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Holly Anderson, Clerk
Vermont Public Utility Commission
112 State Street
Montpelier, VT 05620-2701

RE: Case No. 20-0703-PET: Washington Electric Cooperative Response to Commission questions Disconnection Moratorium Order Dated 5-24-2021 Extension June 30, 2021.

Washington Electric Cooperative (WEC) hereby submits a response to the Vermont Public Utility Commission (PUC) order issued on May 24, 2021. The PUC requested utilities file information relative to utility engagement with respect to past due accounts and cessation of the disconnection moratorium. Specifically, the order noted:

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.

As of May 30, 2021, WEC had 956 members with past due accounts 60 days and greater totaling \$377,915. WEC's normal arrears prior to COVID 19 for accounts 60 days and greater past due is only \$80,313. With arrears almost 4 times greater than normal while cases of COVID 19 are declining, WEC believes an end of the disconnection moratorium is necessary. Being allowed to reach members with disconnection notices will help establish connections and work with members to set up payment plans. In order to engage with members, we need tools to encourage members to work with us and respond to our outreach and calls. With the state of emergency coming to an end, the economy recovering, and employment rates declining, the timing is appropriate to end the disconnection moratorium extension that is in effect through June 30, 2021.

The most important step members can take that are having difficulty paying bills is to respond to outreach. We want to help! We will work with each member and do our best to set up payment arrangements. We want to avoid disconnections and talking with WEC can facilitate choices. WEC has found two tools that have been successful to help members pay their bills (availability of financial assistance and disconnection notices). The disconnection notices serves as a stimulus to take action and it is a motivational tool.

WEC has always been sympathetic to members having financial difficulty paying bills. As the cases and numbers have grown, we have made use of phone calls, member outreach through letters, stories in Coop Currents, and compassionate pleas to reach us as we can help. We actively promoted and made members aware of the state's financial assistance offers from the VCAAP program. We also support finding new sources of funds to help those struggling to pay their bills. We are continuing to explore and reach out for new sources of assistance. We participated in the most recently provided training provided the Vermont Public Service Department for the recently opened Vermont Emergency Rental and Utility Assistance Program (VERUAP). Just as we did with the VCAAP program, we will actively promote the VERUAP through outreach efforts and communication channels.

WEC had 237 members make use of VCAAP funding for a total of \$214,491. Of these 237 members, two were commercial members \$4,445 and 235 were residential members totaling \$210,046. We worked with Capstone and other state services to offer help to members struggling.

Use of disconnection notices actually assists WEC to encourage members to pay their bills. Having the ability to send disconnection notices motivates some members to take action, even if for some it may be considered a blunt tool. WEC will work with members to make payment arrangement and we will commit to longer than one year payment timeframes and hold off on disconnects for anyone that has set up a payment plan.

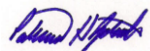
The key to getting all of this started is to have active communication with our past due members. We are working hard to reach members in a sensitive and compassionate manner, but in the end, we need members to engage with us so we can get started.

Our approach is to encourage longer term payments and to set members up for success to pay off bills. We will work with members to avoid disconnections and extend payment timeframes but in the end the disconnection letter can help members get started. Our plans and steps are noted as follows:

- Disconnection Notices resume July 1
- WEC Member Services staff will call, send letters, and email in an attempt to reach past due accounts that receive disconnection notices
- Our mind set and service will be conducted in a sensitive and compassionate manner
- WEC will extend the disconnection period to 2 months to give members time to react to disconnection notices
- WEC will extend budget plans over 1 year and up to 2 years; the extension of time over a year will be determined based on each person's circumstances and abilities.
- WEC does not charge late fees so there are no impacts of late fees

WEC appreciates the opportunity to respond and for your consideration in this matter. If you need additional information do not hesitate to contact us.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patricia H. Richards".

Patricia H. Richards
General Manger, Washington Electric Coop