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STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Docket No. 20-0703-PET

Vermont Organizations declaration in support of)
Vermont Legal Aid Request for Moratorium on)
Utility and Telecommunications Shutoffs During)
State of Emergency)

REQUEST TO REINSTATE THE TEMPORARY MORATORIUM

We, 21 organizations dedicated to the health and wellbeing of Vermonters, wish to comment once again in support of Vermont Legal Aid’s request, filed March 15th, 2021, for the Public Utility Commission (PUC) to continue the temporary halt of involuntary utility disconnections (the moratorium) through the end of the state of emergency in Vermont because of the COVID-19 pandemic. The fundamental truth remains that no Vermonter should have to worry that their utilities could be disconnected during this pandemic because they are unable to make bill payments. The PUC should continue to exercise its authority to prevent these disconnections.

We are grateful that Vermont and the rest of the world is finally making strides in combatting this devastating pandemic. But even though Vermonters are now receiving vaccinations and the end of the COVID era seems to be in sight, the utility arrearage problem has continued to spiral out of control. By way of illustration, refer to residential arrearage numbers

reported by five of the state's largest utilities: BED, GMP, VEC, VGS, and WEC. In early (Jan-Feb) 2020, total arrearages to these utilities amounted to \$3.9 million. By the end of 2020 -- even with over \$8.5 million paid out through the Vermont COVID-19 Arrearage Assistance Program (VCAAP) -- these utilities were owed \$16.1 million. And, by early 2021, that number had increased by nearly \$2.7 million to \$18.8 million. The amount owed by residential customers to these large utilities is more than fourfold that of early 2020.

We were appreciative when the moratorium was reinstated in December of last year, after being renewed periodically from March to October of 2020. Yet, crucially, the State was prepared to support Vermonters with federal monies through VCAAP at that time. While work is being done to deploy Emergency Rental Assistance funds from the December federal stimulus bill, that program is not yet up and running -- and, crucially, will be entirely unavailable to homeowners. The \$50 million in homeowner assistance provided through the just-passed American Rescue Plan Act will enable the state to fill that gap, but any utility payment assistance through those funds will not be available to Vermonters for even longer.

This is an enormous challenge for the customers, utilities, and the State. We appreciate the work that many utilities have done to be in communication with customers in arrears, and the work the State has done to relieve the burden on Vermonters struggling to pay their bills. If there was ever a time for the PUC to use its power to ensure Vermonters are not cut off from their vital utilities, it is now: as we are just beginning to recover from a once-in-a-lifetime pandemic that has upended our entire way of life.

Our organizations urge the PUC to continue the involuntary utility disconnection moratorium through the end of the state of emergency, and not through another date-certain in the future. None of us know what the coming weeks or months of this pandemic will bring, and

there is no reason that the State of Vermont should allow utilities to be shut off while at the same time have as state policy a moratorium on evictions and foreclosures. Utilities are essential to safe, healthy housing, and as long as the state of emergency exists, the State should not allow utilities, no matter how well-intentioned, to remove Vermonters' access to safe, healthy housing – just like we are not allowing financial institutions or landlords to do so.

Dated at Montpelier, Vermont, this the 17th of March 2021

VERMONT PUBLIC INTEREST RESEARCH GROUP

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Vermont Affordable Housing Coalition

Vermont Businesses for Social Responsibility

Vermont Conservation Voters

Vermont Housing Finance Agency

Vermont Interfaith Power and Light

Vermont Low Income Advocacy Council

Vermont Natural Resources Council

Vermont Yankee Decommissioning Alliance

Washington County Mental Health Services