



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

OFFICIAL COPY

Sep 30 2021

September 30, 2021

**VIA ELECTRONIC FILING**

Ms. A. Shonta Dunston, 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  
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. Dunston:

This letter is intended to notify the Commission of recent 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 have benefitted from the Low-Income Energy Assistance Program ("LIEAP"), the Crisis Intervention Program ("CIP") and the North Carolina Housing Opportunities and Prevention of Eviction Program<sup>1</sup> ("NC HOPE") (collectively, "vulnerable customers"). As of September 28, 2021, Duke Energy had assisted approximately 110,000 vulnerable customers through its previous three voluntary extensions and expansion of the Commission's annual moratorium on disconnections for non-payment that begins November 1 and continues five months through March 31 of every year ("Winter Moratorium"). Such previous voluntary extensions by the Companies conclude on October 1, 2021. After a review of the current circumstances facing these approximately 110,000 vulnerable customers, Duke Energy has determined that it will voluntarily further extend the moratorium on disconnections for vulnerable customers. As noted, the Commission's upcoming Winter Moratorium goes into effect on November 1. Accordingly, for customers that are identified as eligible for LIEAP, CIP or NC HOPE funds, Duke Energy will continue the moratorium on disconnections for non-payment until March 31, 2022.

---

<sup>1</sup> This will include "Hope 2.0" emergency rental assistance recipients.

## Background

On February 11, 2021, the Companies notified the Commission that, in response to the financial hardships on low-income households as a result of the COVID-19 pandemic, they 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 qualify for a disconnection moratorium from November 1 to March 31: (i) 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), (ii) if they are suffering financial hardship that prevents them from being able to afford their bills or a 6-month payment arrangement, and (iii) if they have a household member who is handicapped and/or elderly (65 or older) or both. Duke Energy voluntarily broadened the 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 above-captioned dockets ("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 non-payment 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 NC HOPE; 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.

Under the Commission's Suspension Order, the suspension on disconnections for non-payment for LIEAP, CIP and NC HOPE customers expired March 31, 2021. Duke Energy then voluntarily extended the Suspension Order's protection against disconnection for non-payment to CIP, LIEAP, and NC HOPE beneficiaries from April 1, 2021 to June 30, 2021. During this time, Duke Energy provided these impacted customers, with a few exceptions explained below, an 18-month payment arrangement on an opt-out basis for their outstanding balances prior to their July 2021 bill. Exceptions to the automatic provision of an 18-month payment arrangement included: (i) 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) customers on the equal payment plans, because the DEP's and PNG's systems will not allow them to be on an

equal payment plan and an installment arrangement; (iii) customers who participate in Preference Pay, a legacy DEP program for customers 55 or older with a fixed income, which allowed these customers flexibility in paying their bills after they received their monthly checks, without penalty. Duke Energy committed to proactively contact and offer these customers an 18-month payment plan; however, they had the option to opt-into the payment arrangement due to the Companies' billing systems, instead of opting out.

On April 5, 2021, the Commission issued its *Order Reinstating Limited Residential Disconnection Moratorium*, which extended the Residential Disconnection Moratorium from March 31 until June 30, 2021.

### **Current Disconnection Moratorium in Effect Until October 1**

On June 28, 2021, with vaccinations against COVID-19 available, businesses reopening, and cases of COVID-19 appearing to decline, Duke Energy filed a notification with the Commission ("June 28 Notification") that it still intended to help its vulnerable customers transition to more normal, post-pandemic lives by extending the Winter Moratorium another three months, until October 1, 2021. The Companies sent communications to customers about the extension and opportunities for deferred payment arrangements ("DPAs"). Customers that were already participating in the previous moratorium and moratorium extensions would have DPAs applied in July. For new customers participating in this extended moratorium after July 1, 2021, Duke Energy stated its intent to apply DPAs on October 1. As reported in the July 28 Notification, the automatic opt-in to the 18-month DPA did not include: (i) 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) customers on the equal payment plans, because the DEP's and PNG's systems will not allow them to be on an equal payment plan and an installment arrangement; (iii) customers who participate in Preference Pay, a legacy DEP program for customers 55 or older with a fixed income, which allowed these customers flexibility in paying their bills after they received their monthly checks, without penalty. Duke Energy offered these customers the opportunity to opt into the DPAs.

Duke Energy further stated in its June 28 Notification that it has worked to be as flexible as possible with these vulnerable customers during this difficult time and to assist in helping customers obtain agency assistance in paying their electric and natural gas utility bills. Finally, Duke Energy stated its intent to otherwise return to normal business practices for all other customers, residential and nonresidential, after June 30, 2021. Customers that were not vulnerable would once again be subject to the Companies' pre-pandemic disconnection and DPA practices, subject to the Commission's Rules and orders.

As outlined in the June 28 Notification, Duke Energy's July 1 through October 1, 2021, extension of the moratorium for their vulnerable customers has operated as follows:

- For DEC, vulnerable customers that were in arrears but not currently on a DPA have been placed on an automatic 18-month DPA. For DEC

customers already on a DPA, DEC communicated with that customer by letter, offering to restructure their current DPA to an 18-month DPA if they called Duke Energy with this request by October 1, 2021.

- For DEP, vulnerable customers that were in arrears but not currently on a DPA have been placed on an automatic 18-month DPA. For DEP customers already on a DPA, all past due balances, including any outstanding balance from a current DPA, have been restructured into a new 18-month DPA.
- For PNG, vulnerable customers with a past due balance that were not currently on a DPA have been placed on an 18-month DPA for any existing past due amounts. For customers that were already on a DPA, all past due balances, including any outstanding balance from the current DPA, have been restructured into a new 18-month DPA.

### **Extension of Disconnection Moratorium for LIEAP, CIP and NC HOPE Customers After October 1**

Despite this summer's earlier progress in minimizing the spread of the pandemic, the delta variant of COVID-19 has caused additional hardships and delayed a return to more normal, pre-pandemic life. Therefore, customers that have been or are identified by the North Carolina Department of Health and Human Services ("DHHS") as LIEAP or CIP customers or by the North Carolina Office of Resilience and Recovery ("NCORR") as NC HOPE customers will remain subject to the extension of Duke Energy's moratorium on disconnections for nonpayment until March 31, 2022. On or about October 15, Duke Energy plans to send a letter to those customers that are subject to the current moratorium that expires October 1 to communicate this extension. Please note that the holds in the systems will be extended immediately, so there is no risk of disconnection or credit action for these vulnerable customers during the process of printing and mailing the letters.

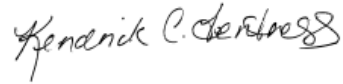
With respect to the deferred payment arrangements ("DPAs"), from February 2021 to the present, Duke Energy has offered the approximately 110,000 vulnerable customers the opportunity to enter into DPAs. Duke Energy will complete processing of those DPAs on or about October 1, 2021. Consistent with Ordering ¶ 4 of the Commission's February 23, 2021 *Order Suspending Disconnections And Providing For Extended Special Repayment Plans For Certain Vulnerable Residential Customers And Requiring Door Hanger Notice*, issued in the above-captioned dockets, LIEAP, CIP, and NC HOPE customers will remain eligible for DPAs of 18 months on arrearages accrued during the Covid-19 State of Emergency.

The Companies welcome this opportunity to provide further assistance to their vulnerable customers by extending this moratorium on disconnections until March 31, 2022. Moreover, disconnection for non-payment remains a last resort for Duke Energy.

Therefore, Duke Energy intends to continue working with all of its customers to assist in paying their bills and maintaining service.

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

Sincerely,

A handwritten signature in black ink that reads "Kendrick C. Fentress". The signature is written in a cursive style with a large, stylized "K" and "F".

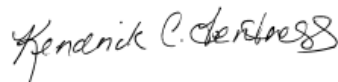
Kendrick C. Fentress

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, 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, 1<sup>st</sup> Class Postage Prepaid, properly addressed to parties of record.

This the 30<sup>th</sup> day of September 2021.



---

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](mailto:Kendrick.Fentress@duke-energy.com)