



Filed VIA E-PUC

March 1, 2021

VERMONT PUBLIC UTILITY COMMISSION
People's United Bank Building, 4th Floor
112 State Street
Montpelier, VT 05620-2701

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

Dear Commission:

On December 22, 2020, the Public Utility Commission ("Commission") issued its Order Reinstating the Temporary Moratorium on Disconnection through March 31, 2021. The Order directed utilities to file information on their customer arrearages and levels of payment agreements no later than March 1, 2021, with responses to those comments to be filed by March 15, 2021. This letter provides the response of Vermont Gas Systems, Inc. ("VGS" or the "Company").

With respect to the Commission's questions, VGS provides the following information in its responses below:

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):

The following charts show residential and non-residential customer arrearages through end of January 2020 and 2021, in both number of customers and amount of total arrearage.

Arrearages through January 2020	60+ Days	
	Count	Amount
Residential Customers in Arrears	3,853	\$456,076
Non-residential Customers in Arrears	198	\$37,470
Arrearages through January 2021	60+ Days	
	Count	Amount
Residential Customers in Arrears	5,432	\$922,889
Non-residential Customers in Arrears	420	\$132,321
Residential % Increase from 2020 to 2021	41.0%	102.4%
Non-residential % Increase from 2020 to 2021	112.12%	253.14%

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:

This is a difficult metric for us to provide precision on as we do not regularly track customer interactions to initiate repayment plans. VGS took a proactive approach regarding payment agreements with our customers and had previously implemented 12-month repayment plans for impacted customers that commenced in September 2020. At that time, 1,753 customers were enrolled in these repayment plans. Since the auto-enrolling of customers in September 2020, our CSRs have continued to discuss and offer repayment plans as applicable when interacting with customers.

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

As noted above, VGS had a proactive approach of auto-enrolling customers into 12-month repayment plans in fall 2020, thus reducing opportunities for future agreements. However, since the December 22, 2020 date of this Order to current, we enrolled an additional 16 accounts on to payment agreements.

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:

Out of the 16 additional accounts enrolled on payment agreements, 13 of them have adhered to the plan to date.

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

VGS continues to support the disconnection moratorium and believes it should stay in effect until the Governor lifts the state of emergency in Vermont. We also support a second legislative allocation of Vermont Covid-19 Arrearage Assistance Program funds to be distributed to customers in need during

and following any reinstated moratorium. As is reflected in our arrearage metrics above, people are still struggling with paying their bills during the Covid-19 pandemic, and we are supportive of an extension that would continue through the duration of the state of emergency.

We continue to appreciate the Commission's time and attention on this critical matter.

Sincerely,

Matthew Allen
Customer Care Manager