



March 15, 2021

Ms. Holly Anderson, 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. Anderson:

Through a December 14, 2020 Order, the Public Utility Commission (“Commission”) reinstated the *Temporary Moratorium on Disconnection* (“Moratorium”) and directed utilities to file information on their customer arrearages and levels of payment arrangements by March 1, 2021. The Commission requested that responses to the utilities’ filings be filed by March 15, 2021. The Vermont Public Power Supply Authority (“VPPSA”) offers the following comments in response to utility filings for the Commission’s consideration.

As demonstrated in the March 1st utility filings, unpaid balances have increased throughout the winter months. The VPPSA members also report that they have observed a decline in the volume of customer contacts regarding unpaid balances and payment arrangements since the Moratorium was reinstated in December. VPPSA remains concerned that extending the Moratorium beyond March 31st will create a disincentive for customers to communicate with their utilities about unpaid balances, and some customers may accrue balances that they are ultimately unable to pay.

VPPSA has continued to lobby at the state and federal levels for financial assistance for customers who are struggling to pay their utility bills. Prospects for federal relief for at least a subset of customers are promising.

It is important to consider that not all unpaid utility balances are attributable to the COVID-19 pandemic. To the extent that funding is limited to arrearages accrued due to the pandemic, some customers with significant balances may not be able to access funds. Continuing a blanket moratorium allows unpaid balances to continue to grow, regardless of whether there are prospects for financial assistance down the road.



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VPPSA urges the Commission to lift the blanket Moratorium on April 1st. Vermont's utilities have indicated a desire to work with their customers to address arrears and non-payment resulting from the pandemic. Community-owned utilities in particular know how to work effectively with their customers. Utilities that see continuing the Moratorium as in the best interest of their customers should be permitted to do so voluntarily.

Thank you for your consideration of these comments.

Sincerely,

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