

**Green, Erica**

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**From:** Dunston, Antonia  
**Sent:** Friday, March 11, 2022 4:16 PM  
**To:** Green, Erica  
**Subject:** FW: Expiration of the Winter Moratorium 1) Repayment Plan Arrangements 2) Data Reporting 3) Future Design of the Winter Moratorium

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**From:** Al Ripley <al@ncjustice.org>  
**Sent:** Friday, March 11, 2022 4:15 PM  
**To:** Dunston, Antonia <adunston@ncuc.net>  
**Cc:** Fentress, Kendrick C <Kendrick.Fentress@duke-energy.com>; Gina Holt (gina.holt@psncuc.nc.gov) <gina.holt@psncuc.nc.gov>; Ayers, Christopher J <chris.ayers@psncuc.nc.gov>; Dianna Downey (dianna.downey@psncuc.nc.gov) <dianna.downey@psncuc.nc.gov>; Peggy Force (pforce@ncdoj.gov) <pforce@ncdoj.gov>; Barnes, Conitsha B <Conitsha.Barnes@duke-energy.com>; Donaldson, Bob <Bob.Donaldson@duke-energy.com>; Richard, Kathleen Hunter <Kathleen.Richard@duke-energy.com>; Powers, Pia K <Pia.Powers@duke-energy.com>  
**Subject:** Expiration of the Winter Moratorium 1) Repayment Plan Arrangements 2) Data Reporting 3) Future Design of the Winter Moratorium

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

Consumer Statement of Position from the North Carolina Justice Center Via Email: [adunston@ncuc.net](mailto:adunston@ncuc.net)

**RE: Anticipated Expiration of The Winter Moratorium and Repayment Plan Arrangements and Data Reporting**  
**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:

The expansion and extension of the Winter Moratorium has helped protect the health and well-being of approximately 114,000 residential rate payers during the worst parts of the COVID pandemic . The State's public health was also protected by the moratorium, as several studies have shown that utility disconnection moratorium were effective at lowering the spread of COVID. Finally, the moratorium helped give more time for COVID relief funds to be distributed without the risk of utility disconnection. For all these reasons, we are very appreciative of the Duke companies, the Public Staff, the Attorney General, and the Commission, for the expansion and extension of the Winter Moratorium.

With the anticipated end of the moratorium on March 31, 2022, there nevertheless remain many thousands of residential rate payers that were protected by the moratorium that have significant unpaid arrearage balances. For people that are low-income, simply paying a regular energy bill is very difficult. Adding an additional repayment plan payment will make it even more challenging for low-income rate payers to stay connected to utility service. We believe that in many instances, a 12 month repayment plan will result in plans that are not sustainable, and while still challenging, an 18 month and in some instances 24 month repayment plan would help make these plans more affordable.

The following chart shows the difference in monthly payments for 12 month plans versus 18 and 24 month plans based on arrearages of \$200 to \$2,500.

<b>Amount</b>	<b>12 months</b>	<b>18 months</b>	<b>24 month</b>
<b>\$ 2,500.00</b>	<b>\$ 208.33</b>	<b>\$ 138.89</b>	<b>\$ 104.17</b>
<b>\$ 2,000.00</b>	<b>\$ 166.67</b>	<b>\$ 111.11</b>	<b>\$ 83.33</b>
<b>\$ 1,500.00</b>	<b>\$ 125.00</b>	<b>\$ 83.33</b>	<b>\$ 62.50</b>
<b>\$ 1,000.00</b>	<b>\$ 83.33</b>	<b>\$ 55.56</b>	<b>\$ 41.67</b>
<b>\$ 500.00</b>	<b>\$ 41.67</b>	<b>\$ 27.78</b>	<b>\$ 20.83</b>
<b>\$ 200.00</b>	<b>\$ 16.67</b>	<b>\$ 11.11</b>	<b>\$ 8.33</b>

We are very concerned that many thousands of low-income residential rate payers covered by the Winter Moratorium, will be unable to pay for regular service and maintain high cost repayment plans. These customers will then be disconnected from utility service and the delinquent accounts discharged and recovered against the remaining residential class. We hope that through more reasonably structured repayment plans, disconnections, and the resulting delinquent accounts discharged and recovered against the remaining residential class can be avoided, thereby better protecting all residential rate payers.

Given these dynamics, we therefore ask that the Commission require the following:

- A. Repayment Plans - Require a 12-month repayment plan for accounts with remaining balances of \$200 or less, 18-month plans for accounts above \$200 to \$1000, and 24 months above \$1000. We also ask that the Commission adopt a provision that allows rate payers to miss 2 payment plan payments a year with the understanding that if a payment is missed the payment plan would be extended by 30 days with the missed payment due at the end of the additional 30 day period.
- B. Data Reporting - We also ask the Commission to require a modification to current monthly data reporting requirements that would remain in place until all repayment plans instituted as part of the Winter Moratorium have ended. Customers covered by the Winter Moratorium include a high number of CIP and LIEAP recipients, whereas other repayment plans were made with customers that are less likely to receive CIP and LIEAP. We believe it is important that we have the opportunity to see this aggregate data for Winter Moratorium repayment plan customers separated from other repayment plan customers so that we can monitor the success or failure of repayment plans for CIP and LIEAP customers. By doing this, the Commission and others, will have a better understanding of repayment plan impacts and dynamics for CIP and LIEAP customers. We suggest the following aggregate information for Winter Moratorium Customers by arrearage amounts \$0 - \$199, \$200 - \$499, \$500 - \$999, \$1000 - \$1900, \$2000 - \$5000:
  - 1) Number of Winter Moratorium Customers with arrearages
  - 2) Total Dollar amount of Winter Moratorium arrearages outstanding
  - 3) Number of Winter Moratorium customers with current (not delinquent) repayment plans
  - 4) Number of Winter Moratorium customers with delinquent repayment plans
  - 5) Number of Winter Moratorium customers disconnected for failure to pay for regular service
  - 6) Number of Winter Moratorium customers disconnected for failure to pay repayment plan

7) Number of Winter Moratorium repayment plans that were completed successfully and fully paid

C. Revisions to the Winter Moratorium going forward - We believe the expansion of the Winter Moratorium to include CIP and LIEAP recipients was a good policy decision and may have implications for future design changes to the Winter Moratorium. As such, we anticipate that the Affordability Working Group will consider what if any changes may be appropriate based on the dynamics around the Winter Moratorium.

Thank you for your attention to these matters.

Sincerely, Alfred Ripley

Alfred Ripley  
Director of Consumer, Housing and Energy Affairs  
North Carolina Justice Center  
PO Box 28068  
224 S. Dawson St.  
Raleigh NC 27611-8068  
(919) 856-2573

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Mar 11 2022