Date Filed: October 09, 2026

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

Question:

(CREDIT AND COLLECTIONS) How does the Company determine what accounts are sent to a collection agency?

a. Is there a certain threshold in arrearages that an account must reach before it is sent to collections?
b. Is there a maximum length of time that an account remains past due that would trigger an account to be sent to collections?
c. Does the Company have internal policies that pertain to collections? If so, provide those.

Response:

a. Accounts are referred to a third-party collection agency when a final bill remains unpaid for at least 35 days and the outstanding balance is $5.00 or greater. Once referred, unpaid accounts may remain with the collection agency through the applicable statute of limitations period.

b. Please refer to the Company's response to subpart (a).

c. Yes. Please refer to EOE-342, Attachment 1, for the Company's "Determination of Collection Action", which is Customer Service Policy 210.3.