



Filed VIA E-PUC

June 15, 2021

Ms. Holly 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:

On May 24, 2021, the Public Utility Commission issued an Order extending the collections and disconnect moratorium to June 30, 2021. In that Order, the Commission directed the utilities in this proceeding to file 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. With respect to the Commission's questions, VGS submits the following response.

Since the onset and throughout the duration of the disconnection moratorium, VGS has consistently filed comments in support of the moratorium and the subsequent extensions as we believe it has provided relief to Vermonters who have suffered financially during the pandemic. We voluntarily elected not to pursue disconnections throughout this past winter, even if the moratorium had not been extended. Our approach has always been – and will continue to be – to compassionately work with our customers in addressing and resolving their past due balances.

Following Vermont's rescinding of all state Covid-19 restrictions, VGS supports the Commission lifting the state disconnection moratorium as currently scheduled after June 30, 2021. When the moratorium is lifted, we will continue to take a proactive and empathic approach working with our customers to resolve outstanding, past due balances. As communicated in past filings in this Case, VGS took a proactive approach with our customers last fall, implementing 12-month repayment plans for

impacted accounts that went into effect in September 2020. This approach was well received and effective for both our customers and VGS. Currently, with over 1,000 customers still on these plans as we approach the end of the initial 12-month term, we intend to implement another round of repayment plans which would commence in September 2021. Additionally, after the moratorium, VGS Customer Care Representatives will continue to work closely with customers to help them take full advantage of financial assistance that is available through traditional means and will aggressively promote the new Vermont Emergency Rental Assistance Program (VERAP) and any new funding programs that will assist our customers with their arrearages. We were pleased with the success of the Vermont COVID-19 Arrearage Assistance Program (VCAAP) and will replicate our time and efforts promoting and engaging in such programs going forward. VGS representatives will continue to engage with customers through both routine interactions and targeted outbound phone calls.

We intend to start resuming collections activities after the moratorium is lifted but will maintain a voluntary pause on disconnections through at least August 2021 to allow customers more time to seek financial assistance and to work with us on customized payment arrangements. In July 2021, we plan to resume collections activities on closed accounts. Since March 2020, we have waived late fees on commercial accounts and are planning to reinstate those in September 2021. Through the coming winter season, we will operate under traditional disconnection rules, pursuing compassionate collections and working with customers to address past-due balances well before pursuing disconnection. Disconnects will be extremely rare and in full compliance with Commission rules.

Going forward, we will continue to partner with customers in pursuit of the best solution for each individual account, leveraging and maximizing financial assistance programs that are available to resolve and address growing past-due balances. We know many Vermonters are still impacted financially by the pandemic and we feel our compassionate approach will continue to work and be appreciated across our customer base.

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

Sincerely,

Matthew Allen

Customer Care Manager