Date Filed: October 09, 2026

Witness: Jessica B. Cain
Request from: Office of Education, Outreach, and Enforcement

Question:

(MEDICAL AND FINANCIAL HARDSHIP DOCUMENATION) Provide all Company policies and procedures regarding the length of time (timeline) between a customer or physician submitting their medical protection and financial hardship verification documentation and when the customer's account is coded? If the Company does not have a written policy, please explain why.

Response:

For processing proof of financial hardship, please refer to EOE-330, Attachment 1, for Joint 03_HowItWorks_Financial Hardship filed annually for PURA and key stakeholder input and PURA approval and most recently in Docket No. 26-05-01[1]. Generally, for proof sent directly to the Company, the Company aims to process proof of financial hardship documentation within a few business days. During peak times of year (at the beginning and end of the 6-month annual "Winter Protection" period), volumes of documents received increase significantly and have varied with other changes occurring in recent years, including the introduction of the monthly automated-identification of financial hardship customers through data-matching. During these peak times, if the volume received exceeds the capacity of the resources processing the proof, the Company has and may leverage additional employees to assist in processing.

For medical certifications, a registered physician, advanced practice registered nurse, or physician's assistant (together, "medical professionals") can certify the customer's illness directly and in real-time through the Company's Medical Portal on-line. The vast majority of medical certifications are submitted through the Company's Medical Portal online. Certification via the Medical Portal updates customers' accounts in real-time in the Company's customer information system. Alternatively, medical professionals can choose to submit their certifications by mailing via U.S.P.S mail. Upon receipt, and consistent with the processing goals of proof of financial hardship, the Company also aims to process these within 2 business days.

To help clarify questions related to "policies", please refer to Exhibit CLP-CUSTOMER-1, at 46, which defines a policy[i]. In this, and related questions which seek "policies", the Company interprets the intent of the questions to seek insight into the process and/or goals versus policy.

[1] Refer to the Company's Motion 7 filing on June 1, 2026, in Docket No. 26-05-01, Annual Review of Affordability Programs and Protections.

[i] Exhibit CLP-CUSTOMER-1, page 46 states the following:

What is the definition of a "policy?"

The list below identifies the parameters of a policy:

- Set the goal.
- Show the why.
- Establish a deliberate system of guidelines to guide decisions.
- Broad and general applicability.
- Allow for flexibility.
- Standards that apply across time.