

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 20-0703-PET

Vermont Legal Aid request for moratorium on utility and telecommunications shutoffs during State of Emergency	
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Order entered: 06/24/2021

ORDER ENDING THE TEMPORARY DISCONNECTION MORATORIUM ON JULY 15, 2021, AND REQUIRING CONSUMER PROTECTIONS WHEN THE MORATORIUM IS LIFTED

This proceeding concerns a petition from Vermont Legal Aid to the Vermont Public Utility Commission (“Commission”) requesting the temporary halt of involuntary utility disconnections during the state of emergency in Vermont because of the COVID-19 pandemic.

In today’s Order, we address a request by Vermont Legal Aid and the Vermont Public Interest Research Group (“Movants”) to extend the temporary moratorium from June 30, 2021, to August 31, 2021. The Vermont Public Service Department (“Department”) and the Vermont utilities that have filed comments on the extension oppose any further extensions of the moratorium.

In today’s Order, we grant in part and deny in part the Movants’ request, and we extend the temporary moratorium until July 15, 2021, to provide the Commission time to put in place additional consumer protections that the utilities must provide when the moratorium is lifted.

I. BACKGROUND

On March 18, 2020, the Commission imposed a temporary moratorium on certain involuntary utility disconnections. The temporary moratorium currently applies to involuntary disconnections of natural gas, electric, and traditional landline telecommunications service to consumers of regulated utilities in Vermont, except for unoccupied properties. The Commission granted this temporary moratorium to protect utility customers who could not make payments due to job losses or other economic impacts from the COVID-19 pandemic.

From October 8, 2020, until December 22, 2020, the Commission temporarily lifted the moratorium, while simultaneously ordering additional consumer protections, to encourage utility customers to take advantage of an \$8 million assistance program being administered by the

Department. The Department's Vermont COVID-19 Arrearage Assistance Program ("VCAAP") provided eligible Vermont households and businesses with grants to pay past-due balances on utility bills. Residential households and non-residential account holders who suffered economic hardship due to loss of income precipitated by COVID-19 could apply for assistance. The VCAAP stopped accepting applications on December 15, 2020, when it had exhausted all available funds.

The Commission reinstated the moratorium on December 22, 2020. Although the temporary moratorium had previously applied to Commission-regulated water utilities, a moratorium was no longer needed for water utilities because the Vermont Legislature had now imposed its own moratorium on disconnections of water service during a state of emergency.¹

On March 24, 2021, the Commission issued an order asking utilities to report on "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."

On June 11, 2021, the Movants filed a motion asking the Commission to extend the moratorium until August 31, 2021.

On June 14, 2021, Governor Scott ended the state of emergency in Vermont, effective June 15, 2021, and eliminated most COVID-19 restrictions.

Over the course of several days, ending on June 15, 2021, utilities filed comments in response to the Commission's March 24, 2021, Order.

On June 16, 2021, the Commission directed parties to file any responses to the pending motion by June 18, 2021, and directed the Movants to file any reply by June 22, 2021.

Also on June 16, 2021, the CenturyLink operating companies in Vermont filed a response opposing the pending motion.²

¹ Act 92 of 2020, at Section 9.

² The CenturyLink operating companies in Vermont are CenturyLink Communications, LLC (with assumed names of Lumen, Lumen Technologies, and Lumen Technologies Group); Level 3 Communications, LLC; Broadwing Communications, LLC; TelCove Operations, LLC; WilTel Communications, LLC; Global Crossing Telecommunications, Inc.; Global Crossing Local Services, Inc.; and Level 3 Telecom Data Services, LLC (collectively "CenturyLink operating companies").

On June 17, 2021, eight Vermont rural local exchange carriers (“Eight RLECs”) filed a response opposing the pending motion.³

Also on June 17, 2021, Vermont Water Utilities, Inc. (“VWU”) filed comments.

On June 18, 2021, Consolidated Communications of Vermont Company, LLC, and Consolidated Communications of Northland Company, both doing business as Consolidated Communications (collectively, “Consolidated”) filed a response opposing the pending motion.

On June 22, 2021, the Movants filed a reply to the responses filed.

II. COMMENTS

In addition to the pending motion and the responses to the motion noted above, the Commission received the following comments.

The City of Burlington Electric Department (“BED”) filed comments on June 7, 2021. BED operates a voluntary disconnection moratorium and has not set a time for lifting that moratorium. When it does lift its own moratorium, BED will resume its standard account collection and disconnection policy, with COVID-19 modifications. BED has no objection to the Commission lifting the statewide disconnection moratorium.

Champlain Broadband, LLC, doing business as Burlington Telecom (“Burlington Telecom”) filed comments on June 11, 2021. Post-moratorium, Burlington Telecom will help any residential or non-residential customer that accrued an arrearage during the moratorium.

AT&T filed comments on June 11, 2021. AT&T does not have any residential customers but has provided plans for addressing potential disconnections of commercial customers.

The Town of Stowe Electric Department (“Stowe Electric”) filed comments on June 14, 2021. Stowe Electric proposes to continue communicating with customers who have past-due utility bills through bill stuffers, Stowe Electric’s online payment portal, website updates, and social media posts. Stowe Electric also proposes to educate customers on the Vermont Emergency Rental Program. Stowe Electric encourages the Commission to lift the moratorium.

³ The Eight RLECs are 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.

Green Mountain Power Corporation (“GMP”) filed comments on June 14, 2021. GMP plans to implement a four-phase approach with a focus on residential customers, small commercial customers, dairy farms, and a handful of large customers with large past-due balances. GMP’s approach is as follows:

- Phase 1 (Targeted through June 30, 2021) will include providing information to customers in arrears by meter readers, outbound letters and emails, and customer service representatives. Outreach will focus on providing information on how to apply for the new state assistance programs, GMP’s Energy Assistance Program, Budget Billing, and autopay options.
- Phase 2 (Targeted July 1, 2021, through October 31, 2021) will involve informing customers of when the formal moratorium ends and engaging in an extensive effort to help as many customers as possible access all available funds. GMP will end its voluntary moratorium on September 7, 2021. Also, GMP will not pursue disconnection activity for any customer who has applied for and is awaiting a decision regarding any state or federal arrearage assistance programs. Finally, GMP’s collections efforts related to closed accounts will be reinstated August 1, 2021, as will late fees for Commercial and Industrial accounts for new debt going forward. GMP will not charge or reinstate fees that would normally have been charged on debts that accrued before August 1, 2021.
- Phase 3 (Targeted November 1, 2021, through March 31, 2022) will involve GMP working under traditional winter disconnection rules to help customers reduce outstanding debt, including helping customers access available funding programs.
- Phase 4 (Targeted April 1, 2022, through December 31, 2022) will help customers reduce overdue balances to return as close to normal pre-pandemic levels as possible. GMP will implement normal practices under existing Commission-approved summer disconnection rules on April 1, 2022, including the use of payment arrangements and reminders via mail, phone, or in person. GMP’s goal is to help customers return to the typical arrearage amount over 60 days old by December 31, 2022⁴

GMP is in favor of ending the temporary moratorium.

CenturyLink filed comments on June 14, 2021. CenturyLink states that it does not have residential customers in Vermont. However, CenturyLink proposes new steps for its business customers to prevent the disconnection of service due to non-payment.

Consolidated Communications filed comments on June 14, 2021, stating that once the moratorium is lifted, Consolidated will resume sending disconnection notices and generating outbound calls to customers with a past-due balance before suspending or disconnecting service.

⁴ GMP Comments at 3-6.

Consolidated currently offers, and expects to continue offering, extended payment arrangements, when necessary, within the existing framework of its systems, but long-term arrangements (12-24 months) will be the exception. Consolidated will also encourage customers to work with its customer service teams to ensure that customers subscribe to the most cost-effective plans to meet their needs.

Vermont Electric Cooperative, Inc. (“VEC”) filed comments on June 14, 2021. VEC has been actively communicating with its members – including auto calls, mailings, direct calls, and bill stuffers – to inform them of the need to address arrears and of various ways they can do so. VEC will inform members of and help connect them to various financial assistance programs, including the Vermont Emergency Rental Assistance Program. VEC strongly recommends that the Commission set a near-term end date for the temporary moratorium.

The Eight RLECs filed comments on June 14, 2021. 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 needs of the company and its customers.

The Village of Hyde Park Electric Department (“Hyde Park Electric”) filed comments on June 14, 2021, stating that it will abide by Rule 3.300 on disconnections. Hyde Park Electric supports the lifting of the moratorium.

Washington Electric Cooperative, Inc. (“WEC”) filed comments on June 14, 2021, and proposes the following approach: (1) disconnection notices will resume on July 1; (2) WEC staff will call, send letters to, and email members in an attempt to reach past-due accounts that receive disconnection notices; (3) WEC will extend the disconnection period to two months to give members time to react to disconnection notices; (4) WEC will extend budget plans for repayment to over one year and up to two years; and (5) WEC will not charge late fees. Also, WEC believes an end of the disconnection moratorium is necessary.

The Department filed comments on June 15, 2021. The Department supports ending the moratorium and states that \$12 million has been made available for the Emergency Rental Assistance Program for Utility Assistance and \$15 million has been made available for the VCAAP.

The Vermont Public Power Supply Authority (“VPPSA”) filed comments on June 15, 2021. VPPSA members want the moratorium lifted and the discretion to work with individual customers in a flexible manner that balances the needs of individuals with the needs of the general customer base.

MCI Communications Services, Inc., doing business as Verizon Business Services, and MCI Metro Access Transmission Services, Inc. doing business as Verizon Access Services (collectively, “Verizon”) filed comments on June 15, 2021. Verizon states that it has very few customers in Vermont whose service would be subject to disconnection under the Commission’s rules. Once the moratorium expires, Verizon intends to engage with these customers in the same manner as before the moratorium was put into place.

Vermont Gas Systems, Inc. (“VGS”) filed comments on June 15, 2021. VGS supports ending the moratorium and proposes to resume normal collection activities after the moratorium is lifted but will maintain a voluntary pause on disconnections through at least August 2021. VGS also plans to continue working closely with its customers to help them access financial assistance that is available through traditional means, through the new Vermont Emergency Rental Assistance Program, and through any new funding programs, such as VCAAP. Payment agreements of up to 12 months’ duration will be made available to customers. Since March 2020, VGS has waived late fees on commercial accounts, but those fees will be reinstated in September 2021.

VWU filed comments on June 17, 2021. VWU states that the COVID-19 pandemic has had little to no effect on customer payments. Because of this lack of any significant impact by the pandemic or by the disconnection moratorium on VWU, the company has maintained its standard operational procedures regarding billing and customer engagement.

III. DISCUSSION AND CONCLUSION

We have carefully considered the many comments we received from the participants in this proceeding, including the Movants’ request to extend the temporary moratorium, as well as the requests by the Department and many utilities to end the temporary moratorium on June 30, 2021. We have also considered the impacts of the moratorium on utilities and their customers. Given these considerations, we find it in the public good to extend the temporary moratorium on involuntary utility disconnections until July 15, 2021, and then impose additional consumer

protections for disconnections that may occur after that date. This extension of the temporary moratorium and the additional consumer protections post-moratorium apply to involuntary disconnections of water, natural gas, electric, and traditional landline telecommunications service to consumers of regulated utilities in Vermont, except for unoccupied properties. We are applying these requirements to Commission-regulated water utilities because, now that Vermont is no longer in a state of emergency, the consumers of water utilities are no longer protected by the legislative prohibition on disconnections during a state of emergency.

In making this decision, we are guided by several important factors.

First, \$15 million in new federal funding was recently made available to the Department's VCAAP, as well as \$12 million for the Emergency Rental Assistance Program for Utility Assistance, to help utility customers pay down some or all of their arrears. When we lifted the moratorium between October and December 2020, at the urging of the Department and many utilities, we did so because those entities argued that lifting the moratorium would provide customers with a greater incentive to seek out the financial assistance that was available through VCAAP. This approach worked, and all \$8 million of the original VCAAP funding was quickly distributed to consumers, to the benefit of consumers and utilities. Given this recent experience, we agree with the position put forward by the Department and many utilities that ending the moratorium will once again spur customers to work with their utilities to seek aid from the Department's VCAAP and quickly and efficiently make use of the new funding.

Second, the utilities have demonstrated in their most recent round of filings that they have considered the unique circumstances of the COVID-19 pandemic and have adjusted their customer service and assistance activities to better ensure that their customers avoid disconnections after the moratorium is lifted. GMP, which serves a significant majority of Vermonters, provides an excellent example of the flexibility with which many utilities plan to approach customers. GMP has a four-stage plan extending to the end of 2022 that gradually helps customers address outstanding arrears by accessing state, federal, and utility-funded financial assistance and by accessing affordable payment arrangements, all while avoiding disconnection. While most plans post-moratorium are individual to each utility, they share the common goal that GMP's plan exhibits – to help customers pay their bills, while avoiding disconnection.

Third, a 15-day extension of the temporary moratorium will enable us to reinstate enhanced consumer protections to help customers when the temporary moratorium is lifted on July 15, 2021. On October 8, 2020, the Commission issued an order that included specific consumer protections for utility customers. Those enhanced consumer protections – which were put in place on October 15, 2020, and expired on April 13, 2021 – protected consumers and prevented needless disconnections. We will reinstate similar consumer-protection rules soon after the issuance of this Order. They will include specific additional protocols that utilities must follow before disconnecting a consumer, including:

- informing customers of how to obtain available funding, and
- working with customers on long-term payment plans for past-due amounts.

While the Movants have asked the Commission to extend the temporary moratorium until “August 31, 2021, to allow adequate time for the programs that will provide financial assistance to customers with account arrearages to become accessible and available for all utility customers,”⁵ we do not find that such a lengthy extension is appropriate here. The Movants argue that extending the moratorium until August 31, 2021, would give Vermont time to design and implement assistance plans using recently received federal COVID-19 funds. The Movants specifically cite utility assistance that will be available through the Vermont Emergency Rental Assistance Program and the Housing Assistance Fund.⁶

For many of the reasons discussed earlier in this Order, we grant the Movants’ request in part, by extending the temporary moratorium until July 15, 2021, but deny the request to extend the moratorium beyond that date. We disagree with the Movants that there is insufficient time to design and implement assistance plans using recently received federal Covid-19 funds. The VCAAP is already in place, and it is our understanding that the new \$15 million for utility assistance will be disbursed through that existing mechanism. The Department, which is in charge of implementing the VCAAP, favors ending the temporary moratorium on June 30, 2021. As the Department and many of the utilities note, any significant delay in ending the temporary moratorium could hamper their ability to work with customers on maximizing available funds.

⁵ Motion at 1.

⁶ While the Movants also ask the Commission to enter an interim order allowing interested parties until June 30, 2021, to respond to the utilities’ plans for customer re-engagement and outreach, we find this part of the Motion moot in light of our decision to impose additional consumer protections through the emergency rulemaking process.

Finally, the consumer protections that we are imposing, along with the voluntary actions of the utilities to work with their customers, will address the concerns raised by the Movants regarding protecting those who have been economically harmed by the COVID-19 pandemic.

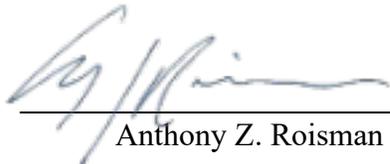
IV. ORDER

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED by the Public Utility Commission of the State of Vermont (“Commission”) that:

1. The temporary moratorium on involuntary utility disconnections of water, natural gas, electric, and traditional landline telecommunications service to consumers of regulated utilities in Vermont, except for unoccupied properties, is extended until July 15, 2021.

2. When the temporary moratorium is lifted on July 15, 2021, all disconnections of water, natural gas, electric, and traditional landline telecommunications service to consumers of regulated utilities in Vermont, except for unoccupied properties, must follow the additional requirements of the emergency rules that the Commission will soon adopt.

Dated at Montpelier, Vermont this 24th day of June, 2021.

)	
Anthony Z. Roisman)	PUBLIC UTILITY
)	COMMISSION
)	OF VERMONT

OFFICE OF THE CLERK

Filed: June 24, 2021

Attest:  _____
 Clerk of the Commission

Notice to Readers: This decision is subject to revision of technical errors. Readers are requested to notify the Clerk of the Commission (by e-mail, telephone, or in writing) of any apparent errors, in order that any necessary corrections may be made. (E-mail address: puc.clerk@vermont.gov)

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