

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On its Own Motion:)	
)	
In the Matter of Moratorium on)	
Disconnection of Utility Services During)	Docket No. 20-0309
the Public Health Emergency Declared on)	
March 9, 2020 pursuant to Sections 4 and 7)	
of the Illinois Emergency Management)	
Agency Act.)	

**UTILITY SERVICES OF ILLINOIS, INC.’S RESPONSE TO
EMERGENCY INTERIM ORDER**

On March 18, 2020, the Illinois Commerce Commission issued an Emergency Interim Order directing all Illinois gas, electric distribution, water, and sewer utilities to cease disconnections for non-payment and to suspend the imposition of late payment fees or penalties until May 1, 2020, or until the Governor announces the end of the COVID-19 state of emergency if the state of emergency continues past May 1, 2020. Emergency Interim Order at 7 (Mar. 18, 2020). The Emergency Interim Order also directs each Illinois gas, electric distribution, water, and sewer utility to file a response to the order identifying: (a) whether it will voluntarily cease disconnections for non-payment, and suspend the imposition of late payment fees or penalties, after the expiration of this Emergency Interim Order, and through and including May 1, 2020 or until the Governor announces the end of the COVID-19 state of emergency; and (b) proposed flexible credit and collections procedures to ensure that customers remain connected to essential utility services when the emergency status ends; or (c) show cause why it is unable to commit to such moratorium or propose such revised credit and collections procedures. *Id.*

Utility Services of Illinois, Inc. (USI) hereby responds to the directives of the Emergency

Interim Order:

1. USI is committed to ensuring the continued reliability and safety of our water and wastewater systems for our customers, as well as the health and safety of our employees. To that end, USI has initiated physical distancing measures, operations contingency and continuity plans, emergency security clearances for access to plants and facilities, cyber security precautions, and regular customer communications to mitigate any disruption to our employees and customers.

2. At this time, USI does not anticipate any disruptions or impact to our services as a result of the public health emergency.

3. USI agrees with the positions expressed by the Commission in its Emergency Interim Order regarding access to essential utility services.

4. Effective March 10, 2020 USI voluntarily initiated a customer disconnection moratorium, and has suspended water and wastewater service disconnections for non-payment and the imposition of late payment fees or penalties until May 1, 2020, or until the Governor of Illinois announces the end of the COVID-19 state of emergency if the state of emergency continues past May 1, 2020. In conjunction with this decision, customers who recently have been disconnected for nonpayment will be reconnected at no charge, at their election, and collection of any outstanding balances and late fees will be suspended during this time.

5. Concurrent with this filing, and pursuant to the Emergency Interim Order, USI is filing water and sewer tariff pages with the Commission Clerk implementing the above disconnection moratorium and the suspension of the imposition of late payment fees or penalties.

6. In its first bill following this filing, USI will notify all customers, including households at risk of disconnection, of the emergency shut-off protections and tariff changes

referenced in Paragraph 5, pursuant to the Emergency Interim Order (p. 5).

7. Further, USI has identified the following temporary flexible credit and collections measures that it will undertake in order to ensure that customers remain connected to essential utility services when the emergency status ends. USI is proposing that these temporary measures remain in place for six months after the emergency status ends.

- USI is working with its Illinois customer service representatives and their managers to ensure that call center personnel work with customers affected by the COVID-19 emergency to (1) identify the unique needs of USI customers affected by the COVID-19 emergency; and (2) develop flexible payment solutions to mitigate the financial burden imposed on those customers by the emergency;
- USI will work with individual customers to develop extended Deferred Payment Arrangement (DPA) timeframes of up to 18 months, pursuant to 83 Ill. Adm. Code 280.120(g)(1).
- USI will work with individual customers to determine if extended payment dates are necessary based on the customer's unique needs resulting from the public health emergency.
- USI is working to identify other procedures that may add flexibility to USI's existing customer protection provisions required by Part 280 of the Commission's Rules, 83 Ill. Adm. Code, Part 280.

8. USI presently does not believe that any of the above measures require revision to its existing tariffs, which are generally subject to the Commission's Part 280 Rules, 83 Ill. Adm. Code, Part 280. Those Rules provide that "[u]tilities that are subject to this Part shall have the ability to expand or supplement the customer rights guaranteed by these provisions as long

as those policies are applied in a nondiscriminatory manner. The ‘nondiscriminatory manner’ requirement shall not be construed or interpreted to require a utility making an accommodation to a customer in a hardship situation to make that same accommodation for all customers facing a similar hardship.” 83 Ill. Adm. Code 280.05.

9. Nevertheless, USI will continue to assess its existing tariffs to ensure that none of the above measures are inconsistent with those existing tariffs. In the event that USI identifies an inconsistency that requires a tariff filing, it will promptly make a proposed tariff filing with the Commission to resolve the inconsistency.

10. USI will work to ensure the continued reliability and safety of our water and wastewater systems for our customers, as well as the health and safety of our employees in accordance with applicable state and federal regulatory requirements.

11. USI will track all expenses resulting from this Emergency Interim Order and any other measures taken in response to the COVID-19 disease to enable meaningful future Commission review of the reasonableness and prudence of such expenses.

DATED: March 27, 2020

Respectfully submitted,

UTILITY SERVICES OF ILLINOIS INC.,

/s/ Albert D. Sturtevant

One of its attorneys

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CERTIFICATE OF SERVICE

I, Albert D. Sturtevant, an attorney, certify that on March 27, 2020, I caused a copy of the foregoing Utility Services of Illinois, Inc.'s *Response to Emergency Order* to be served by electronic mail to the individuals identified below, who appear on the Commission's Service List for Docket 20-0309 as of the date and time of this filing.

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