



NARUC

National Association of Regulatory Utility Commissioners

April 20, 2020

The Honorable Mitch McConnell
Majority Leader
United States Senate
Washington, DC 20510

The Honorable Nancy Pelosi
Speaker
U.S. House of Representatives
Washington, DC 20515

The Honorable Charles E. Schumer
Minority Leader
United States Senate
Washington, DC 20510

The Honorable Kevin McCarthy
Minority Leader
U.S. House of Representatives
Washington, DC 20515

RE: Federally Mandated Debt Collection Requirements and Service Disconnection Moratorium

Dear Leader McConnell, Speaker Pelosi, Leader Schumer, and Leader McCarthy:

On behalf of the members of the National Association of Regulatory Utility Commissioners (NARUC), I write to express our deep concerns with recent congressional proposals to impose federally mandated debt collection requirements and a service disconnection moratorium on utilities regulated by state public service commissions.

NARUC is a non-profit organization dedicated to representing the state public service commissions who regulate utilities that provide essential energy, telecommunications, power, water, and transportation services. NARUC's members include all 50 states, the District of Columbia, and the U.S. territories. Under state law, NARUC's members are obligated to regulate and ensure the establishment and maintenance of retail utility services and to ensure that these services are provided at rates and conditions that are fair, reasonable, and nondiscriminatory for all consumers.

While the congressional desire to assist customers by curtailing utility collection and disconnection actions during the health and economic crisis brought about by COVID-19 is laudable, we strongly urge that you not impose prescriptive federal mandates on state regulated utilities. Be aware that state utility commissions and/or the entities they regulate have already established termination moratoria and collection policies for their electricity and natural gas ratepayers in all 50 states in response to this emergency. For Congress to engage now seems akin to coming to the table to address a problem after it has already been handled and resolved.

We believe that a federal "one-size-fits-all" approach will severely restrict or eliminate the ability of state commissions and utilities to work with customers on acceptable payment plans. In effect, any proposals that dictate how and whether utilities



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contact and work with customers to make payment arrangements will complicate state efforts to help guide customers through this crisis and its aftermath into the future.

State public service commissions already play a substantial role in interactions between utilities and their customers by regulating retail utility services, including issues around billing, customer payment plans, and service disconnection policies. Thus, state commissions are simply in the best position to understand how the coronavirus pandemic is impacting customers in their states and to promote good working relationships between utilities and customers as they navigate different stages of recovery from the pandemic at time schedules unique to each state.

We urge Congress to reject proposals that would preempt or intrude upon the jurisdiction of state public service commissions to continue regulating utility retail service issues in the best interests of their own state's utility customers.

Sincerely,

Brandon Presley
President
NARUC