CAPI Rules Analysis

<http://puc.vermont.gov/sites/psbnew/files/doc_library/3200-ratepayer-deposits.pdf>

<http://puc.vermont.gov/sites/psbnew/files/doc_library/3300-disconnection-of-residential-service.pdf>

**Medical notes -- 3.301(D); 3.302(B)(5)**

The seven day notice period begins the day **after** the consumer informs a utility that he or she will use a med note.

Disconnection for non-receipt of a med note is allowed on the **eighth** day or the next disconnectable date (if the eighth day falls on a Friday, weekend, holiday or date when temps do not allow for disconnection).

Once service is off, utilities are **not required** to reconnect for a medical note promise, only when a consumer produces the note. However, CAPI would support a utility reconnecting for a med note promise if the consumer’s medical situation warrants immediate reconnection.

PUC rules allow the use of three medical notes per calendar year **per account**. If a new person comes into a household and establishes an account in his/her name, the utility should treat this as a new account and allow the use of three medical notes/year regardless of how many have been used under a different account for the household during the calendar year.

**Deposits – 3.203; 3.204**

After a consumer has been disconnected for non-pay, the utility may adjust the deposit to reflect changes in usage. The deposit can be increased (if usage is higher) or decreased (if usage is lower).

**Notice for broken payment arrangement – 3.305(A)**

The notice that a utility mails or posts when a consumer breaks a payment arrangement must have **five or nine (depending on the time of year) disconnection dates** printed on it, the same as a regular notice.

**Budget billing – 3.302(D)(2) and (3)**

A consumer can elect to go on budget billing at **any time.**

If a utility adjusts the monthly budget amount in the first year, the adjustment should reflect changes in **usage** only. If the consumer has a past due balance at the time of the adjustment, he or she should be allowed to make a payment arrangement on that amount.

Budget billing works well for consumers with seasonal fluctuations and consumers who want to pay the same amount each month.

If a consumer is on budget billing and has a concurrent repayment plan, the monthly budget amount and the payment plan should be separate line items on the bill and treated separately. If your billing software cannot accommodate this, **please contact CAPI** and we will be happy to work with you on a solution.

**Oral notice for disconnection November-March – 3.304**

A utility **can** give oral notice to a customer in October for disconnection after November 1st, provided the disconnection window extends beyond November 1.