Date Filed: October 26, 2026

Witness: Jared A. Lawrence and Timothy W. McGrath
Request from: Office of Education, Outreach, and Enforcement

Question:

(CUSTOMER CALLS) Refer to the call labeled CL&P_2_7_25_Hour 10_Call 1 submitted in response to EOE-1.

a. The CSR informed the customer that their FPA down payment would be $35, after the customer informed the CSR that their intention was to pay $200 towards their past due balance. Please explain if customers may pay more than the minimum FPA down payment. If they are, did the CSR in this call act in a manner consistent with the Company's policy? Explain why or why not.
b. The CSR stated, "you're not able to make any payments on the payment arrangement until March 10th." Are customers able to make payments towards their past due balance prior to their first FPA monthly required payment due date?
c. How did the CSR calculate the $35 down payment? Was $35 the lowest down payment amount available to the customer?
d. If a customer pays off their past due balance before the end of their FPA term, are they removed from the FPA, or must the customer proactively remove themselves?
e. The CSR states that the total balance for this account was $519.64 with an amount of $312.47 to avoid termination. Would the $200 initially offered by the customer have been enough to avoid termination pursuant to General Statutes §16-262d(f) and Conn. Agencies Regs. § 16-3-100(d)(4)? If yes, should the CSR have informed the customer of that other option? Explain why or why not and provide all related policies, procedures, and scripts.

Response:

a. The customer always has the option to proactively pay more than the minimum down payment required for a Flexible Payment Arrangement (FPA).

   Consistent with the authority-approved script in Docket No. 17-12-03RE01,[1] July 1, 2020, Decision at Order No. 4. (Please refer to OCC-110, Attachment 1). Customer Service Representatives ("CSRs") are trained to prequalify every customer for financial hardship and to offer flexible payment arrangements with the lowest monthly payment and longest available term (up to 18 months). CSRs are also required to conduct calls in accordance

[1] Docket No. 17-12-03RE01, PURA Investigation into Distribution System Planning of the Electric Distribution Companies – Energy Affordability.

with the live call guidance established under the Settlement Agreement approved with conditions in the Motion No. 43 Ruling in Docket No. 20-03-15[2], which directed the PURA Office of Education, Outreach, and Enforcement (EOE) to develop a standard review template for customer representative calls (see OCC-110, Attachment 2).

In this case, the CSR offered the minimum required down payment to help the customer establish an arrangement with the lowest possible upfront financial burden and to ensure the customer understood that an arrangement could be started with the minimum qualifying payment. The intent was to assist the customer by presenting the most affordable entry point into the arrangement in alignment with the guidance referenced above, however the CSR should have more thoroughly acknowledged and accommodated the customer's willingness to pay more than the minimum required amount.

b. The customer always has the option to make proactive payments toward their balance prior to the first required FPA monthly payment, as well as at any time during the duration of the plan. The CSR's intent was to advise the customer to wait until the FPA was active in the system and the next bill was generated. Later in the call, the CSR further explained that the customer could pay more than the required monthly payment to reduce the balance faster. The CSR also advised that the customer could continue making additional payments to significantly lower the balance and, if they determined that a payment plan was no longer needed, they could cancel the plan and pay the remaining balance in full.

c. The CSR utilized the Payment Plan Portal. This tool guides representatives to offer all eligible payment arrangements and assistance programs available to customers and generates the minimum required down payment. For this customer, the minimum down payment available was $35.

Effective November 2024, the down payment requirement for *non-hardship*[3] residential customers with active electric and gas accounts enrolling in a FPA increased, from 5% of the past-due balance or $25 minimum, to up to 10% of the past-due balance. At the time of the call, the customer was classified as a non-hardship customer, making the $35 down payment the minimum amount available through the system.

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[2] Motion No. 43 Ruling dated July 13, 2021, in Docket No. 20-03-15; the Settlement Agreement filed June 23, 2021, as Motion No. 43, noted at page 2, "The Parties understand that the scripts are now guidance and cannot be followed precisely due to changes necessitated by Docket No. 20-03-15, and potentially other PURA orders."

[3] See Docket 24-05-01, November 6, 2024, Decision at Order No. 2 stating "As of the date of this Decision, the Companies shall increase the payment required for non-financial hardship customers to avoid shutoff to 10% of the customer's arrearage."

d. If a customer is on an active payment arrangement and pays the past-due balance before the arrangement's scheduled end date, the account is removed from the payment arrangement automatically. The customer does not have to proactively request to be removed.

e. The CSR followed the required process and accurately advised the customer that the delinquent balance on the account was $312.47, which matched the amount reflected on the disconnection notice previously sent to the customer.

While the customer initially offered to make a $200 payment, and that amount would have been sufficient to temporarily prevent termination pursuant to General Statutes §16-262d(f) and Conn. Agencies Regs. §16-3-100(d)(4), doing so would only have delayed the termination process until a subsequent disconnection notice was issued with an updated past-due balance.

The CSR appropriately followed approved live-call guidance by explaining and recommending the *Best Plan* available to the customer (refer to subpart a). Rather than focusing solely on a short-term solution, the CSR provided guidance intended to help the customer avoid future collection activity and additional disconnection notices.