



**Testimony in Opposition to LD 1949  
An Act Regarding Energy Fairness  
May 13, 2025**

Senator Lawrence, Representative Sachs, and members of the committee, my name is James Cote and I am here on behalf of Versant Power to provide testimony in respectful opposition to LD 1949.

First, though we unfortunately cannot support this legislation overall, we would like to extend our appreciation to Senator Carney for engaging with us in meaningful conversation about the bill and the goals she is seeking to accomplish. Versant Power shares her commitment to ensuring that all Maine people can access affordable electricity, that customers receive significant value for their rate dollars, and to transparency to better inform complex policy debates. We have attempted to identify areas of the bill that would benefit from additional consideration in this or a future legislative session.

**Sec. A-1: Disconnection of Service**

Several provisions of this legislation deal with requirements around the disconnection of residential customers for non-payment of utility bills. This is a challenging topic in which numerous valid considerations must be carefully balanced including the protection of vulnerable customers and the rights of ratepayers (many of who are also struggling financially) who may be required to absorb the costs of unpaid bills.

Versant Power welcomes a debate on these issues and the opportunity to create better alignment among Maine's policymakers, regulators, utilities, and customers (among others) regarding residential disconnections, including on questions of who should be protected from disconnection and when, how utilities should communicate with customers regarding non-payment and potential disconnection, and how unpaid amounts should be fairly recovered from other customers (or other funding sources).

Currently, a utility in Maine is prohibited from disconnecting a residential customer for non-payment between November 15 and April 15 of every year (the "Winter Disconnection Moratorium"). Due to recently passed legislation, utilities are also prohibited from disconnection for non-payment during defined periods of extreme heat, a provision Versant Power supported. Additionally, a medical waiver program currently exists to protect customers with documented medical needs.

We understand the intent of the sponsor to expand the universe of customers who would be protected from disconnection for non-payment of utility bills, but also have significant concerns with certain provisions of LD 1949 and believe some proposals raise the possibility of serious unintended consequences. Specifically:



1. The magnitude of such new limitations on disconnections, especially related to customer age, is largely unknown and, thus, could significantly increase the amount of bad debt (which, presumably, would ultimately be recovered from other ratepayers as the bill does not identify another revenue source for such costs).

For example, utilities currently have no visibility into the ages of our customers or their household members, however, the number of our customers with a person aged 65 or older or not yet 12-months is likely to include a significant percentage of all customer households given the overall demographics of the state. As a result, it would be very difficult for the utilities to estimate the potential cost impact of this proposal to other ratepayers.

The bill extends this treatment to certain classes of customers who are also receiving assistance (though the specific assistance programs that would qualify are undefined) and, thereby appears to link such protections to a demonstrated financial need, something Versant believes is appropriate. However, the bill would also allow a customer to qualify for this treatment if they have “begun the process to enroll in any assistance program, or has attempted to access any assistance program and been denied, and attests to the utility that they or a member of the household” meet certain criteria. Such a provision would potentially include a much larger group of customers, including those who have been denied participation in an assistance program, e.g. due to income eligibility.

It is important that the committee evaluate the consequences of this proposed expansion (and the corresponding anticipated increase in bad debt) as such costs are very likely to ultimately be recovered by paying customers, including from those who themselves are financially challenged.

2. The approach taken in this section would require customers to provide very sensitive information to utilities and for utilities to serve an eligibility verification role that is a major departure from current practice, and which raises significant concerns.

Today, customers who are income-eligible to receive bill assistance (e.g. through LIAP) verify their eligibility with one of Maine’s CAP agencies. Soon, eligibility will also be determined automatically in coordination with Maine DHHS. In none of these cases is a customer currently required to provide sensitive financial information – including a demonstration of financial need – directly to a utility, something we believe is appropriate.

The current process also does not require utilities and their customers to pay to construct the sophisticated systems and processes necessary to safely store this information and protect it from unauthorized disclosure.

3. Several of the provisions in this section are already governed by existing MPUC rules.



For example, the current medical waiver program prohibits disconnection of a customer whose medical provider has certified that the customer has a medical need for electricity (e.g. to operate medical equipment or store medication). This protection lasts for three months and may be renewed twice per year.

The proposed expansion in Sec. A-1 (B)-1(c), and the corresponding Sec. A-1 (E) would extend this timeline to an annual certification and cover a full year, something that may be reasonable for some customers (e.g. with chronic conditions) and unreasonable for others (e.g. those with a single short-term need).

Simultaneously, the same provision would require that, in order to be eligible for protection from disconnection for non-payment, a customer with a medical need would also need to satisfy the test in (B)-1 regarding application or participation in an assistance program. This might limit those customers eligible for coverage as compared to the status quo MPUC guidelines.

We believe the current medical waiver program appropriately protects the health and safety of those with documented medical needs.

4. Part D of this section would require a utility to “issue monthly notices to customers who have unpaid amounts for utility service during any period in which the utility is prohibited from disconnecting the customer’s utility service in accordance with” the new requirements of this bill.

Versant Power bills our customers monthly (as required by rule) and includes on these bills both current and past-due amounts.

We also communicate with our customers regularly across various media regarding financial assistance opportunities (e.g. LIAP, ARP, payment arrangements, Versant’s Power Match Program, etc.) that may be available for those struggling to pay their bills.

### **Sec. B-1 and B-2: Rate Recovery**

The regulatory construct currently in place in Maine, and in many jurisdictions across the country, generally allows utilities to recover in rates certain prudently incurred costs that have been approved by their regulator.

Central to this construct is the lengthy and transparent rate case adjudication process, which offers opportunities for all stakeholders, including but not limited to the Office of the Public Advocate, individual customers and their representatives, commercial and industrial interests, the Governor’s



Energy Office, environmental and energy advocacy organizations, and others, to review and challenge the requests utilities make and the justifications underlying those requests.

Like other businesses, an investor-owned utility incurs costs for various common business reasons, including for its board of directors (which, for Versant, includes several independent Maine directors) and for investor relations (e.g. related to raising the capital that may be necessary to invest in approved infrastructure projects). Significant additional investment in our electric grid will be required for Maine to meet its energy goals and, for that, investment capital will be necessary.

Unlike other businesses, a utility also incurs costs specific to the rate case structure, as required by statute and regulation.

When seeking a rate change, the onus is appropriately on a utility to explain and justify its proposal. As part of this process, which includes numerous opportunities for public input, feedback, discussion and challenge over a more than year-long timeframe, utilities may be required to bring forward certain evidence to support their request – e.g. marginal cost of service studies, ROE comparisons, compensation studies, etc. This evidence is often challenged by various participants and stakeholders, some of whom regularly introduce alternative evidence and expertise to bolster their positions.

Versant believes this system allows any interested party the ability and information necessary to review or dispute any part of a utility rate change application. The Office of the Public Advocate is almost always deeply involved in any significant rate request proceeding, and frequently brings important information to the table in support of its positions.

To date, we are unaware of the OPA expressing a need for additional funding or resources to participate in future rate cases on behalf of the customers that office represents. If such a request were to be made, Versant would have no issue with it as we believe the OPA provides valuable advocacy on behalf of ratepayers, an important perspective for the MPUC to consider as it adjudicates the various issues and interests at play.

However, artificially pegging the expenses a utility can recover in certain proceedings to those of the OPA is incompatible with the very different roles a utility and OPA appropriately play in a rate change proceeding. A utility, for example, is required to make a case that includes a large amount of written testimony, accounting detail, service quality information, etc., in addition to the specialized studies mentioned above. The OPA, for example, may produce evidence on any topic, but is not required to do so.

Versant Power believes it is imperative that prudently incurred rate case costs be recoverable in rates. The provisions in this bill prohibiting such recovery would ultimately deny utilities their ability to satisfy



existing regulatory and statutory obligations to provide sufficient information and evidence to support a rate request.

Regarding Sec. B-2 (2) C, we note that the legislature very recently passed a law limiting the recovery of certain lobbying and advocacy costs in rates – a practice that was previously prohibited by rule. Any political or advocacy work is currently tracked and paid for by entirely shareholders and not ratepayers.

The new requirement of LD 1949, which would prohibit the recovery of *any* employee compensation if *any* of that employee's time was spent on lobbying, would inappropriately limit utility participation in important policy debates, especially as utilities are often asked to facilitate state programs (e.g. PPAs, Net Energy Billing, etc.) and/or act on behalf of our ratepayers' interests (e.g. in state procurements for energy resources).

Utility employees have sometimes unique subject matter expertise (e.g. regarding system engineering or operations) that can be valuable to policymakers or other state entities as they consider changes to law or rules to meet Maine's needs. This provision could well limit the information brought to bear in important debates which could be detrimental to arriving at the best policy outcomes.

Additionally, it is important to note that many of the costs identified in this section are already paid by shareholder, not ratepayer, including:

- Political contributions and lobbying;
- Fines or penalties;
- Contributions to trade associations, chambers of commerce, or public charities;
- Investor relations costs, and;
- All media expenditures unless otherwise approved by the Public Utilities Commission.

### **Sec. C-1: Customer Hardship Reporting**

Versant Power agrees with the intention of this section, which, as we understand it, seeks to introduce additional publicly available information and data regarding utility customer disconnections for non-payment. We believe relevant data could better inform future policy debates concerning this complex and difficult topic. Below we detail the disconnection-related data public utilities already provide and offer some considerations concerning the feasibility of providing additional data as contemplated by LD 1949.

Versant Power currently provides annual reporting to the Commission on several credit-related topics from the prior year. Included in this report, among additional information, are data concerning:

- The number of residential accounts with overdue amounts (by month)



- The average dollar amount of residential overdue amounts (by month)
- The number of disconnection notices issued (by month) for residential and non-residential customers
- The number of actual disconnections each month for any reason other than at the customer's request for residential and non-residential customers
- The number of reconnections each month following disconnection for nonpayment and other reasons (not including requests for service by new customers) for residential and non-residential customers
- The total number of payment arrangements negotiated by type, for residential and non-residential customers

The requirements enumerated in Sec. C-1 (1-B) sections A through E not specifically reported in the manner proposed. Versant Power is not opposed to such additional reporting, but would request further clarification of any new requirements and consideration of the reporting timeframe in order to minimize unnecessary administrative costs.

Specifically, we would request clarification on subsection "D," which requires data regarding "the number of customers in debt to the utility disaggregated by at least 3 periods of time spent in debt." We are unsure exactly which data this language seeks and believe that more clarity is needed.

Regarding timing, we believe the current annual process for reporting similar data provides relevant information in a timely manner while avoiding unnecessary administrative costs for utilities and their customers.

Additionally, Versant recognizes the value of locationally specific data and is not opposed to reporting certain data by customer account zip code. However, Versant Power, like other utilities, is not in possession of many of the other criteria included in the definition of "Environmental justice population" in Sec. D-5 (103-B)-1 B, including individual customer information regarding household income, race or ethnicity, or language proficiency. We also note that the proposed reporting standard in this section is divided by census block, rather than zip code.

Should the Committee choose to move forward with these proposals, we would suggest that utility data provided at a zip code level could allow policymakers, regulators, stakeholders and the public to leverage this information and perform additional analysis, including potentially overlaying the demographic factors listed in Sec. D-5 (103-B)-1 B should such information be available from external sources.

Should the committee decide to pursue this requirement, Versant Power believes that it would be beneficial to direct the Public Utilities Commission to open a proceeding to determine how this process would work. Versant Power would be glad to participate in such a proceeding.



## **Sec. C-2: Administrative Charges**

Versant Power believes this section is largely duplicative of existing processes and regulatory requirements and is concerned it would raise administrative costs and burdens for utilities and their customers without providing commensurate benefit.

Most of what is included in the definition of an “administrative charge” in this section is already captured in Versant Power’s overhead charges and include labor, materials, and outside services.

Overhead charges are currently calculated at the time that estimates are generated and are based on the most current overhead rates. For some projects, this is calculated within our GIS estimating system. For other projects, primarily for distributed generation, Versant Power manually calculates the overhead. These charges are typically collected when the customer pays their invoice.

As written, this section would clearly apply to the interconnection of distributed energy resources. We are concerned that it could also be read to apply to a far broader range of work including line extension and service upgrade projects – essentially *any* job that requires a utility to send a bill to a customer.

Currently, in the event there is a dispute around such charges for a DER interconnection, a clear process is in place to adjudicate a fair outcome as governed by the MPUC’s Chapter 324 rules. Line extensions have a similar Chapter 395 dispute process, and a separate process exists enabling the MPUC to investigate and establish rates for our services.

Additionally, these charges can also currently be litigated during normal rate case proceedings.

Should these proposed provisions be adopted, Versant believes it would likely be necessary to establish a new tracking mechanism to capture the overhead charges for each project under this section, something that would require additional ratepayer investment. Additional cost would be required by the mandatory regular proceedings contemplated in subsection 3, which we believe are unnecessary and duplicative of the processes currently in place.

## **Sec. C-5: Public Policy Charges**

Versant Power understands the intent of this section to be to provide customers with additional information on their bills regarding the components of a Public Policy Charge.

Versant recognizes the values that many public policy programs deliver to customers and Maine residents and agrees that transparency is valuable for customers, especially regarding the non-utility



costs for which utilities are required to bill customers, e.g. energy supply, conservation, and public policy driven initiatives.

To that end, the following language already appears prominently on customers' Versant Power bills regarding Stranded Costs and the Public Policy Charge, each of which is broken out separately:

*Stranded Cost*

*These include all remaining costs from electric industry restructuring, including power purchase agreements, Maine Yankee, and other costs.*

*Public Policy Charge*

*This recovers costs of programs required by state policy, including the net energy billing program, low income assistance programs, and more recent long-term power purchase agreements.*

The proposed language of LD 1949 would require utilities to "include an accurate and comprehensive description of the costs and benefits of the components of public policy charges if such charges are included on a customer's bill, including, but not limited to, energy efficiency programs, renewable energy programs and low-income energy assistance programs."

First, Versant believes our bills currently include an accurate and comprehensive (subject to the limitations of the information that can reasonably be included on a customer bill) description of the Public Policy Charge (see above). Given a customer's bill seeks to collect amounts owed for services provided, it is appropriate for this description to inform customers about the costs of various services and programs for which their rate dollars are paying. Such costs are factually established in regular MPUC proceedings, some of which also govern the method by which overall costs shall be allocated to various customers (e.g. by customer class). As a result, each line of the bill, including the Stranded Cost and the Public Policy Charge, reflects a specific (and frequently updated) ratemaking exercise.

We would also note that, while the bill specifically identifies "energy efficiency programs" as one of the applicable components, Versant Power currently collects these costs on a separate "Conservation" line item on our bills, the description for which reads:

*Conservation*

*Efficiency Maine Trust was created by the Legislature to deliver energy efficiency programs and services. It is funded in part by Conservation, a fee on electricity usage.*

On the other hand, while they are important, the benefits of various programs are much less clearly defined and few processes exist currently that would provide the utility with a definitive value associated with each one. While there is a current ongoing MPUC proceeding relevant to the NEB





program, it is been intensely litigated over the course of many months and its outcome remains unclear at this point.

Versant Power does not believe that it is currently within our capacity to provide each customer with an accurate and comprehensive description of the benefits of each component of the Public Policy Charge, as the utility does not have visibility into such information nor are processes currently in place to reliably provide the utility with the necessary information to do so.

Versant's billing system is not currently configured to make the changes that would be necessary to produce individual values for individual customers for each separate component of the charge, presumably on a regularly updated basis.

While it may be more feasible to further break out the individual cost components of the Public Policy Charge, (as these values are known), the system reconfiguration necessary to implement such a change would impose a significant cost on ratepayers and would likely take years to implement.

### **Conclusion**

Versant Power appreciates the opportunity to work with the sponsor, Committee, and other stakeholders on this proposal. While we understand the intentions behind many of the provisions of LD 1949, we have serious concerns and reservations about the unintended consequences associated with moving this bill forward without significantly more consideration and evaluation.

Thank you for your consideration and we would be pleased to answer questions or provide more information for the work session.



Bill Date: February 18, 2025  
Account #: 0XXXXXXXXX  
Invoice #: XXXXXXXX  
Read Cycle: 13  
JILL E CUSTOMER  
XXXXXXXXXX  
ORRINGTON

## Billing Summary

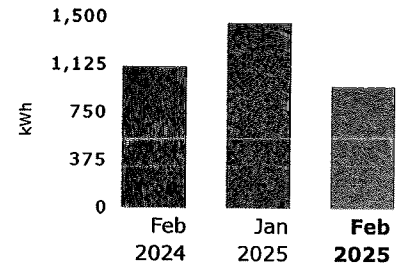
Service Period: Jan 15, 2025 - Feb 13, 2025

Previous Balance	\$350.20
Payment Made	\$0.00
<b>Remaining Balance</b>	<b>\$350.20</b>
New Charges (see page 2)	\$250.26
<b>Total Current Charges</b>	<b>\$250.26</b>

**Total Amount Due By Mar 17, 2025 \$600.46**

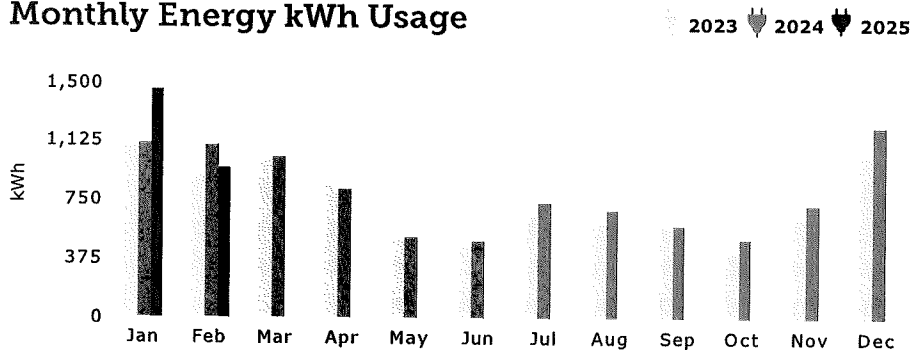
## Your Energy Insight

This month your usage decreased 13% compared to the same time as last year.



Total Monthly kWh	1,101	1,459	954
Avg Daily kWh	38	47	33
Avg Daily Cost	\$9.75	\$11.30	\$8.63
Service Days	29	31	29

## Monthly Energy kWh Usage



## Eco-friendly Solutions

Cost savings are available for customers like you, using eco-friendly solutions for your home and business. Go to <https://versantpower.com> and enter "Eco Rates" in the search bar for more information.

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## Additional Ways To Pay

<b>By Phone</b> Call (207) 973-2000 for payment by debit or credit card.	<b>Online</b> Pay by credit/debit or set up autopay online; <a href="https://versantpower.com/my-account">versantpower.com/my-account</a>
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There may be a fee for certain transactions.

Make check payable to: Versant Power  
Do not mail cash

JILL E CUSTOMER  
XXXXXXXXXX  
ORRINGTON ME 04474

Account #: XXXXXXXXXXXXXXXX  
-9 Payment Due By: Mar 17, 2025

**Total Due: \$600.46**

**You are on Automated Payments  
and do not need to mail a payment.**

VERSANT POWER  
PO BOX 16044  
LEWISTON ME 04243-9527



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## New Charges

### Bangor Hydro District (Rate A-20 Home Heating Eco)



#### Versant Delivery

	kWh	Price	
Distribution	700	\$0.09532	\$66.72
Distribution	254	\$0.04116	\$10.45
Transmission	954	\$0.05646	\$53.86
Stranded Costs	954	-\$0.00172	-\$1.64
Public Policy Charge		\$11.64	\$11.64
Conservation	954	\$0.00641	\$6.12
<b>Taxes and Fees</b>			
Maine State Sales Tax			\$1.15

**Versant Delivery Subtotal** **\$148.30**

### Standard Offer Service



#### Supply Service

	kWh	Price	
Electricity Supply	954	\$0.105628	\$100.77
<b>Taxes and Fees</b>			
Maine State Sales Tax			\$1.19

**Supplier Subtotal** **\$101.96**

**Versant Delivery + Supplier Charges =** **\$250.26**

## Meter Read

Meter#: XXXXXXXXX

Service Period: Jan 15, 2025 - Feb 13, 2025

Current Reading		Previous Reading
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10206	-	9252
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Total kWh: 29 Day(s)

954

## Supplier Message

### Standard Offer

Your electricity price for Standard Offer service for the period of January 1, 2025 through December 31, 2025 is \$0.105628 per kWh.

### About Your Energy Supply

You're on Standard Offer. Did you know you can choose your Energy Supplier? Versant Power does not supply energy, but provides billing & payment services on behalf of your electricity supplier.

## Billing Terminology

For further definitions on your energy bill terms, please visit us online at:  
[www.versantpower.com/residential/my-bill/understanding-your-bill/](http://www.versantpower.com/residential/my-bill/understanding-your-bill/)

### kWh (kilowatt hour)

The amount of electricity you use is measured in kilowatt hours (kWh) by a meter. For example, a 100-watt light bulb used for 10 hours will consume 1,000 Watt hours, or one kWh.

### Estimated Bill

If we are unable to obtain a scheduled meter reading, your bill will be estimated based on the amount of kWh consumed based on past usage.

### Sales Tax Exceptions

Maine state sales tax does not apply for the first 750 kilowatt hours (kWh) of residential usage.

### Late Payment

The amount not paid by the Due Date on the bill will be subject to a late payment fee of 0.949% on the unpaid balance.

### Payment Arrangement

If you have trouble paying your bill, a payment arrangement may help. Please call customer service for more information.

### Delivery Rates

Maine's rates are approved by the Maine Public Utilities Commission. Copies of our rate schedules are available online at [www.versantpower.com](http://www.versantpower.com)

### Distribution

This recovers the costs of the local system – including poles, wires, and substations – used for delivery of power from the bulk grid system to your home or business.

### Transmission

This recovers the costs of the high-voltage system that transports bulk power.

### Stranded Costs

These include all remaining costs from electric industry restructuring, including power purchase agreements, Maine Yankee, and other costs.

### Public Policy Charge

This recovers costs of programs required by state policy, including the net energy billing program, low income assistance programs, and more recent long-term power purchase agreements.

### Conservation

Efficiency Maine Trust was created by the Legislature to deliver energy efficiency programs and services. It is funded in part by Conservation, a fee on electricity use.

## Your Supply Service

Your electricity is provided by suppliers licensed by the Maine Public Utilities Commission for electric energy and capacity. Customers can choose their supplier. For information on available electricity suppliers, selecting a supplier, or current rates, visit [www.maine.gov/meopa](http://www.maine.gov/meopa)

The Maine Public Utilities Commission administers competitive billing for Standard Offer Electricity Supply. Learn more by visiting [www.maine.gov/meopa](http://www.maine.gov/meopa)

### Standard Offer electricity supply is provided as follows:

#### Small Class

Constellation Energy Commodities Group Maine LLC 75%  
New Brunswick Energy Marketing Corporation 25%

#### Medium Class

NextEra Energy Marketing LLC 100%

#### Large Class

Maine Power LLC 100%

## Contact Information

**Account #: 0000000010501138-9**

Have questions? Need to report an outage?  
Change of address? Our contact center is  
open from Mon - Fri: 7:30 am - 5:00 pm.



#### Phone

**Local:** (207)-973-2000

**Toll Free:** 1-(855)-363-7211

**Dig Safe:** 8-1-1



#### Online

[www.versantpower.com/  
contact-us](http://www.versantpower.com/contact-us)

Or [info@versantpower.com](mailto:info@versantpower.com)



#### Mail

PO Box 932

Bangor, ME 04402-0932

## Consumer Assistance

### Need to Appeal?

The CASD investigates complaints, determines corrective action, educates the public and ensures utilities remain in compliance with State statutes and Commission rules.

Maine Public Utilities Commission, Consumer Assistance & Safety Division (CASD):

1-800-452-4699.

Or visit [www.maine.gov/mpuc](http://www.maine.gov/mpuc)

### Need Help Understanding your Bill?

Visit us online:

[www.versantpower.com/residential/  
my-bill/understanding-your-bill/](http://www.versantpower.com/residential/my-bill/understanding-your-bill/)

Maine Public Utilities Commission  
Consumer Assistance Division

**2024 ANNUAL REPORT OF  
CREDIT AND COLLECTION ACTIVITIES  
(for Electric and Natural Gas Utilities)**

**Versant Power**  
**PO Box 932**  
**Bangor, ME 04402-0932**

Reporting Requirements. Chapter 815, *Consumer Protection Standards for Electric and Gas Transmission and Distribution Utilities*, Section 15 requires every utility to submit credit and collection information annually to the Maine Public Utilities Commission. The information provided will be used to track and evaluate the effectiveness of residential and non-residential credit and collection programs.

Please submit your completed form electronically by **Tuesday, February 18, 2025** to the PUC's online Case Management System. (As 2-15-25 is a Saturday and Monday, 2-17-25 is a holiday.)

Prepared by: Kathy Largay Telephone: 207-973-2691

E-mail: kathy.largay@versantpower.com

All responses below combine Versant Power's Bangor Hydro and Maine Public Service Districts.

1. Please enter the annual average number of:

Residential accounts: 137,906

Non-residential accounts: 28,361

Note: To obtain the annual average, add the month-end totals and divide by 12. If a different method is used, please explain your method.

2. Please indicate your billing period (circle one):

**Monthly**

**Quarterly**

3. Please enter the average residential customer bill per billing period (divide the total residential revenues receivable by the number of bills sent out):

<b>January</b>	\$ 91.40
<b>February</b>	\$ 92.32
<b>March</b>	\$ 84.43
<b>April</b>	\$ 79.46
<b>May</b>	\$ 71.33
<b>June</b>	\$ 61.03
<b>July</b>	\$ 86.06
<b>August</b>	\$ 87.46
<b>September</b>	\$ 76.36
<b>October</b>	\$ 73.98
<b>November</b>	\$ 69.84
<b>December</b>	\$ 89.45
<b>YEARLY AVERAGE</b>	\$ 80.26

*Note: To calculate the yearly average, divide the total residential revenue for the year by the total number of residential bills sent out.*

***Note2: This includes T&D residential revenue only and does not include supply costs.***

4. Please enter the number of residential accounts with overdue amounts for months when bills were issued (an "overdue amount" is the amount you billed customers that was not paid in full by the due date of the bill or by a date otherwise agreed upon):

<b>January</b>	35,428
<b>February</b>	29,947
<b>March</b>	31,201
<b>April</b>	37,129
<b>May</b>	29,918
<b>June</b>	29,208
<b>July</b>	32,158
<b>August</b>	31,553
<b>September</b>	31,369
<b>October</b>	30,962
<b>November</b>	28,505
<b>December</b>	33,514
<b>YEARLY AVERAGE</b>	31,741

5. Please enter the average dollar amount of residential overdue amounts for months when bills were issued:

<b>January</b>	\$ 445.94
<b>February</b>	\$ 540.37
<b>March</b>	\$ 542.69
<b>April</b>	\$ 503.91
<b>May</b>	\$ 498.88
<b>June</b>	\$ 454.58
<b>July</b>	\$ 371.91
<b>August</b>	\$ 392.68
<b>September</b>	\$ 349.84
<b>October</b>	\$ 372.67
<b>November</b>	\$ 363.25
<b>December</b>	\$ 371.82
<b>YEARLY AVERAGE</b>	\$ 434.52

6. Please enter the number of disconnection notices issued:

	<b>Residential</b>	<b>Non-residential</b>
<b>January</b>	11,097	1,435
<b>February</b>	9,075	1,124
<b>March</b>	9,328	1,153
<b>April</b>	5,191	701
<b>May</b>	10,335	1,017
<b>June</b>	8,765	1,241
<b>July</b>	10,110	1,164
<b>August</b>	9,648	1,214
<b>September</b>	10,939	1,341
<b>October</b>	10,244	1,188
<b>November</b>	16,760	2,237
<b>December</b>	15,227	2,346
<b>TOTAL</b>	<b>126,719</b>	<b>16,161</b>

Note: Notices sent to residential customers in the winter period (Nov-Apr) include 61,071 Winter Warning Letters, which are not technically disconnection notices.



7. Please enter the number of actual disconnections each month for any reason other than at the customer's request:

	Residential	Non-residential
January	4	62
February	4	51
March	2	49
April	113	48
May	249	2
June	410	12
July	542	5
August	618	9
September	612	17
October	621	28
November	319	49
December	2	56
<b>TOTAL</b>	<b>3,496</b>	<b>388</b>

8. Please enter the number of reconnections each month following disconnection for nonpayment and other reasons (do not include requests for service by new customers):

	Residential	Non-residential
January	-	32
February	-	34
March	-	44
April	58	25
May	183	5
June	229	11
July	372	4
August	475	4
September	467	7
October	493	19
November	313	29
December	4	36
<b>TOTAL</b>	<b>2,594</b>	<b>250</b>

9. Please enter the total number of payment arrangements negotiated by type:

	Residential	Non-residential
<b>Regular:</b>	4,647	885
<b>Prior Unpaid Debt :</b>	0	0
<b>Deposit :</b>	0	0
<b>Special:</b>	8,730	34
<b>TOTAL</b>	13,377	919

10. Please enter the number of deposits requested and received, and the average dollar amount of the deposits:

	Residential	Non-residential
<b>Deposits requested:</b>	1,165	720
<b>Average amount of deposits requested:</b>	\$ 544.41	\$ 3,634.87
<b>Deposits received:</b>	407	233
<b>Average amount of deposits received:</b>	\$ 296.15	\$ 1,601.26

11. Please enter the number of residential applications for service denied according to Section 6(A)(1) of Chapter 815:

0

12. Please enter the number of residential applications for service for which you demanded a deposit or payment arrangement according to Section 6:

At the time of request for service:

0

After the request for service, but within 60 days:

0

13. Please enter your total annual revenue from:

Residential accounts:

\$132,801,881.53

Non-residential accounts:

\$127,557,312.87

14A. Please enter the amount actually written off this year from:

Residential accounts: \$5,965,348.49

Non-residential accounts: Included in Residential

Please indicate the method used to determine these write-off figures (circle one):

**Actual write-offs**

**Accrual**

14B. Please enter the amount recovered this year from previously written-off amounts:

Residential accounts: \$351,197.79

Non-residential accounts: Included in Residential

Please indicate the method used to determine these write-off figures (circle one):

**Actual write-offs**

**Accrual**

15A. Please enter the number of cases and dollar amount of residential unpaid debt pursued through the court system or means other than disconnection, and the costs of collection by each method:

	Number of Cases	Amount of Unpaid Debt Collected	Cost of Collection
<b>Court System:</b>		\$	\$
<b>Collection Agency:</b>	5,980	\$762,619.44	\$132,515.92
<b>Other means (specify):</b>		\$	\$
<b>TOTAL</b>	<b>5,980</b>	<b>\$762,619.44</b>	<b>\$132,515.92</b>

15B. Please list the accounts included in the above figures where you could have (according to Section 6) but did not transfer the prior debt to a current account:

Customer Name	Account Number	Amount of Debt	Reason Why Not Transferred
		\$0	N/A
		\$0	N/A
		\$0	N/A
		\$0	N/A

16. Please enter the total number of disputes received during the year for:

Residential accounts:

619

Non-residential accounts:

28