

As of today, most utility offices are now closed to the public. Call centers remain open, either remotely where capability exists, or at offices that are closed to the public. Distribution utilities continue to communicate with the customers via their call centers, email, and through social media avenues like Front Porch Forum and Facebook.

Essential staff are reporting for duty, and most utilities are practicing social distancing while in the office or in the field where appropriate and feasible, without compromising the safety of the system or staff. Distribution utilities are in regular communication with each other, sharing updates and best practices as they become available. The Department is monitoring and encouraging this continued coordination and urges utilities to continue to practice social distancing in the workplace – this is the best means of ensuring that the utility workers will remain in good health and able to maintain safe and reliable service to Vermonters.

Vermont's municipal utilities are also working with the Northeast Public Power Association to coordinate on regional mutual aid arrangements in case of emergency, in addition to the normal mutual aid that happens between VT utilities.

The Department is in the process of contacting the water utilities under the supervisory jurisdiction of the Department and the Commission to determine how these companies are handling disconnections. As the Commission is aware, there are relatively few water utilities subject to supervisory jurisdiction and they tend to be very small with very few customers. The Department will report on its findings as soon as practicable. Most, if not all of these utilities bill on a cycle longer than 30 days. At this time, the Department has had no indication of any imminent disconnection from any water company. Out of an abundance of caution, the Department underscores here that water treatment facilities fall under the separate jurisdiction of the Agency of Natural Resources and are not regulated by the Commission or the Department.

The Department notes the hardship that many businesses are experiencing during the COVID-19 emergency. At this time, the Department is aware that Green Mountain Power Corporation has suspended disconnections for all customers – whether residential or business. The Department recommends that the Commission convene a process (notice and comment, for instance) to consider whether to extend disconnection protection beyond residential customers. The Department understands that the Agency of Commerce and Community Development will be making filing with the Commission about this issue on March 25th.

The Moratorium Order provides that the stay of disconnections will continue until April 30, 2020. The Department recommends that the Commission have further process (notice and comment, perhaps combined with a video workshop) to plan for the possibility that there may be a need to extend the moratorium. More information will become available over the next several weeks as our experience grows in functioning under the COVID-19 emergency conditions. The ends of regulatory efficiency and effectiveness will be best served if the Commission hears directly from the utilities as to their views as to how best to protect their customers while working to ensure the continuation of reliable service under these very challenging emergency conditions, including the financial impacts that are likely to arise from the moratorium. For those customers who find themselves unable to pay their bills due to the COVID-19 pandemic, regulators will need to work with the utilities to ensure that these customers are not overwhelmed by accrued arrearages. Similarly, regulators will need to consider how to proceed in ensuring that the utilities – especially the small municipal utilities – are able to cope financially should arrearages become widespread and reach material balances.

At this point in time, this is just a sample of potential issues that the utilities, Department, and other parties will need to consider with guidance from the Commission as we all navigate this very fluid situation. The Department welcomes all constructive suggestions as we go forward together to promote the best interest of the people in our state.

Dated this 20th day of March, 2020.

VERMONT DEPARTMENT OF PUBLIC SERVICE

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