

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, INCAA, AND OUCC'S NOTICE OF LETTER TO UTILITIES**

Citizens Action Coalition of Indiana (“CAC”), Indiana Community Action Association (“INCAA”), and the Indiana Office of Utility Consumer Counselor (“OUCC”) hereby provide notice to the Indiana Utility Regulatory Commission of the attached letter sent to the Indiana utilities in the above captioned proceeding.

Respectfully submitted of behalf of CAC,  
INCAA, and the OUCC,



Jennifer A. Washburn, Atty. No. 30462-49  
Citizens Action Coalition of Indiana, Inc.

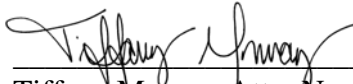
1915 W. 18th Street, Suite C

Indianapolis, Indiana 46202

Phone: (317) 735-7764

Fax: (317) 290-3700

[jwashburn@citact.org](mailto:jwashburn@citact.org)



Tiffany Murray, Atty. No. 28916-49

Indiana Office of Utility Consumer  
Counselor

115 W. Washington Street, Suite 1500 South

Indianapolis, Indiana 46204

Phone: (317) 232-2494

Fax: (317) 232-5923

[timurray@oucc.in.gov](mailto:timurray@oucc.in.gov)

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that foregoing was served by electronic mail or U.S. Mail, first class postage prepaid, this 26<sup>th</sup> day of August, 2020, to the following:

Jason Stephenson  
Heather Watts  
Robert E. Heidorn  
CenterPoint Energy, Inc.  
[jason.stephenson@centerpointenergy.com](mailto:jason.stephenson@centerpointenergy.com)  
[heather.watts@centerpointenergy.com](mailto:heather.watts@centerpointenergy.com)  
[bob.heidorn@centerpointenergy.com](mailto:bob.heidorn@centerpointenergy.com)

Kelley A. Karn  
Melanie D. Price  
Duke Energy Business Services LLC  
[Kelley.karn@duke-energy.com](mailto:Kelley.karn@duke-energy.com)  
[Melanie.price@duke-energy.com](mailto:Melanie.price@duke-energy.com)

Teresa Morton Nyhart  
Jeffrey M. Peabody  
L. Parvin Price  
Nicholas K. Kile  
Barnes & Thornburg LLP  
[tnyhart@btlaw.com](mailto:tnyhart@btlaw.com)  
[jpeabody@btlaw.com](mailto:jpeabody@btlaw.com)  
[Parvin.Price@btlaw.com](mailto:Parvin.Price@btlaw.com)  
[Nicholas.kile@btlaw.com](mailto:Nicholas.kile@btlaw.com)

Shaw R. Friedman  
Friedman & Associates, P.C.  
[sfriedman.associates@frontier.com](mailto:sfriedman.associates@frontier.com)

Kurt J. Boehm  
Jody Kyler Cohn  
John P. Cook  
Kevin Higgins  
Justin Bieber  
Kroger Company  
[kboehm@bkllawfirm.com](mailto:kboehm@bkllawfirm.com)  
[jkylercohn@bkllawfirm.com](mailto:jkylercohn@bkllawfirm.com)  
[john.cookassociates@earthlink.net](mailto:john.cookassociates@earthlink.net)  
[khiggins@energystrat.com](mailto:khiggins@energystrat.com)  
[jbieber@energystrat.com](mailto:jbieber@energystrat.com)

William Fine  
Abby Gray  
Randy Helmen  
Tiffany Murray  
Indiana Office of Utility Consumer Counselor  
[wfine@oucc.IN.gov](mailto:wfine@oucc.IN.gov)  
[agray@oucc.IN.gov](mailto:agray@oucc.IN.gov)  
[rhelmen@oucc.IN.gov](mailto:rhelmen@oucc.IN.gov)  
[timurray@oucc.IN.gov](mailto:timurray@oucc.IN.gov)  
[infomgt@oucc.IN.gov](mailto:infomgt@oucc.IN.gov)

Joseph Rompala  
Todd A. Richardson  
Lewis & Kappes, P.C.  
[JRompala@lewis-kappes.com](mailto:JRompala@lewis-kappes.com)  
[TRichardson@lewis-kappes.com](mailto:TRichardson@lewis-kappes.com)  
[etenant@lewis-kappes.com](mailto:etenant@lewis-kappes.com)  
[atyler@lewis-kappes.com](mailto:atyler@lewis-kappes.com)

Claudia J. Earls  
NiSource Corporate Services – Legal  
[cjearls@nisource.com](mailto:cjearls@nisource.com)


Clayton C. Miller  
Stoll Keenon Ogden PLLC  
[clayton.miller@skofirm.com](mailto:clayton.miller@skofirm.com)

Kay E. Pashos  
Mark Alson  
Ice Miller LLP  
[kay.pashos@icemiller.com](mailto:kay.pashos@icemiller.com)  
[mark.alson@icemiller.com](mailto:mark.alson@icemiller.com)

Keith L. Beall  
Clark, Quinn, Moses, Scott & Grahn, LLP  
[kbeall@clarkquinnlaw.com](mailto:kbeall@clarkquinnlaw.com)

Allison W. Gritton  
[allison.gritton@woodenlawyers.com](mailto:allison.gritton@woodenlawyers.com)

J. Christopher Janak  
Nikki Gray Shoultz  
Kristina Kern Wheeler  
[cjanak@boselaw.com](mailto:cjanak@boselaw.com)  
[nshoultz@boselaw.com](mailto:nshoultz@boselaw.com)  
[kwheeler@boselaw.com](mailto:kwheeler@boselaw.com)

  
Jennifer Washburn

August 26, 2020

Counsel and Leadership at Indiana Utility Companies:

On June 29<sup>th</sup>, 2020, the Indiana Utility Regulatory Commission (“Commission”) issued an Order related to the Phase I and Interim Emergency Order in Commission Cause No. 45380. On page 5 of this Order, the Commission “encourages the utilities to collaborate with interested stakeholders, such as the OUCC, CAC, Sierra Club, and INCAA to identify other customer assistance practices and measures that could be implemented.” Subsequently, on August 12<sup>th</sup>, 2020, the Commission issued a Second Interim Emergency Order in Commission Cause No. 45380. On page 5 of this Order, the Commission urged Indiana utilities to “coordinate with customer-assistance programs and services, such as Indiana 2-1-1 and other governmental and community organizations, to ensure that residential customers are made aware of assistance programs they could enroll in,” as well as “collaborate with interested stakeholders, such as the Citizens Action Coalition and Indiana Office of Utility Consumer Counselor, to identify other customer assistance practices and measures that could be implemented by the utility.”<sup>1</sup>

Therefore, Citizens Action Coalition of Indiana, Inc. (“CAC”), Indiana Community Action Association (“INCAA”), and the Indiana Office of Utility Consumer Counselor (“OUCC”) respectfully offer a number of customer assistance practices and measures that could and should be implemented by each utility. Please see CAC and INCAA’s June 10<sup>th</sup>, 2020, *Response to the OUCC’s Request Related to Customer Disconnections, Utility Fees, and Payment Arrangements* for a comprehensive list of CAC and INCAA’s recommendations. Likewise, the OUCC has made a number of filings in Cause No. 45380 detailing the customer protections it believes are needed in the face of the COVID-19 crisis. In the spirit of compromise and collaboration, however, please consider the following refined recommendations:

- Plainly display basic information about deferred payment arrangements, or payment plans, on all disconnection notices and other billing communications, including how to access such payment arrangements;
- Offer 12-18 month deferred payment arrangements for Low-Income customers (and allow customers to self-certify as low-income through any means-tested program enrollment<sup>2</sup> or attestation of job or wage loss);
- Continue the suspension of credit reporting activities;
- Continue the suspension of collection activities; and
- Include in monthly reports filed with the Commission the following data points: the number of disconnection notices sent by customer classes by month (including the same data for the same month in the prior year); the number of actual disconnections and reconnections

---

<sup>1</sup> CAC and INCAA appreciates that NIPSCO already reached out to collaborate and have productive conversations.

<sup>2</sup> These programs include customer enrollment in: (1) public or assisted housing; (2) Supplemental Security Income (“SSI”); (3) Supplemental Nutrition Assistance Program (“SNAP”) (formerly Food Stamps); (4) Temporary Assistance for Needy Families (“TANF”); (5) Telephone Lifeline; (6) Women, Infants and Children (“WIC”) Special Supplemental Nutrition program; (7) Medicaid; (8) free or reduced school lunch/school breakfast; (9) Head Start; or (10) other programs as may from time to time require income qualification.

by customer class per month (including the same data for the same month in the prior year), and; when applicable, the amount of late fees, convenience fees, customer deposits, and reconnection fees assessed and the amount of those same fees collected from customers (by class and by month, including the same data for the same month of the prior year).

CAC, INCAA, and the OUCC maintain their commitment to the collaborative resolution of difficult and complex matters directly involving Hoosier ratepayers. We appreciate your thoughtful consideration of our recommendations. We are available to discuss these recommendations via conference call or through online meeting platforms and welcome such a discussion. Please do not hesitate to reach out to have further discussions on these and other related matters.

Respectfully,

William Fine, Utility Consumer Counselor  
Indiana Office of Utility Consumer Counselor  
115 W. Washington St, Suite 1500 South  
Indianapolis, Indiana 46204  
(317) 232-2494  
[wfine@oucc.in.gov](mailto:wfine@oucc.in.gov)

Ed Gerardot, CCAP, Director  
Indiana Community Action Association  
1845 W. 18<sup>th</sup> Street  
Indianapolis, Indiana 46202  
(317) 638-4232  
[egerardo@incap.org](mailto:egerardo@incap.org)

Kerwin Olson, Executive Director  
Citizens Action Coalition of Indiana  
1915 W. 18<sup>th</sup> Street, Suite C  
Indianapolis, Indiana 46202  
(317) 735-7727  
[kolson@citact.org](mailto:kolson@citact.org)