

Filed VIA ePUC

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Docket No.

Vermont Legal Aid Request to Amend)
COVID-19 Emergency Disconnection)
Rule 2.600)

REQUEST TO AMEND EMERGENCY RULE

Petitioner Vermont Legal Aid, Inc. respectfully requests that the Public Utility Commission (PUC) amend its COVID-19 EMERGENCY DISCONNECTION RULE 2.600 (Emergency Rule 2.600) to add enhanced protection against disconnection for consumers who are homeowners and to encourage them to participate in the Vermont Homeowner Assistance Program (VHAP). VHAP, which became available to Vermont homeowners last week, is operated by the Vermont Housing Finance Agency (VHFA) and distributes federal funds to homeowners who may use them to make overdue mortgage payments, pay homeowners association fees, pay property taxes, or pay utility bills. <https://vermonthap.vhfa.org/>

Further, amending Emergency Rule 2.600 to include homeowners who are eligible for VHAP would encourage utilities to provide meaningful assistance to homeowners to connect them with these much-needed, newly available funds.

When the PUC adopted Emergency Rule 2.600, effective January 3, 2022, the VHAP program was not yet available to Vermont homeowners. Indeed, Emergency Rule 2.600 deleted references to the prior VCAAP II program, which expired in 2021 and had distributed state funds

to homeowners to assist with their utility arrearages. Thus, as it is currently written, Emergency Rule 2.600 provides protection only to renters who apply for assistance from the Vermont Emergency Rental and Utility Assistance Program (VERAP or VERAP-U), which is administered by the Vermont State Housing Authority. However, because there is no reason to provide protection against disconnection to renters who apply for VERAP but not to homeowners who apply for VHAP, we respectfully request that Emergency Rule 2.600 be amended to protect those homeowners as well.

Dated at Burlington, Vermont, this 24th day of January, 2022.

VERMONT LEGAL AID, INC.

By: /s/ W. David Koeninger

W. David Koeninger
Deputy Director
Vermont Legal Aid, Inc.
264 North Winooski Avenue
Burlington, VT 05401
802.863.5620, x.216
dkoeninger@vtlegalaid.org