

**STATE OF CONNECTICUT
PUBLIC UTILITIES REGULATORY AUTHORITY**

EMERGENCY PETITION OF	:	DOCKET NO. 20-03-XX
WILLIAM TONG,	:	
ATTORNEY GENERAL FOR THE	:	
STATE OF CONNECTICUT,	:	
FOR A PROCEEDING TO ESTABLISH	:	
A STATE OF EMERGENCY UTILITY	:	
SHUT-OFF MORATORIUM	:	MARCH 12, 2020

**EMERGENCY PETITION OF WILLIAM TONG,
ATTORNEY GENERAL FOR THE STATE OF CONNECTICUT,
FOR A PROCEEDING TO ESTABLISH A
STATE OF EMERGENCY UTILITY SHUT-OFF MORATORIUM**

Pursuant to General Statutes § 16-11 and 16-19e, William Tong, Attorney General for the State of Connecticut (“Attorney General”), hereby petitions the Connecticut Public Utilities Regulatory Authority (“PURA” or “Authority”) to establish a proceeding to order electric, natural gas, and water utilities to cease all utility (electricity, natural gas, water) service terminations for non-payment for a thirty day period subject to renewal in response to Connecticut’s public health and civil preparedness emergencies related to the COVID-19 coronavirus. Such a moratorium—the “State of Emergency Utility Shut-off Moratorium”—is essential to protect public health and safety in Connecticut due to the COVID-19 coronavirus.

On March 10, 2020, Connecticut Governor Ned Lamont issued a Declaration of Public Health and Civil Preparedness Emergencies (“Declaration”) in response to the global pandemic of COVID-19 disease associated with the novel coronavirus currently affecting multiple countries and states, including Connecticut and surrounding states. The Declaration provides that the public health and civil preparedness emergencies shall remain in effect until September 9, 2020, unless terminated earlier by the Governor.

Running water and a way to heat that water—through electricity or natural gas—are essential for COVID-19 prevention sanitization. There are many Connecticut families heeding public health and safety warnings by staying at home in quarantine due to COVID-19 infection, potential exposure to COVID-19, or flu-like symptoms. In order to maintain Connecticut’s public health and safety, such families must be able to comfortably stay at home under safe conditions which include running utilities that are essential for hygiene, cleaning, cooking, and climate control.

In addition, many families are staying at home—or may be forced to stay at home—due to work and school closures in response to the pandemic virus. It would be impossible for home schooling in households with no electricity, which raises educational equity issues as students from low-income or otherwise vulnerable families would not have the same at-home learning opportunities without electricity for internet services.

In accord with general ratemaking principles, the utilities should be permitted to recover all prudently incurred uncollectible costs associated with the State of Emergency Utility Shut-off Moratorium.¹ The PURA proceeding could also explore whether there are available state and federal emergency preparedness dollars to fund the State of Emergency Utility Shut-off Moratorium.

The Attorney General recommends that the effectiveness and continued need for the State of Emergency Utility Shut-off Moratorium be subject to PURA review every thirty days to evaluate whether it should continue for another thirty days and whether any

¹ The State of Emergency Utility Shut-off Moratorium would not affect the winter shut-off moratorium which applies to electric and gas hardship customers until May 1, 2020 pursuant to General Statutes § 16-262c(b)(1). Similar to the winter moratorium, the utilities could work out payment plans for those ratepayers who can afford to make some form of payment during the State of Emergency Utility Shut-off Moratorium.

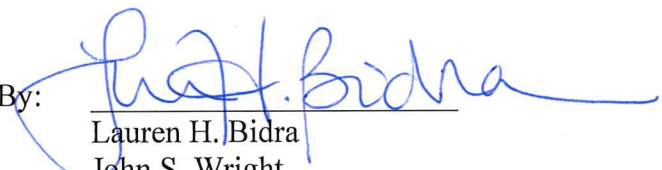
modifications are necessary. During the reviews, the utilities would have the opportunity to apply for the termination of the moratorium for good cause. PURA would retain full authority to cease the State of Emergency Utility Shut-off Moratorium in the event it is no longer necessary. The Attorney General recommends that in the absence of PURA cessation, the State of Emergency Utility Shut-off Moratorium last no longer than the duration of Connecticut's state of emergency.

WHEREFORE, for the reasons stated herein, the Attorney General respectfully requests that the Authority open a proceeding to establish a State of Emergency Utility Shut-off Moratorium. The Attorney General appreciates the Authority's attention to this important matter of public health and safety.

Respectfully submitted,

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