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STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Vermont Legal Aid request for moratorium on utility and telecommunications shutoffs during State of Emergency

Case No. 20-0703-PET

RESPONSES OF THE EIGHT RLECS

Eight Vermont rural local exchange carriers (the “Eight RLECs”)¹ hereby respond to the “Order Extending Disconnection Moratorium Until June 30, 2021,” which was issued by the Public Utility Commission (“Commission”) on May 24, 2021, in the above-captioned proceeding (the “Order”).

I. Background

In response to the COVID-19 pandemic, the Commission on March 18 and 27, 2020, ordered a moratorium on involuntary disconnections for non-payment of charges for regulated services.² In its most recent Order, the Commission extended the moratorium until June 30, 2021, and directed utilities to make written filings, as follows:

That said, we also note that Vermont is continuing to move towards reopening all sectors of the economy, and we may soon be at the point where there is no longer a need for a temporary moratorium. The Commission therefore directs the utilities in this proceeding to file with the Commission, **no later than June 15, 2021**, 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. The utilities and any other parties to this proceeding may file any other comments, recommendations, or objections regarding the next steps in this proceeding **no later than June 15, 2021**.³

¹ Franklin Telephone Company, Inc., Ludlow Telephone Company d/b/a TDS Telecom, Northfield Telephone Company d/b/a TDS Telecom, Perkinsville Telephone Company, Inc. d/b/a TDS Telecom, Shoreham Telephone LLC d/b/a Otelco, Topsham Telephone Company, Inc., Vermont Telephone Company, Inc. d/b/a VTel, and Waitsfield-Fayston Telephone Company, Inc. d/b/a Waitsfield Telecom, d/b/a Champlain Valley Telecom.

² “The temporary moratorium applies to involuntary disconnections of natural gas, electric, and traditional landline telecommunications service to consumers of regulated utilities in Vermont, except for unoccupied properties.” Order, at 1, fn. 1.

³ Order, at 2 (emphasis in original).

The responses of the Eight RLECs follow hereinafter.

II. Responses of the Eight RLECs

The Eight RLECs have previously submitted detailed comments and data responses at various points in this proceeding, and in particular in response to the Commission's earlier requests for descriptions of utilities' plans for addressing past-due customer balances that have accrued during the moratorium.⁴ In their previous filings, the Eight RLECs have reported small to substantial increases in customer arrearages during the COVID pandemic, but not to a degree that is likely to warrant changes in the pre-pandemic billing or collection practices of the Eight RLECs.

The Eight RLECs do not anticipate making any notable changes in their existing policies once the Commission's moratorium has expired. The companies will continue to adhere to the requirements of Commission Rule 7.600 regarding customer billing, credit, and disconnection. Each company expects to tailor its reopening policies to meet the particular needs of the company and its customers.

As incumbent carriers with longstanding ties to the communities they serve, the Eight RLECs will work with their customers to put in place reasonable repayment arrangements, including, on a case-by-case basis, offering extended repayment periods if circumstances warrant.⁵ The Eight RLECs are able to make individualized repayment plans to meet their customer's needs.

In addition, the Eight RLECs are carriers-of-last-resort under Vermont law, eligible telecommunications carriers under federal law, and carriers of E911 traffic. As such, they are required to keep their customers connected to basic exchange telephone service and to avoid

⁴ See Eight RLECs' Responses to the Commission's Information Requests, Case No. 20-0703-PET (filed June 19, 2020) ("Data Responses"); see also Eight RLECs' Responses to Commission's Questions Re: Further Extension of Disconnection Moratorium, Case No. 20-0703-PET (filed Sept. 17, 2020) and Eight RLECs' Report on Disconnections and VCAAP Funding, Case No. 20-0703-PET (filed Dec. 15, 2020).

⁵ The Eight RLECs previously reported using repayment periods ranging from 3 months to 6 months, with some companies providing greater flexibility to address higher arrearages. See Data Responses, Exhibits A to F. 4860863.1

disconnection whenever possible. They will address any substantial customer arrearages with these obligations in mind.

The Eight RLECs thank the Commission for the opportunity to offer the foregoing responses for the Commission's consideration.

DATED at Burlington, Vermont, this 12th day of June, 2021.

Respectfully submitted,

Franklin Telephone Company, Inc., Ludlow Telephone Company, Northfield Telephone Company, Perkinsville Telephone Company, Inc., Shoreham Telephone LLC, Topsham Telephone Company, Inc., Vermont Telephone Company, Inc. d/b/a VTel, and Waitsfield-Fayston Telephone Co., Inc. d/b/a Waitsfield Telecom, d/b/a Champlain Valley Telecom

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CERTIFICATE OF SERVICE

I, Paul J. Phillips, Esq., certify that on June 12, 2021, I caused electronic copies of the "Responses of the Eight RLECs" to be delivered to all participants in Case No. 20-0703-PET by means of the ePUC electronic filing system of the Vermont Public Utility Commission.

DATED: June 12, 2021

/s/ Paul J. Phillips
Paul J. Phillips, Esq.