To reduce customer stress and fear over large past-due balances, GMP expects to put all customers who have balances of more than \$100.00 60 days past due on 12-month payment plans, so customers can spread out past-due balances over time. We expect to include residential and commercial customers, and to provide notice to customers of the new arrangement with an opportunity to “opt out.” Customer could pay the overdue balance if they were able, adjust the length of the payment arrangement up or down if desired, to a maximum length of 24 months except in extraordinary circumstances, or cancel the arrangement altogether. Customers could call our Customer Care team, and we are also working to expand current payment arrangement self-service options via the web and our automated phone system. We are prepared to implement this plan during the spring, even if the moratorium remains in place, though we will coordinate those plans with any relief programs that become available to help customers. Putting payment plans in place will allow customers to find a predictable and more achievable path out of debt once the immediate crisis has passed and help to protect other customers from the increasing arrearage we have experienced.

We hope these updated responses help inform the Commission of the impact the pandemic continues to have on our customers, and our efforts to work with them. It will take time to emerge from this crisis, and GMP will continue to work with all customers, the Department of Public Service, and the Commission to address past-due balances and the impacts they create with flexibility, patience, and empathy.

Respectfully submitted this 1st day of March 2021.

Green Mountain Power:

A handwritten signature in blue ink, appearing to read "Steve Costello". The signature is written in a cursive style with a horizontal line underneath the name.

Steve Costello, Vice President
Customer Care