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January 7, 2022

Holly Anderson, Clerk  
Vermont Public Utility Commission  
Peoples United Bank Building, 4th Floor  
112 State Street  
Montpelier, VT 05620-2701

**Re: Case No. 20-0203-INV – Investigation into the establishment of reduced rates for low-income residential ratepayers of Vermont electric utilities**

Dear Ms. Anderson,

Green Mountain Power (“GMP”) welcomes the opportunity to respond to the questions presented in the September 28, 2021 Order of the Vermont Public Utility Commission (“PUC” or “Commission”) in Case No. 20-0203-INV, the Low-Income Rate Investigation. The topic is of great interest to GMP, with implications for participating and nonparticipating customers, especially customers who struggle to make ends meet even in the best of times. Given the continuing pandemic, we believe these issues will only grow in importance, and appreciate the opportunity to work with regulators, other distribution utilities, low-income advocates, and other stakeholders to address them in an equitable way.

The PUC issued three questions for GMP and other parties to address, followed by 10 additional questions and sub-questions specifically for GMP in association with the Department of Public Service (“DPS”) and GDS Associates Inc. (“GDS”) as appropriate. Hence, the following is split into two sections. With the shared goal to always improve how we serve Vermonters, especially low-income customers, and the goals of this proceeding, GMP met with DPS and GDS staff to discuss the PUC’s inquiries and our initial thoughts, and shared early drafts of our responses so

they could provide insights and feedback. The following responses were improved through those conversations and feedback.

## **Section 1**

*Q1. What are the utilities' and other stakeholders' views on creating a statewide funding mechanism to fund low-income bill assistance for all utility customers?*

### **GMP Response**

We believe the Commission, DPS, distributed utilities (“DUs”), low-income advocates, and other interest groups should work collaboratively to ensure that low-income assistance programs are available to all Vermont customers. This could be accomplished by a statewide program, if allowed by state statute, or by individual programs designed to meet the specific needs of individual companies and their customers, like GMP’s Energy Assistance Program (“EAP”). While a statewide program or mechanism might be appealing, there are questions and concerns about customers’ ongoing ability to fund such a program that should be considered. The source of the funding for any statewide program would be very important to consider, for equity and stability. Energy services are critical for customers, and keeping rates affordable for all Vermonters is paramount, so raising costs on the electric bill should be carefully considered.

Absent each DU supporting the concept of a low-income program for its customers, it is clear the current statute, specifically 30 V.S.A. § 218(e), does not provide the PUC with the authority to create a statewide mechanism. The language suggests that the PUC has the authority to approve low-income programs for individual DUs, but it does not appear that the PUC can *require* them to do so or create a statewide program and funding mechanism. Absent legislative action granting authority to the PUC to create a statewide program, or instead a statewide mandate, GMP would support collaborative discussions to gain DU support statewide for individual programs, which would remove the need for a mandated program or legislative action.

Any statewide program should avoid the potential for cross-subsidization, i.e., cost-shifting between various DU service territories. The discussion from the Commission in Docket 7535, an investigation into AARP’s petition to establish reduced rates for low-income GMP and CVPS customers, touched upon this issue, but the issue remains. As the PUC noted:

In the Docket 5308 investigation, the [Commission] determined that there was a need to assist low-income Vermonters with meeting the burden of their high energy costs. To that end, the [Commission] made several recommendations for regulatory and legislative action to improve coordination of then-existing programs to assist low-income Vermonters with paying their energy bills. However, the [Commission] declined at that time to order the creation of a ratepayer-funded low-

income electric rate program because designing such a rate would have required cross-subsidization by the remaining, ineligible electric utility ratepayers. In view of existing law at the time, the [Commission] concluded that rate designs "that deliberately allow major non-cost-based cross-subsidies should require specific legislative authorization.

Docket 7535 *Phase I Final Order* (July 22, 2011) at 13. The PUC clearly articulated the primary issues GMP notes above. Still, we would welcome the opportunity through regulatory and/or legislative discussion to work with all the parties in this case to seek to remedy these concerns. In short, GMP supports the concept of an appropriately designed statewide low-income program and would actively engage in discussions and proceedings aimed at that goal.

*Q2. How could such an approach be executed under the current legal framework of 30 V.S.A. § 218(e), which provides that "the Commission . . . may issue an order approving a rate schedule, tariff, agreement, contract, or settlement that provides reduced rates for low-income electric utility consumers"?*

#### GMP Response

As noted in GMP's response to Question 1, we see two potential paths: legislative action that clearly articulates PUC authority to create a statewide program, whether funded by electric customers or through other financial means, that either addresses the cross-subsidy issue or authorizes creation of individual programs within every DU service territory, or a collaborative process that includes all DUs aimed at settlement. A collaborative process that resulted in settlement of these issues with all DUs would appear to meet the specific language of 30 V.S.A. § 218(e) that is noted in the question, and we believe would provide the best opportunity for success in the least amount of time.

*Q3. What alternative ideas, if any, do the utilities have to extend electric bill assistance to low-income customers of all Vermont utilities while also addressing the concerns of some utilities regarding individually funding their own low-income programs because of the high percentage of low-income customers in their service territories?*

#### GMP Response

GMP, the DPS, and the PUC have spent considerable time exploring this issue, starting with the creation of the GMP program in December 2012; through the review and analysis of the program by the DPS's consultant GDS; and in this case. We have solid data and experience upon which we can rely to make decisions. Given they have not offered such a service before, most of the other DUs do not have much hard data to inform their own decision-making. Absent a statewide program or a settlement as described above, which could be beneficial, GMP sees the best near-

term alternative to be for the PUC to ask the other DUs to model a program based on GMP's low-income program or some similar concept, to see what level of fees to all customers would be required to serve each DU's low-income customer base. This would also entail some analysis of poverty rates and related data within specific service territories. Based on that data, the PUC, DUs, and DPS would have a much clearer view of potential impacts and the DPS and PUC could then work individually with each DU to determine whether any identified challenges could be overcome.

## **Section 2 – Questions for GMP, DPS, and GDS**

*Q1. Is GMP using marketing efforts for other assistance programs (such as the VCAAP II, Vermont Emergency Rental Assistance Program, LIHEAP, etc.) to also encourage participation in the EAP?*

### **GMP Response**

Yes. GMP has done an incredible amount of outreach to customers during the pandemic about all the programs and assistance available. As GMP developed outreach efforts to inform customers about the pandemic-prompted assistance programs, the Vermont Covid-19 Arrearage Assistance Program ("VCAAP"), the Vermont Emergency Rental and Utility Assistance Program ("VERAP"), and VCAAP II, we regularly included information about the EAP as well.

From mailed letters, outbound and inbound calls, emails, letters hand-delivered by meter readers and other staff, media interviews, news releases, social media, paid advertising, and outreach to third parties we thought might help inform customers, we have attempted to inform customers of the wide array of assistance for which they may be eligible, including the EAP.

We have also been focused on this when customers contacted us to discuss overdue bills and/or the state-sponsored programs. This has been effective for many customers, coupling VERAP or VCAAP help with the EAP to give customers additional support during these difficult times.

We are also planning another wave of our outreach campaign and will include information about the EAP in that effort, timed to educate customers about the coming Vermont Housing Finance Agency's ("VHFA") Vermont Homeowner Assistance Program ("VHAP"). VHAP, which will be able to provide up to \$30,000 in assistance to qualifying homeowners to pay mortgages, utility bills, back taxes, etc., is expected to open for enrollment in January or February. At that time, we plan another wave of mailings, calls, social media marketing, paid advertising, and outreach to traditional media to highlight VHAP, VERAP, and the EAP.

*Q2. Please describe the work GMP has done to expand outreach to the wider network of low-income support agencies to provide referrals to the EAP and to provide a link between GMP and the larger set of social programs that support low-income residents. a. Also, what plans does GMP have for expanding this in the future? b. How, if at all, is this outreach being coordinated or could this outreach be coordinated with outreach efforts related to the current arrearage assistance programs?*

### GMP Response

Throughout the pandemic, GMP has been working to expand the network of potential referring agencies, people, and organizations for all the state programs and the EAP, and we have seen anecdotal evidence that it has helped and prompted some applications for the program. This work will continue as we think there may be additional opportunities, which we address below in answer to question 2b.

(Part a) We address this in some depth in answer to question 2b, below.

(Part b) This effort is already underway and can be further linked with the state Covid-assistance programs. In addition to the community action agencies, with which we routinely work to assist customers facing financial difficulty, GMP sought the assistance of a wide variety of organizations, people, and businesses to spread the word about the state-funded Covid-inspired programs, and by association, the EAP. These efforts include a variety of nontraditional avenues. They were primarily focused on the state Covid programs, given the complexity of the situation, specifically VCAAP, VERAP, and VCAAP II, but when customers contacted GMP about these programs, we would (and still do) inform them about the EAP too.

GMP reached out to churches, other religious organizations, food shelves, and other nonprofits to seek help informing customers about the funds that were and are available. We also reached out to a wide variety of organizations, community leaders, and trade groups including banks, credit unions, town clerks throughout our service territory, legislators, and other nonprofit groups that serve Vermonters who have low incomes.

The town clerks and legislators, for example, often have their fingers on the pulse of the community, oftentimes know who might be facing financial difficulty, and are adept at protecting privacy and using tact to assist community residents. They care about their constituents. Banks and credit unions, similarly, have interests in the success of their customers, and some have been helpful in spreading the word about available programs.

The expanded list of programs available—many being time-limited—drove a need to use all types of communication channels. This type of expanded outreach appeared effective for the state assistance programs, and we can use it to more directly focus on the EAP in the future.

*Q3. Is GMP considering a stronger person-to-person outreach effort (i.e., calling customers versus other means of communication, such as mailers, web advertising, etc.)? a) If so, what would that outreach look like?*

GMP Response

Yes. During the pandemic, we have committed significant resources to direct calls and emails to customers, and personal “door-to-door” outreach, and we plan to continue and expand the efforts previously described above. We have contacted thousands of customers through personal phone calls by CSRs and other staff, our overflow call center, RDI, and through automated calls. Meter readers, managers, members of the leadership team, and other employees have made hundreds of visits to customer premises during the past few months alone, offering information, empathy, and advice to customers with significant past-due bills.

Through these efforts, combined with the other outreach described above, we have helped thousands of customers get VCAAP, VERAP, and VCAAP II assistance, and for some, EAP assistance. We anticipate continuing these types of outreach efforts to promote VERAP, VHAP, and the EAP, though in-person visits will be reduced during the winter due to weather and safety concerns.

(Part a) We anticipate the personal outreach in the future will largely mirror the outreach described in our response to Q3 above, though likely with an even greater emphasis on EAP in the future. GMP is committed to finding additional ways to inform and encourage our customers to apply for the EAP and other assistance, and welcomes additional ideas from the DPS, its consultant, other parties to this proceeding, and the PUC.

*Q4. In the workshop, GMP stated that funding the EAP is becoming more challenging. At this time, has GMP identified any specific state and federal funding to support the EAP?*

GMP Response

No, we have not identified any specific new EAP funding mechanisms beyond fees paid by our existing customers, and the possibility of statewide funding if the Vermont General Assembly determines that to be in the state’s best interest. That said, the success of the state’s VERAP and VCAAP programs demonstrates the value federal- or state-funded programs could have in helping Vermonters. Thousands of customers have benefitted from these programs, in many cases wiping out months of debt they would otherwise have been unable to pay, and many beneficiaries have been able to remain current.

We continue to explore the possibility of state and federal funding to help our customers, especially given the various bills that have and are working their way through Congress in recent

months. Congress has provided unprecedented funding to the states and various federal agencies, in some cases with broad discretion provided to legislatures on how to spend it. Some of the programs, such as the VERAP and VHAP, include ongoing bill support for numerous months, a recognition of the need and a significant help to the rest of our customers whose energy affordability we must also keep in mind. We are exploring how and if some of the other funds available might be used to help low-income customers, including many dairy farmers who are struggling, through new programs or the EAP.

*Q5. If there are not available state and federal funds or insufficient state and federal funds, what mechanism does GMP propose to continue funding the EAP (e.g., reduced benefits or increased EAP fees), particularly given the planned expansion of the income-level qualification for the EAP from 150% of the federal poverty guidelines to 185%?*

We have not yet determined a design, in part because we are focused on helping customers first reduce the unprecedented levels of debt accrued during the pandemic with all existing available relief. This will also help us determine what changes might be both beneficial and affordable for other customers. It is clear the increases for qualifying for the EAP, from incomes of 150% of federal poverty guidelines to 185%, will necessitate changes of some kind. This is a significant eligibility expansion, and has implications for customers enrolled in the EAP, future enrollees, and nonparticipating customers who help fund the EAP. GMP suggests that a deliberative, informed discussion with a variety of constituencies, including the DPS, low-income advocates, and customers, will be required to address these issues.

GMP estimates that change in eligibility alone will add 11,400 customers to those already eligible; if the newly eligible customers participate at the current level of participation of the lower-income group, it will require an additional \$1.2 million in annual benefits. If we enroll even more customers through our outreach, the demand will grow accordingly.

For context, 10,213 customers were active EAP participants at the end of 2021. Customers received arrears forgiveness of \$710,000 and bill discounts of \$3,721,000 in 2021. In 2020, 10,107 customers were active participants at year end. They received \$380,000 in forgiveness and \$3,713,000 in bill discounts. In 2019, the pre-pandemic year, 10,074 customers were active participants at year end. They received \$516,000 in arrears forgiveness and \$3,606,000 in bill discounts. By comparison, the EAP fees generated \$3,807,000 in 2021, \$3,781,000 in 2020, and \$3,752,000 in 2019. Though the numbers seem comparable, we foresee the potential for significant additional EAP forgiveness requests and benefits, based on current accounts receivable, which remain quite high, and the potential for declining state and federal assistance funding.

A second major factor will put pressure on EAP fees: the existing EAP deficit. The EAP Fund deficit has been growing since January of 2019 and has grown to more than \$1.6 million as of the date of this filing.

There will also likely be new arrears balances from these newly eligible customers to fund through EAP fees. Based on our initial estimates, paying for the additional customers alone would require an increase of 30% in EAP fees. This is high as a percentage, but the current residential fee is \$1 per month, so the increase would be 30 cents. While some customers will not welcome any increase, GMP believes that absent other funding or a statewide funding decision, this is an important discussion, and there are benefits to nonparticipants by way of reduced bad debt and write-offs, which ultimately impact rates for all customers.

GMP would prefer not to reduce benefits in this program, which is helping an important and income-challenged segment of our customer base. We recognize that a holistic look at low-income support across our programs is probably required to ensure that overall support for eligible customers is strong and sustainable for nonparticipating customers who pay for it. While we don't want to prejudge the outcome, given the possibility of a statewide program or state or federal assistance on a broader scale, an increase in EAP fees is likely needed if other outside funding sources are not available.

As noted during the July 8, 2021 workshop, GMP's plan is to make changes in a deliberate way, first through our continued efforts to encourage customers to enroll in VERAP and VHAP, turning our attention to EAP adjustments later in 2022, probably by summer. We also plan to evaluate the re-enrollment process to determine if there are ways to reduce the re-enrollment burden on customers. Ultimately, our collective goal is to help qualifying customers receive the benefits of the program while they are eligible. While we are still studying this issue and the data, we expect in 2022 we will propose adjustments to erase the EAP deficit and incorporate the new eligibility standard. We are also likely to propose a mechanism that will adjust EAP fees on an ongoing basis at a predictable time to keep the program funding and expenditures in better balance for all our customers over the long run.

*Q6. What, if any, plans does GMP have to work with the Vermont Department for Children and Families ("DCF") to develop an EAP application that can be submitted online? a) Also, what, if any, barriers exist to GMP working with DCF to create an application that can be submitted online?*

#### GMP Response

The current application is available to be printed online and is available at GMP offices and CAP agencies for customers to fill out at the time they enroll or recertify in other programs. The GMP website also contains a document uploader that connects directly to DCF if customers prefer to



use that method of application—in effect an online application. When forms are requested to be mailed, GMP includes a stamped, addressed envelope for the applicant’s benefit. Little effort is required from the customer to complete the form, which is attached. Besides a copy of the customer’s GMP bill, the form requires the customer’s name and address; Social Security number; identification of programs in which applicants are already enrolled; and household income.

While not an issue of online vs. paper, GMP is interested in working with DCF to develop a process that syncs with other programs consistent with eligibility requirements. For example, when a customer is signing up for 3SquaresVT or Fuel Assistance programs, there could be a checkbox asking if they would also like to sign up for GMP’s EAP. This is something we intend to explore as we develop the program requirements and structure needed to increase the eligibility to 185% of the FPL.

*Q7. GMP has stated that it does not favor a program in which customers can self-certify that they qualify for the program. If GMP’s concern is fraudulent self-certification, how big a concern is it that this would actually occur, and, if it is a big concern, are there ways to address that?*

#### GMP Response

Before answering this question in detail, given that it appears to be based at least in part on a desire for approved applicants to receive benefits quickly, it is important to note that current program benefits, once approved, are retroactive to the date of application.

GMP’s primary concern with automatic enrollment at the time of application is that it will create issues of adjusting customers’ bills retroactively to align with each customer’s application date or potentially rebilling customers at regular rates (including rebilling arrears) if they are deemed ineligible. Because the entity receiving the application and determining eligibility (the Department for Children and Families (“DCF”)) and the entity with the customer’s billing data and meter reading dates (GMP) are different, it would be difficult to put into practice this idea of providing benefits immediately and then waiting for DCF to process the application. All adjustments on GMP’s systems (either proactive adjustment to provide benefits or retroactive adjustments to recapture benefits in the case of a denial) would require manual intervention. We believe the current practice of providing arrears forgiveness (if eligible) and reduced rates on the next bill cycle after DCF enrollment is the most efficient administration at the level of system integration that exists today or that we conceive in the foreseeable future. DCF’s timely response to process applications is generally excellent, so we don’t see that this technical enhancement has much value.

With respect to fraud, we do not have concerns, as customers at this time are already required to declare under penalty of perjury that their income information is accurate, so in that sense they are already self-certifying. No financial records are required if a customer is already certified for other state low-income assistance programs. Many customers can simply prove eligibility by declaring their participation in other Vermont assistance programs. GMP is not staffed to perform income verification, does not believe asking for or obtaining specific income information from customers is an appropriate part of our role, and believes it would be inappropriate for any part of that role to shift to GMP when DCF is fully staffed and has the information and tools to verify income as required by the various assistance programs it offers.

*Q8. While the Commission understands that GMP does not want to collect personal customer income and household data, what work would be necessary for GMP and DCF to create a shared data system that would be helpful to the administration of the EAP, including the applicant's status; arrearage status once enrolled; and major events, such as disconnections, reconnections, exits from the program, and reenrollments?*

#### GMP Response

While this is a laudable goal, GMP does not believe the cost, significant IT upgrades, and risks to both sides associated with such a data system make it tenable, at least under current circumstances. Cyber security ranks with global warming, reliability, and resiliency among the most critical issues facing GMP as we work to serve Vermont and Vermonters, and we know it is also of critical importance to the State of Vermont. Like virtually every significant business and government in the country, we both face a constant threat of cyberattacks. As the PUC is aware through filings and testimony in a variety of dockets within which we have addressed cyber security and efforts to protect the company and our customers, this is a responsibility we take seriously and for which we have and continue to invest substantially.

As we recently said in our Integrated Resource Plan, filed with the PUC on December 10, 2021:

While technology continues to enable more opportunity each day at GMP, it is also imperative that we acknowledge and remain focused on our role as a critical infrastructure provider, counted on by our customers and others to deliver services in a highly available and secure manner, and to weigh those responsibilities in context with a worldwide surge in cyberattacks and cybercrime. It is essential, therefore, that we fundamentally reimagine how we deploy, enhance, and **protect every facet of our infrastructure, and every system utilized by our employees and customers, to ensure their integrity, availability, and utility in the face of exponentially increasing risks.**

Case No. 21-5208-PET *GMP 2021 Integrated Resource Plan* at 4-1 (emphasis added). This includes a responsibility to ensure to the greatest extent possible the safety of every link through which we connect to other entities, whether through the electrical grid or the sharing of data with organizations like the Vermont Electric Power Company and ISO-New England, or with vendors, customers, and state agencies. We believe the risks of creating the type of systems and integration the PUC suggests would be too great for GMP and our customers, even with the utmost of care and substantial expense that would be required. Simply put, we believe the potential benefits would be greatly outweighed by the costs and risks.

In addition, the actual costs and technical risks of implementation are unknown but not likely to be low or easy; if it were instead to shift to a statewide funded program where DCF administered the entire program and then sent payment along with a roster of customers to which the EAP applied, for example, it would be far easier to accomplish what the PUC suggests. Integrating two separate systems is not the right course, in our view.

*Q9. GMP stated that it may want to reconsider how it implements the arrearage forgiveness portion of the EAP, noting that some jurisdictions forgive outstanding balances over time as customers pay their monthly bill (rather than upfront, as with the EAP). What are the benefits and what are the downsides to having GMP forgive arrears over time rather than upfront?*

#### GMP Response

GMP believes there may be significant benefits to a change in the forgiveness portion of the EAP, but the topic requires additional review before making a specific proposal and should be done considering the other redesign issues noted above. As suggested by GDS Associates, a system that ensures customers see a correlation between their own payments and past-due balance forgiveness could provide benefits to all customers. Benefits we would hope to see include creation of incentives for customers to make regular payments in return for corresponding forgiveness; long-term pattern modification as customers with past trouble paying bills build improved payment habits; reduced reliance on the EAP by individual customers who develop improved finances and payment habits; and potentially reduced collection costs and write-offs, which affect all customers.

Potential downsides to an incremental forgiveness program include: fewer applications for assistance, as some customers unable to make any payments initially may become discouraged and not even apply; delays in getting assistance to customers who do apply but can't make a payment up front; customers dropping out of the program because they can't make subsequent scheduled payments to leverage additional forgiveness; fewer dollars getting to those customers most in need, as any barrier to forgiveness may discourage participation; additional manual

management of individual accounts by utilities to implement each stage of forgiveness as customers make payments, or removal from the program if they do not; an increase in disconnections affecting customers who under the current system might avoid such outcomes; and potentially other unforeseen consequences for customers.

Each of these issues warrants investigation to determine how we might best ameliorate such potential impacts, whether in the standalone GMP program or a new statewide program.

*Q10. While this was not raised in the Evaluation, has GMP considered tying enrollment in the EAP to enrollment in or referral to low-income efficiency programs for low-income customers? a) Also, if not tying enrollment to such efficiency programs, has GMP considered referring low-income EAP participants to efficiency programs as a means of helping these customers reduce their usage and their bills?*

#### GMP Response

GMP has not considered tying enrollment in the EAP specifically to participation in efficiency programs. We plan to review this possibility further given increased efficiency funding and encourage investigation as well in the context of a potential statewide program. If effective, such a requirement could drive down energy use and cost for customers struggling to pay their bills, but experience to date suggests such a program might produce significant unintended consequences. For example, as implied in the answer to Question 9, barriers to enrollment in any low-income program may simply eliminate the possibility of some customers applying. Low-income customers, especially those below or around the poverty line, often face substantial hardships in their day-to-day lives. Oftentimes these customers, in our experience, have every intention of paying their bills, but are constantly facing multiple pressing issues and competing interests. As a result, many must focus on the most imminent crisis at hand, such as feeding their families, ensuring transportation, or dealing with health crises. Adding a new barrier to getting help, such as requiring energy audits and working with weatherization programs, could mean some qualified customers just don't apply. Other issues we could envision include potential delays in aiding customers as they go through efficiency program enrollment as a precursor to aid, and landlord-tenant issues that delay or even prevent the customer from participating.

(Part a) We routinely refer customers, including folks who are having trouble paying their bills, to Efficiency Vermont, and our internal Tier III program offerings. Reducing consumption is always a good way to reduce bills, regardless of income, and we especially encourage customers who are struggling with their bills to take advantage of these opportunities. Customer care representatives do this every day.

*Q11. What, if anything, is GMP doing to address language barriers for EAP-qualifying customers who do not speak English as a first language?*

### GMP Response

With a growing number of customers coming from around the world, as refugees and immigrants, GMP recently began to offer a new service from Telelanguage to ensure virtually any customer can effectively communicate with the company. Telelanguage offers an incredible array of translators with a simple phone call—allowing us to communicate with native speakers of nearly 300 languages. From widely spoken languages such as French and Spanish to dialects unique to relatively small populations worldwide, Telelanguage allows us to speak with customers through interpreters who are available virtually any time.

The system is simple, and available for use with any customer, whether regarding the EAP or any other product or service GMP provides. A customer service representative simply puts the customer briefly on hold, calls Telelanguage, and tells their customer service representative at Telelanguage the language needed for the call. Once connected with the interpreter, the GMP customer service representative adds the customer to the three-way call, and the conversation begins. We are proud to offer this service to the growing number of Vermonters who might benefit from it and have had a positive response since we implemented it in the fall.

The cost to GMP is quite reasonable and there are no monthly or upfront fees. It is a pay-for-service offering, which costs 65 cents per minute for Spanish translation, and 80 cents per minute for all other languages. The first call for which we relied on Telelanguage, as an example, involved a Russian-speaking Vermonter who wanted to set up a new account with GMP. Translation services cost just six dollars for the call and helped ensure a clear and productive experience for the customer with a great outcome.

GMP is in the process of updating our website to include information about these translation services in multiple languages. We are examining translation capabilities that would make virtually our entire website accessible in various languages. We are also working to make the EAP form available in Spanish and French.

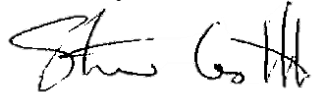
### Summary

In closing, GMP thanks the PUC, DPS, GDS, and other parties for their work and leadership in this proceeding. In that spirit, we offer the following summary of many of the numerous and complicated issues that must be addressed as we collectively work to improve the GMP EAP and consider a statewide program or programs. The challenges and concerns include but are not limited to the following: 1) the overarching question of whether GMP's program should be revamped on its own, or folded into a new statewide program; 2) the current deficit in the GMP

program; 3) expected cost growth related to expanded eligibility; 4) customer education designed to help ensure the customers with the most need apply for and receive benefits; 5) significantly higher-than-normal accounts receivable attributable to the Covid-19 pandemic; 6) discontinuation of VCAAP and the planned winding down of VERAP; 7) uncertainty over the PUC's statutory authority to create a statewide program; 8) concerns over cross-subsidization across utility service territories; 9) the question of possible reductions in benefits as more participants are added; 10) cyber security for customer and utility data, and the greater grid; 11) investigation of potential new funding sources, including potentially new state and federal avenues; 12) continued support from nonparticipating customers; and 13) mechanisms to facilitate necessary funding adjustments quickly to prevent future surpluses or deficits as enrollment changes over time.

Despite cataloging these issues here, GMP reiterates its support for the existing EAP and the concept of a statewide program or programs, and its commitment to working constructively with the PUC, DPS, GDS, other DUs, and other parties on this important topic.

Sincerely,



Steve Costello  
Vice President, Customer Care

cc: Service list (*via ePUC*)