

Exhibit No.:
Issue: **Deferred Accounting Treatment of
COVID-19 Costs**
Witness: **Scott A. Weitzel**
Type of Exhibit: **Direct Testimony**
Sponsoring Party: **Spire Missouri Inc.**
Case Nos. **GU-2020-0376**
Date Testimony
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Spire Missouri Inc.

GU-2020-00376

DIRECT TESTIMONY

OF

SCOTT A. WEITZEL

August 2020

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1 **DIRECT TESTIMONY OF SCOTT A. WEITZEL**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Scott A. Weitzel and my business address is 700 Market Street, St.
4 Louis, Missouri 63101.

5 **Q. WHAT IS YOUR PRESENT POSITION?**

6 A. I am the Managing Director of Regulatory and Legislative Affairs for Spire
7 Missouri, Inc. (“Spire Missouri” or “Company”).

8 **Q. PLEASE STATE HOW LONG YOU HAVE HELD YOUR POSITION AND**
9 **BRIEFLY DESCRIBE YOUR RESPONSIBILITIES.**

10 A. I have been in regulatory affairs since I joined Spire in August of 2016. I was
11 promoted to my current position in December of 2019. In this position, I am
12 responsible for all regulatory, rates, and government affairs activities for Spire
13 Missouri Inc. I have held previous roles for Spire as the Manager of Tariffs and
14 Rate Administration and I also served as the Director of Rates and Regulatory
15 Affairs.

16 **Q. PLEASE BRIEFLY DESCRIBE YOUR PREVIOUS PROFESSIONAL**
17 **EXPERIENCE PRIOR TO JOINING SPIRE MISSOURI.**

18 A. Upon graduation from college, I was employed by CenterPoint Energy as a Gas
19 Marketing Rep/Analyst where I handled billing, nominations, hedge settlement,
20 and account management for commercial, industrial and municipal gas customers.
21 I then spent 9 years working for Ameren Missouri in various roles relating to its
22 gas supply operations. This work included scheduling gas, peak day planning,
23 capacity and storage planning, gas supply procurement, capacity releases, hedging,

1 gas accounting, responding to data requests, PGA analysis, and review of
2 competitor's tariffs and cases. I then went to work for Ameren Illinois in the area
3 of gas business development where I focused on extending natural gas to
4 communities that were not currently supplied with natural gas, and acquiring gas
5 utilities and municipal gas systems.

6 **Q. WHAT IS YOUR EDUCATIONAL BACKGROUND?**

7 A. I graduated from the University of Missouri-Columbia in 2003 with a Bachelor of
8 Science in Human Environmental Sciences, with a major in Consumer Affairs and
9 a minor in Leadership and Public Service. I received my Masters of Business
10 Administration from Webster University in 2007.

11 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY BEFORE THIS**
12 **COMMISSION?**

13 A. Yes, in Files Nos. GR-2017-0215, GR-2017-0216, GO-2019-0058, GO-2019-0059
14 and GU-2019-0011.

15 **PURPOSE OF TESTIMONY**

16 **Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

17 A. The purpose of my testimony is to sponsor and explain the Company's Accounting
18 Authority Order (AAO) application in which Spire Missouri is requesting
19 authorization to identify, document, track and defer for potential future recovery
20 the Company's incremental costs and lost revenue associated with the coronavirus
21 disease 2019 ("COVID-19") pandemic.

22 **Q. WHY IS THE COMPANY REQUESTING AN AAO FOR COVID-19**
23 **COSTS?**

1 A. An accounting authority order is appropriate when there has been an event that is
2 extraordinary, non-recurring and unusual and results in material costs to a utility.
3 The COVID-19 pandemic represents such an extraordinary event, and the amount
4 of costs associated with COVID-19 impacts is still not fully realized. Spire Missouri
5 forecasts approximately \$8-9 million in impacts related to COVID-19 for the period
6 March 1, 2020 through September 30, 2020. This is an increase that is beyond the
7 control of Spire Missouri and for which no provision is made in the ratemaking
8 process.

9 **COVID-19 PANDEMIC**

10 **Q. PLEASE BRIEFLY DESCRIBE THE COVID-19 PANDEMIC.**

11 A. COVID-19 is a novel coronavirus that has rapidly spread across the world,
12 including the United States. COVID-19 can lead to severe respiratory illness and
13 has resulted in the loss of many lives. To date, the United States has more cases
14 of COVID-19 than any other country in the world, and has documented nearly 5
15 million cases, and over 159,000 deaths. As of August 5, 2020, Missouri has seen
16 over 54,000 cases, and over 1,300 deaths.

17 **Q. PLEASE EXPLAIN WHY THE COVID-19 PANDEMIC IS AN**
18 **EXTRAORDINARY EVENT.**

19 A. The COVID-19 pandemic has not only resulted in dire health impacts, but also
20 severe and unforeseeable social and economic consequences that on whole is
21 nothing short of an extraordinary event. This fact is evident by many factors,
22 including actions taken by the World Health Organization (“WHO”). In January
23 of 2020, the WHO declared the COVID-19 outbreak a global health emergency of

1 international concern, when COVID-19 cases were approximately 8,200
2 worldwide. WHO defines a public health emergency of international concern as
3 an “extraordinary event” that “constitute[s] a public health risk to other States
4 through the international spread of disease” and “potentially require[s] a
5 coordinated international response.” The WHO website states that “the definition
6 implies a situation that is serious, sudden, unusual or unexpected.”
7

8 The fact that the pandemic is extraordinary has also been recognized on national,
9 state, and local levels. On March 13, 2020, United States President, Donald
10 Trump proclaimed the COVID-19 outbreak a national emergency beginning
11 March 1, 2020. Missouri Governor Mike Parsons also declared a state of
12 emergency, in order to allow the state to tap into emergency funds to be used for
13 coronavirus response efforts. In attempts to slow down the spread of the virus,
14 local governments implemented “stay-at-home” or “shelter-in-place” orders
15 resulting in schools and businesses across the country shutting their doors for
16 several weeks, if not months. In Spire East, St. Louis City Mayor Lyda Krewson
17 and St. Louis County Executive Same Page, issued a 30-day stay-at-home order
18 on March 21, 2020 to be effective on March 23rd. In Spire West, Mayor Quinton
19 Lucas of Kansas City also issued a stay-at-home order. The stay-at-home orders
20 were extended on both sides of the state to mid-May. Governor Parsons issued a
21 statewide stay-at-home order on April 3rd to begin April 6th. During this time,
22 individuals were required to stay in their place of residence except for when
23 engaging in essential activity. As a result of these measures, people stopped

1 traveling and going out, which greatly impacted airlines, hotels, movie theaters,
2 retailers, amusement parks and other places of public accommodation. Major
3 sporting events were suspended, and many businesses had to close permanently as
4 a result. These closures have caused lost jobs. Missouri saw a peak of
5 unemployment claims the last week of March 2020 with 104,230 unemployment
6 claims. The unemployment rate rapidly degraded from 3-4% to 10.2% at its
7 highest in April in just a matter of weeks. Community spread of the virus is still
8 not contained, and additional limitations on businesses and activities have been
9 recently announced by local officials, with additional limitations still possible.

10 **Q. HAS SPIRE MISSOURI TAKEN ANY ACTION TO ASSIST ITS**
11 **CUSTOMERS DURING THE COVID-19 PANDEMIC?**

12 A. Yes. Given the extreme impact COVID-19 has had on the economy, many of
13 Spire Missouri's customers have fallen on difficult economic times. In order to
14 assist our customers who have been impacted by COVID-19, Spire Missouri has
15 implemented changes to its tariff to waive late payment fees and suspend
16 disconnections through June 1 of this year. Spire Missouri has also donated to
17 Dollar Help to assist struggling, limited-income residential customers as well as
18 small business customers in the form of bill credits. The Company is also
19 considering new programs to further assist its customers through the pandemic.

20 **Q. WHAT MEASURES HAS SPIRE MISSOURI TAKEN TO ENSURE THAT**
21 **IT WILL CONTINUE TO SAFELY PROVIDE GAS SERVICE TO ITS**
22 **CUSTOMERS?**

1 A. At Spire Missouri we recognize the important and essential service that we
2 provide to our customers, and we are committed to continue to do so through this
3 pandemic. Part of that commitment involves keeping our employees safe so that
4 they can continue to do the essential work that they do each day. Safety has and
5 always will be a key component of our operations, and with the COVID-19
6 pandemic, Spire Missouri has had to evolve its approach and vision as to what
7 constitutes a safe work environment. Beginning in mid- March, pursuant to state
8 and local orders, the Company required all employees who were able to work
9 effectively from home to do so. This constitutes approximately 35% of the
10 Company's workforce. In order to enable a mass number of employees to work
11 remotely, additional server capacity and VPN licenses, and other technology
12 related equipment has been required. In addition, the Company immediately
13 formed an internal COVID-19 task force with representatives from various
14 business units throughout the Company. The task force has met daily as needed
15 to discuss concerns and the safety measures required to operate in the safest
16 manner possible in furtherance of the Company's mission to ensure the safety of
17 both our employees and our customers. This has involved the need for a
18 significant increase in additional personal protective equipment, which range from
19 masks and gloves to sanitizing spray and shoe coverings. We have also put
20 together processes and procedures to address what happens when an employee is
21 infected with COVID-19. These procedures include contact tracing and
22 notification of impacted customers, testing and quarantining of potentially
23 impacted employees, and additional cleaning of facilities and vehicles where

1 necessary. Spire Missouri has closely followed the recommended Centers for
2 Disease Control and Prevention (“CDC”) guidelines. We have also been
3 observing best practices from other utilities in the industry to ensure to the best of
4 our ability the safety of our employees and customers. In recognition of these
5 limitations, in July the Company obtained a waiver from certain rules and
6 Commission orders that will allow the Company additional time to complete
7 inspections and surveys where completion requires entry into a customer’s home
8 or business.

9 **COVID-19 COSTS**

10 **Q. PLEASE DESCRIBE WHAT COSTS THE COMPANY IS SEEKING TO**
11 **DEFER AS A RESULT OF THE COVID-19 PANDEMIC.**

12 A. Spire Missouri is requesting authority to identify, document, track and defer into a
13 regulatory asset for potential future recovery in its next rate case: (1) new or
14 incremental operating and maintenance expense related to protecting Spire’s
15 employees and customers including additional cleaning of facilities and vehicles,
16 personal protective equipment, and technology upgrades and equipment needed to
17 enable employees to work from home as well as possible sequestration of
18 employees if necessary; (2) increased bad debt expense to the extent it exceeds
19 levels included in the cost of service; (3) increased labor cost due to COVID-19
20 (4) costs related to new assistance programs implemented to aid customers with
21 payment of natural gas bills during the pandemic; (5) COVID-19 Leave for
22 employees; (5) lost revenues associated with suspended disconnections, waiver
23 of late payment fees, reconnection charges and other tariff charges; (6) lost

1 revenues associated with volumetric reduction in customer natural gas load, (7)
2 carrying costs; and (8) other COVID-19 costs not yet identified.

3 **Q. PLEASE DESCRIBE HOW THE COMPANY IS SEEING AN INCREASE**
4 **IN BAD DEBT EXPENSE AS A RESULT OF COVID-19.**

5 A. With an increase in customers being unable to pay their bills due to economic
6 impacts of COVID-19, the Company has seen an increase in arrearages, and
7 anticipates that it will continue to see an increase for the foreseeable future. This
8 increase in arrearages contributes to an increase in the Company's bad debt
9 expense. With Commission approval, the company also instituted a moratorium
10 on customer disconnections during the height of the virus impacts in the late
11 winter and spring. This moratorium also contributed to larger past due balances
12 and, therefore, higher bad debt expense. As of June 2020, 12% more customers
13 are in arrears than typical. However, the total dollar amount that is past due is
14 nearly double the 2017-2019 average.

15 **Q. WHAT INCREASED LABOR COSTS HAS THE COMPANY INCURRED**
16 **DUE TO COVID-19?**

17 A. Spire Missouri made changes to its operations to avoid going into customer
18 homes because of the pandemic. In general, most leaks on the Company's mains
19 are repaired, and this labor cost is treated as an O&M expense. However, most
20 leaks on services typically result in replacement of the service, rather than repair.
21 The hours spent replacing services are thereby treated as capital. To avoid going
22 into homes during the peak of stay at home orders, the decision was made to
23 transition our focus to repairing leaks on mains. This dramatically increased the

1 hours going to O&M and decreased the hours going to capital, which compounds
2 the dollar impacts of clearings and transfers to construction.

3 **Q. PLEASE DESCRIBE COVID-19 LEAVE.**

4 A. Spire Missouri's COVID-19 leave includes two weeks of paid leave to employees
5 directly impacted by the virus. COVID-19 leave is available to all employees who
6 get COVID-19 or must care for a family member who has fallen ill due to
7 COVID-19. Employees can also use the leave to care for their school aged
8 children who don't otherwise have care due to daycare and school closures.

9 **Q. HAVE ANY SPIRE EMPLOYEES UTILIZED THE COMPANY'S COVID-
10 19 LEAVE?**

11 A. Yes, to date, approximately 695 employees have utilized 34,878 hours of COVID-
12 19 leave.

13 **Q. PLEASE DESCRIBE THE COMPANY'S LOST FEE REVENUES
14 RESULTING FROM THE COVID-19 PANDEMIC.**

15 A. In response to the economic hardship that many of Spire Missouri's customers are
16 facing, the Company took steps to modify its tariffs so that customers struggling
17 to pay their bills did not have to worry about late fees being added to a bill that
18 they already struggled to pay. We also suspended disconnections and
19 reconnection charges through June 1 of this year. As a result, the Company has
20 lost revenues associated with fees and charges stated in the Company's tariffs that
21 it would typically be able to collect.

22 **Q. IS THE COMPANY SEEKING RECOVERY OF LOST REVENUES DUE
23 TO REDUCTION IN LOAD?**

1 A. Yes, although we are still evaluating the overall net load impacts by customer
2 class.

3 **Q. PLEASE DESCRIBE HOW THE COMPANY PROPOSES TO TREAT**
4 **CARRYING COSTS ATTRIBUTABLE TO COVID-19?**

5 A. Carrying costs should be applied to all of the Company's capital related COVID-
6 19 costs. The Company proposes applying the Allowance for Funds Used During
7 Construction ("AFUDC") rate that was approved in the Company's last general
8 rate case to its carrying costs.

9 **Q. HAS THE COMPANY SEEN ANY REDUCTIONS IN COSTS AS A**
10 **RESULT OF THE COVID-19 PANDEMIC?**

11 A. Yes. As a result of Spire Missouri's measures to keep its employees safe, travel
12 has been reduced to essential travel only. So, with employees traveling less, the
13 Company has been spending less. In addition, with 35% of its workforce working
14 remotely, Spire Missouri has seen a reduction in expenses such as conference
15 attendance fees, and meals. The Company is also looking at other potential
16 offsets.

17 **Q. DOES THE COMPANY PROPOSE THAT THE COST REDUCTIONS**
18 **ATTRIBUTABLE TO COVID-19 BE USED TO OFFSET SOME OF THE**
19 **COSTS THE COMPANY IS SEEKING TO DEFER?**

20 A. Yes, the Company believes it would be appropriate to offset any cost reductions
21 resulting from COVID-19 against any cost increases the Company has realized as
22 a result of COVID-19.

1 **Q. DOES THE COMPANY KNOW HOW MUCH IT WILL SEEK TO DEFER**
2 **INTO A REGULATORY ASSET?**

3 A. No, it does not. While the Company has been tracking COVID-19 expenses, and
4 can make some projections, it is unknown what the ultimate impact will be over
5 time. This is because we don't know how long the impacts of COVID-19 will
6 affect our business and it isn't clear if all costs have been identified yet. Also, the
7 full extent of the bad debt increase will take months to materialize.

8 **Q. HOW LONG IS THE COMPANY PROPOSING TO DEFER**
9 **INCREMENTAL COVID-19 COSTS INTO A REGULATORY ASSET?**

10 A. The Company proposes to track and defer these costs into a regulatory asset so
11 long as there are identifiable COVID-19 costs incurred by the Company, to be
12 included as part of the Company's next general rate case. The Company is
13 required to file its next rate case no later than October 7, 2021.

14 **Q. HAS THE COMPANY EXPERIENCED A MATERIAL LOSS AS A**
15 **RESULT OF THE COVID-19 PANDEMIC?**

16 A. Yes, to date, the Company has tracked actual losses and forecasted approximately
17 \$8-9 million in impacts due to COVID-19.

18 **Q. IS THE COMPANY ASKING THE COMMISSION FOR GUARANTEED**
19 **RECOVERY OF THESE DEFERRED COSTS?**

20 A. No. The Company is only asking for the ability to track and defer these costs into
21 a regulatory asset for possible recovery in its next rate case. The Company fully
22 expects that these costs will undergo a prudence review as part of its next rate
23 case.

1 **Q. IS SPIRE MISSOURI PROPOSING A REPORTING METHOD FOR ITS**
2 **COVID-19 COSTS IF ITS REQUEST FOR AN AAO IS GRANTED?**

3 A. Yes, as stated in the Company’s Application, the Company proposes to file an
4 annual report, with the first report being filed January 2021. The report will
5 identify costs incurred as well as cost reductions by expense category on a
6 monthly basis.

7

8 **ACCOUNTING AUTHORITY ORDER**

9 **Q. DOES THE COMMISSION HAVE AUTHORITY TO GRANT AN AAO?**

10 A. Yes. Although I am not an attorney, I have been advised by legal counsel that the
11 Commission, pursuant to its authority found in Section 393.140(8), RSMo “to
12 prescribe the accounts in which particular outlays and receipts should be booked”,
13 has promulgated Commission Rule 20 CSR 4240-40.040. That rule, in turn,
14 prescribes the use of the Uniform System of Accounts (“USOA”) adopted by the
15 Federal Energy Regulatory Commission. The USOA provides for the deferred
16 treatment of extraordinary costs. An application for an AAO contains a single
17 factual issue -- whether the costs, which are asked to be deferred, are extraordinary
18 in nature or otherwise qualify for deferral. As the Commission has previously
19 stated, all other issues remain for later determination, “including, but not limited to,
20 the prudence of any expenditures, the amount of recovery, if any, whether carrying
21 costs should be recovered, and if there are any offsets to recovery.” Mo.P.S.C.3d
22 200, 203-204 (1991).

1 **Q ARE THERE ANY SPECIFIC STANDARDS THAT GOVERN WHEN AN**
2 **AAO SHOULD BE ISSUED?**

3 A. Again, I have been advised by legal counsel that Section 393.140(8), RSMo does
4 not contain any express standard for the exercise of AAO authority and therefore,
5 it is within the Commission's discretion. I have also been advised that Missouri
6 courts have recognized the Commission's authority to approve an AAO in
7 extraordinary and unusual circumstances.

8 **Q. HAS THE COMMISSION ISSUED AAO'S IN MISSOURI UTILTIY**
9 **REGULATION?**

10 A. Yes, the Commission has repeatedly approved AAO's in electric cases, gas cases,
11 and water cases.

12 **Q. HAS THE COMMISSION EVER ISSUED AN AAO FOR COSTS RELATED**
13 **TO A PANDEMIC?**

14 A. Not to my knowledge. However, the Commission has recognized that there is
15 nothing in the law that would limit the Commission's grant of an AAO to any
16 particular set of circumstances. The fact that a global pandemic is an issue of first
17 impression before the Commission further supports how extraordinary and unusual
18 this pandemic is. Much like the Joplin tornado (EU-2011-0387) and the 2008 ice
19 storm (EU-2012-0027), the COVID-19 pandemic is uniquely extraordinary
20 compared to other events the Commission has seen in its over 100 years of
21 existence.

22 **Q. HAS THE COMMISSION ISSUED AAO'S THAT ARE RELEVANT TO**
23 **SPIRE'S ISSUE OF COVID-19?**

1 A. Yes. The Commission has in the past issued AAO’s for costs “caused by
2 unpredictable events, acts of government and other matters outside the control of
3 the utility or the Commission.” *In the Matter of St. Louis County Water Company’s*
4 *Tariff Designed to Increase Rates*, MoPSC Case No. WR-96-263, p. 13 (December
5 31, 1996). The Commission has further stated that it “has periodically granted
6 AAOs and subsequent ratemaking treatment for various unusual occurrences such
7 as flood-related costs, changes in accounting standards, and other matters which are
8 unpredictable and cannot adequately or appropriately be addressed within normal
9 budgeting parameters.” *Id.* at p. 14. Further, the Commission has issued AAOs for
10 Commission enacted mandates such as gas safety programs and changes in the Cold
11 Weather Rule.

12 **Q. HOW DOES FERC DEFINE AN “EXTRAORDINARY ITEM”?**

13 A. The General Instructions of the Uniform System of Accounts states as follows:

14 “7. *Extraordinary items.* It is the intent that net income shall reflect all items
15 of profit and loss during the period with the exception of prior period
16 adjustments as described in paragraph 7.1 and long-term debt as described
17 in paragraph 17 below. **Those items related to the effects of events and**
18 **transactions which have occurred during the current period and which**
19 **are of unusual nature and infrequent occurrence shall be considered**
20 **extraordinary items. Accordingly, they will be events and transactions**
21 **of significant effect which are abnormal and significantly different**
22 **from the ordinary and typical activities of the company, and which**
23 **would not reasonably be expected to recur in the foreseeable future.** (In
24 determining significance, items should be considered individually and not
25 in the aggregate. However, the effects of a series of related transactions
26 arising from a single specific and identifiable event or plan of action should
27 be considered in the aggregate.) To be considered as extraordinary under
28 the above guidelines, an item should be more than approximately 5 percent
29 of income, computed before extraordinary items. **Commission approval**
30 **must be obtained to treat an item of less than 5 percent, as**
31 **extraordinary.** (emphasis added)”
32

1 **Q. UNDER THE FERC DEFINITION, WOULD SPIRE’S COVID-19 COSTS**
2 **QUALIFY FOR AAO TREATMENT?**

3 A. Yes, they would. The COVID-19 pandemic is undoubtedly “of unusual nature and
4 infrequent occurrence”, as well as “abnormal and significantly different from the
5 ordinary and typical activities” of Spire Missouri. Although costs may not meet
6 the FERC’s income threshold of five percent, that just means that Spire cannot
7 automatically defer it but, rather, must seek Commission approval. That is why
8 Spire filed this case.

9 **Q. HAVE OTHER UTILITY COMPANIES SOUGHT AAO’S AS A RESULT**
10 **OF THE COVID-19 PANDEMIC?**

11 A. Yes. Other Missouri utilities, including Evergy and Missouri American Water,
12 have each filed for accounting authority orders due to COVID-19. AAO’s and
13 other tracking mechanisms have been approved by Commissions or other
14 legislative bodies in 21 other states due to the COVID-19 pandemic. Please see
15 Schedule SAW-1 for a comprehensive list of state responses pertinent to this matter.

16 **Q. WHAT ACTION SHOULD THE COMMISSION TAKE AS A RESULT OF**
17 **THE IMPACTS COVID-19 HAS HAD ON SPIRE MISSOURI?**

18 A. The Commission should grant Spire Missouri the accounting authority order it has
19 requested in this proceeding.

20 **Q. DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

21 A. Yes, it does.

Last Updated: 8/3 @ 900		Commissioner Presley letter to Congress on federal mandates		PUC Moratorium on Disconnect		Mandatory Suspended Late Fees	Rate/Rider Suspensions	COVID-19 Cost Recovery	Executive Orders	AG Activity	Legislation	Consumer Advocate
Alabama		Coordinating with utilities voluntarily										
Alaska											SB 0241 : Prohibits residential disconnects for length of emergency; allows utilities to recover costs on unpaid bills & extraordinary costs. Enacted	
Arizona		Commission voluntary press released only applied to electric						Docket No. AU-00000A-20-0094 : Initiated proceeding to track financial impact of COVID-19 on utilities and ratepayers. Seeking to examine utility liquidity and cash flow, the commercial paper market, and bad debt and lost revenue associated with the utilities' recent implementation of voluntary moratoriums on service disconnections and late fees. Order allows utilities to request cost recovery. Issued 4/24				
Arkansas		Docket 20-012-A : moratorium on service disconnections during the state of emergency and encouraged the provision of payment arrangements. Issued 4/10 , lasts for length of emergency or until PSC determines otherwise. Emergency order expires June 19. Resolution M-4842 : prohibits residential and small business disconnects through 4/16 with option to extend. Waives deposit requirement for those seeking to reestablish service. Ordered 3/17 , The COVID-19 protections adopted in Resolution M-4842 will remain in place and prevent disconnections entirely until next year.						Docket 20-012-A : Utilities directed to use an accounting mechanism to track costs associated with the moratorium. Issued 4/10				
California				By PUC				Resolution M-4842 : Directs utilities to establish accounts to track incremental costs associated with COVID-19 Issued 4/16			AB 2887 : prohibit residential or small commercial disconnects for up to three months post emergency; allows customers reasonable payment plans not to exceed 12 months. Re-referred to committee 5/7	
Colorado				By Gov				EO 098 : Extends disconnect moratorium through July 12. Issued 6/12				
Connecticut		Docket 20-03-15 : Commission extended moratorium for non-hardship residential customers to expire on Sept 9 and Oct. 31 for hardship residential customers; confirmed that the non-residential moratorium will not be extended beyond Aug. 1st. Issued 7/21		By PURA			Docket 03-18-20 : Orders utilities to track all costs related to the implementation of these emergency measures; and creates forum to consider thoroughly the expansion of existing affordability measures to all customers, such as an increased offering of flexible payment plans and late fee waivers. Issued 3/18 Payment Program guidance: http://www.dpuc.state.ct.us/dockcurr.nsf/8e6fc37a54110e3e852576190052b64d?38462d9dc4c13d85258559007c8944?OpenDocument		Filing : AG William Tong sought an emergency order from PURA suspending all disconnects for at least 30 days. The filing states that utilities should be permitted to recover prudently incurred uncollectible costs associated with the moratorium. Filed 3/12			
Delaware								EO 23 : every utility shall, at a minimum, extend a four month payment plan for past due accounts to customers that indicate they have been affected by the impacts of COVID-19. Such utilities shall not apply eligibility criteria, such as installment plan history, and customers may enroll in the COVID extended payment plan with no deposit/payment. Effective July 1				Docket 20-0286 : In response to staff request for cost recovery, Division of Public Advocate objected arguing that any increased costs associated with the coronavirus pandemic can be addressed in a utility's next base rate case.
District of Columbia		Mayor extended emergency order until October 9 (the moratorium will expire at least 15 days after end of EO).						Docket 20-0286 : PSC staff filed a motion requesting PSC authorize regulated utilities to establish a regulatory asset for COVID-19-related incremental costs. Filed 5/4; Approved 5/13 Order No. 20329 : Order establishes regulatory assets for Covid-19 related incremental costs. Issued 4/15			Act 23-247 : Prohibits disconnects for length of emergency plus 15 days. Applicable 3/11	
Florida		Coordinating with utilities voluntarily Coordinating with utilities voluntarily										
Georgia								Docket No. 42516 : Georgia Power authorized to defer all lost revenue and increased costs associated with COVID-19, with the deferred balances to be addressed in a future docket. Affiliate Atlanta Gas Light Co. (Docket No. 42315) proposed that lost revenue associated with continuing to serve customers who are not paying their bills through the revenue true-up process within the Georgia Rate Adjustment Mechanism. Issued 4/14				

<p>Hawaii</p>	<p>By PUC</p>	<p>Order No. 37153; extend the suspension of service disconnections until June 30, 2020.</p> <p>Order No. 37125; each of these Utilities to establish regulatory assets to record costs resulting from the suspension of disconnections. In future proceedings, to the extent any of these utilities request recovery of these costs, the Commission will consider whether each Utility's request for recovery of these regulatory assets is reasonable and necessary. The Commission will also consider in a future proceeding other issues, such as the appropriate period of recovery for the approved amount of regulatory assets, any amount of carrying costs thereon, any savings directly attributable to suspension of disconnects, and other related matters. Issued 5/4</p>
<p>Idaho</p>	<p>Coordinating with utilities voluntarily</p>	<p>Docket No. GNR-U-20-02; adopted staff proposal to open an investigation to address whether and to what extent utilities should be authorized to defer incremental COVID-19 related expenses into a regulatory asset for possible future recovery. Issued 4/15</p>
<p>Illinois</p>	<p>By ICC</p>	<p>Docket 20-0309; prohibits disconnects through 5/1 or until end of emergency, should it extend past 5/1. Extended to 8/1 at latest on 6/11.</p> <p>Cause No. 45377; URC extended disconnect moratorium until 8/14 Issued 6/29</p> <p>20-0309; ordered utilities to track of all COVID-related expenses to enable future review of the reasonableness and prudence of such expenses." In a proposed second interim order issued April 20, the administrative law judge recommended that the companies continue the deferrals, with recovery of the deferred amounts to be addressed at a later date. Issued 3/18</p> <p>AG Kwame Raoul announced agreement with the major utilities to enact important consumer protections once the shut-off and late fee moratorium has lifted. Under the terms of the agreement, the moratorium may remain in place until Illinois enters Phase 4 of the Restore Illinois plan, but no later than Aug. 1. Announced 6/11</p> <p>Cause No. 45380; wants the URC to begin a "generic investigation" into the impact of COVID-19 on utility rates and the services they are providing during the pandemic. The OUC seeks an "expeditious" two-phase investigation. In phase one, the consumer counselor seeks a stay on disconnections that are "pending or imminent" when the state's moratorium is removed. In addition, certain utility fees, including late fees, convenience fees, deposits and reconnection fees, would be waived. Also, the URC would order the use of deferral accounting to account</p>
<p>Indiana</p>	<p>By ICC</p>	<p>Docket No. SPU-2020-0003; Order Directing Phase-in of Utility Service Disconnections, order establishes requirements that low utilities must follow before they can resume disconnections of customers' utility service. Disconnects may resume 7/1</p> <p>EO 20-05; prohibits any disconnect for length of emergency. Issued 3/19; extended to 6/30</p> <p>Order; the use of regulatory accounts by rate-regulated utilities is appropriate for the tracking of financial impacts after March 1, 2020, that arise from the COVID-19 pandemic. The order opens separate dockets for each rate-regulated utility to file information regarding these accounts and requires each rate-regulated utility to file a proposal for the use of regulatory accounts to be submitted for review by the IUB. Issued 5/1</p>
<p>Iowa</p>	<p>By ICC</p>	<p>Docket No. 20-GIMX-393-MIS; KCC orders utilities to offer payment plans, waive late fees through 2020</p> <p>Docket No. 20-GIMG-423-ACT; KCC allowed gas utilities to defer for possible future recovery certain costs and lost revenues associated with the pandemic. Issued 7/9</p>
<p>Kansas</p>	<p>By PSC</p>	<p>Case No. 2020-00085; Utilities should suspend disconnects until further notice Issued 3/17</p> <p>Case No. 2019-00366; final Order to improve the effectiveness of Home Energy Assistance (HEA) programs, establishes uniform standards such as \$0.30 per-meter-surcharge . Issued 5/1</p> <p>Case No. 2020-00085; if utilities believe their tariffs or regulations preclude them relieving the hardship of this emergency or must deviate from its tariff, file that request in this docket. Issued 3/17</p>
<p>Kentucky</p>	<p>By PSC</p>	<p>Special Order 43-2020; order authorizing utilities to reinstate service disconnections for non-payment. Order also allows utilities to resume charging late fees and requires the utilities to submit a report detailing the payment plans offered to customers. Issued 7/1; effective 7/16</p> <p>Special Order 44-2020; PSC declared utilities "are entitled to formally petition" the PSC to recover the revenues lost as a result of complying with the commission orders prohibiting service disconnections, "including but not necessarily limited to administrative costs and expenses associated with customer notifications." Issued 7/1</p> <p>HCR 22; Urges PSC to temporarily prohibit disconnects. Introduced 3/16</p>
<p>Louisiana</p>	<p>By PSC</p>	<p>HCR 22; Urges PSC to temporarily prohibit disconnects. Introduced 3/16</p>

Maine	<p>Order: prohibits disconnects until further notice. Issued 3/16</p>		<p>Letter: PUC letter encourages utilities to file waivers and clarifications as needed, especially to modify terms and condition modifications. Issued 4/3</p>	<p>2020-00335: PUC seeking input on how the pandemic will impact utilities, customers' ability to pay their utility bills, and any federal resources available to help both customers and utilities with their ongoing obligations. Announced 4/28</p>	<p>ME 59 799: empowers the Gov, in consultation with PUC, to prohibit residential disconnects for water and electric for length of emergency plus 60 days after Enacted 3/18</p>
Maryland	By Gov			<p>Order 89542: authorizes each utility to create a regulatory asset to record COVID costs in order to plan for cost recovery. Issued 4/9</p>	<p>EO: prohibits residential disconnects and late fees for length of emergency and until at least 8/1 Issued 3/16; extended to 9/1</p>
Massachusetts			<p>Docket 20-58: established a Customer Assistance and Ratemaking Working Group, comprised of interested parties, to assist with establishing policies and practices that enhance customer assistance and implementing flexible ratemaking treatment in response to the effects of COVID-19 pandemic. The DPU directed the working group to divide its activity into two projects: customer assistance and "providing appropriate financial support for the utilities to implement such assistance and maintain utilities' financial integrity." Filed 4/1</p>	<p>Announcement: Gov. Baker directed DPU to issue an order prohibiting any disconnects for length of emergency or until DPU determines otherwise. Announced 3/24</p>	<p>Filing: AG Maura Healey filed an emergency motion with the DPU seeking a 3-month delay for the May 1 scheduled rate increase that natural gas customers pay to cover pipeline replacement projects. Filed 4/1</p>
Michigan	By PSC for low-income & seniors		<p>U-20757: Requires statement by 4/20 affirming disconnects suspended for low-income, elderly, & those medically affected by COVID-19; deposit and reconnect fees waived Issued 4/15, applicable through 6/12</p>	<p>U-20757: requested utilities supply PSC with categories of COVID-costs, potential COVID cost savings, external sources of revenue for COVID expenses, and options to track costs. Utilities are authorized to defer uncollectable expenses incurred since 3/24 and must provide advance notice to staff prior to filing new rate cases before 8/1/20 Issued 4/15</p>	
Minnesota	Requested by PUC		<p>Letter Requested utilities extend cold weather rule for duration of emergency, waive late fees, and arrange reasonable payment plans. Sent 3/24, otherwise voluntary coordination.</p>	<p>20-425: Opening a general inquiry for issues related to financial impacts associated with Covid-19. Issued 5/7</p>	<p>SF 4422/HF4197: Extends prohibited disconnect cold weather period through April 30. Introduced 3/16</p> <p>SF 4469: directs Xcel to take \$65 million for FY 20 from an existing renewable energy development fund and "provide immediate relief to residential, commercial, and industrial electric customers."</p>
Mississippi			<p>Docket 2018-AD-141: prohibits disconnects for 60 days from date of order Issued 3/18; extended through 5/26</p>	<p>Order: authorizes utilities to defer all costs, including any incremental bad debt expenses and all associated credit and collection costs, related to connections, reconnections, or disconnections for all customer classes. Issued 4/20</p>	
Missouri	Voluntary coordination with utilities	<p>Waived late fees for Summit customers Announced 4/15</p> <p>One-time bill credit for certain low-income Spire MO customers; uses unspent funds from low income affordability program Released 4/15: https://psc.mo.gov/NaturalGas/PSC_Approves_Spire_Request_Regarding_a_One-Time_Bill_Credit_to_Eligible_Customers--pr-20-145</p>	<p>PSC approved a request filed by Liberty Utilities Company for a temporary variance from company tariffs, which will allow them to continue to forego collection of late payment fees, to not send collection or disconnection notices, and to reconnect recently disconnected customers during the COVID-19 emergency. Approved 5/13</p>	<p>AW-2020-0356: Order Opening Working Case to Consider Best Practices for Recovery of Past-Due Customer Payments After the COVID-19 Pandemic Emergency Approved 5/13</p>	<p>SB 618: During a state of emergency due to a pandemic, the discontinuance of gas or electric services to residential users for nonpayment of bills, if gas or electricity is used as a heating or cooling source at such residence, shall be prohibited.</p> <p>Case ER-2019-0374: MO Office of Public Counsel requested PSC suspend utility energy efficiency programs to reduce customer bills. Proposal dropped under settlement agreement. Settlement 4/15</p>
Montana	By Gov		<p>MDU filed for an accounting order allowing it to defer as a regulatory asset incremental costs, including revenue impacts, incurred since the state of emergency as a result of COVID-19. Filed May 8</p>	<p>EO: prohibits residential disconnects for length of stay at home order. Issued 3/30; disconnects may resume after 6/1</p>	
Nebraska	Coordinating with utilities voluntarily		<p>Black Hills filed with the commission for approval to establish a regulatory asset to record and preserve costs related to the COVID-19 pandemic. Filed April 22</p>		
Nevada	Coordinating with utilities voluntarily			<p>The Commission directed all of the rate-regulated public utilities within its jurisdiction, including natural gas, to begin recording, as of March 12, 2020, in regulatory asset accounts, amounts that reflect the costs of maintaining service to customers affected by COVID-19. Issued 3/27</p>	
New Hampshire	By Gov & PUC		<p>Order 26.343: Requires no disconnects or late fees for length of emergency; must allow customers to make reasonable payment agreements over no less than 6 months. Issued 3/31; expires 7/15</p>	<p>IR 20-089: investigation to consider necessary and appropriate changes to existing policies and practices regarding utility operations, collections, revenues, finances, accounting, customer assistance measures, and ratemaking impacts, in light of the pandemic Issued 6/4</p>	<p>EO 03-17-2020: prohibits any disconnect or late fees for length of emergency; customers shall have opportunity to make reasonable payment agreements over no less than 6 months. Issued 3/17; expires 7/15</p>

	Coordinating with utilities voluntarily			Order: BPU authorized the state's utilities to defer "prudently incurred costs related to COVID-19" beginning on March 9. The deferred costs must be offset by any federal or state assistance the utility receives as a result of the pandemic, as well as any savings that may occur. The order does not specify what costs qualify for deferral and so it is unclear whether lost revenue resulting from the related recessionary downturn in economic activity would be eligible for such treatment. Issued 7/2	A 3878 : Prohibits residential disconnects for length of emergency; directs utilities to reconnect any previously disconnected customers. Introduced 3/23
New Jersey					
New Mexico	Case No. 20-00069-UT_order emergency amendment 17,10,650 prohibits the utility to disconnect service under the emergency executive order. Issued 3/19; emergency extends to at least 5/31 Suspend disconnects "during the COVID-19 outbreak" . Announced 3/13, end date unclear	By PUC			
New York		By PSC	Order : PSC approves National Grid request to postpone 4/1 rate increase until 7/1. Issued 3/25 Case 20-M-0187 : petition from large energy consumers requesting 1.1 billion of rate payer funding from NYSEDA to use for bill credits. Petitioned 4/15 https://documents.dps.ny.gov/public/MatterManagement/CaseMaster.aspx?MatterSeq=62432&MN=20-M-0187	20050/20-M-0266 : Proceeding will address effects of COVID on utilities, power producers, renewables, and NYPS programs. In filings utilities have requested to defer COVID-19-related costs, authorize surcharges to prevent a cash flow crisis and excuse them in cases where they cannot meet performance metrics due to the pandemic. Announced 6/11	S 08113 : prevents residential disconnects for length of emergency. Referred to committee 3/23 AB 10261: Suspends all student loan, mortgage, auto loan, credit card, and utility payments for ninety days in response to the outbreak of coronavirus disease. Pending. EO 124 : prohibits residential disconnects for 60 days; prohibits late fees or interest and grants customers opportunity to seek reasonably payments over at least 6 months for length of emergency plus 180 days after. Order only applies to ordinary monthly charges and not optional services added on by customer. Issued 3/31
North Carolina		By Gov & PUC	Docket M-100 : suspends regulations of utility tariffs that prevent or condition reconnection of customers. Issued 3/19	Docket E-7, Sub 1214 : NCLUC denied Duke request to defer revenue and establish an accounting order to offset the need to implement temporary rates. Denied 7/10	
North Dakota	Docket M-100 : prohibits disconnects for length of emergency. Issued 7/29; PUC order extends prohibition until 9/1 Order : Extends winter reconnect order through 5/1. Issued 3/13				
Ohio	Order from 3/12 directed utilities to review disconnect policies during emergency	By PUC	20-591-AU-UNC : directs utilities to review policies, practices, and tariff provisions and to promptly seek any necessary approval to suspend otherwise applicable requirements that may impose a service continuity hardship. Issued 3/12		HB 596 : prohibit residential or small commercial disconnects for 120 days post emergency; prevents debt collection from consumers or small businesses for 120 days post emergency. Introduced 3/31 19-2084-GA-UNC : Consumer Advocate asking PUC to divert funds from EE programs into bill assistance; opposed by utilities & enviros Petitioned 4/3
	Coordinating with utilities voluntarily			Adopted an April 20 proposal by the commission staff, allowing each utility to record as a regulatory asset increased bad debt expenses, costs associated with expanded payment plans, waived fees and incremental expenses that are directly related to the suspension of or delay in disconnection of service beginning March 15, 2020. Issued May 7	
Oklahoma					
Oregon	Coordinating with utilities voluntarily Docket M-2020-3019244 : prohibits disconnects for length of emergency; encourages reconnections. Letter requests utility info on customer service, billing, and public outreach efforts Issued 3/13; letter issued 5/29	Voluntary			
Pennsylvania				Letter : Secretarial letter authorizes creation of regulatory asset for any incremental uncollectible expenses incurred above those in embedded rates. Issued 5/13	
Rhode Island	Docket 5022 : prohibits residential disconnects through 4/15 and non-residential disconnects through 4/15. Issued 3/16, extended through 7/17 LOW INCOME moratorium thru 11/1	By PUC			
South Carolina	Release : PSC moved to prohibit disconnects for length of emergency. Announced 3/23; emergency order expires June 26	By PSC	Release : PSC sent letter to Gov. requesting delay of statutory deadlines for issuing orders in pending rate cases. Sent 3/23	Announcement : Gov. McMaster urged utilities to suspend disconnects for all customers for the length of the emergency. Announced 3/15 Letter : Governor letter on utilities returning to normal operations and working with customers. Issued 5/13	
South Dakota	Coordinating with utilities voluntarily Docket 20-00047 : prohibits disconnects for length of emergency; orders reconnects at no charge; orders utilities to submit a report describing any grace periods that will be offered. Issued 3/31; emergency extended to 8/10	Unclear in PUC order			Filing : AG Herbert Slaterly filed an emergency petition with the PUC to suspend disconnects for the length of the emergency. Filed 3/24
Tennessee					
Texas	Voluntary coordination with utilities			Order : authorizing accounting mechanism and process for future recovery of COVID expenses Issued April 2020	

<p>Utah</p> <p>Vermont</p>	<p>Voluntary coordination with utilities</p> <p>Order: prohibits residential disconnects through 7/31. Issued 3/18; reissued 5/28</p>	<p>Opened a proceeding to discuss actions commission might take in light of voluntary moratoriums; on April 27, the Public Utilities Division recommended that the commission take no action.</p>	<p>Vermont H 681: temporary prohibition on disconnecting customers from water or sewer services for length of emergency. Enacted 3/30.</p>
<p>Virginia</p>	<p>Order: Prohibits disconnects until August 31 Issued 3/16</p>	<p>Order: suspends all provisions of tariffs on file that prevent or condition the disconnection of service by such utility. Issued 3/16</p> <p>PUR-2020-00074: Authorizes creation of regulatory asset for accounting purposes. Issued 4/29.</p>	<p>Filing: AAG C. Meade Browder Jr. petitioned the SCC for an emergency order to suspend disconnects and late charges. Filed 3/13</p>
<p>Washington</p> <p>West Virginia</p>	<p>Voluntary coordination with utilities</p> <p>Voluntary at request of PSC; will begin process of disconnects on 7/1</p>	<p>Order: approved a rate increase for Avista Corporation electric and natural gas customers, but fast-tracked a number of customer refunds to hold rates down this year. Average customer monthly bill could increase by \$1.56, less than half the amount authorized. Authorized additional 7% increase for bill assistance program. Issued 3/25</p> <p>Order No. 262: All ALJ decision due dates not subject to statutory deadline are extended by two months Issued 3/17</p>	<p>Proclamation 20-23 1: Calls on utilities to suspend all disconnects, waive late fees, and expand bill assistance programs. Suspends restrictions on rate-making authority of WUTC to enable use of ratepayer dollars to provide assistance to customers. Issued 3/24; extended to 5/31; extended to 7/28</p>
<p>Wisconsin</p>	<p>Order: directs utilities to cease residential disconnects for length of emergency and make reasonable efforts at reconnects. Released 3/13; extended through 9/1</p>	<p>Announced: appropriate to include in the deferral authorization, incremental increase in bad debt or uncollectible expenses related to COVID above what is in authorized rates; (2.) premature to include declining sales revenue as a component of foregone revenue; (3.) until further notice, total deferral amounts should be reported monthly by IOUs; (4.) necessary to authorize specific carrying cost rates for IOUs to accrue at the authorized cost of short-term debt and at the municipal benchmark rate of 4.9% for municipal utilities. A written order will be served at a later date. Announced 4/16</p>	
<p>Wyoming</p> <p>Ontario</p>	<p>Authorizes utilities to voluntarily suspend disconnects Issued 3/26</p> <p>Authorized</p>	<p>Authorizes the suspension of certain tariffs, rules, regulations, and similar terms of service. Order acknowledges utilities have voluntarily instituted temporary moratoriums on service disconnections and allows utilities to seek an accounting order to defer any related costs and lost revenues. Issued 3/26</p>	<p>Emergency accounting order establishing COVID cost account Issued 3/25</p>