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June 12, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**RE: COVID-19 Customer Service, Billing, and Public Outreach Provisions
Request for Utility Information, Docket No. M-2020-3020055**

Dear Secretary Chiavetta:

Attached please find the response of Valley Energy, Inc. ("Valley" or "Company") to the Pennsylvania Public Utility Commission's request for COVID-19 utility customer service, billing, and public outreach information in its May 29, 2020, Secretarial Letter issued in the above-referenced docket.

Valley appreciates the Commission's desire to stay abreast of how the COVID-19 emergency declaration is impacting Pennsylvania consumers and utilities. As set forth in the attached responses, Valley has experienced an increase in the number of delinquent accounts for both residential and non-residential customers in comparison to prior years. The Company has abided by the Commission's Emergency Order that prevents the pursuit of termination for those accounts.

While the Emergency Order is prohibiting termination, the arrearages for many of the accounts continue to grow without the customers seeking payment arrangements. Some of those arrearages accrued prior to the Governor's Emergency Declaration in March 2020 and were subject to the 2019-2020 winter moratorium, which was extended by the Emergency Order. Valley recognizes the financial struggles that many customers are facing due to the COVID-19 pandemic; however, the Company submits that the accumulation of large arrearages without good faith efforts to apply for a payment arrangement or to make partial payments is not in the public interest.

In addition, we urge the Commission to consider that our efforts to collect the past due amounts that have accrued during the Emergency Order moratorium may be hampered by the onset of the 2020-2021 winter moratorium. Utilities should have a reasonable window to terminate accounts or enter into payment arrangements with eligible customers prior to the start of the next winter moratorium.

Valley respectfully requests that the Commission provide a definitive end date for the current moratorium, subject to the ability of customers to seek payment arrangements to avoid termination. The schedule proposed by Duquesne Light Company in its comments at this docket, which would enable termination to commence on or around August 3, 2020, is an acceptable timeline for the transition from

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the Emergency Order moratorium. Valley stands ready to negotiate payment arrangements with residential and non-residential customers to mitigate the financial impact of repaying the arrearages.

If you have any questions concerning this matter, please contact the undersigned. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Pamela Polacek

Counsel to Valley Energy, Inc.

c: Sarah Dewey, BCS (via E-mail)
Tom Charles, Director, Office of Communications (via E-mail)
Tanya McCloskey, Office of Consumer Advocate (via E-mail)
John R. Evans, Office of Small Business Advocate (via E-mail)
Richard A. Kanaskie, Bureau of Investigation and Enforcement (via E-mail)

COVID-19 Customer Service, Billing, and Public Outreach Provision
Request for Utility Information
Docket No. M-2020-3020055
VALLEY ENERGY, INC
JUNE 12, 2020

I. COVID-19 Utility Consumer Service and Billing Policies and Procedures

Describe and report efforts to support customers through initiatives in customer service and billing policies and procedures in response to the COVID-19 pandemic and the ensuing recovery period. Explain how these initiatives differ from normal operations:

We are using bill messages, notices on our Facebook page & twitter account.

Termination of Utility Service:

- After the Commission's Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment?

We will begin terminations upon the moratorium expiration.

- How does the utility plan to implement terminations and will it start the process with new termination notices?

The termination process will follow PUC guidelines & will begin with new termination notices.

- Broken out by customer class, how many customer accounts may be subject to termination if the Commission's Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?

2020: RESIDENTIAL = 650 COMMERCIAL = 124

2019: RESIDENTIAL = 424 COMMERCIAL = 96

- Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.

2020: LOW INCOME = 47

2019: LOW INCOME = 32

- Provide future projections if available.
Valley does not have future projections.

- Is the utility currently assessing a “reconnection fee” to restore service? If yes, how is the fee billed and/or collected? Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

Once the Commission’s Emergency Order is lifted, a reconnection fee will be assessed as per our tariff and policy that will be collected upfront to restore service.

Universal Service Programs:

- Is the utility currently removing customers from CAP for non-payment or failure to recertify?

Valley Energy does not have CAP.

- What are the utility’s current Hardship Fund payment requirements to qualify low-income customers for grants (e.g., waiving payment history “good faith payment”, or CAP participation criteria) and have these requirements been revised due to the pandemic?

We waived the “good faith payment” requirement for our Dollar Energy Program.

Other Assistance Initiatives:

- Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in PUC policies or regulations.

We have waived penalties for any customer that expressed a hardship.

- Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor’s Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted.

We will continue to offer payment plans and refer to programs. Every effort will be made to make termination a last resort.

II. Consumer Education and Outreach

The Commission is specifically interested in how utilities are informing customers of their rights and responsibilities as ratepayers during the COVID-19 pandemic and in determining whether any gaps exist in consumer education and outreach efforts. The Commission directs all jurisdictional electric, natural gas, water, wastewater, and telecommunications utilities to submit to Tom Charles, thcharles@pa.gov, in the Commission’s Office of Communications, the following information, if applicable, regarding consumer education and outreach strategies related to the COVID-19 pandemic and the ensuing recovery period.

- Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.

Messages have been placed on social media platforms, notices on customer bills and bill inserts on customer educational material. We have also given guidance to customers via the telephone.

- Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.

Messages have been placed on social media platforms, customer bills and guidance to customers via the telephone.

We have attempted to contact all low-income customers in arrearage of 60 days or more by telephone to provide information on assistance programs and options. We also are sending letters to all customers in arrearage of 60 days with information on assistance and urging them to contact us to make payment arrangements as necessary.

- Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.

Customers are provided educational material on their rights and responsibilities.

- Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service. N/A

Questions regarding these responses can be directed to: Beth Williams @ bethw@ctenterprises.org or 570-888-9664 (ext. 5226)