

Vermont COVID-19 Arrearage Assistance Program

Frequently Asked Questions - Updated October 21, 2020 to reflect material modifications

Utilities

What is the Vermont COVID-19 Arrearage Assistance Program (VCAAP)?

The program was established by the Vermont General Assembly through Section 20 of House Bill 966 that was later signed into law on July 2, 2020 as Act 137. \$8 million was appropriated to provide utility ratepayer assistance for accumulating arrearages that could be linked to economic hardships precipitated by the COVID-19 Pandemic. Funding comes from the Federal CARES Act.

Who may apply for a grant award?

Any utility ratepayer served by a Vermont electric, natural gas, fixed-line telephone service provider, or a private water company may apply. Both residential and non-residential applicants (but not governmental entities) may apply.

How much can a utility customer expect to receive as a grant award through the program?

Customers can receive a grant for eligible outstanding arrearages that are more than 60 days overdue, up to a \$10,000 limit.

Applicants are eligible for and can apply for utility arrearage assistance on a single application for electricity, natural gas, private water, and landline telecommunications services.

Who is eligible to apply for VCAAP grant awards?

Both residential utility ratepayers, and non-residential (businesses and non-profits) may apply. Government entities are not eligible.

Are second homes and camps eligible for grant awards under the program?

Only arrearages for primary residences qualify. Residential customers must attest that the grant award that they are seeking is only for arrearage relief related to their primary residence.

What certifications will be required of residential applicants?

Applicants must certify and attest to a COVID-19-related economic hardship. Hardships include unemployment, layoff, reduced work hours, health (had COVID or cared for someone with COVID) and can't work because no childcare is available or school was closed.

Other detailed certifications or attestations apply.

What is a qualifying economic hardship for the VCAAP? Are increased expenses due to COVID-19 a qualifying economic hardship?

There is no threshold income eligibility limit for qualifying for the VCAAP.

There must be an economic hardship due to loss of income because of a COVID-19 reason such as loss of wages, job loss, health (had COVID or cared for someone with COVID), or can't work because no childcare is available, or school was closed. For example, an adult child returning home because they lost work due to COVID.

No, increased expenses (even if they are related to COVID-19) will not qualify an applicant for VCAAP under the guidelines set.

What certifications are required of non-residential applicants?

Applicants must attest to a loss of business revenues equal to 50% in a single month since the beginning of March 2020.

Other detailed certifications or attestations apply.

Can businesses with multiple utility service addresses apply for separate locations?

Yes. Each utility service location is eligible for a distinct grant award provided that it is a separate service location and has a separate utility account number.

What are the options for people who don't have access to the Internet?

Vermont Community Action Agencies can assist individuals that do not have access to the Internet.

How long will the program run?

Applications will be accepted through November 30, 2020, or until available funds have been exhausted through the awards program.

Can customers apply more than once?

Customers may apply once for each utility type or apply separately for each utility type. Once a customer has applied, the application is eligible for review and separate award twice during the application period ending November 30, 2020.

Will everybody who is eligible get a grant?

Funds are limited and grants will be awarded as eligibility is determined and funds are available.

Will the grant pay off all of a customer's past due bill?

Grant awards are limited to utility service with bills that are more than 60 days late. Awards are also capped at \$10,000.

Do customers have to file taxes for 2019 before being able to apply?

No, it is not required for residential applicants.

Yes, it is required for non-residential applicants.

Does a customer have to be low income to apply?

No, there is no income eligibility requirement. See eligibility specifics for non-residential applicants.

Is there any documentation that has to be submitted with an application?

Yes, if the customer is applying for a grant for telephone wired/land line services, the customer will need to upload a copy of their most recent bill.

If the customer is not applying for telephone wired/land line services, the customer will not need to upload any bills.

Can the funding be used towards a customer's final bill? For example, if a customer recently left the system and accumulated arrears after March 1, 2020, are they eligible?

Customers must be active and have an active arrearage (from service after March 1, 2020). Funds are meant to keep customers from being disconnected.

If income has not changed can they access funds?

There must be an economic hardship from loss of household income. Customers will be asked to attest to the economic hardship as described on the application.

Will the Department's Consumer Affairs Division provide language to help utilities get the word out?

Yes. Look for more info in the coming days. Some language is available below.

What is meant by a "qualified arrearage" - what would constitute a qualified arrearage?

An eligible or verified arrearage constitutes an arrearage related to service provided after March 1, 2020 and which is more than 60 days past due. Qualified arrearages constitute arrears that are deemed eligible and fall within the customer and utility caps.

Will customer attestations and other features of the program be subject to audit?

The Department, utilities, and ultimately consumers should anticipate the potential for an audit, largely as part of either state or federal requirements. No specific requirement has yet been built into the program design.

Are taxes and surcharges considered qualified for reimbursement?

Any charges on the bill that are linked to eligible utility services in arrears will qualify. This includes taxes and fees that show up on the bill but ultimately must be paid by the utility to the state and federal government. This includes energy efficiency charges, gross receipts taxes, and relevant sales taxes that are linked to utility services deemed eligible for a grant award through the VCAAP program.

Are there specific guidelines on how/when customers will need to be notified?

The program began on August 15, 2020 with a soft launch. Consumers could have been notified any time after August 15. The Department has recommended bill stuffers and web site notifications on or after the press release and public announcement. The Department has recommended the following language for notice:

Vermont COVID-19 Arrearage Assistance Program (VCAAP)

“The VCAAP provides eligible Vermont utility customers with grants to assist with unpaid and past-due balances that put them at risk for disconnection of utility services. The past-due balance must be more than 60 days old and only for expenses incurred for service provided after March 1, 2020 for electricity, fixed-line telephone services, natural gas service, and private regulated water services. Customers can apply online at <https://publicservice.vermont.gov/>.”

What is the "formula" for assistance?

Customers with accumulated arrearages greater than 60 days in arrears qualify for a grant award up to the 60+ days of arrearage, for service provided after March 1, 2020. Customers can receive a grant for eligible outstanding arrearages that are more than 60 days overdue, up to the limits listed below.

The maximum grant award per ratepayer account is \$10,000.

Limited funding constrains the ability to make grants. In the end, available funds will be disbursed until all available program funds have been disbursed to cover overhead program expenses.

Will eligibility be based on arrearages as of June 30th or a rolling time window?

Eligibility will be based on arrearages as of the review date.

What are the maximum grant awards that qualifying and eligible customers could receive?

Residential customers: maximum of \$10,000; commercial customers: maximum of \$10,000.

Will this only be for active customer accounts? What about accounts that have been recently closed?

Grant awards are only available for active customers in arrears meeting the criteria listed above.

Can a utility provider opt out of participating? In other words, just absorb the losses?

The Department of Public Service encourages participation from all the utilities and service providers for their customers' benefit. The program and its benefits are focused on customers, not the utility. For utilities that do not participate, but have customers that are eligible and apply for grants, it will require extra effort on the part of the Department to qualify customers and will present challenges to both program administrators and to customers that want to

participate. Ultimately, utility cooperation in verifying eligible arrears is necessary for the program to function well in service of utility customers.

Will there be any way to leverage the online application portal to get folks enrolled in a low-income discount program (for those utilities that have them) to the extent they aren't already?
Utilities will have access to information about their customers and should be able to request or generate reports from the system.

How will utilities know if a customer is approved for assistance and for how much, so they do not continue collections activities after September 30, 2020 for that customer?

The utility will certify the arrearage during review of the application. Once the consumer's eligible amount is determined by the utility, payment will be made (as long as funding limits are not exceeded). With utility cooperation we believe it can be a quick turnaround.

Will customers be able to apply multiple times through November 30, 2020?

As currently structured, customers will apply one time for funding appropriated through Act 137. Customer eligibility is on a first come, first served basis. Unless a customer application has been rejected, a customer can only apply once for each service sector (e.g., electricity or natural gas services). However, a single application may apply to more than one billing cycle. As such a customer's single application may be reviewed twice and receive awards in each round based on the rules in place at the time of the review.

If the arrearages accumulated for landline telephone are bundled with other services, is the expectation that the customer will know the breakdown of their arrearage when filling out the application?

No. The customer is not expected to know. This task will be part of the utility's review. The utility should report the arrearage amount based on the revenue from the bundled package that the utility would attribute to voice service. Voice service includes all charges attributable to the provision of voice service, including government fees (such as USF), subscriber line charge, and access charges that the provider charges as part of the provision of voice service.

Any other way for customers to apply other than online?

Yes, they can call the local Community Action Agency and work with them.

Can the PSD provide a script for utilities to add to customers' bills as bill messages so everyone's messaging is consistent?

Yes. For a short message, we recommend that you include something like the following:

“Eligible Vermont utility customers can get help with unpaid past-due balances that put you at risk for disconnection. The past-due balance must be more than 60 days old for service provided after March 1, 2020. Apply for help now at <https://publicservice.vermont.gov/>”

Will all of the customer vetting regarding their COVID-19 economic hardship and qualification for this program be completed before the utilities are asked to review the customer's account?

Utilities will need to verify active accounts and the eligible amount of arrears (i.e., for service received on or after March 1, 2020 and in arrears for more than 60 days). Customers will need to attest to qualifying hardships.

If a customer is suffering from disabilities, or economic hardship unrelated to the COVID-19 pandemic, will they be eligible for grant awards under VCAAP?

No. VCAAP is only available to those that suffer from economic hardships precipitated by the COVID-19 pandemic.

What are the qualifying economic hardships necessary to receive a grant award under the VCAAP program?

- Loss of job or wages or income, layoff, or furlough
- Loss of income because of illness of self or household member related to COVID-19
- Loss of income related to the need to care for a child who has had their school or childcare center closed

To clarify, regarding cap per customer, will a natural gas or private water customer be able to obtain assistance if they also got electric assistance?

Yes. Customers can receive assistance for more than one utility service. Electricity, natural gas, private water, and landline telecommunications services all qualify.

If a customer had an arrearage prior to March 1, 2020, and also has a qualifying arrearage after March 1, 2020 that receives a grant, is the expectation that the utility would apply the grant funds to the oldest past due charges (i.e., the grant relates to the March –June period but the funds are applied to December because it's the latest)?

Customers are qualified and awarded grants based on accumulated arrearages for service delivered after March 1, 2020. We expect utilities to credit customer accounts for those awards in a manner that minimizes the risk of disconnection consistent with Commission rules and the spirit of Act 137.

What qualifies as a residential versus non-residential customer account?

The Department offers the following guidance to utility eligibility determinations:

- Under the arrearage grant program, the choice to apply as “residential” or “non-residential” falls on the customer to select the correct form, complete the appropriate fields, and render the necessary attestations to support the application.
- Government entities do not qualify as either residential or non-residential.
- In general, we expect that applications for residential grant awards will be consistent with customer class and tariffs that were designed specifically for the class. Similarly, non-residential grant awards should conform to the tariffs designed for business and non-profits. That said, the utility will have the discretion to either indicate that an application is incomplete if the utility believes that the incorrect application has been submitted. If,

for example, a residential customer submits a non-residential application and the customer is on a residential tariff, the utility has the discretion to mark the application as “rejected” and an email will go to the end user asking them to resubmit.

- If, on the other hand, a customer submits an application that the utility has cause to believe straddles two customer groups, then the utility has the discretion to approve an application and verify the qualifying arrearages. We recommend that the utility rely first on the customer’s choice along with the information and attestations provided in exercising that discretion. As an example, if a customer operates a business off of a single line drop that also serves a residence, and the applicant’s situation is known to the utility or service provider, then the utility has the discretion to treat the application as either a residential or a non-residential application based on the character of the application submitted.

Can an applicant submit more than one application for a residential or non-residential customer?

Only one application can be made for residential grant assistance. The application form itself requires that the applicant attest that it is the primary residence. More than one application can be submitted by non-residential customers.

If a ratepayer has multiple accounts will they be eligible for all accounts or just one? An example we have:

- Mr. Smith – House account
- Mr. Smith – Barn - Dairy Farm account
- Mr. Smith – Housing for farm worker account
- Mr. Smith – Housing for farm worker account
- Mr. Smith – Housing for farm worker account

Will he be able to apply for assistance for all his accounts?

In this case, “Mr. Smith” may apply for only one residential service address for his primary residence. The details matter and do not come through clearly in the question, but if the farm workers are associated with different service locations (i.e., separate meters and service drops) in Mr. Smith’s name, then they may be treated as accounts that relate to a single business with multiple locations. If Mr. Smith relies on one meter for housing farm workers under a residential account, then he may apply for and receive grant assistance up to the residential cap of \$10,000. If Mr. Smith applied for a grant under a non-residential rather than residential account application, then, at the discretion of the utility based on the factors listed above, they may treat the application as a single non-residential application.

If, on the other hand, the farm workers are associated with non-residential business accounts with distinct service locations and meters, then they will be associated with a distinct set of rules. Mr. Smith can apply for multiple separate and distinct services if associated with a business account that are connected to different accounts and service locations.

What information will the utility receive to connect the "aggregate" payment to the individual approved grants?

The utility will identify the customer by name and account. The utility will identify eligible arrearages. Utilities will be provided with information about available funds. Customer awards are capped as described above.

How will utilities know when the remaining funds are getting low?

The utility portal will alert utilities when they reach their cap or available funds run out.

Could you discuss more about how commercial customers may receive a grant?

Commercial and non-residential customers must certify that they have suffered an economic hardship. The only qualifying economic hardship is associated with a loss in monthly revenue equal to 50% after February of 2020. Other attestations apply.

Is there going to be a state "hotline" to answer customer questions on this and other programs being rolled out now (e.g., LECAP) besides the general CAPI line?

Call the Department of Public Service CAPI line.

How will the \$8M be allocated among utility industry sector and among the customers of the respective utilities within each sector?

At this stage, approximately \$500,000 is set aside for the costs of administering the program. With time and the unfolding of the program, we hope to reduce this set aside and increase the amount available for benefits. The Department initially set up budgets for utilities and customer caps to help ensure equity. The slow rate of applications, however, caused the Department to loosen the initial guardrails. Budgets that potentially constrained the flow of funds to a sector or company no longer apply. Customer award caps have been largely eliminated and now cap out at \$10,000.

What is the PSD's timetable for providing additional information and guidance regarding

a. \$ amount caps for residential and commercial electric customers?

This information will be provided to each utility through their utility portal. We expect that funds that go unused will be reallocated after approximately 60 days based on unfolding demand for assistance by other companies or sectors.

b. Whether and how customers can apply more than once?

As stated earlier, the application for the Act 137 funds requires only one application. No further funds are available for the applicant once limits have been reached.

c. Language and clear assurance on economic vs COVID hardship?

That is described in the application and above.

d. Whether the utility should apply the grant to the oldest arrearage or only to qualifying arrearages (those >60 days past due for services delivered after March 1, 2020)?

The Department places no restrictions on how the company applies the arrearages provided that they apply to arrearages that are over 60 days past due and for utility service delivered past March 1, 2020.

How and when does the PSD plan to offer training on the Salesforce platform to utility reps who will be reviewing customer applications?

Initial round of training occurred in August. An additional round of training was offered on October 20, 2020, to reflect differences in the program to allow a second round of reviews on earlier applications.

Is the program only going to include arrearages over 60 days past due?

At this juncture, we only plan to include arrearages over 60 days past due; 60 days is linked to the period at which customers are exposed to disconnection (consistent with the intent of Act 137).

How does the PSD plan to handle disputes? The ILEC communications bills that include BLES (basic, regulated charges) and non-basic unregulated charges are inevitably going to cause confusion for customers, no matter how good our collective communication is. Some customers will inevitably dispute how much was approved or why they were not approved.

The Department staff (CAPI) will be available to assist with disputes. In the first instance we will rely on the utilities to provide good information and be on hand to support eligibility determinations.

Is there an expected turnaround time for reviewing these requests?

We recommend that utilities try to turn around the review as quickly as possible to help ensure that there are available funds to cover their customer applications. We are asking in any event to complete their review within 10 business days of each application.

How will we know when a customer's application has been approved?

Email notice will be sent when customers receive the award in an award letter (via email).

How will payments from the PSD be sent and how long from the time an application has been approved before payment is issued?

Payment will generally be electronic. A request has been sent to all the utilities to link them to the ACH system for electronic payments. Those that responded will receive an electronic payment. Otherwise, the utilities will receive a physical check. Once utility participation is fully integrated, we estimate no more than 2.5 weeks from the successful application to the award, but this depends on the utility review. We are asking utilities to complete their review as soon as possible but no more than 5 business days once the initial backlog of applications have been reviewed.

Does the PSD plan to pay the whole amount of the qualifying arrearage or just a percentage and if so, do you know the percentage?

Yes, the whole amount, but limited by the customer cap per sector (i.e., \$10,000), and arrearages that qualify: 60+ days in arrears. Caps were listed earlier and bound the customer award.

We noticed there was not a question on the application about how much the customer's arrearage is, or how much funding they are looking for. We had anticipated that we would be confirming what the customer provided for details, but it seems perhaps you will be looking solely to the provider for account balance information.

Where we can, we are hoping to rely on the utility providers to establish the eligible amounts. We think consumers would likely err in the requests and sow confusion and frustration. Recall that the formula for award is 100% of 60+ day arrearages, up to \$10,000. We believe that the formula for determining eligible arrears should be straightforward for most utility reviewers but will be challenging for customers.

The exception may be in the telecommunications sector. So, we may need to pivot toward additional information, like the most recent bill, and further independent verification. We are working on that separately.

The confirmation email indicates the process will take approximately 4 weeks; is that about how long you feel it will take utilities to receive a check/s? Just thinking about the collections process now that the moratorium has expired.

At this point we expect that utility assistance will greatly help to speed the process. We are seeking all reviews from utilities to be completed no later than 10 business days after receipt of a completed application. With that timetable in mind, we think we can turn payment around within 13 business days (about 2.5 weeks) from the completed application, and ideally much faster.

Additional Questions After August 14, 2020 Meeting

What is the difference in the meaning between "eligible" or "verified" arrearages and "qualified" arrearages as used in the language of this program?

When we use the terminology "eligible" or "verified" arrearages, we mean that the utility has made a judgement that the customer has filled out the correct application form (i.e., is a utility customer and correctly filled out the residential or non-residential form) and that the amount of the arrearage that is sought has been identified to reflect service after March 1, 2020, and contains the amount verified that is more than 60 days in arrears.

Please explain what it is that utilities are asked to certify as eligible or verified arrears.

Utilities will be asked to identify the dollar value of both total amount in arrears and the amount that is eligible for grant awards. The eligible amount is for overdue balances that are more than 60 days past due. Only utility service provided on or after March 1, 2020 is eligible. The amount that is eligible from the utility perspective is capped at \$10,000 per account.

Responses were requested to the following billing cycle examples:

Assuming a 30-day billing cycle, 2 scenarios: meter read on 3/30, due 4/30; 60 days late is 6/30 - that one is easy - 100% of the 3/30 bill should be eligible - correct?

Answer: Assuming that the 3/30 meter read included none of the February service, then, yes 100% of the 3/30 bill should be eligible if the payment due date was April 30.

Meter read 3/15 would reflect 15 days eligible usage and 15 days of non-eligible usage. As of 6/15, only 50% of the bill is eligible - correct? Would a straight-line proration be OK? Better solution than bills rendered.

Answer: A pro rata share is fine. Alternatively, the utility with advanced metering infrastructure could simply reflect the actual measured billing amounts for services that were provided on or after March 1, 2020. A valid third option is to simply wait until there is a full month of arrears for service delivered on or after March 1, 2020.

Would you suggest self-calculating prorations? Such as a 3/20 bill for service 2/20-3/20; divide by 30; multiply by 20 to get the prorated amount from 3/1-3/20?

Answer: The Department is not proscribing a pro rata methodology. Pro rata based on the proportion of days would be appropriate. We leave it to the discretion of the utility to make best efforts to reflect the share of bills that straddle two calendar months. Wherever possible we request that the most accurate method that balances both consumer interests, and that of the letter and spirit of the underlying legislation (both state and federal) be applied.

One utility representative asks that you be careful NOT to structure the qualification such that utilities lose a full month of “eligible” revenue. Saying only bills rendered after April 1 would have that effect.

Yes. Point taken. There is no such limit.

Can the award be applied to the oldest balance?

PSD supports applying it in the way that will best protect customers. The Department will not limit how companies apply the credit for customer benefit. The eligible amounts, however, are limited to arrearages past due 60+ days for service after March 1, 2020. Once grants have been applied, the potential for future awards will first credit the initial awards.

As an example, let’s say a customer has accumulated arrearages equal to \$1,000; \$900 of those are for arrearages past due by 60 days and for service on or after March 1, 2020. This falls within the \$10,000 sector-customer cap and so \$900 is the award for the sector.

Will taxes and fees be included?

Yes, as long as they are based on regulated services and covered by the program.

The cap on the amount may make some of the pro-rating moot. Can you share generally what the customer caps are?

The caps can render the issue moot if there are no additional funds available. In the event that there are, there needs to be appropriate boundaries set. The cap formula is relevant and is listed above.

Are the caps applied to individuals or accounts? (We have individual customers with multiple accounts.)

Residents have to certify that the assist is for the primary residence.

Non-res applicants can apply for multiple accounts/service addresses.

How many times can a customer apply?

Once, depending on funding and program demand; the Department may permit subsequent awards. As of the October 21, 2020 program revisions, a single application may be reviewed twice (ideally in separate billing cycles).

ETA for the portal to open?

The application review portal is open as is the reviewer panel.

How does money flow?

Money flows to the utility (with limited exceptions in telecommunications).

Are there income eligibility requirements?

No, just COVID-19 related economic hardship. Economic hardship pertains to loss of household income or business revenue loss of greater than 50% in a given month.

Who approves the hardship? DU approval?

Customer must certify. DUs do not have to verify hardship. Just verify for the account that there are persistent arrearages, that the customer has exercised reasonable judgement in choosing either a residential or non-residential application, and verify the eligible amount of still available funds.

How will customers apply without broadband and Internet access?

The Community Action Agencies will assist.

What will applicants need to provide to demonstrate a hardship in order to be eligible?

Only the certification on the application.

What is our job once applications come in? We go into the portal and input arrearage amount. Anything else?

Verify the account is active, verify amounts.

Can you share the utility reviewer portal address?

When it is ready.

Can you share the URL for the customer application?

Applications are available online at <https://publicservice.vermont.gov> or at your local Community Action Agency.

Could a Sewer Company apply as well?

They could as a non-res customer, provided that they are not part of a government body. Sewer companies and their customers are not among the utility services that are targeted for the program.

Are utilities allowed to help with online access (in utility office) to customers without Internet since libraries are closed and the closest Community Action is a 30-minute drive away?

Utilities are discouraged from providing direct assistance with the application. We have made the application brief and rely on Community Action Agencies and other local organizations to provide assistance directly to customers that require the assist.

Utilities are not barred from helping but are discouraged from providing direct assistance. The primary role of the utility is to assist customers with program awareness, provide the verifications, and then to receive and properly apply funds to credit customer accounts.

Regarding utilities marketing the program, does the DPS have developed materials we can share? Or should we expect to create our own? bill stuffers, mailers, etc.

Yes. This FAQ sheet provides some guidance. Further guidance is available on the Department's website.

When is it okay for companies to let their customers know?

Utilities can promote VCAAP now.

PSD has and will continue to provide suggested social media blurbs and press release materials if needed. You can also create your own.

How are utilities notified about customer applications? How often will we need to check the portal?

Dependent on the size of the utility. Larger utilities can check daily or throughout the day. Smaller companies can check less. PSD would like applications and eligibility determinations to be turned around in 5 days.

Will disbursements based on validated applications be batched by PSD on a routine basis, or be ad hoc?

Yes. We expect a three-day turnaround once the eligibility determination is made by utilities.

Any way to increase caps?

Not at this point. If additional money becomes available or available funds are undersubscribed, we can and will revisit.

Are broadband Internet services eligible for this program?

No, consumers can participate in the Temporary Broadband Subsidy program.

What info are customers asked to provide? Service address? Account number?

There are fields for both of those, which are required of applicants.

How should a utility determine arrearage levels relative to budget billing customers that apply for a grant award? In other words, suppose a budget customer is past due for budget payments and past due in actual usage charges (i.e., there is difference between budget balance and actual balance.) What is the “eligible” arrearage that is verified by the utility?

The utility should quote both total past due AND the eligible past due based on actual usage only, NOT budget balance.

We have customers who have entered a 12-month payment plan. The term of their written payment plan is to pay 1/12 of their arrears, plus their current bill. How should we determine the eligible arrears?

Eligible arrears should be based on the total arrears balance less the 1/12th of the arrearage subject to the payment plan.

Example:

Current bill due 9/3 (\$127.07) + 1/12 of arrears (\$70.41) = \$197.48 total paid

The customer has a 60+-day arrears balance of \$374.86.

How do we determine their ‘qualifying arrearage’? Would the full \$197.48 be applied to the \$374.86 leaving \$177.38 as qualifying arrears or would the 1/12 arrears portion of \$70.41 be applied leaving \$304.45 as qualifying arrears.

Only the 1/12 payment would be applied to the arrears since the customer has agreed that \$127.07 is being paid towards their current bill.

3.302 (E) Equal Treatment of Payments. A company shall treat all payments made by any person including the ratepayer in the same manner unless the utility receives instructions to the contrary. Payments shall be applied toward the delinquent portion of the account before being applied to the current bill unless written instructions from the customer, a disputed bill, or payment arrangements require otherwise.

The Department indicates that the VCAAP covers arrearages associated with services after March 1, 2020. Our March bill went out on March 18. That covers usage from around February 10th to March 10th. The bill was due on April 17th. Would we count the 60+ days overdue for

that bill or do we have to wait till the next bill that went out in April (usage from March 10th to April 10th)?

60+ days arrears would pertain only to service on the April 17th bill for the days from March 1 through March 10. At the discretion of the utility, these amounts can be estimated on a pro rata basis; 60 days in arrears would be after the June billing cycle (approximately June 17th).

The amounts associated with usage from March 10 to April 10 would be due approximately May 17 and would be 60 days in arrears on July 17.

We are a municipal utility water system that is not regulated by the Public Utility Commission. Is it correct that this grant program does not cover the water for our customers?

Correct. Act 137 indicates that the program applies exclusively to utilities and their customers that were impacted by the PUC moratorium on disconnections.

Are the applications confidential? I assume can't share info about individuals, etc.

The applications and the information contained in these applications should be treated as strictly confidential and made available only to those individuals within the utility that need to be included to ensure that the program is successful and the awards are properly applied. Information contained in the applications should be shared only with the applicant and/or the account holder. The Department of Public Service and the program developers that support the state's efforts are the only others that should have access.

When will the utility be able to begin their review of applications and making eligibility determinations?

Once reviewers have viewed the training and reviewed the user guide, send Carol and Christine at the Department contact info and we will get credentials.

Members are asking about making payments - should they hold off making payments until they have applied and/or been approved?

The focus of the program is to help applicants who have arrearages due to economic hardships caused by loss of income precipitated by the COVID-19 pandemic in order to prevent disconnection. Customers that can make payments should be encouraged to make those payments so that customers in the greatest distress can receive needed assistance.

If an application is assigned to the wrong utility, who corrects that?

The application needs to be rejected and sent back to the applicant for correction.

If we mark an application as rejected can the customer reapply?

Yes, they can resubmit the application with modifications responsive to the rejection.

How do we get our login/passwords?

Take the training, review the user guide, e-mail psd.consumer@vermont.gov, and the Department will request credentials/provisioning (email access and provide a password).

What would be the appropriate procedure to add an additional reviewer?

Same process.

Once the service provider/utility approves an application, does the customer receive an email confirmation?

If an application is rejected or needs editing, the applicant will be notified.

Approvals notification will be sent out after all utilities' approvals.

Are we to assume that once we have approved an application, that is effectively an "arrangement" and we are guaranteed payment (from SOV) on that account for that approved amount? (in order to avoid disconnection)

As long as there is still \$, money should be expected. There is a final review by PSD, but utility attestation should be enough to get funds. If funds are exhausted, the reviewer will get an error message. The system is also checking for personal/utility cap.

If we have only one person approving applications can we bulk assign the accounts from the Utility Queue to My Queue?

There is as yet, no functionality for that.

In an example where a residential electric customer had total qualifying arrears for \$1,000, we would input that total (\$1,000) in the form and behind the scenes the system will adjust the amount to \$1,000, based on a \$10,000 residential cap, correct? Would this be reflected in the funding dashboard?

The system will adjust the amount to match the CAP in the backend.

An incomplete reason is "no telecom bill uploaded." Will we be able to view the uploaded bill or know that one was uploaded?

An upload of the most recent bill is required for most telecom applications. This upload is viewable on the telecom review modal.

Can you please review how I would see that we as a utility have not met OUR cap (assuming that the customer has not met THEIR cap)?

You will view the funding dashboard, which keeps a running total of committed amounts once an application is verified.

Once we approve an application, does the customer receive an email confirmation?

The applicant receives email notifications for incomplete and rejected, but not for verified. Once all utilities have completed their review, they receive one award letter.