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S.100 Section 25a. Utility Disconnection and Landlord Notification

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Thank you for the opportunity to offer comments on Section 25a of S.100.

Landlord Notification. We support the ability for landlords to be provided notification about disconnection to avoid property damage provided that:

- member privacy is protected
- the process created is efficient and not overly burdensome to the utility
- the utility is protected against liability if reasonable effort is made to contact the landlord after disconnection. Note: we may not know who the owner is, they might not update information, etc.
- we only need to notify the landlord after the power is actually disconnected.

We believe the current language will allow these goals to be achieved through the rulemaking process.

Current Disconnection Processes. The current notification process is extensive and the disconnection process is highly regulated. The winter rules provide additional protections. Very few members actually get disconnected although many get sent disconnection notices. Approx. 15% of VEC members (5,000) are sent disconnection notices each month. Most then pay upon notice or make payment arrangements. We manage over 1,000 payment arrangements a month and approximately 83% are successful. Approximately 45-90 accounts may be disconnected a month, with many reconnected very soon after. In our experience it is extremely rare that when we are on site to leave the last disconnect notice that a member is not already aware that disconnection is imminent.

Needed Changes to Protect Employees and Save Members Money- Remote Notification and Remote Disconnection

It is **NOT SAFE** to send employees to the member property at the time of disconnection. Our experience is that the time of disconnection is a time of high stress for the member and a time when altercations are most likely. It is not necessary to put our employees in these potentially dangerous situations when there are safer, lower cost, and equally effective ways to obtain the desired outcomes.

In an April 2016 filing to the PUC when we requested an update to the disconnection rules, VEC documented 17 separate occasions, involving 10 members, over the prior few years where we felt it was necessary to utilize police escorts.

Not only are we concerned about known threats but we are especially concerned about dangers that we do not expect or anticipate, when our meter tech is usually alone, and potentially in remote areas often without cell service.

It is **EXPENSIVE** to send employees to the member property to provide a notice.

- On-site notification costs the member \$55 for a site visit. This is an added cost to those who can least afford to pay (and not fair if not paid for this cost to shift to others).
- The average cost for the policy escorts was \$125-\$150 per escort.

There are alternatives. One option is instead of the on-site notice that an additional pre-disconnection notice be given (additional phone call day before disconnect).

We support the section 25a and updates to the PUC rules that will keep our employees safe and can save members money.

Thank you for the opportunity to comment.