

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of a Working Case to Consider Best Practices for Recovery of Past-Due Utility Customer Payments After the COVID-19 Pandemic Emergency )  
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 ) **File No. AW-2020-0356**

**COMMENTS**

Summit Natural Gas of Missouri, Inc. (“SNGMO”) or (“The Company”) submits comments in consideration of best practices for recovery of past-due utility customer payments after the COVID-19 pandemic emergency.

SNGMO is supportive of practices that benefit customers through expanded LIHEAP eligibility guidelines, increased LIHEAP maximum benefit amounts and most importantly, the ability to use LIHEAP funding for past due heating bills. By allowing LIHEAP funds to be used on past due heating bills prior to the upcoming winter season, customers struggling with past-due balances could greatly benefit by either preventing disconnection of their gas service or restoring service if they have been disconnected.

SNGMO has already implemented expanded bill payment programs and supports continuing this practice. Through expansive communication efforts to ensure customer awareness of all payment options, SNGMO has encouraged payment of past due balances, discussed flexible payment arrangements, and directed customers to the Company website to access information from organizations that provide payment assistance. SNGMO supports practices that involve expanded customer communications. Additional SNGMO communications have included direct mail/email campaigns that targeted accounts with past due balances of 60 days old or greater, to

encourage customers to pay past due bills or to contact customer service to discuss payment arrangement options. This targeted group of customers also received person to person contact to discuss past due balance payment options. Past due balances and repayment options were also reviewed with customers during routine inbound calls. SNGMO also provided outreach material to not for profit agencies within the service territory that provided payment assistance information.

SNGMO supports practices that include energy efficiency opportunities like those that SNGMO offer to residential and small commercial customers. The Low-Income Weatherization Assistance Program in our service area is implemented through the local Community Action Agencies. SNGMO continues to provide funding in support of this program, which is often under-subscribed. SNGMO intends to continue referring all eligible customers to this beneficial program, particularly as there is more than adequate funding for increased participation.

SNGMO has evaluated internal COVID response and opportunities, in order to be part of the solution and support communities during this time of crisis. SNGMO has engaged in capital projects in the Rogersville rate area that include the multi-million-dollar central Missouri transmission project as well as other improvement and replacement projects. SNGMO has also restructured charitable giving to provide direct support and donations to organizations supporting COVID-19 relief efforts.

SNGMO does not believe that extension of a disconnection moratorium is appropriate at this time. The Company, like others, has resumed collection activities and early indications for SNGMO show success in increasing customer communication to pay past due balances. Additionally, SNGMO notes an increase in customers seeking

guidance for payment assistance opportunities and entering into payment agreements or modified budget bill plans.

SNGMO notes that recommendations from non-utility participants contained in the Staff Report in reference to waived late fees, security deposits and down payments do not include sufficient detail to thoroughly evaluate and therefore SNGMO is not supportive of those recommendations as written.

SNGMO believes any evaluation of household income should not be performed by the utility but rather would best be completed by organizations that have the experience in making those determinations, such as LIHEAP. Lastly, while enhanced information tracking can be beneficial, SNGMO believes the information currently being gathered and provided to the Missouri Public Service Commission (“Commission”) is sufficient to meet the needs of the Commission and other interested parties, and therefore no changes are necessary.

SNGMO appreciates the opportunity to submit comments to the Commission regarding best practices for past-due utility customer payments after the COVID-19 pandemic emergency and looks forward to continued participation.