



March 31, 2021

Ms. Steffany Powell Coker
Public Service Commission of Wisconsin
P.O. Box 7854
Madison, WI 53701-7854

RE: Investigation on the Commission's Own Motion to Ensure
Safe, Reliable and Affordable Access to Utility Services
During Declared Public Health Emergency for COVID-19 –
Utility Arrearage Management Plan Filings

Docket: 5-UI-120

Dear Commissioners:

On behalf of our membership, Municipal Electric Utilities of Wisconsin (MEUW) appreciates the opportunity to provide additional comments in this docket.

Addressing the impacts of the public health emergency has required fresh thinking. Faced with historically high arrears and customers struggling with job loss and health and safety concerns, many municipal utilities have re-evaluated their collections procedures and are demonstrating enhanced flexibility to set up deferred payment arrangements (DPAs), while also helping customers access available energy-assistance resources.

Maintaining open lines of communication has been important to navigating the pandemic response. MEUW has appreciated the collaborative approach the Commission took to ensure municipal utilities had the most up-to-date information necessary to engage with customers. MEUW hosted multiple forums in the past year to provide an opportunity for the PSC to hear directly from those on the frontline working with impacted customers. Facilitating question-and-answer sessions for Commission staff to respond to and advise our members provided much-needed clarity and saved time for everyone involved.

As a statewide trade association, part of MEUW's role is to help our members exchange ideas and stay informed. On March 24, 2021, we held a virtual forum to bring municipal utility employees together and refresh their knowledge about the rules and regulations around disconnections, DPAs, and deposits. The half-day session included a review of energy-assistance programs and the Wisconsin Department of Revenue's collection programs, as well as discussion of bankruptcy procedures, and an overview of Manitowoc Public Utilities' experience offering a Minimum Payment Option (MPO). We were pleased to have PSC staff among those who presented and answered questions. Similarly, WPPI Energy has assisted its membership with customizable customer communication materials and a news release for local media outlets and social media channels about utility bill pay assistance and rental assistance. WPPI has also hosted virtual training sessions regarding utility collections and DPAs for members utilizing WPPI's hosted billing system. All of these efforts have enabled municipal utilities to consider new strategies for managing arrears and helping customers once the disconnect moratorium ends.

With regard to the decision points in the March 10, 2021, staff memo, MEUW respectfully submits the following comments for the Commission's consideration:

- **Customer Outreach and Energy Assistance Partnerships and Payment Plans:** MEUW does not believe Commission staff assistance is needed for municipal utilities to move forward with their plans, and therefore supports Alternative Two. The municipal utilities will continue to work with Commission staff to ensure that service rules are applied in a non-discriminatory way, with a focus on flexibility and offering reasonable terms for customers.
- **Other Customer and Collection Strategies:** MEUW believes the Commission action taken at its March 18, 2021, open meeting sufficiently supports an expedited process for those municipal utilities that have indicated an intent to modify their rules regarding DPAs for residential tenants. Nonetheless, MEUW supports an expedited process for those utilities seeking Commission approval for other elements of their customer and collection strategies.
- **Other Discussion:** With respect to the impact of increased arrears on municipal utilities, MEUW supports the Commission taking no action at this time, providing for continued evaluation of the impact of customer arrears over the coming months, as options to address any persistent negative financial impacts on municipal utilities are considered.

Thank you again for the continuing opportunity to participate in this important proceeding.

Sincerely,

A handwritten signature in cursive script, appearing to read "Tim Heinrich".

Tim Heinrich
Executive Director