

Hello, my name is Carol Flint. I work at the Department of Public Service as the Director of the Consumer Affairs, Public Information and Administrative Services divisions. Thank you for offering me the opportunity to talk with you about H. 21, Utility Disconnection; Landlord Notification.

Consumer Affairs and Public Information staff receive contacts from Vermont consumers making inquiries, complaints, or comments about utilities. This division investigates complaints made by consumers against utilities and provides informal complaint resolution assistance, among its other responsibilities.

Anecdotally, staff tell me that landlords that we hear from are often frustrated by privacy policies set in place by Vermont's utilities. Landlords are rightfully concerned about protecting their properties from no heat issues that could be caused by loss of electricity.

Consumer Affairs and Public Information staff hear from about 100 Vermont constituents each year requesting assistance with payment arrangements. Many of these Vermont constituents are facing disconnection. Others are addressing concerns with paying for a security deposit. Anecdotally, tenants are rightfully concerned about protecting their personal and financial information. Tenants are rightfully concerned about maintaining their housing; tenants relay concerns that they may be evicted if a landlord were to hear about the tenant's failure to pay the utility bill. Tenants' concerns are valid. Leases that include tenants' responsibilities to pay certain utilities also often include these responsibilities, if unmet, to be reasons for eviction.

Consumer Affairs and Public Information is very concerned that no personal nor financial information be provided to landlords by utilities. A customer's privacy should be respected. There are at least three PUC cases addressing utility customer privacy concerns. I provided a Statement of Principles Relative to Privacy from Docket 7307, the final order from the Barton case, Docket 6075, an investigation into confidentiality of customer bills of Barton Village, Inc. Electric Department, and Docket 4989, Tariff filing of Village of Stowe Electric Department requesting a revision to its Rules and Regulations. For this last case, the document I've provided discusses Stowe's proposal that all charges for electric service be billed to the property owner.

The CAPI division is also concerned about the increased costs that would be paid by all ratepayers in order for utilities to implement additional tracking mechanisms and staffing to alert landlords. Additionally, CAPI is concerned that the bill doesn't include any requirements of the utilities to notify tenants in advance that landlords could be provided this information.

Again, thank you for giving me the opportunity to address the House Committee on General and Housing about H. 21.