STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY
OFFICE OF EDUCATION, OUTREACH, & ENFORCEMENT

May 18, 2022

Chairman Marissa P. Gillett
Public Utilities Regulatory Authority
10 Franklin Square
New Britain, CT 06051

Docket No. 20-03-15 – Emergency Petition of William Tong, Attorney General for the State of Connecticut for a Proceeding to Establish a State of Emergency Utility Shut-off Moratorium

Docket No. 21-07-01 – Application of The Connecticut Light and Power Company and Yankee Gas Services Company, each individually d/b/a Eversource Energy, The United Illuminating Company, Connecticut Natural Gas Corporation, and The Southern Connecticut Gas Company for Approval of Arrearage Forgiveness Program 2021-2022

Dear Chairman Gillett:

Pursuant to Condition No. 3 in the Ruling on Motion No. 43, dated July 13, 2021, in Docket No. 20-03-15, the Office of Education, Outreach, and Enforcement (EOE) respectfully submits the attached review template to guide EOE's evaluation of all utility calls regarding payment arrangements. The attached document is a template, not a script. The Public Utilities Regulatory Authority provided scripts to the utilities in Docket No. 17-12-03RE11. Although portions of those scripts are now outdated, EOE expects that the utilities would continue in the order of the scripts and with the wording contained in the scripts to the extent the scripts are still valid.

Finally, EOE wishes to emphasize that when reviewing calls it listens for context to determine if the utilities are conveying information appropriately. For example, some customers are reticent to engage in the hardship prequalification procedure and it would be appropriate to explain hardship benefits to those customers at the beginning of the call to encourage their willingness to complete the questions; other customers, however, willingly answer the hardship prequalification questions and it would be more appropriate to explain hardship benefits to those customers in more detail after explaining how to submit verification documents to encourage the customer to submit the required documents. EOE recognizes the burden this places on the customer service representative conducting the call, but all calls must be reviewed in such context until a system is in place to identify hardship customers automatically.

Sincerely,

PUBLIC UTILITIES REGULATORY AUTHORITY
Office of Education, Outreach, and Enforcement

Call Review Template

Does the customer have an arrearage or indicate difficulty paying their bill?
<u>If Yes: Pre-Qualify for Hardship</u>
Ask government benefits questions; if none, progress to income questions
Explain method(s) of providing hardship verification documents
Do not guide to CAAs for hardship verification unless for Zero income
Explain financial hardship benefits (moratorium protection, payment plans, etc.)
<u>If No: Actively listen for indications of difficulty paying bill throughout the call or if customer indicates medical difficulty that should lead to evaluation of medical hardship.</u>
Explain, Guide, and Properly describe the 'best' PA available for them:
<u>If Hardship, Offer an Arrearage Forgiveness Program</u>
Offer MPP *(Heating Only)*
If customer receives certain benefits, place them on the BBP
Explain MPP and that they MUST apply for CEAP before deadline to receive match, including explaining that they can apply for CEAP at a CAA or online
Offer New Start or BFP *(if not MPP)*
Offer other Flexible PA as described by Decision in Docket No. 21-07-01
<u>If NOT Hardship:</u>
Explain Flexible PA and begin by offering arrangement with the lowest monthly payment
If customer interest, explain PA with shorter lengths
For both hardship and nonhardship customers, after establishing PA:
If applicable, explain ability to renegotiate PA and dispute resolution procedures
Offer weatherization information