Date Filed: November 23, 2026

Witness: Jessica B. Cain, Timothy W. McGrath and Daniel M. Traynor
Request from: Office of Education, Outreach, and Enforcement

Question:

(MEDICAL AND FINANCIAL HARDSHIP DOCUMENTATION) Refer to the Company's response to EOE-332. Does the Company keep track of how many customers' paperwork is not properly designated on their account within the Company's "target processing timeframe"? If so, provide this metric for the test year.

Response:

The Company's internal target is to achieve a two-business day processing time *on average for the year*. In 2025, the average number of business days to process and code an eligible customer account with a financial hardship was 1.1 business days.

Regarding medical documentation, please refer to the Company's response in EOE-330[i].

Prior Referenced Response:

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[i] EOE-330 Question:

(MEDICAL AND FINANCIAL HARDSHIP DOCUMENATION) If a customer's account has not received the appropriate designation within the Company's standard timeframe identified in response to EOE-330 after receipt of the required verification documentation, what steps does the Company take to remedy this situation?

a. Does this process differ if a customer is already terminated during that delay caused by the Company? If so, please provide the applicable policy or procedure.

EOE-330 Response:

After the Company receives the required verification documentation, if a customer's account isn't provided with the appropriate financial hardship or medical certification designation within the Company's target processing timeframe, the Company conducts a review of the account to determine whether the delay resulted in any adverse customer impact. If the Company determines that a customer may have been adversely affected due to a delayed designation, it will consider each account to take customer service recovery actions, which may include:

- cancel-rebilling to provide the low-income discount rate retroactively back to the period the required documentation was submitted.
- suspending any ineligible collection activity and/or;
- contacting the customer to explain the situation, discuss options and any necessary next steps.

a. Yes. If the review determines that a customer was disconnected during a period of delayed processing and their service should been protected during that period due to a verified financial hardship or medical certification status, the Company will treat the disconnection as an error. On a case-by-case basis, each situation would be evaluated, and the Company may take the following customer service recovery actions:

- contact the customer promptly to apologize;
- reconnect service as soon as possible;
- reverse any reconnect fees, if charged and/or;
- provide a goodwill credit.