



June 7, 2021

Holly R. Anderson, Clerk
Vermont Public Utility Commission
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 Ms. Anderson,

Burlington Electric Department ("BED") submits this letter in response to the Public Utility Commission's ("Commission's") May 24th, 2021 Order Extending Disconnection Moratorium Until June 30, 2021. In that Order, the Commission directs the utilities in this proceeding to file with the Commission detailed descriptions of how they will engage with customers to resolve outstanding, past-due balances after the temporary moratorium ends and how they will address terminations of service for nonpayment going forward.

As first noticed to the Commission in BED's March 17, 2020 letter in Case #20A-0711, BED has had a voluntary disconnection moratorium in effect since that date and that moratorium remains in effect until further notice. BED notes that while its voluntary citywide disconnection moratorium will remain in place after June 30, 2021, BED has no objection to the Commission lifting the statewide disconnection moratorium as scheduled after that date. On a date yet to be determined, BED will resume its standard account collection and disconnection policy with COVID-19 modifications. BED submitted this policy to the Commission in BED's June 19, 2020, September 17, 2020 and October 15, 2020 letters and an updated copy of that policy is resubmitted with this letter along with the following description of those policy provisions.

BED's Disconnection Policy Description

While not required by PUC Rules or BED tariff, for at least three months after BED resumes its standard account collection and disconnection policies, BED's Customer Care team will call customers in attempt to reach payment plans to avoid disconnections.

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Throughout the Vermont COVID-19 state of emergency, BED has continued to offer its existing budget billing and payment plan programs to residential customers who wish to take advantage of these payment options. Prior to the COVID19 response period, budget billing and payment plan programs were only available to residential BED customers. As of April 7th, 2020, BED made budget billing available to commercial customers in good standing in addition to residential customers. BED also made payment plans available to commercial customers impacted by COVID-19 as of BED's October 15, 2020 letter in this case.

Further, BED proposes modifications to the timeline in which payments are required under its payment plans for all customers financially affected by COVID19 to increase payment flexibility, as described below.

All eligible customers who wish to participate in a payment plan and self-certify that they are financially impacted by COVID19 may pay between six and 12 equal monthly payments to bring their account balances to zero dollars. Concurrently, participating customers must also pay monthly electric bills. This payment plan modification provides increased flexibility for customers with COVID19 financial impacts, as the existing payment plan program requires participating customers to pay 50% of the past-due account balance in the first month's payment, with remaining payments required in the following three months, with a possible extension of up to six months with a showing of hardship.

BED does not assess late fees for residential customers in accordance with its residential tariffs. BED suspended assessment of late fees on its commercial accounts as of March 18th, 2020. This temporary suspension of assessment of late fees on customer accounts will remain in effect until further notice. For clarity, BED does not intend to retroactively assess late fees for the time they were suspended.

We appreciate the opportunity to provide the Commission with BED's updated collection and disconnection policy that BED will implement once its voluntary disconnection moratorium is lifted on a yet to be determined date. Should you have any questions or concerns, please feel free to contact us at any time.

Sincerely,



Amber Widmayer
Regulatory Specialist
Burlington Electric Department
(802) 735-6918

BED's Budget Billing, Payment Plans, Late Fees, Interruptions and Collections

Definitions

- Deficit: a positive (owed) account balance resulting from participating in an electric utility budget plan due to discrepancy between estimated monthly bill and actual bill
- Delinquency: failure of ratepayer to tender payment for valid bill or charge including an amount owed under a budget or payment plan (1) within 30 days of the postmark date of that bill or charge, or (2) by a "due date" at least 30 days after mailing, which date shall be printed on the bill
- Interruption/Disconnection: deliberate interruption, limitation, or disconnection of utility service to a ratepayer by the serving utility, not including disconnection at the request or with the permission of the ratepayer

Residential accounts

- **Budget Billing**
 - Existing practice
 - 12-month budget plan
 - Plan trued up at end of 6 months, and budget payment amount adjusted for remaining 6 months at that time to minimize any deficit.
 - Plan trued-up again after 12 months.
 - If deficit exists at end of 12 months, deficit can be rolled into following 12-month budget plan.
 - Delinquencies (that exist at time customer enters budget plan) – concurrent 12-month payment plan for delinquent amount at time of budget plan initiation available if customer requests.
- **Payment Plan**
 - Existing practice
 - Must pay 50% of delinquency plus enter into payment plan by which customer pays current bill plus equal portions of delinquency for next three months to avoid disconnection.
 - Payment plan may be extended for up to 6 months for customers reporting hardship.
 - **Proposed COVID-19 Payment Plan as of a final date to be determined (to avoid disconnection)**
 - Must make between 6 and 12 equal, monthly payments with 1st payment due at time plan established.
 - After 1st payment, customers required to pay their monthly bills in addition to making payment plan payments.
 - Rely on customers' self-certifications of COVID-19 financial impacts.
- **Late Fees**
 - Existing practice
 - Not assessed under residential tariffs

Commercial accounts

- **Budget Billing**
 - Prior to COVID-19 response, no existing opportunity. Made available to commercial customers in good standing during COVID-19 response, as of April 7, 2020.
 - **Proposed COVID-19 Plan (to avoid disconnection)**
 - 12-month budget plan
 - Plan trued up at end of 12 months
 - If deficit exists at end of 12 months, it must be paid within 30 days.
 - Unlike residential accounts, budget billing for commercial accounts is a one-time opportunity.
 - Delinquencies (that exist at time customer enters budget plan) – concurrent 12-month payment plan for delinquent amount at time of budget plan initiation available if customer requests.
 - Rely on customers' self-certifications of COVID-19 financial impacts.
- **Payment Plan**
 - No existing opportunity
 - **Proposed COVID-19 Payment Plan**, as of October 15, 2020 BED letter in case # 20-0703-INV payment plans available to commercial customers
 - Must make between 6 and 12 equal, monthly payments with 1st payment due at time plan established.
 - After 1st payment, customers required to pay their monthly bills in addition to making payment plan payments.
 - Rely on customers' self-certifications of COVID-19 financial impacts.
- **Late Fees**
 - Existing practice
 - Assessed only under commercial tariffs.
 - **Proposed COVID-19 plan**
 - Late fees suspended in late March 2020 until further notice.
 - Continue with suspension of late fees for all commercial accounts until an undetermined date.

Residential and Commercial accounts

- **Interruptions/Disconnections**
 - Resume interruptions due to delinquency not resolved by a payment plan on a date to be determined
 - Resume mailing interruption and final warning notices with at least 30 days' notice before any interruptions
 - Actual interruptions based on scheduling and availability
 - While not required by PUC Rules or BED Tariff, prior to interruptions/disconnections, Customer Care team will call customers in attempt to reach payment plans to avoid interruptions/disconnections – BED to engage in this practice for at least 3 months from time interruptions/disconnections are resumed
- **Collections** – as of October 15, 2020 letter in case # 20-0703-INV, BED resumed collections on closed accounts.