

Kendrick C. Fentress Associate General Counsel

NCRH 20 / P.O. Box 1551 Raleigh, NC 27602 o: 919.546.6733 c: 919.546.2694

Kendrick.Fentress@duke-energy.com

March 31, 2021

VIA ELECTRONIC FILING

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

> RE: Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and Piedmont Natural Gas Company, Inc.'s Notification of Voluntary Extension of Assistance to Vulnerable Customers from April 1, 2021 until June 30, 2021 Docket Nos. E-7, Sub 1236; E-2, Sub 1228; G-9, Sub 767; M-100, Sub 158; E-7, Sub 1241 and E-2, Sub 1258

Dear Ms. Campbell:

This letter is intended to notify the Commission of actions taken by Duke Energy Carolinas, LLC ("DEC"), Piedmont Natural Gas Company, Inc. ("PNG") and Duke Energy Progress, LLC ("DEP", collectively, "Duke Energy" or the "Companies") to voluntarily further assist the Companies' customers with households that benefit from Low-Income Energy Assistance Program ("LIEAP") and Crisis Intervention Program ("CIP") and the North Carolina Housing Opportunities and Prevention of Eviction Program ("NC Hope"). As set forth in more detail below, the Companies will voluntarily extend the protection against disconnection for non-payment to CIP, LIEAP, and NC HOPE beneficiaries from April 1, 2021 to June 30, 2021.

As the Commission is aware, on February 11, 2021, the Companies notified it that, in response to the financial hardships on low-income households as a result of the COVID-19 pandemic, the Companies intended to broaden the winter disconnection moratorium for some of the most vulnerable members of our communities by expanding eligibility to include all LIEAP and CIP beneficiaries. Under normal circumstances, pursuant to NCUC Rules R12-11(l)(6) and R12-10(h)(6), Duke Energy's residential customers in North Carolina may qualify for a disconnection moratorium from November 1 to March 31 if they are certified by the local social service office which administers the Energy Crisis Assistance Program or other similar programs as being eligible to receive assistance under such programs (e.g., LIEAP eligible), if they are suffering financial hardship that prevents them from being able to afford their bills or a 6-month payment arrangement, and if they



have a household member who is handicapped and/or elderly (65 or older) or both. Duke Energy voluntarily broadened eligibility for the winter moratorium to include all LIEAP and CIP beneficiary customers through March 31, 2021.

On February 23, 2021, the Commission issued its Order Suspending Disconnections And Providing For Extended Special Repayment Plans For Certain Vulnerable Residential Customers And Requiring Door Hanger Notices, in the abovecaptioned dockets ("February 23 Suspension Order"), which: (i) commended Duke Energy for its decision to broaden the winter disconnection moratorium to include all LIEAP and CIP beneficiaries, (ii) expanded the winter disconnection moratorium to include the broadened eligibility criteria to the largest regulated electric, natural gas, water, and wastewater utilities; and (iii) required certain additional customer protections, including opt-out payment plans with 18-month terms and on-premises notices. Specifically, the Commission held that for bills rendered through March 31, 2021, DEC, DEP, PNG, and other North Carolina public utilities shall cease residential customer disconnections due to nonpayment of utility bills, except where disconnection is necessary as a matter of safety or where requested by the customer, where the residential customer can establish that the customer is unable to pay for such service in full and that the customer's 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; where the residential customer can establish that the customer is unable to pay for such service in full and that the customer's household is eligible to receive assistance (whether funds are then available or not) from LIEAP, CIP, or NC HOPE.

Approximately 86,000 of Duke Energy's vulnerable customers have benefitted from the Companies' and the Commission's determination to broaden the winter moratorium. Under the Commission's February 23 Suspension Order, the suspension on disconnections for non-payment for LIEAP, CIP and NC HOPE customers expires March 31. The COVID-19 pandemic, however, still impacts our customers. To ease the ongoing financial hardships for the Companies' most vulnerable customers, and to continue the protections for these approximately 86,000 vulnerable customers, the Companies will voluntarily extend the February 23 Suspension Order's protection against disconnection for non-payment to CIP, LIEAP, and NC HOPE beneficiaries from April 1, 2021 to June **30**, **2021**.¹ During this time, the Companies will provide these impacted customers, with a few exceptions explained below, an 18-month payment arrangement on an opt-out basis for their outstanding balances in early July that will include any outstanding balance at that point. These customers will be in no risk of disconnection before their July bill due date. Exceptions to the automatic provision of an 18-month payment arrangement include: (i) DEC, DEP and PNG customers with account balances of less than \$36.00 where applying the 18-month payment arrangement will result in installments of less than \$2.00 per month for 18 months; (ii) DEP and PNG customers on the equal payment plans, because DEP's and PNG's systems will not allow them to be on an equal payment plan and an installment

¹ Commission Rule R12-11(r) and Commission Rule R12-10(n) allow DEC, DEP and Piedmont reasonable discretion in waiving or extending the times pertaining to termination of service, particularly when such waiver or extension would result in the prevention of undue hardship in those cases where termination of service would be especially dangerous to health or where the customer or a member of the customer's household is elderly or handicapped.

Mar 31 2021

arrangement at the same time; (iii) approximately 475 DEP customers who participate in Preference Pay, a legacy DEP program for 55 or older with a fixed income, which allows these customers flexibility in paying their bills without penalty after they receive their monthly checks. To be clear, Duke Energy will *proactively contact and offer* these customers an 18-month payment plan before the end of June; however, they will have to respond to the Companies' offer by contacting the Companies to opt-in to the payment arrangement.

The Companies appreciate the opportunity to assist more of their vulnerable customers during this pandemic. The Companies have discussed their intent to assist these customers with the Public Staff of the North Carolina Utilities Commission prior to filing this letter.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Kenanik C. Jerstress

Kendrick C. Fentress

cc: Parties of Record

CERTIFICATE OF SERVICE

I certify that a copy of Duke Energy Carolinas, LLC, Duke Energy Progress, LLC and Piedmont Natural Gas Company Inc.'s Notification of Voluntary Extension of Assistance to Vulnerable Customers from April 1, 2021 until June 30, 2021, filed in Docket Nos. E-7, Sub 1236; E-2, Sub 1228; G-9, Sub 767; M-100, Sub 158; E-7, Sub 1241 and E-2, Sub 1258, has been served by electronic mail, hand delivery, or by depositing a copy in the United States Mail, 1st Class Postage Prepaid, properly addressed to parties of record.

This the 31st day of March 2021.

Kendnik C. Jerstress

Kendrick C. Fentress Associate General Counsel Duke Energy Corporation P.O. Box 1551 / NCRH 20 Raleigh, NC 27602 Tel 919.546.6733 Fax 919.546.2694 Kendrick.Fentress@duke-energy.com