

June 5, 2020

**VIA ELECTRONIC FILING**

Honorable Mark C. Christie  
Chairman  
State Corporation Commission  
1300 E. Main Street  
Richmond, VA 23219

**Re:** *Commonwealth of Virginia, ex rel. State Corporation Commission,  
Ex Parte: Temporary Suspension of Tariff Requirements*  
**Case No. PUR-2020-00048**

Dear Commissioner Christie:

We greatly appreciate the State Corporation Commission’s continued efforts to protect Virginia consumers during the economic crisis caused by the Coronavirus pandemic (“COVID-19”). Please accept this informatory letter in response to issues and questions raised in the Commission’s May 26 Order in the referenced docket.

In its Order, the Commission asserted that the current moratorium on utility service disconnections for nonpayment “is not sustainable” and could result in costs being “unfairly shifted to other customers.” The Order also suggested that this moratorium could have “negative impacts on small, less-capitalized utilities and member-owned electric cooperatives,” which “could impact vital services to all customers of such utilities.”

The Commission requested comment regarding whether the current moratorium should be continued, and if so, for how long. The Commission also asked commenters to identify “the programs and mechanisms, public or private, that will provide sufficient funding to ensure that the costs of unpaid utility bills are defrayed and will not result in even higher costs on other utility customers.”

Given the unprecedented nature and breadth of this crisis, it is our considered opinion that the above issues raised by the Commission will require legislative action. We are currently evaluating novel legislative options that could mitigate the financial hardship faced by our constituents as well as those of Virginia’s public service companies, recognizing as the Commission notes, the significant variance between the types of utilities serving Virginian customers. Our consideration of potential legislative options is hindered, however, by insufficient data on the extent of the problem. To allow us to better evaluate potential policy options, we request that the Commission obtain, or compel the production of, the following information from all regulated public utilities on a weekly basis:

- The number of residential and non-residential customer accounts of each utility currently in arrearage, as compared to historical averages;

- The number of residential and non-residential accounts disconnected in the current year and not reconnected;
- The total current arrearage balance of each utility, as compared to historical averages;
- Information regarding each utility’s revenue and earnings history;
- Information regarding each utility’s financial strength and debt service reserves;
- The magnitude of late fees and penalties that would have been charged absent the moratorium; and
- Any other data the Commission may deem relevant.

We ask that the Commission publish and/or provide this information to the Governor and members of the General Assembly as soon as possible.

This additional information will allow the General Assembly to more fully consider and propose legislation, potentially in an emergency legislative session to address the COVID-19 crisis. In the interim, we consider it advisable that the Commission keep the current moratorium on disconnections in place through August 31, 2020.

Thank you for your service to the Commonwealth during this difficult time.

Sincerely,

Senator Jennifer McClellan  
Senate District 9

Delegate Jay Jones  
House District 89

Delegate Lee Ware  
House District 65

Delegate Dawn Adams  
House District 68

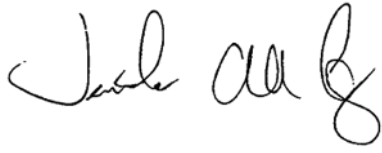
Delegate Lashrecse Aird  
House District 63

Delegate Alex Askew  
House District 85

Delegate Terry Austin  
House District 19

Delegate Hala Ayala  
House District 51

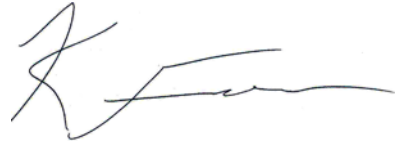
Delegate Jeffrey Bourne  
House District 71



Delegate Jennifer Carroll Foy  
House District 2



Delegate Joshua Cole  
House District 28



Delegate Kelly Convirs-Fowler  
House District 21



Delegate Carrie Coyner  
House District 62



Delegate Wendy Gooditis  
House District 10



Delegate Nancy Guy  
House District 83



Delegate Elizabeth Guzman  
House District 31



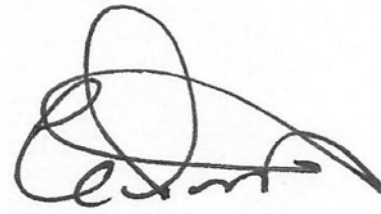
Delegate Dan Helmer  
House District 40



Delegate Patrick Hope  
House District 47



Delegate Chris Hurst  
House District 12



Delegate Clinton Jenkins  
House District 76



Delegate Mark Keam  
House District 35



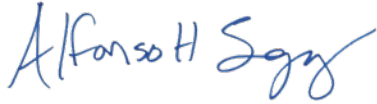
Delegate Kaye Kory  
House District 38



Delegate Paul Krizek  
House District 44



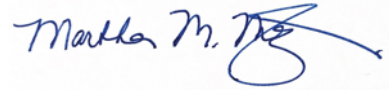
Delegate Mark Levine  
House District 45



Delegate Alfonso Lopez  
House District 49



Delegate Delores McQuinn  
House District 70



Delegate Martha Mugler  
House District 91



Delegate Mike Mullin  
House District 93



Delegate Ken Plum  
House District 36



Delegate Sam Rasoul  
House District 11



Delegate David Reid  
House District 32



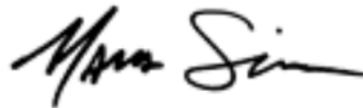
Delegate Danica Roem  
House District 13



Delegate Ibraheem Samirah  
House District 86



Delegate Mark Sickles  
House District 43



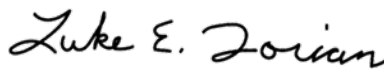
Delegate Marcus Simon  
House District 53



Delegate Shelly Simonds  
House District 94



Delegate Suhas Subramanyam  
House District 87



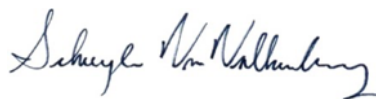
Delegate Luke Torian  
House District 52



Delegate Kathy Tran  
House District 42



Delegate Roslyn Tyler  
House District 75



Delegate Schuyler VanValkenburg  
House District 72



Delegate Vivian Watts  
House District 39



Delegate Michael Weibert  
House District 18



Delegate Rodney Willett  
House District 73



Delegate Tony Wilt  
House District 26



Senator John Bell  
Senate District 13



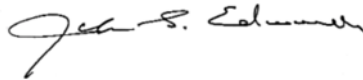
Senator Jennifer Boysko  
Senate District 33



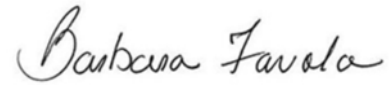
Senator Creigh Deeds  
Senate District 25



Senator Adam Ebbin  
Senate District 30



Senator John Edwards  
Senate District 21



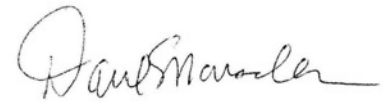
Senator Barbara Favola  
Senate District 31



Senator Ghazla Hashmi  
Senate District 10



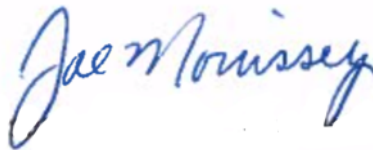
Senator Louise Lucas  
Senate District 18



Senator Dave Marsden  
Senate District 37



Senator Monty Mason  
Senate District 1



Senator Joseph Morrissey  
Senate District 16



Senator Chap Petersen  
Senate District 34



Senator Lionell Spruill  
Senate District 5