


COMMONWEALTH OF PENNSYLVANIA



OFFICE OF CONSUMER ADVOCATE

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March 13, 2020

Chairman Gladys Brown Dutrieuille
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

Re: Request For Emergency Action Regarding Utility Service In Response to COVID-19

Dear Chairman Brown Dutrieuille,

The Office of Consumer Advocate, the Office of Small Business Advocate, and the Pennsylvania Utility Law Project write today with great urgency as our communities and our Nation faces the wide-spread outbreak of COVID-19. As you are aware, COVID-19, and the response to COVID-19, is taking a toll on our citizens and businesses. Closures of schools and businesses, as well as cancellation of many events, will result in financial losses to both employees and businesses during this crisis. In addition, many citizens may be confined to their homes for an extended period of time, and citizens are being asked to spend additional dollars on obtaining necessary supplies of household goods and medications to prepare for an emergency. The economic impact of COVID-19 for homes and businesses could be profound, causing consumers to have difficulty meeting their utility payment obligations in a timely manner. This is particularly true for low wage workers and consumer-facing small business owners that survive pay check to pay check.

Access to utility service will be critically important in the coming weeks. Essential utility services of water, wastewater, electric, natural gas, and telephone will be needed to maintain safe and healthy environments at our homes and for the continued safe operation of our businesses. In light of these circumstances, we urge the Commission to issue an emergency Order to suspend all terminations of service to utility consumers, residential and business alike, until at least April 30, 2020. The Commission should revisit this emergency Order as April 30th approaches to reassess the need for this measure. We believe it is unquestionably in the public interest for the Commission to, on an emergency basis, extend the winter moratorium on utility shutoffs, and expand protections to apply to water and wastewater utilities and to small business customers who do not have any such protection at this time. We would also ask that utilities be directed to work with customers whose service is already shut off to promptly restore that service.

In addition, we would ask that the Commission direct the utilities to work with consumers in establishing reasonable payment arrangements after the crisis passes. Given the economic disruption, it may take some time for customers to be able to regain their financial footing and catch up on any missed utility payments. Additional time to negotiate these

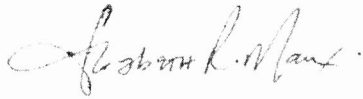
arrangements, and utility agreement to extend the payment periods if necessary, will help to alleviate any financial hardships.

Finally, we request that the Commission issue guidance to utilities to prevent consumers from being removed from Customer Assistance Programs during this time, particularly if the customer has difficulty recertifying eligibility. It may be difficult for customers to recertify during this time for many reasons, including reduced access to transportation for in-person recertification, the inability to connect with agencies that may be closed or have reduced hours, or added obstacles to obtaining documents necessary for recertification.

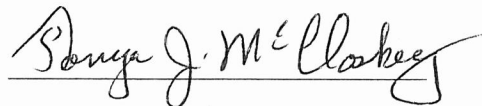
There may be other measures that become necessary or apparent as this situation develops. We would like to acknowledge and commend utilities that have already announced some of these measures to assist their customers. We stand ready to work with the Commission and all Pennsylvania utilities to assist our citizens and businesses that will be deeply affected by this global pandemic.

If you have any questions about this request, please feel free to contact any of the undersigned. Thank you in advance for your consideration of this request.

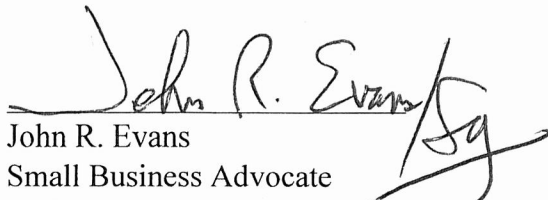
Very truly yours,



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