

August 3, 2022

Via ePUC

Holly Anderson, Clerk
Vermont Public Utility Commission
People's United Bank Building, 4th Floor
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 Holly,

This letter is being submitted jointly by Vermont Electric Co-op, Burlington Electric Department, Washington Electric Co-op, Stowe Electric Department, Green Mountain Power, VPPSA, VGS, and the Village of Hyde Park. We are writing regarding the July 19, 2022, Department of Public Service's letter filed in this proceeding seeking clarification of the Emergency Disconnection Rule 2.600 and Vermont Legal Aid's July 27, 2022, response.

We agree with Legal Aid and the Department that customers remain exempt from disconnection if an application is under appeal because they are "awaiting a determination" on eligibility under the Emergency Rule. This is the current practice across utilities. Regarding those customers who have received assistance from one of the available programs but exhausted available benefits, the intent of the Emergency Rule is that such customers are no longer exempt from disconnection if they are in arrears or subsequently fall into arrears. We have been following the Emergency Rule, including notice of available payment plans and other provisions in the disconnection notice, in these circumstances.

Legal Aid proposes three specific steps to address the potential lack of clarity raised by the Department. The first step is already a part of the Emergency Rule process through the disconnection notices now in use. The second and third steps suggested by Legal Aid are not fully aligned with the way the two programs work (for example, there is not a uniform 18 months of assistance for all eligible customers under both programs), and the utilities cannot take on individualized additional or overlapping administrative tasks for these already-complex programs. We think that the funding programs are in the best position to communicate with eligible recipients about when they have exhausted available support and we would be happy to continue to work with these programs to find ways to streamline access to information sharing about eligibility to help facilitate the Emergency Rule and provide the best possible service to customers.



We could address the Department's concern and accomplish much of what Legal Aid suggests if the Commission finds it warranted by allowing each utility discretion on how to communicate directly with customers. For some, that might be direct outreach through phone calls, or an additional letter or bill message for program recipients.¹ Individual notice is required to be sent before disconnection to a customer in arrears including any who may have exhausted the programs. Amending the disconnection notice, while seemingly straight forward, is a communication late in the process and effective in getting customers to contact their utility. Direct contact with a customer remains one of the best ways to figure out how to help the customer who is in arrears. We remain committed to helping our customers during this unprecedented and difficult time and appreciate the work of the Commission and other stakeholders to assist in our customers accessing all available funds.

Please let us know if you have any questions or need further information.

Signed,

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Vermont Electric Co-op

Josh Castonguay
Chief Innovation Officer
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Andi Higbee
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Sarah Braese
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Matthew Allen
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Michael Lazorchak
Manager of Regulatory Affairs
Stowe Electric Department

Carol Robertson
General Manager
Village of Hyde Park

¹ Green Mountain Power plans to send a notice letting customers who are receiving program support know that when benefits expire, eligible debt will trigger a disconnect notice. This is a separate communication that will be sent in addition to any required disconnect notice.