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June 12, 2020

Rosemary Chiavetta, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street, 2nd Floor
Harrisburg, PA 17120

VIA ELECTRONIC FILING

**RE: COVID-19 Customer Service, Billing, and Public Outreach Provisions
Request for Utility Information, Docket No. M-2020-3020055**

Dear Secretary Chiavetta:

Attached please find the response of Citizens' Electric Company of Lewisburg, PA ("Citizens" or "Company") to the Pennsylvania Public Utility Commission's ("PUC" or "Commission") request for COVID-19 utility customer service, billing, and public outreach information in its May 29, 2020, Secretarial Letter issued in the above-referenced docket.

Citizens' appreciates the Commission's desire to stay abreast of how the COVID-19 emergency declaration is impacting Pennsylvania consumers and utilities. As set forth in the attached responses, Citizens' has experienced an increase in the number of delinquent accounts for both residential and non-residential customers in comparison to prior years. The Company has abided by the Commission's Emergency Order that prevents the pursuit of termination for those accounts.

While the Emergency Order is prohibiting termination, the arrearages for many of the accounts continue to grow without the customers seeking payment arrangements. Some of those arrearages accrued prior to the Governor's Emergency Declaration in March 2020 and were subject to the 2019-2020 winter moratorium, which was extended by the Emergency Order. Citizens' recognizes the financial struggles that many customers are facing due to the COVID-19 pandemic; however, the Company submits that the accumulation of large arrearages without good faith efforts to apply for a payment arrangement or to make partial payments is not in the public interest.

In addition, we urge the Commission to consider that our efforts to collect the past due amounts that have accrued during the Emergency Order moratorium may be hampered by the onset of the 2020-2021 winter moratorium. Utilities should have a reasonable window to terminate accounts or enter into payment arrangements with eligible customers prior to the start of the next winter moratorium.

Citizens' respectfully requests that the Commission provide a definitive end date for the current moratorium, subject to the ability of customers to seek payment arrangements to avoid termination. The schedule proposed by Duquesne Light Company in its comments at this docket, which would enable termination to commence on or around August 3, 2020, is an acceptable timeline for the

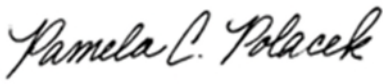
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transition from the Emergency Order moratorium. Citizens' stands ready to negotiate payment arrangements with residential and non-residential customers to mitigate the financial impact of repaying the arrearages.

If you have any questions concerning this matter, please contact the undersigned. Thank you.

Very truly yours,

McNEES WALLACE & NURICK LLC

By 
Pamela Polacek

Citizens' Electric Company of Lewisburg, PA

c: Sarah Dewey, BCS (via E-mail)
Tom Charles, Director, Office of Communications (via E-mail)
Tanya McCloskey, Office of Consumer Advocate (via E-mail)
John R. Evans, Office of Small Business Advocate (via E-mail)
Richard A. Kanaskie, Bureau of Investigation and Enforcement (via E-mail)

**COVID-19 Customer Service, Billing, and Public Outreach Provision
Request for Utility Information
Docket No. M-2020-3020055
Citizens' Electric Company
06/12/2020**

I. COVID-19 Utility Consumer Service and Billing Policies and Procedures

Describe and report efforts to support customers through initiatives in customer service and billing policies and procedures in response to the COVID-19 pandemic and the ensuing recovery period. Explain how these initiatives differ from normal operations:

Termination of Utility Service:

- After the Commission's Emergency Order on Terminations at Docket No. M-2020-3019244 ends, how soon does the utility plan to begin termination of service for nonpayment?

Citizens' will initiate normal termination processes at the conclusion of the Emergency Order. Absent a clear end date, the Company plans to begin sending notices in mid-July, with terminations beginning in early August.

- How does the utility plan to implement terminations and will it start the process with new termination notices?

We will issue all new termination notices and will work through the process as we would normally. As always, we will continue to work with customers to the maximum extent possible and will pursue terminations as a last resort.

- Broken out by customer class, how many customer accounts may be subject to termination if the Commission's Emergency Order prohibiting terminations is rescinded and how does this number compare to the same time period in 2019?
 - Provide these figures for all utility confirmed low-income customers, including Lifeline and Customer Assistance Program (CAP) customers.
 - 2020 low-income customers at risk of termination = 34
 - 2020 total number of residential customers at risk of termination = 169
 - 2020 commercial customers at risk of termination = 41
 - 2019 low-income customers at risk of termination = 32
 - 2019 total number of residential customers at risk of termination = 95
 - 2019 commercial accounts at risk of termination = 68
 - Provide future projections if available.

The Company is not able to provide meaningful projections of future data.

- Is the utility currently assessing a “reconnection fee” to restore service? If yes, how is the fee billed and/or collected? Will this fee apply to customers reconnected under the Commission’s Emergency Order that wish to pay any arrearage and stay connected?

There are no reconnect fees being assessed at this time as we are not terminating any customers. Once the Commission’s orders are lifted, reconnect fees will be due prior to reconnection of any terminated electric service.

Universal Service Programs:

- Is the utility currently removing customers from CAP for non-payment or failure to recertify?

The Company does not offer a CAP program.

- What are the utility’s current Hardship Fund payment requirements to qualify low-income customers for grants (e.g., waiving payment history “good faith payment”, or CAP participation criteria) and have these requirements been revised due to the pandemic?

We are waiving “sincere effort payments” that are normally required when obtaining assistance through the Dollar Energy Program.

Other Assistance Initiatives:

- Describe any policies/procedures the utility has updated to assist customers impacted by the pandemic that go beyond provisions in PUC policies or regulations.

We have expanded the termination moratorium to include commercial accounts. We are also waiving late fees on all customer types during the moratorium. We will be monitoring commercial accounts closely and may initiate termination activities for any that may be putting our other customers at risk by accumulating large arrearages.

- Describe any proposed or anticipated changes in programs/practices/policies to assist customers impacted by the pandemic after the Governor’s Emergency Proclamation and the PUC Emergency Order on Terminations expire or are lifted.

The Company is not anticipating any significant changes to existing programs/practices/policies. To reiterate current assistance offerings, a hardship fund (Dollar Energy Fund) is available to customers at income levels 1 & 2. Contributions to this fund are made by customers and matched by the Company. We also refer low-income customers to the Red Cross, Salvation Army, United Way, Community Action Agency and LIHEAP, as well as offer company payment arrangements when needed. We will continue treating terminations as a last resort.

II. Consumer Education and Outreach

The Commission is specifically interested in how utilities are informing customers of their rights and responsibilities as ratepayers during the COVID-19 pandemic and in determining whether any gaps exist in consumer education and outreach efforts. The Commission directs all jurisdictional electric, natural gas, water, wastewater, and telecommunications utilities to submit

to Tom Charles, thcharles@pa.gov, in the Commission's Office of Communications, the following information, if applicable, regarding consumer education and outreach strategies related to the COVID-19 pandemic and the ensuing recovery period.

- Descriptions and/or examples of how the utilities are educating their customers about their rights and responsibilities, assistance programs, energy efficiency and conservation, and/or COVID-19 recovery.

The Company has provided information through social media, its website, customer newsletter, bill inserts, past due notices and over the phone. See attached for communications examples.

- Efforts to reach all utility consumers with information about income-qualified programs and resources and about non-income-qualified educational services, tools, and resources.

In addition to the items listed above, the Company sent an informational letter to current past due customers. This notice contained information about programs that can help customers struggling to pay their electric bill. See attached example.

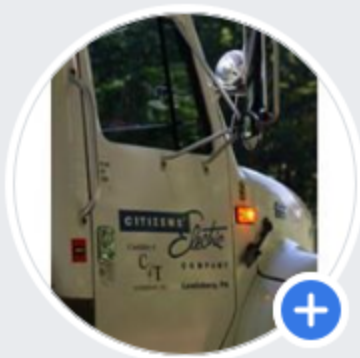
- Methods that utilities are using to make their customers aware of important proceedings that may include telephonic public input hearings and allowing consumers to be able to make their voices heard.

The Company provides notice via newspaper notices, web site postings and bill inserts or special mailings. Notices are provided in accordance with PUC regulations.

- Description of utility outreach methods that could be used to inform eligible Pennsylvanians about changes related to COVID-19 in the Lifeline Program for Telephone and Broadband Internet Service.

N/A

Questions regarding these responses can be directed to: Brook Bogaczyk 570-522-6144



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Citizens' Electric Company

@CitizensElectric.Lewisbu
rgPA

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Citizens' Electric Company

Published by John Kelchner [?] · March 17 · 🌐

Citizens' Electric closes office to walk-in traffic as coronavirus precaution.

In an effort to slow the spread of the COVID-19 virus and to help us ensure we can continue providing the best service possible, we have closed our office to routine public entry until further notice.

Our top priority during this evolving pandemic continues to be the safe and reliable delivery of electricity to our customers' homes, farms and businesses. In order to help ensure there will be no disruption to our business operations or the essential services we provide, we are focused on keeping our employees healthy by limiting the potential exposure to coronavirus.

To pay your bill:
Customers who are dropping off payments are asked to use the night deposit slot to the left of the front door (please, no cash after regular business hours.)

You can also view your bill, make payments, set up auto-pay, view usage and conduct other business by visiting <https://citizenselectric.smarthub.coop/Login.html#login>.

You can install the SmartHub app on your iphone, iPad or Android device. Look for NISC SmartHub in your app store.

As has been the case throughout our 109 years of business, customers can count on Citizens' Electric to be there for them. This time is no different. You can reach out to us at 570-524-2231 with questions or concerns 24 hours a day, seven days a week. Visit www.citizenselectric.com for more information.

The employees of Citizens' Electric thank you for your cooperation as we adjust to a rapidly changing situation.



BEHIND THE LINES

Community News

1775 Industrial Boulevard • Lewisburg, PA 17837 • (570) 524-2231

We're here for you

By John Kelchner



John Kelchner
President & CEO

I sincerely hope the COVID-19 pandemic has peaked in Pennsylvania by the time this reaches you and that we are starting to return to some sense of normalcy at home and at work.

Unfortunately, as I write this in mid April, there's no way of knowing what our world will look like by the time you are reading it in May. What I do know is that regardless of the path this virus takes, your electric provider will be here for you, and our top priority during this pandemic continues to be the safe and reliable delivery of electricity to our customers' homes, farms and businesses.

As you probably know, we adjusted our daily operations in many ways in mid March. In an effort to slow the spread of COVID-19 and to help ensure we can continue providing the best service possible, we closed our office to routine public entry, and it remains so until further notice. In order to help ensure there will be no disruption to our business operations or the essential services we provide, we have been focused on keeping our employees and customers healthy by limiting potential exposure to coronavirus. If you are interested in viewing our full COVID-19 Action Plan, it is available online at <https://citizenselectric.com/wp-content/uploads/2020/04/COVID-ACTION-PLN.pdf>

To support our customers during these uncertain times, we have also suspended service disconnections and are waiving late fees for all customers until further notice.

During the office closure and beyond, we offer many options for you to conduct business with us. To pay your bill in person, customers are asked to use the night deposit slot to the left of the front door to drop off payments — please, no cash after regular business hours.

You can also view your bill, make payments, set up auto-pay, view your electric use and conduct other business by logging into SmartHub, which can be accessed through our website, citizenselectric.com, or by downloading the SmartHub app on your mobile device. Additional methods to pay your bill or obtain assistance are available through our website or by calling the office.

We continue to closely monitor the evolving COVID-19 pandemic and are here to help our customers in any way possible. As has been the case throughout our 109 years of business, customers can count on Citizens' Electric to be there for them. This time is no different. You can reach out to us at 570-524-2231 or visit us online at <https://citizenselectric.com/contact-us/> with questions or concerns 24 hours a day, seven days a week.

Together, we'll get through these trying times. Once we can again enjoy each other's company, we look forward to supplying low-cost, reliable electricity for happy occasions like concerts, dances, carnivals, and movies. The employees of Citizens' Electric thank you for your cooperation as we adjust to a rapidly changing situation.

SENIOR STAFF

John Kelchner

President & Chief Executive Officer

Nate Johnson

*Vice President of Engineering
& Operations*

Gene Cree

Chief Financial Officer/Treasurer

ON THE FLIP SIDE

- Tree-trimming work begins
- Help your neighbors in need
- Manage your account with SmartHub

Tree-trimming work, pole inspections planned

Citizens' Electric has awarded contracts for its annual vegetation management and pole inspection programs.

Dincher & Dincher Tree Surgeons, the contractor hired to perform right-of-way maintenance throughout our service territory, will be conducting tree-pruning activities throughout the spring.

Citizens' annual pole inspection program will be performed by GeoForce Utility Technologies in coming months.

The right-of-way maintenance and pole inspections programs are conducted annually to help ensure continued safety and system reliability.

Employees working for our right-of-way and pole-inspection contractors will carry identification cards and work from vehicles marked with a company logo. If you have questions about the authenticity of contractors, please contact us at (570) 524-2231.

Manage your account from anywhere

SmartHub lets you manage all aspects of your Citizens' Electric account online or with your mobile device.



SmartHub gives you the ability to view and pay your bills online, report power outages and check outage status, monitor your daily electric use and view your billing history.

To create a SmartHub account, visit our website at www.citizenselectric.com and click on the SmartHub link. The SmartHub mobile application for Android or Apple can be downloaded for free from your app store.



**Know what's below.
Call before you dig.**

Help neighbors get through these challenging times

Financial hardships created by the COVID-19 pandemic have caused many families in our region to struggle to keep up with their energy bills.



You can assist those impacted by job loss or other financial hardship during these challenging times by participating in Citizens' Electric's Dollar Energy Fund. By adding one dollar or more to your electric bill each month, you will be helping your neighbors right here in the Buffalo Valley.

Your tax-deductible contribution to the Dollar Energy Fund is matched by Citizens' Electric, and 100 percent of the contributions will be used to provide energy assistance grants to families in Citizens' territory.

To participate, please check the Dollar Energy Fund box on your electric bill, enter your contribution amount, and return it to Citizens' Electric.

Citizens' named Tree Line USA utility

Citizens' Electric Co. has been named a Tree Line USA utility by the National Arbor Day Foundation for the 18th consecutive year.



The Tree Line USA program recognizes utilities that demonstrate practices that protect and enhance America's urban trees.

Citizens' Electric achieved Tree Line USA by meeting five program standards. Utilities must follow industry standards for quality tree care; provide annual worker training in best tree-care practices; sponsor a tree-planting and public education program; maintain a tree-based energy conservation program; and participate in an Arbor Day celebration.

Let Budget Billing even out your electric bill payments

You can avoid seasonal fluctuations in your electric bill by participating in Citizens' Electric's budget billing plan. Budget billing allows you to level out your monthly payments throughout the year, eliminating seasonal spikes and resulting billing fluctuation caused by changes in your electric use. The plan is entirely voluntary and available to all customers on our residential rate schedule.

There is no cost to participate in the plan, nor are there any savings. If you are interested in setting up a budget billing plan for your account or to learn more about how the plan works, please give us a call at 570-524-2231.

Account [REDACTED]

Dear [REDACTED]

You are receiving this letter as notification that your electric account is currently past due in the amount of [REDACTED]. Although we are not terminating any customers at this time due to the COVID-19 pandemic, your account will continue to incur charges based on your usage.

Our priority is to help you avoid a future termination once the temporary moratorium has been lifted. There are many options available that can help lessen the burden of your past due balance. The Low-Income Home Energy Assistance Program (LIHEAP) helps low-income households pay some energy costs associated with heating your home. In response to the global coronavirus (COVID-19) pandemic, the United States Congress passed the Coronavirus Aid, Relief, and Economic Security (CARES) Act. The CARES Act, in part, has provided additional funding for LIHEAP to aid households that have been negatively financially impacted by the COVID-19 pandemic. In order to get this much-needed assistance to as many households as possible, the Pennsylvania Department of Human Services has created the LIHEAP Recovery Crisis Program. If your household is experiencing a heating emergency, such as being out of fuel or having a past due balance that may result in your electricity or natural gas being shut off, LIHEAP may be able to help.

If you are not eligible for LIHEAP, our Dollar Energy program may benefit you. In addition, there are local community agencies which have funding available for those in need. We can also help set you up with a payment arrangement plan to help spread your payments over a longer period of time.

Together, we can work through current difficulties and emerge stronger. Although our office will remain closed to the public for a little while longer, we can take your call to assist you with any of these options Monday through Friday 7:30 a.m. through 4:00 p.m. at 570-524-2231.

Sincerely,



Brook Bogaczyk
Customer Service Manager
Citizens' Electric Company

Welcome to Citizens' Electric Company Lewisburg, PA

News

- 3/31/2020 – Citizens' Electric Company has filed a [Default Service Plan](#) for the period June 1, 2021 through May 31, 2025. This plan is subject to approval by the PA Public Utility Commission.
- 3/17/2020 – **In an effort to slow the spread of the COVID-19 virus and to help us ensure we can continue providing the best service possible, we have closed our office to routine public entry until further notice.** Our top priority during this pandemic continues to be the safe and reliable delivery of electricity to our customers' homes, farms and businesses. In order to help ensure there will be no disruption to our business operations or the essential services we provide, we are focused on keeping our employees and customers healthy by limiting potential exposures to coronavirus. Our full COVID-19 Action Plan is available [here](#).

To pay your bill:

Customers are asked to use the night deposit slot to the left of the front door to drop off payments (please, no cash after regular business hours.)

You can also view your bill, make payments, set up auto-pay, view usage and conduct other business by logging into [SmartHub](#). In addition, you can install the SmartHub app on your iPhone, iPad or Android device from the [Apple App Store](#) or [Google Play Store](#). Please see our [Payment Options page](#) for more ways to pay your bill or obtain assistance.

To support our customers during these uncertain times, **we are suspending service disconnections and waiving late fees for all customers until further notice.**

We are closely monitoring the evolving COVID-19 pandemic and are here to help our customers in any way possible. As has been the case throughout our 109 years of business, customers can count on Citizens' Electric to be there for them. This time is no different. You can reach out to us at **570-524-2231** with questions or concerns 24 hours a day, seven days a week. The employees of Citizens' Electric thank you for your cooperation as we adjust to a rapidly changing situation.