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March 30, 2021

Ms. Kimberley A. Campbell, Chief Clerk  
North Carolina Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4300

Re: Docket No. M-100, Sub 158, Investigation of Necessary and  
Appropriate Responses to the Novel Coronavirus COVID-19

Dear Ms. Campbell:

The Attorney General's Office supports the continuation of the winter moratorium on disconnections for eligible residential customers through June 30, 2021, as requested by the North Carolina Justice Center and Legal Aid of North Carolina, due to the ongoing emergency conditions posed by the COVID-19 pandemic. In addition, the AGO encourages utilities to work with the Department of Health and Human Services or other appropriate agencies to extend shutoff protections automatically to eligible recipients as Duke has done.

The Commission has imposed an expanded winter moratorium on disconnection due to nonpayment for income-qualified customers of Duke Energy Carolinas, Duke Energy Process, Dominion Energy North Carolina, Piedmont Natural Gas, Public Service North Carolina, Carolina Water Service, and Aqua, but that moratorium will end March 31, 2021 unless extended.<sup>1</sup> To qualify for the winter moratorium, customers were required to establish that they are unable to pay for such service in full and that their household is eligible to receive assistance (whether funds are then available or not) from LIEAP, CIP, or the North Carolina Housing Opportunities and Prevention of Evictions (NC HOPE) Program. The Commission required the identified utilities to notify their customers about the moratorium and to place a service disconnect door-hanger at all

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<sup>1</sup> See the Order Suspending Disconnections and Providing for Extended Special Repayment Plans for Certain Vulnerable Residential Customers and Requiring Door Hanger Notices issued February 23, 2021.

residences within 24 to 36 hours prior to disconnection. Other provisions also applied including longer repayment plans.

The AGO supports extending the moratorium for qualified customers through June 30 because many customers are still struggling financially due to the pandemic and related poor economic conditions. Studies have proven that there is a link between utility disconnections and the increased spread of the COVID virus and COVID-related deaths.<sup>2</sup> By continuing the moratorium, the Commission will help struggling customers stay in their homes and help slow the spread of COVID.

Best regards,

Electronically submitted  
/s/ Margaret A. Force  
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Consumer Protection Division  
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Cc: Parties of Record

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<sup>2</sup> See e.g., Studies from the Nicholas Institute at Duke University <https://nicholasinstitute.duke.edu/articles/moratoria-utility-shutoffs-and-evictions-reduced-covid-19-infection-rates-duke-analysis>; and from the Food and Water Watch at Cornell University [https://www.foodandwaterwatch.org/wp-content/uploads/2021/03/IB\\_2103\\_CornellWaterCOVID-WEB.pdf](https://www.foodandwaterwatch.org/wp-content/uploads/2021/03/IB_2103_CornellWaterCOVID-WEB.pdf).