

# Pennsylvania Telephone Association

"The Communications  
Leader in Pennsylvania"



June 15, 2020

Ms. Rosemary Chiavetta  
Secretary  
Pennsylvania Public Utility Commission  
P.O. Box 3265  
Harrisburg, PA 17105

Re: **M-2020-3020055**  
COVID-19 Customer Service, Billing, and Public Outreach Provisions  
Request for Utility Information  
*Laurel Highland Telephone Company*

Dear Secretary Chiavetta:

In response to the Secretarial Letter dated May 29, 2020 at the above docket, please find the replies from the company noted above.

Sincerely,

Steven J. Samara  
President

cc: Sarah Dewey (via email)  
Tom Charles (via email)



COMMONWEALTH OF PENNSYLVANIA  
PENNSYLVANIA PUBLIC UTILITY COMMISSION  
400 North Street, Harrisburg, Pennsylvania 17120

IN REPLY PLEASE  
REFER TO OUR FILE  
M-2020-3020055

May 29, 2020

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

To Whom It May Concern:

On March 6, 2020, Governor Tom Wolf issued a Proclamation of Disaster Emergency in response to the COVID-19 pandemic (*Emergency Proclamation*).<sup>1</sup> On March 13, 2020, Gladys Brown Dutrieuille, Chairman of the Pennsylvania Public Utility Commission (Commission), issued an *Emergency Order*. The *Emergency Order* prohibits jurisdictional utilities from terminating service during the pendency of the *Emergency Proclamation* unless termination of service is necessary to ameliorate a safety emergency or unless otherwise determined by the Commission. The *Emergency Order* also encourages utilities to reconnect previously terminated service if such action could be done safely. *Public Utility Service Termination Moratorium Proclamation of Disaster Emergency-COVID-19*, Docket No. M-2020-3019244 (*Emergency Order* ratified on March 26, 2020) (*Emergency Order*). The restrictions surrounding the COVID-19 pandemic, including compliance with the *Emergency Proclamation*, and the *Emergency Order*, have affected the ways in which the utilities can interact with customers.

Accordingly, the Commission hereby directs the utilities to provide the following information to the PUC within 10 calendar days of the issuance of this Secretarial Letter.<sup>2</sup>

**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:

**Customer Service ceased all suspension processes immediately following the initial order March 13, 2020. We ceased all late fees applicable to past due accounts. In April and May all past due customers were individually contacted regarding the past due**

<sup>1</sup> <https://www.governor.pa.gov/wp-content/uploads/2020/03/20200306-COVID19-Digital-Proclamation.pdf>

<sup>2</sup> Jurisdictional utilities have also been directed to track costs associated with COVID-19 and the *Emergency Proclamation* and the *Emergency Order* by Secretarial Letter dated May 13, 2020, at Docket No. M-2020-3019775.

balances. We took this opportunity to assist the customers with questions regarding the best practice to handle all realistic payment arrangements on past due balances or to adjust their account selections so that future accrual of new charges were manageable. No action on past due accounts has been forced upon the customer and no services have been reduced or otherwise suspended. This is how we handle our customers past due balances each month. If a customer fails to respond to our notifications or make payment arrangements on past due balances, we would suspend their services. Local phone would be suspended to 911 only and suspend cable and Internet services and late fees would be applied.

### **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?
  - How does the utility plan to implement terminations and will it start the process with new termination notices? We will first issue new notices of past due balances and try to work out realistic arrangements with the customers regarding payment plans on past due balances. This will be subject to applicable PUC guidance guidelines. We would continue to do our best to work with the customers on making payment arrangements on the past due balances. We would also suspend services for customers who do not respond to our request for payment arrangements.

- 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?
  - Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.
    - Based on those who currently qualify for a past due notice:
      - Business – 27 accounts
      - Residential – 637 accounts
    - Based on the average who make no arrangements or respond:
      - Regulated- 40
      - Non Regulated -100
      - Lifeline customers – 0
      - CAP – not applicable – we do not participate in this program
    - Compared to 2019 – our total overall accounts that are past due have remained relatively similar in number. The number of accounts is similar but our total overall arrearages have increased.
  - Provide future projections if available.
    - \*Return to the rules set by the PUC for handling payment suspensions and terminations – Chapter 64
- 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?
  - We did not suspend any customers during the Order therefore we do not have any customer restoring services upon the order. So, this is not applicable. If we are referring to protocol prior to the Order – yes, we assess a fee to restore services that are suspended for past due. We bill the fee to the customers invoice. We will not charge customers a fee who are on existing payment arrangements or willing to set up arrangements to stay connected and keep paying on the arrearages.

**Universal Service Programs:**

- Is the utility currently removing customers from CAP for non-payment or failure to recertify? N/A we do not participate in this program.
- 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? N/A we do not participate in this 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 issued a statement to customers that we are here to assist in whatever way we can to help them deal with the hardships that they may be going through as a result of the pandemic. This information has been listed on the last two billing invoices. We have notified customers individually on multiple occasions about past due balances and offered our assistance in reviewing their accounts with them to help find ways to save them money or make changes for them that will give them the services they need during these unprecedented times. We ceased any late fee activities for customers who are unable to pay their bills on time.

- 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.

Utilities are directed to report this information to Sarah Dewey, [sdewey@pa.gov](mailto:sdewey@pa.gov) in the Commission's Bureau of Consumer Services (BCS), detailing the efforts already in place and thereafter when further changes by the utilities are implemented.

We will continue to work with our customers on any past due balances that are a result of the COVID-19 pandemic. We are always willing to help set up payment arrangements to help the customer with any past due balances or changes to their services to make sure that they are receiving the proper attention they need while continuing to decrease any balances in arrears.

## **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](mailto: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. We called each past due customer

individually to educate them on the past due balances and what their options are through the COVID-19 pandemic. We educated our customers on the suggested practice of making realistic payment arrangements and keeping services at affordable prices so that once we are back to a recovery stage, the payments are realistic and the arrearages are recoverable.

- Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources. We continued to let customers know about the Lifeline program and assisted them with the information necessary to see if they would qualify for the program.
- 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. NA
- 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.  
All of our Company's Business Offices have mailed letters to all Lifeline customers regarding Lifeline program changes. We have notified all customers on an annual basis about the Lifeline program through our monthly invoicing. No special notification was sent to our customers during COVID-19 regarding any Lifeline program changes. We notified them to call us if they had any questions regarding our COVID-19 plan for their services.


If programs have been modified due to the pandemic, please provide current customer education tools and advertising so that the Commission's own customer education efforts are based on current utility programs and practices.

No modification to any of our programs was made during the Pandemic.

This Secretarial Letter shall be served upon all electric, natural gas, water, wastewater, and telecommunications utilities under the Commission's jurisdiction. All jurisdictional electric, natural gas, water, wastewater, and telecommunications utilities are directed to provide the requested information within 10 calendar days of the issuance of this Secretarial Letter. All responses to the Secretarial Letter should be directed to the Secretary and made by efilings through the Commission's efilings system noting the docket number. If your response contains confidential or proprietary information, you may email your filing directly to Secretary Chiavetta at [rchiavetta@pa.gov](mailto:rchiavetta@pa.gov). As directed, responses pertaining to certain data requests should also be sent to Sarah Dewey of the Bureau of Consumer Services and Tom Charles, Director of Communications, respectively.

If you have any questions in this matter, please contact Renardo L. Hicks, Chief Counsel, at [rehicks@pa.gov](mailto:rehicks@pa.gov), or John Herzog, Executive Deputy Chief Counsel, at [jherzog@pa.gov](mailto:jherzog@pa.gov).

Sincerely



Rosemary Chiavetta  
Rosemary Chiavetta  
Secretary

cc: Seth Mendelsohn, PUC Executive Director  
Renardo L. Hicks, Chief Counsel  
John Herzog, Executive Deputy Chief Counsel  
Alexis Bechtel, Director, Bureau of Consumer Services  
Tom Charles, Director, Office of Communications  
Lori Mohr, Bureau of Consumer Services  
Louise Fink Smith, Law Bureau  
Office of Consumer Advocate  
Office of Small Business Advocate  
Bureau of Investigation and Enforcement