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2/16/2021

Via electronic filing
Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor North
PO Box 3265
Harrisburg, PA 17105

RE: ***Emergency Order Establishing Public Utility Service Termination Moratorium, Docket No. M-2020-3019244***

Secretary Chiavetta,

On Behalf of the Natural Resources Defense Council (“NRDC”), please find enclosed *Comments* pursuant to the Commission’s Order of October 13, 2020. Parties are being served in the manner indicated in the attached Certificate of Service.

Please let me know if you have any questions or concerns. I can be reached at (234) 334-0997 or akaras@fairshake-els.org.

Sincerely,

/s/ Andrew J. Karas
Andrew J. Karas, Esq.

cc: M Szybist, Esq.
E. Collins, Esq.
Per COS

BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Public Utility Service Termination Moratorium
Proclamation of Disaster Emergency – COVID-19

Docket No. M-2020-3019244

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the following *Comments of the Natural Resources Defense Council on Pilot Implementation Plan* was served, in the manner indicated on the persons below, in accordance with the requirements of 52 Pa. Code § 1.54:

Via email only:

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Dated: February 16, 2021

Respectfully submitted,

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BEFORE THE PENNSYLVANIA PUBLIC UTILITY COMMISSION

Public Utility Service Termination Moratorium
Proclamation of Disaster Emergency – COVID-19

Docket No. M-2020-3019244

**COMMENTS OF THE NATURAL
RESOURCES DEFENSE COUNCIL**

Dated: February 16, 2021

I. Introduction

The Natural Resources Defense Council (NRDC) is a nonprofit environmental organization with more than 1.4 million members nationwide, including more than 90,000 members across Pennsylvania. Since its foundation in 1970, NRDC’s lawyers, scientists, and other environmental specialists have worked to protect the world’s natural resources and the environment. NRDC’s primary mission in Pennsylvania is the reduction of pollution and the creation of an equitable clean energy future. Encapsulated within this goal is a vision of society in which all people are able to meet their basic needs. True energy equity requires that all Pennsylvanians have access to safe and sanitary living conditions, a crucial component of which is reliable and affordable utility service. This is especially true in our present moment of crisis, which very much remains ongoing since the Commission’s most recent review of stakeholder comments.¹

NRDC submits the following Comments in response to the Commission’s Order of October 13, 2020, lifting the absolute moratorium on utility service terminations while establishing certain customer protections to be observed during “Phase 2” of the termination moratorium.² Given the “dynamic nature of the pandemic,” the Commission’s order solicits comments and proposals from interested parties “regarding any revisions to the protections outlined herein” during the first quarter of 2021 in order to “refresh input from interested parties based on the trajectory of the pandemic and the status of the economy at that time, so that both customer and utility interests continue to be considered.”³

As more fully articulated below, NRDC recommends the following measures:

¹ See generally White House Coronavirus Task Force, *State Report: Pennsylvania* (Jan. 10, 2021), available at <https://www.health.pa.gov/topics/Documents/Diseases%20and%20Conditions/Pennsylvania%201.10.21.pdf>

² Order of October 13, 2020, 3-6.

³ *Id.* at 6-7.

- The Commission should continue the customer protections established by the October 13, 2020 Order, including the prohibition on terminations for “protected customers,” the requirement that fees for connection, fees for reconnection, deposit fees and late fees be waived, and the requirement that utilities honor two additional medical certificates pursuant to 52 Pa. Code §§ 56.111 – 56.118, 56.351 – 56.358.⁴ The Commission should additionally require that for the duration of the pandemic, any termination notice, as well as monthly bills, specifically inform the customer that assistance may be available pursuant to universal service programs as well as *ad hoc* assistance program such as Pennsylvania Act 1 of 2021.⁵ Finally, the Commission should require utilities to develop Arrearage Management Plans (AMPs) for needy customers who may not benefit from universal service programs or grant funding.
- The Commission should continue and enhance the reporting requirements established by the October 13, 2020 Order, requiring utilities to include comparative data from several previous years, and to include information on “protected customer” status and enrollment in assistance programs, among other metrics. A full list of recommended reporting requirements is included as Attachment 1. The collection and publication of such data will be crucial to inform how to best design equitable approaches to arrearage management.

II. The ongoing COVID-19 pandemic requires that customer protections be maintained.

The Commission’s Order of October 13, 2020 noted that “Pennsylvania’s COVID-19 daily diagnosis statistics remain high and many businesses are not operating at full capacity which

⁴ *Id.* at 4-5, ¶¶ 2, 4-6.

⁵ 72 Pa. C.S. §§ 101-D – 105-D.

means that our economy is still exhibiting a downturn.”⁶ According to data published by the Pennsylvania Department of Health, on day of the Commission’s Order, Pennsylvania experienced 1,272 new confirmed and probable cases.⁷ As the Commission noted, that situation marked some degree of improvement over what had then been the worst rates of infection, down from the at-the-time peak of 2,057 cases on April 8, 2020.⁸ Since that time, of course, infection rates have dramatically worsened, with Pennsylvania experiencing its now peak rate of 12,807 new cases on December 10, 2020.⁹ At the time of filing, the 7-day average of new daily cases is 3,274, more than twice that of the “improved” conditions the Commission described in its previous Order, and significantly higher than what had at the time been the peak daily infection rate.¹⁰ Purely from the perspective of the raw number of cases, conditions today are substantially worse than the conditions that prompted the Commission’s absolute shutoff moratorium on March 13, 2020, let alone the conditions that prompted the lessened “Phase 2” protections put into place by the Commission’s October 13, 2020 Order. Accordingly, those portions of the Phase 2 protections that directly contemplate COVID-19’s health impacts must be maintained.¹¹

While vaccination efforts have begun in earnest since the Commission’s previous order, it will be months until these efforts allow for a return to normalcy. The level of vaccination required to achieve herd immunity remains a matter of dispute,¹² with estimates ranging from

⁶ Order of October 13, 2020, 2.

⁷ Pennsylvania Dept. of Health, *COVID-19 Data for Pennsylvania*, <https://www.health.pa.gov/topics/disease/coronavirus/Pages/Cases.aspx> (Accessed Feb. 14, 2021).

⁸ *See id.*; *see also* Order of October 13, 2020 (noting “the situation has improved since earlier this year”).

⁹ Pennsylvania Dept. of Health, *supra* n. 6.

¹⁰ *See id.* (calculated for period between February 8-14, 2021); *see also* The New York Times, *Pennsylvania Coronavirus Map and Case Count*, <https://www.nytimes.com/interactive/2020/us/pennsylvania-coronavirus-cases.html> (accessed Feb. 15, 2020).

¹¹ *See, e.g.*, Order of October 13, 2020, 5 ¶6 (requiring utilities to accept two additional medical certificates).

¹² Center for Disease Control and Prevention, *Frequently Asked Questions about Vaccination*, <https://www.cdc.gov/coronavirus/2019-ncov/vaccines/faq.html> (Jan. 25, 2021) (“Experts do not yet know what percentage of people would need to get vaccinated to achieve herd immunity to COVID-19”).

fifty to eighty percent.¹³ The Director of the National Institute of Allergy and Infectious Diseases recently estimated that an optimistic timeline by which to expect vaccination of 75-80% of the population is “the third quarter” of 2021, which would portend “some degree of normality” by year’s end.¹⁴ Pennsylvania’s own rate of persons having received two doses of vaccine currently ranks 40th among all states.¹⁵ Accordingly, even under in the most optimistic of scenarios, the pandemic will continue to impact the ability of Pennsylvanians to conduct their business normally for months to come.

Overall infection statistics and vaccination rates do not, of course, paint the full picture. The economic situation of a Pennsylvanian qualifying for shutoff protection under the Commission’s October 13, 2020 Order is likely to be much worse than that of the state population as a whole. Data recently collated by the Center on Budget and Policy Priorities notes overall that unemployment remains high, though job losses have been especially concentrated in low-paid industries.¹⁶ Pennsylvania-specific labor statistics reflect that unemployment in the state during December 2020 remains 42% higher than the rates experienced in December 2019.¹⁷ Moreover, the pandemic has both cast preexisting racial and economic disparities in

¹³ Cleveland Clinic, *Health Essentials: How Much of the Population Will Need to Be Vaccinated Until the Pandemic is Over?* <https://health.clevelandclinic.org/how-much-of-the-population-will-need-to-be-vaccinated-until-the-pandemic-is-over/> (Jan. 23, 2021).

¹⁴ Alvin Powell, Harvard Gazette *Fauci says herd immunity possible by fall, “normality” by end of 2021* (Dec. 10, 2020), available at <https://news.harvard.edu/gazette/story/2020/12/anthony-fauci-offers-a-timeline-for-ending-covid-19-pandemic/>.

¹⁵ See The New York Times, *See How Vaccine Rollout is Going in Your State*, <https://www.nytimes.com/interactive/2020/us/covid-19-vaccine-doses.html?auth=login-google> (Updated Feb. 14, 2021).

¹⁶ Center on Budget and Policy Priorities, *Tracking the COVID-19 Recession’s Effects on Food, Housing and Employment Hardships*, <https://www.cbpp.org/research/poverty-and-inequality/tracking-the-covid-19-recessions-effects-on-food-housing-and> (Updated Feb. 11, 2021); See also United States Bureau of Labor Statistics, *The Employment Situation – January 2021*, 3 (Feb. 5, 2021), available at <https://www.bls.gov/news.release/pdf/empsit.pdf> (“job gains in professional and business services and in both public and private education were offset by losses in leisure and hospitality, in retail trade, in health care, and in transportation and warehousing”).

¹⁷ United States Bureau of Labor Statistics, *Databases, Tables, and Calculators by Subject*, <https://data.bls.gov/timeseries/LASST420000000000003?amp> (accessed Feb. 16, 2021) (reflecting 6.7% unemployment rate in December 2020 and 4.7% in December 2019).

sharp relief and exacerbated them. For instance, Black and Latino families are currently three times as likely than white families to suffer from food insufficiency during the pandemic.¹⁸ Nearly one in five renters reports currently being behind on their rental payments, and more than one in three adults reports having had difficulty paying for usual household expenses in the previous week; each of these figures is more severe for communities of color.¹⁹ In short, low-income households – which disproportionately include households of color – continue to suffer acute economic distress. To layer the threat of utility shutoffs onto households already triaging the need for shelter, adequate food, and other basic living essentials is to demand blood be extracted from a stone.

The persistence of these economic stressors on low income households is especially significant in light of notable coverage gaps in existing assistance programs. For instance, while utilities’ Customer Assistance Programs (CAP) may provide customers a reduction in monthly payments, debt forgiveness, or a waiver of security deposits, CAP participation is generally restricted to households at or below 150% of Federal Income Poverty Guidelines.²⁰ Similarly, Pennsylvania’s implementation of the Low-Income Home Energy Assistance Program (“LIHEAP”) sets a ceiling on eligibility at 150% of the Federal Income Poverty Guidelines.²¹ Accordingly, neither of these two programs is protective of the upper half of the class of “protected customers” established by the Commission’s October 13, 2020 Order, which includes “customers at 300% and below of federal poverty income guidelines.”²²

¹⁸ Center on Budget and Policy Priorities, n. 14 *supra*.

¹⁹ *Id.*

²⁰ See, e.g., Duquesne Light Company, *Customer Assistance Program*, <https://www.duquesnelight.com/account-billing/payment-assistance/customer-assistance-program> (accessed Feb. 15, 2020).

²¹ Commonwealth of Pennsylvania, *Low-Income Home Energy Assistance Program Fiscal Year 2021 Final State Plan*, iv (2021), available at https://www.dhs.pa.gov/Services/Assistance/Documents/Heating%20Assistance_LIHEAP/State%20Plan%2020-21.pdf.

²² Order of October 13, 2020, p. 4 ¶2.

The Pennsylvania General Assembly’s Act 1 of 2021 establishes a Rental and Utility Assistance Grant Program, designed to spend previously unallocated CARES Act funding, that could go some way toward filling the current gap in assistance programs.²³ Act 1 allows for disbursements of funds to landlords and utilities for rent, utility and home energy costs, and associated arrearages.²⁴ However, rollout of Act 1 will require time. The program is overseen by the Department of Human Services and consists of distributing block grants to each of Pennsylvania’s sixty-seven counties, calculated on a per-capita basis.²⁵ Disbursements to counties must be made by March 7, 2021.²⁶ Counties, in turn, are responsible for distributing funds to utilities and landlords on behalf of customers, and have authority to determine participant eligibility.²⁷ Because county programs are not yet up and running, is not presently known what eligibility restrictions counties may place upon program applicants. Both the Department and Counties are responsible for the preparation of monthly reports, “which shall include identified excess or insufficient funding and an itemization of expenditures for administrative costs.”²⁸ If the Department’s initial funding distribution results in funding excesses for certain county programs, the Department is authorized to recoup and redistribute funds to needier counties.²⁹ However, this evaluation and potential redirection of funds will not occur begin until the end of July of 2021.³⁰ Accordingly, the Commission’s Phase 2 shutoff protections should continue until all parties have a better understanding of how effectively counties are able to bring their respective Rental and Utility Assistance Programs online, what

²³ Act 1 of 2021, 72 P.S. §§ 101-D – 105-D.

²⁴ 72 Pa C.S. § 102-D(a)(1).

²⁵ 72 P.S. § 102-D(b) – (c).

²⁶ *See id.* at § 102-D(c)(2) (requiring distribution of grants within 30 days of effective date).

²⁷ *Id.* at § 104-D.

²⁸ *Id.* at §§ 103-D(7.1) 104-D(4)

²⁹ *Id.* at § 105-D.

³⁰ *Id.*

potential program eligibility barriers may exist, how quickly and effectively funds are distributed, and whether special considerations apply in particular counties.

Similarly, additional federal funds may become available to Pennsylvanians for assistance with water bills as part of Congress' General Appropriations Act of 2021, which creates a program whereby the Department of Health and Human Services ("HHS") distributes block grants to the states.³¹ At the time of filing, however, the HSS has not allocated funding between the states, and so Pennsylvania's allotment is not known at the present time. Additionally, the Pennsylvania General Assembly has not at the time of filing made any enactment for the distribution of those funds.

The Commission can proactively manage gaps that may exist with assistance programs and grant assistance by requiring utilities to adopt Arrearage Management Plans ("AMPs"). In a well-designed AMP, the customer pays their current bill (which is made as affordable as possible) and with each current payment a fraction of the arrearage is forgiven, until the arrearage is completely eliminated. AMPs are designed to stop participating customers from sinking into a debt-spiral and to incentivize regular payments from those customers. They work best for households with some form of steady income, as households will need to pay current bills. Accordingly, AMPs are well suited device to address the needs of those designated as "protected customers" under the Commission's October 13, 2020 Order but who do not qualify for CAP and other universal service programs.

In addition to the assistance they provide to economically distressed customers, AMPs benefit utilities and ratepayers as a whole. The National Consumer Law Center has found that "[t]he best available evidence is that AMPs have a positive impact on utility revenues—

³¹ Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Act, 2021, 116 P.L. 260 134 Stat. 1182, § 533.

customers in the plan make higher payments than if they were not in the plan and continue to make higher payments even after completing the plan.”³² Even if overall debt forgiveness is substantial, tools exist effectively manage the cost of AMPs. For instance, the Commission could consider securitization of arrearage debt through low-interest bonds in order to stretch the cost to rate payers over several decades and avoid rate shock. Of note, the National Consumer Law Center has developed an AMP design template based on best practices.³³

Because of the gaps in currently available customer assistance, the still-to-come status of additional relief, and the fact that the conditions that drove the Commission to create the “protected customer” class outlined in its October 13, 2020 Order are in many respects worse now than they were then, the Commission should continue all of the Phase 2 protections put in place by that Order. Specifically, the Commission should (1) continue the requirement that utilities suspend terminations for those residential customers at or below 300% of the federal poverty income guidelines (“protected customers”); (2) continue the requirement that utilities waive all connection, reconnection, and deposit fees otherwise required for service for protected customers, (3) continue the requirement that utilities waive late payment charges for protected customers, and (4) continue the requirement that utilities accept two additional medical certificates pursuant to 52 Pa. Code §§ 56.111-56.118, 56.351-56.358. Additionally, the Commission should specifically require that any termination notice, in addition to contents required by 52 Pa. Code § 56.331, inform the customer that assistance may be available pursuant to *ad hoc* assistance programs such as Pennsylvania Act 1 of 2021. Similarly, the Commission

³² Charlie Harak, Helping Low-Income Utility Customers Manage Overdue Bills through Arrearage Management Programs (AMP), National Consumer Law Center (Sept. 2013), https://www.nclc.org/images/pdf/energy_utility_telecom/consumer_protection_and_regulatory_issues/amp_report_final_sept13.pdf.

³³ John Howat, Electric Service Discount and Arrearage Management Program Design Template, National Consumer Law Center (April 2020), available at https://www.nclc.org/images/pdf/special_projects/covid-19/WP_Program_Design_Template.pdf.

should require utilities to require information about these grant programs, as well as existing universal service programs, to be published in monthly bills for the duration of the pandemic. The Commission should consider what gaps exist in current arrearage management efforts both currently and over the next several months, requiring utilities to design and deploy AMPs to address those voids. Finally, any suggestion that Phase 2 customer protections should now be lessened should be rejected.

III. The Commission should expand its previous data reporting requirements to inform the establishment of equitable arrearage management tools

The Commission's October 13, 2020 Order requires that utilities report the following data on a monthly basis:

- a. Total number of residential and non-residential accounts at risk of termination at the end of the month and for the same month of the year prior.
- b. Total aggregate dollars of arrears, broken down by the same account categories, at the end of the month and for the same month of the year prior.
- c. The number of residential and non-residential accounts disconnected for non-payment with dollar amounts owed.³⁴

At the time of filing, utilities have been required to report such data for three months – November, December, and January.³⁵ Undoubtedly, the data submitted reflects an overall increase in arrearages and the number of customers at risk of termination as compared to the previous calendar year. However, given that the filing of these reports has overlapped with the annual winter moratorium on utility shutoffs,³⁶ is difficult to know to what extent these reports

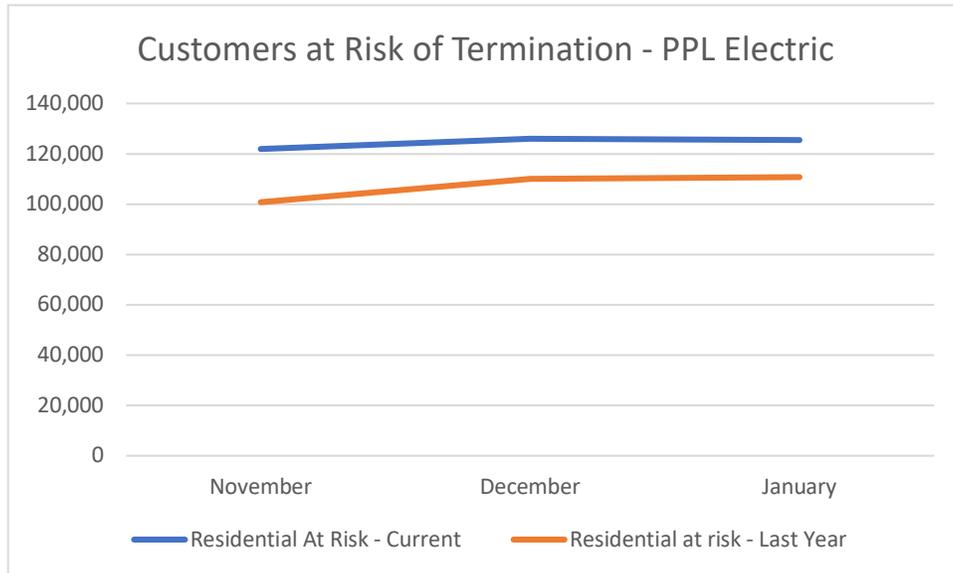
³⁴ Order of October 13, 2021, 6 ¶9.

³⁵ *Id.* Because data from January 2020 is due on or before February 16, the same day as comments on the propriety of continuing the moratorium, the public has had meaningful time to review January data only for those utilities that submitted reports earlier than required. At the time of filing, data for many utilities was only available for November and December for 2021.

³⁶ *See generally* 52 Pa. Code § 56.100.

capture coronavirus-specific arrearage trends, and to what extent these reports simply reflect typical winter-month delinquency patterns. An illustrative example is the data submitted by PPL

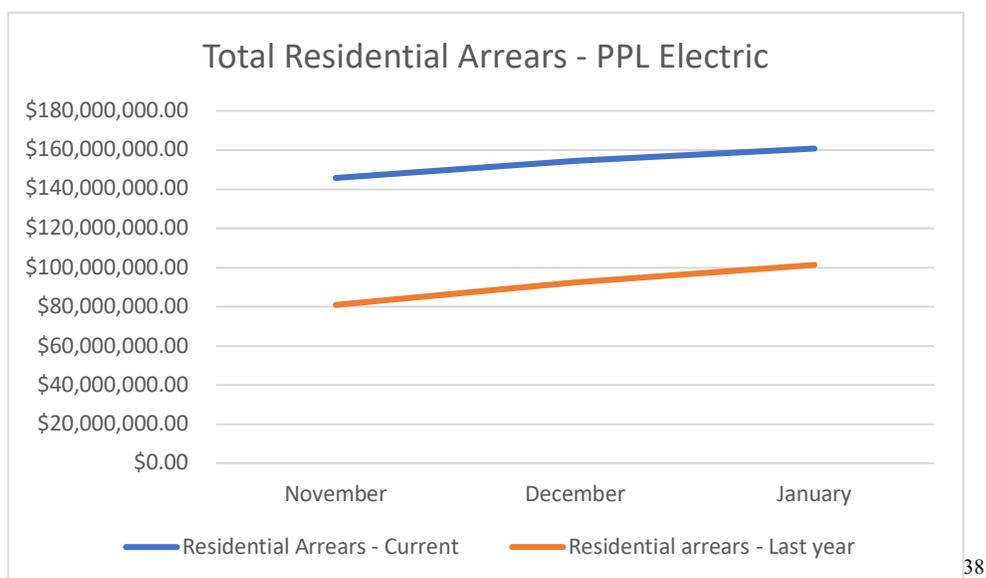
Electric:



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As the above chart indicates, while the overall number of residential customers currently at risk of termination is higher than in the pre-pandemic years (a fact undoubtedly attributable to the acute economic turmoil experienced in the initial months of pandemic), the trend lines between years are currently roughly parallel. That is, while the absolute total of delinquent customers is higher, neither COVID-19 nor the Commission's Phase 2 protections seem to have accelerated customer delinquency as compared to the previous year. A review of the data submitted by PPL Electric regarding total residential arrearages demonstrates a similar trend:

³⁷ Derived from Reports of PPL Electric filed Feb. 11, 2021, Jan 14, 2021, and Dec. 11, 2020.



During the previous round of commenting in this proceeding, several utilities noted that payment delinquency tends to uptick during winter moratorium months and subsides when utilities are able to resume delivering termination notices.³⁹ Given the very limited data thus far available, it is difficult to say what effect, if any, the Commission’s Phase 2 protections have had on arrearage totals.

Accordingly, the Commission should require the submission of several more months of data prior to any reconsideration of the Phase 2 protections. Because the initial Emergency Order will soon celebrate its first anniversary, however, the usefulness of reviewing data from the previous year alone will soon run out. The Commission should require the publication of arrearage and at-risk customer totals for the past several (perhaps five) years. This will better inform public understanding of typical arrearage trends and better isolate coronavirus-specific considerations from the previous year.

³⁸ *Id.*

³⁹ *See, e.g., Comments of Duquesne Light Co., 4-5 (Aug. 18, 2020).*

Furthermore, requiring utilities to supply data on additional topics will be useful in assessing the continued need for the Commission’s Phase 2 protections, as well as better knowing what must be done with respect to customer utility debt as we emerge from the pandemic. For instance, in addition to the overall total number of residential at-risk customers and the overall value of total arrearages, it would be useful to understand those amounts attributable to the class of “protected customers” as defined by the Commission’s October 13, 2020 Order. Additionally, it would be useful for the utilities to report month-to-month levels of enrollment in CAP and other assistance programs, in order to gauge the extent to which such programs are a useful debt-management tool, and what gaps may exist for “protected customers” as well as customers otherwise at risk of termination. Moreover, when Act 1 and similar grant funding becomes available, utilities should report the total number and the total value of payments received pursuant to those programs. A full list of useful metrics that utilities should track and publish is included as Attachment 1 to these comments. As the economic recovery continues and society emerges from the coronavirus crisis, these and similar metrics can serve as a valuable guide in designing an approach to arrearage management responsive to the realities of who the pandemic has harmed the most.

Invariably, reckoning with the economic fallout of COVID-19 will involve questions of how losses can most equitably be distributed. In the absence of robust and detailed data to inform policymaking on the subject, the task of developing just approaches to arrearage management will be stymied. Understanding precisely how large the losses are, where they come from, and what tools are available to manage them will allow for thoughtful consideration of how to balance the responsibility for those losses between all stakeholders – utility shareholders, the different classes of customers, and so forth – rather than inelegantly shunting them all back on

debtors who are least equipped to absorb them. Accordingly, the Commission should maintain the reporting requirements placed on utilities in its previous Order and reinforce those reporting requirements as suggested above.

IV. Conclusion

NRDC thanks the Commission for the opportunity to provide comments on this critical topic. Ensuring reliable utility service to all Pennsylvanians during the COVID-19 pandemic is crucial both for the maintenance of public health and necessary to minimize the further widening of inequities that the pandemic has aggravated. More fundamentally, the creation of the clean energy future that we need demands that we undertake ambitious policymaking efforts, which only becomes possible when all people are capable of meeting their basic needs. The failure to guarantee utility service to society's most vulnerable in a time of plague would, first of all, severely and irreparably impact the health and wellbeing of those persons affected. Beyond that direct injury, the failure of our public institutions to respond to this crisis in the manner that justice and equity demand will only serve to erode the legitimacy of those institutions. In deciding what Pennsylvania's ongoing shutoff moratorium policy should be, NRDC urges the Commission to center its analysis on the precariousness of Pennsylvania's utility debtors; it is not only their oblivion, but all of ours, that is at stake.

Respectfully submitted,

/s/ Andrew J. Karas

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DATED: February 16, 2021

Counsel for Natural Resources Defense Council

Attachment 1 – Data Reporting Requirements

Each utility should submit the following data monthly, except as otherwise noted. It should be disaggregated by month, customer class, and by nine-digit zip code. Customer classes should include residential (total residential and identified low-income residential customers), commercial, and industrial.

To provide a baseline for comparison, monthly data should be submitted retroactive to at least January 2019 and annual data should be provided for 2015-2018. Year-over-year changes should be calculated and included with each report.

Accounts and Billing

1. Total dollar amount billed to and collected from customers
2. Average and median dollar amount billed to customers and the average and median utility usage per account;

Disconnections and reconnections

3. Total number of customers
4. Number of service termination/disconnection notices issued for nonpayment of bills
5. Number of customers disconnected for nonpayment of bill
6. Number of service restorations by customer class for customers disconnected for nonpayment of bills
7. Number of customers that became eligible for disconnection due to nonpayment of bills but were not disconnected
8. Average time in between service disconnection for nonpayment of bills and service restoration
9. Explanation of whether the utility has an effective means of distinguishing disconnections for occupied households from unoccupied ones
10. Explanation of whether the utility has an effective means of tracking disconnections for nonpayment for households where the occupant is not the account holder

Arrears

11. Number of accounts in arrears, total dollar value in arrears, and average arrears per account, by age of arrears (30-59 days, 60-89 days, 90-119 days, 120-149 days, at least 150 days)

Late fees and deposits

12. Number of accounts assessed fees or other charges for late payment, total dollar amount of such fees or charges, and average dollar amount per account
13. Number of accounts assessed reconnection fees following disconnection for non-payment, total dollar amount of such fees, and average dollar amount per account
14. Number and total dollar amount of security deposits collected

Payment agreements

15. Number of customers enrolled in deferred payment agreements (DPAs), total dollar amount subject to DPAs, average amount per DPA, and average length of repayment term
16. Number of customers that entered into, successfully completed, defaulted from, or renegotiated a DPA, including the total dollar amount of arrears and average amount of arrears per DPA
17. Number of customers that have failed to maintain one or more DPAs in the preceding 12 months
18. If a utility offers an arrearage management plan (AMP) that includes arrearage forgiveness in exchange for on-time payment of current bills, the same data concerning AMPs as requested for DPAs, plus the total pre-program arrearages forgiven and average amount of forgiveness per customer

Assistance Programs

19. A description of available customer assistance programs, if any;
20. Number of customers that applied for each customer assistance program;
21. Number of customers enrolled in each customer assistance program;
22. Total dollar amount of assistance provided customers in each customer assistance program and average amount per customer
23. Number of confirmed low-income customers (based on enrollment in existing assistance programs) and estimated low-income customers (based on census data)

Communications to Customers

24. The methods and contents of general communications by utilities to customer accounts concerning their rights and available assistance programs

Utility Finances

25. Description of the financial health of the utility during the COVID-19 state of emergency
26. Changes in customer billing and customer revenue during the COVID-19 state of emergency
27. Number of accounts and total dollar amount written off as uncollectible
28. Description of any cost reduction measures taken during COVID-19 state of emergency
29. Description and dollar amount of savings (e.g., reduced expenditures) realized by the utility due to COVID-19
30. Net corporate income and average annual shareholder return
31. Annual compensation, including bonuses, of the executive team