

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANA OFFICE OF UTILITY CONSUMER)
COUNSELOR FOR GENERIC INVESTIGATION INTO)
COVID-19 IMPACTS TO BE CONDUCTED OVER TWO)
PHASES; EMERGENCY RELIEF PURSUANT TO IND.)
CODE § 8-1-2-113 TO RELIEVE INDIANA RATEPAYERS OF) CAUSE NO. 45380
THE THREAT OF UTILITY SERVICE DISCONNECTION)
AND PAYMENT ARREARAGES DURING GLOBAL)
HEALTH AND ECONOMIC CRISIS)

VERIFIED JOINT PETITION OF DUKE ENERGY INDIANA,)
LLC, INDIANA GAS COMPANY D/B/A VECTREN ENERGY)
DELIVERY OF INDIANA, INC., INDIANA MICHIGAN)
POWER COMPANY, INDIANA NATURAL GAS)
CORPORATION, INDIANAPOLIS POWER & LIGHT)
COMPANY, MIDWEST NATURAL GAS CORPORATION,)
NORTHERN INDIANA PUBLIC SERVICE COMPANY, LLC,)
OHIO VALLEY GAS CORP. AND OHIO VALLEY GAS,)
INC., SOUTHERN INDIANA GAS & ELECTRIC COMPANY)
D/B/A VECTREN ENERGY DELIVERY OF INDIANA, INC.,)
AND SYCAMORE GAS COMPANY FOR (1) AUTHORITY) CAUSE NO. 45377
FOR ALL JOINT PETITIONERS TO DEFER AS A)
REGULATORY ASSET CERTAIN INCREMENTAL)
EXPENSE INCREASES AND REVENUE REDUCTIONS OF)
THE UTILITY ATTRIBUTABLE TO COVID-19; AND (2))
THE ESTABLISHMENT OF SUBDOCKETS FOR EACH)
JOINT PETITIONER IN WHICH EACH JOINT)
PETITIONER MAY ADDRESS REPAYMENT PROGRAMS)
FOR PAST DUE CUSTOMER ACCOUNTS, APPROVAL OF)
NEW BAD DEBT TRACKERS, AND/OR DETAILS)
CONCERNING THE FUTURE RECOVERY OF THE COVID-)
19 REGULATORY ASSET)

CAC AND INCAA’S REPLY TO UTILITY RESPONSES

Pursuant to Section 3 of the Indiana Utility Regulatory Commission’s (“Commission”) May 27, 2020 Order, Citizens Action Coalition of Indiana (“CAC”) and Indiana Community Action Association (“INCAA”) hereby file their Reply to the June 10, 2020 Responses (“June 10

Responses”) and reference the June 15, 2020 Submissions of Requested Information (“June 15 Submissions of Requested Information”) filed in this Cause.

I. The “Measures in Place” to Assist Customers during the Financial Crisis Are Insufficient.

A. The utilities’ patchwork of “measures in place” demonstrate the great need for statewide minimum credit and collections practices and procedures to allow customers a clear, dignified path back to regular utility bill payment.

The patchwork of responses submitted by the various jurisdictional Indiana utilities, especially related to the June 15 Submissions of Requested Information providing lists of measures each utility has in place to assist customers during the COVID-19 pandemic and the utility’s plan to continue such assistance in the future, demonstrate the absolute need for the Commission to establish a set of uniform, statewide minimum credit and collections practices and procedures. The ambiguity and lack of details about many utilities’ “measures in place” in these formal filings to the Indiana Utility Regulatory Commission is especially concerning since one would presume that customers are left even more in the dark if utilities are not even providing such details to their regulator. (*See* Attachment 1 for a table comparing the June 15 Submissions of Requested Information).

The utilities’ proposals, if adopted, would lead to unclear and widely varying practices among a customer’s electric, gas, water, and wastewater utility services, or potentially among two different customers seeking help from the same utility, thereby causing further confusion and financial distress. CAC and INCAA’s better, more comprehensive proposal essentially takes the best practices of the various utility proposals and combines them into a coherent framework that will provide customers the flexibility, clarity, and notice they need to stay connected to

essential utility service. The Commission should find the utilities' counter-arguments about increased expense and lack of technology unconvincing. Our utilities are entrusted with running nuclear plants, keeping our water clean, and running complicated customer service platforms; they can figure out minimum payment plans and the waiver of fees, among other matters. The Commission should also disregard other nonsensical arguments, such as the argument by the Joint Petitioners that a longer extension of the disconnection moratorium is somehow not in the interest of low income customers, because it is better for the customers to be disconnected than for the utilities' deferral balances to grow. (Joint Utilities' June 10 Response, p. 6). The Commission must step in to ensure the utilities are acting in the best interest of ratepayers.

In addition, some June 10 Responses indicate that some utilities are not going to completely comply with the Commission's requested monthly reporting requirements. *See, e.g.*, Joint Utilities' June 10 Response, p. 14, Section IV ("Some of the requested information may be difficult or impossible for some utilities to collect. The Joint Utilities will notify the Commission of any system limitations they have in providing such information with their first monthly report filing."). The Commission should find this unacceptable and require strict conformance to these simple monthly reporting requirements so that the data collected can be standardized, insofar as that is practicable, in order to facilitate comparisons and the tracking of progress towards reducing these problems. Data collection and sharing plays an integral role in providing information for developing evidence-based policies.

B. LIHEAP and other energy assistance is nowhere near what is needed.

Several utilities mentioned the availability of energy assistance funds, either through the Low Income Home Energy Assistance Program (“LIHEAP”) or from other entities such as local churches and town trustees, as measures in place to assist customers during the COVID-19 pandemic. Although any customer assistance is welcomed by entities serving utility customers in need like the Community Action Agencies that INCAA represents, all of this funding combined will not get Indiana ratepayers anywhere close to catching up on arrearages and returning to regular timely bill payment. Rather, a comprehensive set of minimum credit and collections practices and procedures is desperately needed during this unprecedented economic crisis.

First, it is important to understand the extraordinary need before us in comparison to the amount of funding available for energy assistance and the eligibility restrictions for such assistance. The most recently available data from Indiana211, a service that connects Hoosiers with resources from thousands of health and human service agencies, shows that further help is desperately needed. Indiana211 reports that from March 16-May 28, 2020, which was covered by the Governor’s disconnection moratorium, “12,871 Hoosiers contacted 211 seeking utility assistance. Week by week analysis indicates a 28% [increase] since the declared public health emergency to the end of April.” (Attachment 2). The calls for electric utility payment assistance alone reached 7,846, with many of those needs going “unmet” for reasons such as client ineligibility or a lack of available funds. *Id.* Importantly, “Of those that responded, single females with children represent the highest household composition in need. Unemployed and looking for work is the highest reported employment status. This is not consistent with pre-public health emergency data where unable to work/disable was the primary reported status.” *Id.*

The additional \$17 million of LIHEAP funding, and the funding collected by local town trustees and churches, pales in comparison to this demonstrated need. (*See also* CAC and INCAA’s June 10 Response at pp. 3-6 for other data points about this need). Indiana already typically exhausts its nearly \$80 million¹ in annual LIHEAP allocation every year, even before the cooling season hits. \$17 million in a financial crisis will not last long, nor will the meager funding available in town trustee and church programs. And, the situation with the additional LIHEAP funding is complicated insofar as Indiana decided to use different eligibility criteria than what they would normally use for LIHEAP. The Community Action Agencies and other LIHEAP distribution entities are working hard to not just implement, but understand, this new set of eligibility guidelines and protocols. Thus, it is likely that distribution will be further delayed, in addition to the fact that these new guidelines will likely exclude individuals in need. Lingering questions about the changed eligibility requirements exist, such as how and whether CARES Act stimulus payments are incorporated into income intake guidelines, and how to qualify customers who have never received LIHEAP before this financial crisis.

¹https://www.acf.hhs.gov/sites/default/files/ocs/comm_liheap_3rdreleasedclstateterrtable_fy2020_040320.pdf

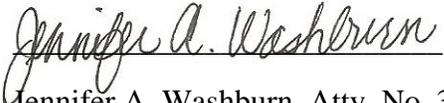
C. Only minimum, statewide credit and collections practices and procedures can guide ratepayers back to regular bill payment.

The Commission must immediately institute further credit and collections practices in addition to continuing the utility disconnection moratorium, the required waiver of certain utility fees, and the availability of expanded payment arrangements until evidence and data show these protections are no longer necessary. The utilities' June 15 Submissions of Requested Information demonstrate the need for this to be addressed comprehensively. The Commission should order:

1. A continued moratorium on utility service disconnections, required waiver of certain utility fees, and the availability of expanded customer payment arrangements as recommended by the OUCC for all jurisdictional utilities;
2. All jurisdictional utilities reconnect previously disconnected customers due to inability to pay;
3. All jurisdictional utilities provide customers with access to a default 24-month deferred payment arrangements for Low-income customers, and default 18-month deferred payment arrangement for non-Low-income customers;
4. All jurisdictional utilities permit customer self-certification of Low-income status to access expanded deferred payment arrangements and other energy assistance for Low-income customers;
5. All jurisdictional utilities waive deposits for residential customers, apply existing deposits to outstanding balances, and waive all late fees and penalties now and throughout a post-moratorium period;
6. All jurisdictional utilities continue the suspension of collection activities and any credit reporting after the shut-off moratorium is lifted;
7. All jurisdictional utilities provide to all customers a description of the new, flexible credit and collection terms and to conspicuously include this information on all disconnection notices for the next two years, at a minimum;
8. All jurisdictional utilities collect and file data on an ongoing basis to monitor the effectiveness of newly adopted credit and collections protections; and
9. All consumer protection requirements apply to all jurisdictional utilities, not just Joint Utility Petitioners and willing jurisdictional utilities, and that these protections are being offered and instituted in a manner that is uniform and consistent statewide.

The Commission should also encourage non-jurisdictional utilities to follow these credit and collections practices and protocols.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served by electronic mail or U.S. Mail, first class postage prepaid, this 18th day of June, 2020, to the following:

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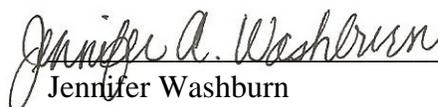
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Attachment 1

Utilities' June 15th Responses	Existing Plans to Assist Customers	Plans to Assist Customers Post-Moratorium
Duke Energy Indiana	<p>"Suspended customer disconnections for non-payment; [r]econnected customers who contacted the Company and had recently been disconnected without requiring a deposit or reconnection fee; [w]orked with its customers who have arrearages to develop alternative extended payment arrangements...; [w]aived late payment fees...and returned check fees...for all customers; [w]aived credit card convenience fees...for residential customers; [w]aived walk-in payment convenience fees...; [a]llowed eligible industrial customers to use maintenance periods to reduce their demand charges without the required tariff notice; [p]rovided for payment arrangements for small and medium business customers; [l]aunched a proactive campaign, using emails, text messages, and outbound calls to inform customers who were behind in payments about various payment arrangement options...; [l]aunched a deferred payment arrangement to assist customers by providing the opportunity to make payments on their past due account balance for either three (3) or six (6) months..."; and "[a]dded capability to the Company's website to allow such payment arrangements to be initiated by customer self-service without the need to call into the Customer Care Center."</p>	<p>Duke "anticipates gradually pursuing disconnection of customers for nonpayment" and "will continue to promote the availability of the extended payment program as an option to avoid disconnection. Once the disconnection moratorium is lifted, Duke Energy Indiana will also wait thirty (30) days before customers begin to receive disconnect notices to allow customers time to get set up with payment arrangements."</p>

I&M	Suspended disconnections for non-payment beginning on March 16, 2020; "unable to suspend the automated processes that generate and send disconnect notices to customers" but "clearly stating on such notices that the Company has suspended disconnections and encourages payment and/or payment arrangements"; "temporarily stopped 'disconnection approaching' calls, texts, and email alerts"; "proactively reaching out to residential customers whose bills are past due to encourage them to enter into payment arrangements and to assist them in accessing available payment assistance offered by third parties"; "I&M has changed its message [for outbound calls to non-residential customers] to indicate that it is offering payment arrangements"; "temporarily launched non-residential deferred payment arrangement programs, which did not previously exist, to help non-residential customers"; "entered into individualized arrangements" with non-residential customers; "[a]ll customers who enroll in a deferred payment arrangement will be able to avoid disconnection as long as their payment arrangement's terms are kept"; provided resources to business customers	"[S]tay utility disconnections for nonpayment for residential customers for approximately thirty days after the expiration" of the disconnection moratorium; "prospectively, from the date of the Commission's order on the merits in these proceedings, waive late fees, convenience fees[], and reconnection fees, for residential customer during the pendency of this stay period (i.e., until July 31, 2020)"; "offer expanded customer payment plans for residential customers that allow arrearages to be paid off over a period of six (6) months (i.e., through December 31, 2020)"; "will continue not to assess deposits on existing customer accounts and to offer deferred payment arrangements to non-residential customers on an individualized basis for a period of time after the disconnection moratorium ends"
IPL	Suspended disconnections beginning on March 14, 2020; "[m]odified bills that would have typically reflected as a disconnect notice to a past due/unpaid balance notice"; "[e]ncouraging customers to pay what they can...and seek assistance if they feel they would qualify"; "[r]econnected residential and commercial customers that were disconnected up to 30 days prior to the moratorium with no reconnection fee and no payment at the customer's request; offered payment extensions on balances"; "[w]aived deposits for residential customers as a condition of new services that have no prior history with IPL"; "[r]educed the payment amount required on unpaid balances for customers wishing to re-establish service with IPL"; "working to enhance its payment extension options for both residential and commercial customers...longer terms and give customers the ability to make a selection from available term amounts"; "[a]dded \$75,000 of IPL funds to the 2020 Power of Change budget"; made various donations to local organizations	Unclear which measures IPL has in place versus which measures IPL plans to continue in the future, including after expiration of Indiana's disconnection moratorium

NIPSCO	"Waiving all late fees for any customers that are past due on their account; [w]aiving all reconnect fees for those customers wishing to reconnect after being disconnected prior to the pandemic; [o]ffering flexible payment plans up to 6 months...; [p]roviding self-service payment plans on the website and the interactive voice response system for both 3 and 6 month periods"	"Offer payment plans up to 6 months for residential customers based on their preference and up to 12 months for LIHEAP eligible customers; [p]roactively reach out to those residential customers that newly find themselves in arrears and may need additional help in accessing resources available to them; [p]roactively reach out to commercial and industrial customers who may have been most impacted by COVID-19 restrictions and offer payment plans to meet their needs; [p]roactively reach out to LIHEAP customers to alert them of the additional funds available to the CARES act and encourage them to contact their local agency; [w]aive credit card fees to provide additional payment options; [p]rovide advance notice as required by the Commission rules to those customers that are eligible for disconnection. Within that communication include information on payment plan alternatives to assure these customers that they have options on how to pay their bill; [o]nly disconnect those customers that refuse to enroll in a payment plan after receiving the above communications or fail to meet the obligations agreed to in a payment plan"
Southern Indiana Gas and Electric (Vectren); Indiana Gas (Vectren)	Suspended disconnections for nonpayment on March 16, 2020; began reconnecting customers in March 2020 who had been recently disconnected and contacted the Company to request reconnection; "offering expanded payment arrangements"; "waived certain fees otherwise applicable to customer accounts"; "launched a proactive pilot campaign to inform some customers behind in payments about various payment arrangement options"; "contacted customers through emails and outbound calls"; "launched a deferred payment arrangement" for a maximum of three months for both residential and non-residential customers whereby "[c]ustomers who enroll in the deferred payment program are able to avoid disconnection when normal business practices are resumed"; "recently began placing automated calls to customers with arrearages in an attempt to proactively work with customers to establish a payment arrangement"	"[W]ill continue to offer payment arrangements to provide customers the ability to pay arrearages over an extended period of time"; "will communicate to customers through multiple channels...to inform them of the availability of payment arrangements, energy assistance and other resources to help prevent disconnections of service for nonpayment"

American Suburban Utilities, Inc., and Howard County Utilities, Inc.	Payment arrangement offered whereby the customer pays current amount of the bill, and the past due amount is spread over 12 monthly installments.	Waive late fees for the balance of 2020; using disconnection as a "last resort."
Aqua IN	"suspended shutoffs for nonpayment on March 13, 2020"; "suspended the activities that generate shutoff notifications to its customers"; "offering flexible payment arrangement programs"	Will restore water and wastewater services upon customer request (via call). Making every effort to work with its customers now to establish payment arrangements. Encouraging customers to contact the call center if having payment issues.
Boonville Natural Gas Co.	Suspended disconnections; "historically worked directly with its customers on payment plans where customer difficulties have prevented complete payments of monthly bills, monthly charges, or deposits. Typically, such payment plans are customized to the customer's economic circumstances"; "delayed collection of late payment fees or reconnection fees, once the Company recognized that the Governor's Executive Order 20-08 on March 23 would likely cause the Company's customers to 'stay at home'" etc.	"...intends to begin using disconnections once the Governor's prohibition expires, but it will use disconnections sparingly and only after it has had discussions with the customer to better understand their economic circumstances, and where appropriate, work out a payment plan...does not intend to apply disconnections to any customer that has established a payment plan and is fulfilling the customer's obligations under that plan"; "Company anticipates...[it] will continue to make payment plans available for all residential customers going forward whose loss of income requires a reasonable payment plan to be put in place....may be necessary to spread out payments under any such plan for up to 6 months"; "Company plans to reinstitute late payment fees, and reconnection charges related to disconnections for nonpayment on August 1, 2020"

Citizens Energy Group	Beginning on March 13, 2020, suspended disconnections and "immediately waived all deposits, reconnection charges and late payment charges"; "initiated a multi-media communications campaign, requesting customers whose water or natural gas service had been turned off for non-payment to contact the utility to have their service reconnected, without any requirement that those customers pay past-due charges as a condition to reconnection"; "deployed assistance funds from various sources to assist customers and mitigate growing outstanding account balances"; eliminated prior requirement "that 25% of the account balance be paid as a condition to entering into any payment arrangement and limited customers to a maximum of three payment arrangements over a 12-month period"; "[c]ustomers that had not made a payment in more than 30 days were asked to pay 15% of the account balance, but were not required to do so to enter into a payment arrangement"; "[p]ayment arrangements may extend for up to twelve months"; "engaged in multiple outreach efforts"; see also Attachment A to Citizens' filing for more details	Resume disconnections for non-payment September 1, 2020 "at the earliest"; "[t]here will be no limit on the number of payment arrangements for customers who have fallen in arrears and customers will be required to pay a smaller portion of their outstanding account balance as a condition to entering into a payment arrangement (i.e., 15%) than was required prior to March 13, 2020 (i.e., 25%)"; "only the minimum deposit will be charged as a condition to reconnecting services following the moratorium"; "[r]econnection charges will be waived through October 1, 2020 and late payments will not be reinstated until sixty days after the expiration of the moratorium"; see also Attachment A to Citizens' filing for more details.
City of Auburn (Electric Dept., Water Dept.)	Suspended disconnections pursuant to the Executive Order; has not charged any disconnect fees, convenience fees, deposits, except for requests for new service connections; "has charged a late payment fee to all [] customers that were delinquent in their payment...was a repetitive charge for each billing period the customer was delinquent...understood at the time of Executive Order 20-05 that the imposition of a late payment fees was not covered under the Executive Order...currently has in place a payment arrangement policy where delinquent customers may request up to twelve months to pay arrearages."	"...will continue to advise customers of current arrears policies, what fees may still be applicable, and any state or local agencies designed to help with payment of their bills."

City of Bloomington	<p>"Approximately one week prior to Governor Holcomb's executive order, Bloomington placed a moratorium on all service termination and assessment of late fees for non-payment of water bills...also offers a payment arrangement whereby customers are given up to 12 months to pay arrearages...has a robust customer assistance program that is offered to all qualified customers based on income requirements."</p>	<p>"...will continue to aggressively advertise this [robust customers assistance program that is offered to all qualified customers based on income requirements] to its customers as an effective method of providing assistance to those qualifying customers who desire assistance in paying their arrearages and/or meeting current bill obligations." "Bloomington will begin to reinstate late fees commencing July 1, 2020, unless Governor Holcomb's executive orders are extended beyond that date...will begin phasing in disconnections commencing September 1, 2020, unless Governor Holcomb's executive orders are extended beyond that date..will not disconnect any customer who has made payment arrangements...will continue to promote its customer assistance program and the availability of extended payments as viable and effective options to avoid disconnection, and will continue exploring additional measures to assist customers."</p>
City of Evansville	<p>"Late fees/Shut offs are suspended without any penalty fees assessed to customer accounts. Water services for customer remain activated regardless of any customer delinquent or past bills owed to the utility. Extended Payment Arrangements- customers are given 3-month payment arrangements & provided extensions longer than 3 months if furloughed or unemployed. EWSU funds a payment assistance program which is administered through the Community Action Program of Evansville...to assist customers who are in shut offs status...[t]he maximum assistance offered to qualified low-income households is up to \$250, unless all EWSU funding has been exhausted." "Evansville Housing Authority (section 8 housing) forms are offered online to assist customer & case managers and can be processed online to allow shorter processing times for the customers." "Customers can make numerous changes to their account online, which include...payment arrangements, bill payment, and leak adjustment forms. EWSU has worked out an arrangement with local Trustees/Townships giving them the ability to pledge toward customer bills over the phone instead of having the customer bring a pledge in."</p>	<p>"Customers who are in shut off status will be notified that they will be given three weeks to pay their outstanding water and sewer bill after they have received a post Moratorium notification of their shutoff status. The Utility will offer a bill payment plan for up to three months when requested. Penalty fees and reconnection fees will be waived during this time. If the customer has not made any effort to pay their bill or set up payment arrangements within the three-week period, the customer will be notified that water services will be shut off." Will continue to fund a payment assistance program at CAPE, until funding exhausted; customers can continue to make changes to their account online, including payment arrangements; arrangement with local Trustees/Townships will continue wherein they can pledge toward customer bills over the phone instead of having the customer bring a pledge in."</p>

Town of Ellettsville	"...suspended disconnections as of March 16, 2020"	...intends to offer a payment arrangement allowing customers to spread payments over several months and discontinuing late fees while customers pay arrearages"; "intends to pursue disconnection of customers for non-payment once the moratorium is lifted; however, Ellettsville will consider enacting a policy excluding from disconnection those customers who continue to accrue an arrearage due to COVID-19 related issues."
City of Frankfort	"...offers a payment arrangement whereby customers are provided up to six months to pay arrearages"; "actively informing customers with an arrearage about this repayment option"	"...anticipates gradually pursuing disconnection of customers for nonpayment"; "will continue to promote the availability of the extended payment program as an option to avoid disconnection"
City of Lafayette	"Suspending disconnections of service consistent with the Governor's Executive Order; Waiving late fees; Proactively contacting our customers with past due balances and informing them of community services who assist with utility bills; Enhancing our payment arrangement programs to offer great flexibility for customers experiencing financial difficulties; Extending payment arrangements; Expanding our guidelines for payment arrangements to encompass all customer types (prior to March 2020, only residential customers qualified for payment arrangements); and Reconnection of service for customers making requests for reconnection where service had been disconnected prior to the Governor's Executive Order."	"Continuation of the in place measures, except as identified below, through at least September 30, 2020. Additional evaluation will be made at that time before returning to pre-COVID-19 practices; Disconnections will resume but only after efforts to reach a payment arrangement have been exhausted; An additional procedure involving a final phone notification to the customer's phone number on file with the utility will be undertaken prior [to] disconnection; and [t]he turn on policy will be more lenient. Rather than requiring payment in full of all past due bills, payment arrangements will be offered to allow turn on of service."
City of New Castle	Suspended disconnections for non-payment and application of late fees and other deferred payment charges.	Intends to continue moratorium on disconnections until August 2020; will offer payment arrangements "for a period of several months"; intends to inform past due customers in writing, beginning in July, that disconnections will resume in August unless enter into payment arrangement; during or after August 2020, allow reconnections upon payment of a lesser sum than is normally required. "Subject to approval by the City's Common Council, late fees and deferred payment charges will begin to be assessed in August 2020."

City of South Bend	"offers a payment arrangement whereby customers are provided up to threemonths to pay arrearages, and further plans to extend the repayment term to up to twelve months when needed"	Created a "Customer Assistance Program" whereby qualifying sewer service customers will qualify for a credit to their utility bill based on income requirements; gradually pursuing disconnection as a last resort once disconnection moratorium is lifted. Will continue to promote the availability of the extended payment program as an option to avoid disconnection, as well as investigate additional measures to assist customers.
Columbus City Utilities	Allow drive-thru service; suspend shutoffs for non-payment; waive non-recurring charges (late fees and penalties) on customer bills; reduce information required on new service requests.	"...anticipate providing a grace period for customers, allowing them additional time to pay their utility bill"; "will continue to offer will pay agreements...[t]he length of the grace period is being considered by CCI, with a decision to come in the near future"
Community Natural Gas Co.	Suspended disconnections; "historically worked directly with its customers on payment plans where customer difficulties have prevented complete payments of monthly bills, monthly charges, or deposits. Typically, such payment plans are customized to the customer's economic circumstances"; "[e]ach of the Company's offices have been authorized to waive late payment fees for any customer requesting such waiver due to economic problems"	"...intends to begin using disconnections once the Governor's prohibition expires, but it will use disconnections sparingly and only after it has had discussions with the customer to better understand their economic circumstances, and where appropriate, work out a payment plan...does not intend to apply disconnections to any customer that has established a payment plan and is fulfilling the customer's obligations under that plan"; "currently expects a continuation of this authority for each of its offices to waive late payment fees through the fall of 2020"
Community Utilities of Indiana, Inc.	Suspended disconnection on March 10, 2020; "customers who recently had been disconnected for nonpayment were reconnected at no charge, at their election, and collection of any outstanding balances and late fees was suspended during this time"	Upon ending of disconnection moratorium, "the Company will enter into what it is calling the Transition Grace Period (TGP), which means 60 days immediately following the Governors moratorium on disconnection expires. During the TGP, the Company will not disconnect customers for nonpayment. However, the Comapny will work with customers...by offering Deferred Payment Arrangement (DPA) and waiving Late Payment Charges (LPC) through the TGP"

Fountaintown Gas Company, Inc.	Suspended disconnections; "historically worked directly with its customers on payment plans where customer difficulties have prevented complete payments of monthly bills, monthly charges, or deposits. Typically, such payment plans are customized to the customer's economic circumstances"	"...intends to begin using disconnections once the Governor's prohibition expires, but it will use disconnections sparingly and only after it has had discussions with the customer to better understand their economic circumstances, and where appropriate, work out a payment plan...does not intend to apply disconnections to any customer that has established a payment plan and is fulfilling the customer's obligations under that plan"; "Company anticipates that it will continue this [customized payment plan approach] on payment plans going forward"
Hamilton Southeastern Utilities, Inc.	Suspended disconnections effective March 13, 2020.	"Once the disconnection moratorium has been lifted, HSE will evaluate the need for disconnections in a non-discriminatory manner for the remainder of the pandemic. If HSE determines disconnection is warranted, it will do so in accordance with its rules and regulations and only as a last resort."
Indiana American Water Company	"reconnected all customers previously disconnected for non-payment; began waiving reconnect fees; began suspending late fees and stopped applying to past-due accounts; suspended disconnection of services for non-payment; and, began sending courtesy letters, and making courtesy phone calls, to customers with past-due balances to inform them of the amount of their past due balances, but making no mention of disconnection or late fees and interest payments; "does not require customer deposits as a condition of water or sewer service"; "often offers customers the opportunity to enter into an [Installment Payment Plan] whereby they can pay a past due amount over time to make the repayment of that outstanding amount more manageable for the customer...can vary in length, but some may be as long as 24 months"; "currently offers budget billing, which allows customers to enter into a budget billing plan...over a 12-month period"; "may provide customers an extension of the payment date in certain circumstances, with the result that the notice/disconnect process is delayed for a period of up to 15 days"; began a Low-Income Pilot program in three communities.	"...intends to take a measured approach to resuming normal collection activities and submits that it intends to delay resuming normal collection activities until at least August 2020"; will follow the requirements and guidance set forth by the Commission

Indiana Natural Gas Corporation	Suspended disconnections; "historically worked directly with its customers on payment plans where customer difficulties have prevented complete payments of monthly bills, monthly charges, or deposits. Typically, such payment plans are customized to the customer's economic circumstances"; "has been in contact with the regional CAP agencies to determine the availability of and eligibility for energy assistance funds and to make that information available to customers"; "currently waiving all late payment fees, collection fees and reconnection fees for non-pay reasons"	"...intends to begin using disconnections once the Governor's prohibition expires, but it will use disconnections sparingly and only after it has had discussions with the customer to better understand their economic circumstances, and where appropriate, work out a payment plan...does not intend to apply disconnections to any customer that has established a payment plan and is fulfilling the customer's obligations under that plan"; "Company will continue to make payment plans available for all residential customers going forward, and will extend such payment plans for up to 6 months"; "Company has not yet determined when to reinstitute late payment fees, and reconnection charges"
Indiana Utilities Corporation	Suspended disconnections; "historically worked directly with its customers on payment plans where customer difficulties have prevented complete payments of monthly bills, monthly charges, or deposits. Typically, such payment plans are customized to the customer's economic circumstances"; "delayed collection of late payment fees or reconnection fees, once the Company recognized that the Governor's Executive Order 20-08 on March 23 would likely cause the Company's customers to 'stay at home'" etc.	"...intends to begin using disconnections once the Governor's prohibition expires, but it will use disconnections sparingly and only after it has had discussions with the customer to better understand their economic circumstances, and where appropriate, work out a payment plan...does not intend to apply disconnections to any customer that has established a payment plan and is fulfilling the customer's obligations under that plan"; "Company will continue to make payment plans available for all residential customers going forward, and will extend such payment plans for up to 6 months"; "Company expects to reinstitute late payment fees, and reconnection charges on August 1, 2020 or 30 days after the disconnection moratorium has been lifted, whichever is longer."

Jackson County Water Utility, Inc.	Suspended disconnections; "historically worked directly with its customers on payment plans where customer difficulties have prevented complete payments of monthly bills, monthly charges, or deposits. Typically, such payment plans are customized to the customer's economic circumstances"; "delayed the collection of late payment fees...but has encouraged all of its customers to initiate payment plans prior to the time their monthly payments became late"	"...intends to begin using disconnections once the Governor's prohibition expires, but it will use disconnections sparingly and only after it has had discussions with the customer to better understand their economic circumstances, and where appropriate, work out a payment plan...does not intend to apply disconnections to any customer that has established a payment plan and is fulfilling the customer's obligations under that plan"; "Company will continue to make customized payment plans available for all residential customers going forward...will continue to work with commercial customers who have lost business or have been required to close unless those commercial customers received loans or grants from federal or state officials which was designed in part to make payment on utility bills"; "Company expects to begin collecting late payment fees where appropriate on billings that go to customers on or after July 1, 2020"
Joint Munis/Non Profits in June 10 Filing	"Municipally-owned utilities, as arms of local government, are generally prohibited from creating their own customer-assistance programs, as this would be an inappropriate use of utility funds...also generally lack the financial resources to establish these programs" (pg. 4).	Allow payment arrangements to extend for 3 to 18 months depending on customer; establish system of partial or proportionate payment late fee offsets; waive disconnection and late fees for customers who are able to keep their payments current during this payment arrangement window; "per the utility's discretion, continue the disconnect moratorium on a month-to-month basis to individual residential and business customers who are able to document a present and continuing loss of income or business, who are already eligible for LIHEAP funding, or meet the requirements of other low-income public assistance programs."
LMH Utilities	Suspended disconnections; "historically worked directly with its customers on payment plans where customer difficulties have prevented complete payments of monthly bills, monthly charges, or deposits. Typically, such payment plans are customized to the customer's economic circumstances"; authorized LMH employees "to waive late payment fees for all customers due to economic problems"	"LMH does not intend to apply disconnections to any customer that has established a payment plan and is fulfilling the customer's obligations under that plan"; "LMH currently expects a continuation of this authority for each of its employees to waive late payment fees through the fall of 2020"

Midwest Natural Gas	Suspended disconnections; "historically worked directly with its customers on payment plans where customer difficulties have prevented complete payments of monthly bills, monthly charges, or deposits. Typically, such payment plans are customized to the customer's economic circumstances"; "has been in contact with the regional CAP agencies to determine the availability of and eligibility for energy assistance funds and to make that information available to customers"; "currently waiving all late payment fees, collection fees and reconnection fees [once] the Company recognized that the Governor's Executive Order 20-08 on March 23 would likely cause the Company's customers to 'stay at home'" etc.	"...intends to begin using disconnections once the Governor's prohibition expires, but it will use disconnections sparingly and only after it has had discussions with the customer to better understand their economic circumstances, and where appropriate, work out a payment plan...does not intend to apply disconnections to any customer that has established a payment plan and is fulfilling the customer's obligations under that plan"; "Company will continue to make payment plans available for all residential customers going forward, and will extend such payment plans for up to 6 months"; "Company has not yet determined when to reinstitute late payment fees, and reconnection charges"
Ohio Valley Gas Company	Suspended disconnections; arrange payment agreements with customers; "[o]ffering flexible payment plans of up to six (6) months in duration for those customers impacted"; "[p]roactively communicating directly with customers in arrears, including by placing door hangers for such customers at their service address encouraging them to contact their local office to set up an extended payment arrangement"; "[s]ending emails and phoning customers with large past due balances to discuss payment plans in order to avoid future disconnection"	"Offer payment plans up to six (6) months for residential customers"; "[r]each out to those residential customers who are in arrears and offer assistance in accessing resources available to them, primarily local organizations"; "[c]ontinue to offer no fee credit, debit, and e-check payment options for all customers"; "[c]ontinue to provide door hangers for those customers that are at risk for disconnection"; "[c]ontinue to provide information on [] all of our monthly billing statements about payment plan alternatives to ensure customers understand the many ways to pay their bill"; "[o]nly disconnect customers who refuse to work with OVG on an extended payment arrangement agreement after receiving our communications, or who fail to meet the obligations agreed to in a payment plan"
South Eastern Indiana Natural Gas Co. Inc.	Suspended disconnections; "historically worked directly with its customers on payment plans where customer difficulties have prevented complete payments of monthly bills, monthly charges, or deposits. Typically, such payment plans are customized to the customer's economic circumstances"	"...intends to begin using disconnections once the Governor's prohibition expires, but it will use disconnections sparingly and only after it has had discussions with the customer to better understand their economic circumstances, and where appropriate, work out a payment plan...does not intend to apply disconnections to any customer that has established a payment plan and is fulfilling the customer's obligations under that plan"; "Company anticipates that it will continue [customized payment plans approach] on payment plans going forward"

Southwestern Bartholomew Water Corporation	Suspended disconnections in February 2020; "has continued to accrue late payment fees, but has also encouraged the Company's customers to request payment plans before payments become late."	"intends to begin using disconnections once the Governor's prohibition expires, but it will use disconnections sparingly and only after it has had to discussions with the customer to better understand their economic circumstances, and where appropriate, work out a payment plan...does not intend to apply disconnections to any customers that has established a payment plan and is fulfilling the customer's obligations under that plan"; "will continue to make customized payment plans available"
Switzerland County Natural Gas Co.	Suspended disconnections; "historically worked directly with its customers on payment plans where customer difficulties have prevented complete payments of monthly bills, monthly charges, or deposits. Typically, such payment plans are customized to the customer's economic circumstances"; "delayed adding late payment fees, reconnection fees, or other penalties to customer bills in order to give the customer more time to make payments"	"...intends to begin using disconnections once the Governor's prohibition expires, but it will use disconnections sparingly and only after it has had discussions with the customer to better understand their economic circumstances, and where appropriate, work out a payment plan...does not intend to apply disconnections to any customer that has established a payment plan and is fulfilling the customer's obligations under that plan"; "Company will continue to make payment plans available for all residential customers going forward, and will extend such payment plans for up to 6 months"; "Company expects to reinstitute late payment fees, reconnection charges, or other penalties on August 1, 2020."
Sycamore Gas	Suspended disconnections; "[w]aiving all late fees for any customers that are past due on their account"; "[o]ffering flexible payment plans up to six (6) months"; "[s]ending letters to customers with past due amounts greater than \$50, offering payment plans to them and encouragement to call the office to discuss a payment plan"; "[f]ollowing up with telephone calls to customers with significant past due balances to further discuss possible payment plans, and to avoid future disconnection"	Will continue to: "[o]ffer payment plans up to six (6) months for residential customers"; "[p]roactively reach out to those residential customer that newly find themselves in arrears and may need additional help in accessing resources available to them"; "[p]roactively reach out to commercial and industrial customers who may have been most impacted by COVID-19 restrictions and offer payment plans to meet their needs"; "[p]rovide advance notice as required by the Commission rules to those customers that are eligible for disconnection...[c]ontinue to provide information on payment plan alternatives"; "[o]nly disconnect those customers that refuse to enroll in a payment plan after receiving our communications or fail to meet the obligations agreed to in a payment plan"

Valley Rural Utility Company	Suspended disconnections; work directly with customers on payment plans where customer difficulties have prevented complete payments of monthly bills, monthly charges, or deposits; have not charged late fees in several years; delayed collection of reconnection fees in light of COVID-19.	Notified customers on methods of contacting the company, provided alternative means of paying Company bills.
Washington Township Water Authority	Suspended disconnects and not imposed any late fees during this period; helping members find assistance from other entities; setting up payment plans.	Unclear which consumer protections would continue

Attachment 2



Jennifer Washburn <jwashburn@citact.org>

FW: IN211 Data Request

Jennifer Washburn <jwashburn@citact.org>
To: Jennifer Washburn <jwashburn@citact.org>

Thu, Jun 18, 2020 at 10:53 AM

----- Forwarded message -----

From: **Kerwin Olson** <kolson@citact.org>
Date: Wed, Jun 17, 2020 at 4:22 PM
Subject: FW: IN211 Data Request
To: Jennifer Washburn <jwashburn@citact.org>

From: Samantha Rhodes <samantha.rhodes@in211.org>
Sent: Wednesday, June 17, 2020 4:06 PM
To: kolson@citact.org
Subject: IN211 Data Request

Hello Kerwin,

Please find the request report attached for Utility services.

Best,



Samantha Rhodes | Data & Reports Specialist

a: Indiana 211 Partnership Inc.
e: samantha.rhodes@in211.org | **w:** www.in211.org
p: 260-228-1136

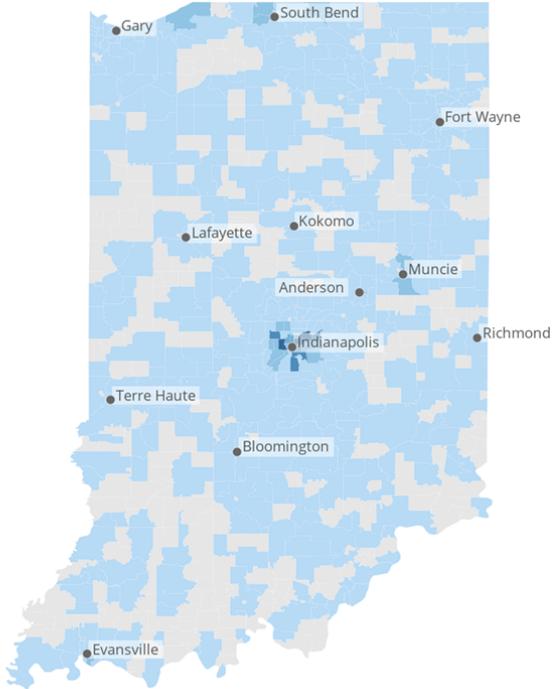


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Utility Report 2020.pdf
645K

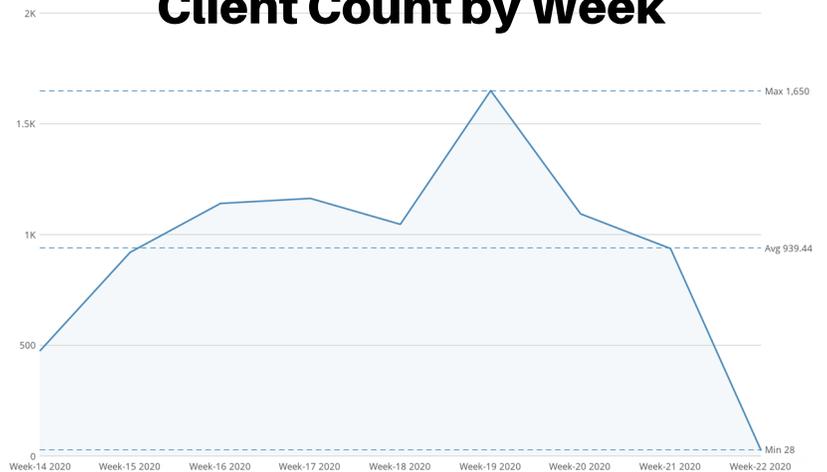
INDIANA 211 PARTNERSHIP INC.

UTILITY NEEDS MARCH 16-MAY 28TH, 2020

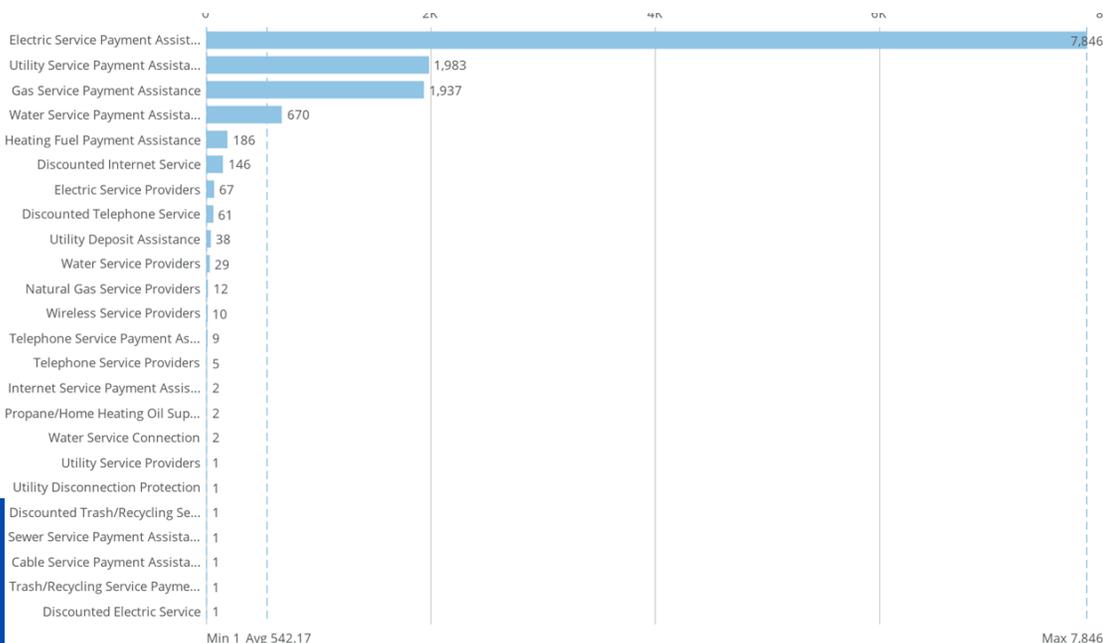


12,871 Hoosiers contacted 211 seeking utility assistance. Week by week analysis indicates a **28%** increase since the declared public health emergency to the end of April.

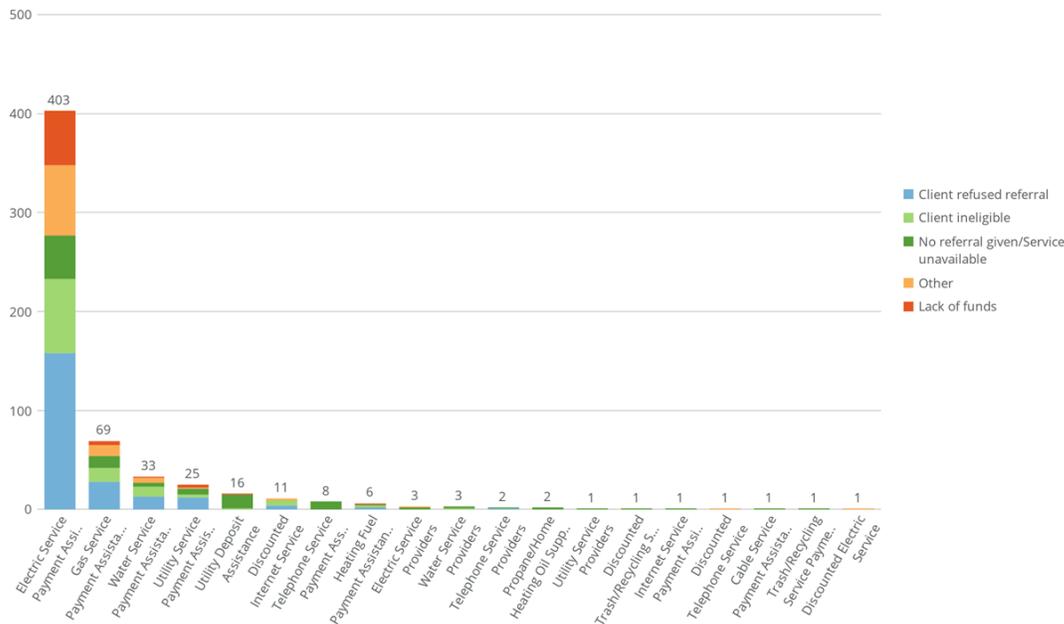
Client Count by Week



Utility Needs by Referral Type

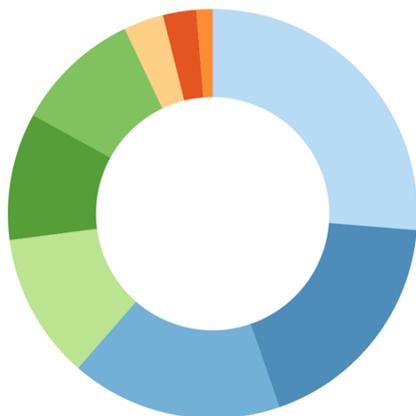


Unmet Utility Needs by Referral Type



Clients by Household Composition

Single Female with Childr...	2,269
Single Female	1,592
Couple with Children	1,441
Multi-generational	995
Couple without Children	868
Single Male	858
Single Male with Children	273
With Others (Doubled Up)	227
Grandparent with Children...	110



Of those that responded, **single females with children** represent the highest household composition in need. **Unemployed and looking for work** is the highest reported employment status. This is not consistent with pre-public health emergency data where unable to work/disable was the primary reported status.

Employment Status

