



Date: March 9, 2026

To: House Committee on Energy and Digital Infrastructure

From: Dylan Giambatista, Director of Public Affairs

Subject: H.753 Draft No. 1.1

Vermont Gas Systems, Inc. (VGS) is a fully regulated distribution utility. We serve more than 56,000 customers in Addison, Chittenden, and Franklin counties. In addition to providing these customers with natural gas to warm their homes and businesses, our teams help them identify the most efficient and cost-effective thermal solutions for their needs. We facilitate comprehensive weatherization and the installation and maintenance of gas and electric heating and cooling systems.

We have monitored the Committee's hearings about utility disconnections and reviewed [H.753 Draft No. 1.1](#). As a distribution utility, we comply with Commission Rule 3.300 and the notification and disconnection procedures it sets out. Our customer teams are trained to help customers in arrears assess options for repayment and, if eligible, connect them with available resources, such as our Low Income Assistance Program (LIAP). If a customer is unable to pay the full balance, we work to identify a payment plan that fits their budget. In most cases, customers who are notified of a pending disconnection or who are disconnected are quickly reconnected after engaging with our teams.

Disconnection and reconnection data is regularly reported to the Department of Public Service's Consumer Affairs & Public Information (CAPI) Division as required by Rule 3.308(B). To aid in transparency, we support it being compiled and made available to policy makers as envisioned by the Sec. 2 reporting requirement.

On the topic of disconnections performed in summer or during periods of extreme heat, it's worth noting that the gas service we facilitate is used for thermal purposes. Natural gas is a heating or process fuel. Its primary residential use is for warming spaces or heating water. This distinguishes it from electricity, which could be used for heating or cooling spaces, and many non-thermal applications.

Rule 3.304 currently governs disconnection during cold weather periods defined as November 1 through March 31. At VGS, our teams operationalize the Rule as a prohibition on disconnection during this 5-month timespan regardless of outdoor temperature. We feel

this is appropriate given the essential role natural gas plays to keep customers' homes warm in colder months.

If Draft 1.1's Sec. 3 (1) rulemaking directive is intended to curtail disconnections in periods of extreme heat so cooling can continue uninterrupted, it raises the question of whether the Committee's intent is to also prohibit gas disconnections during these times. As we've stated, natural gas cannot be used for cooling. We recommend Sec. 3 (1) be updated so the extreme heat provision is not applicable to gas:

On or before January 1, 2028, or upon the initiation of any rulemaking pertaining to Public Utility Commission Rule 3.300 (concerning residential utility service disconnections), whichever occurs first, the Public Utility Commission shall adopt rules that:

*(1) curtail **electric utility** service disconnections during periods of extreme heat, as defined by the Commission, which may include a lower temperature threshold for households comprised of persons who are 62 years of age or older;*

Thank you for considering our testimony. As always, we stand ready to provide information if we can assist with the Committee's deliberations.