

STATE OF TENNESSEE

## Office of the Attorney General



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June 19, 2020

### VIA ELECTRONIC FILING

Ryan Freeman, Esq.  
Baker, Donelson, Bearman, Caldwell & Berkowitz, PC  
633 Chestnut Street, Suite 1900  
Chattanooga, TN 37450

**Re: Tennessee Public Utility Commission, Docket No. 20-00047, *Emergency Petition to Suspend Service Disconnections***

Dear Mr. Freeman:

The Consumer Advocate Unit in the Financial Division of the Office of the Tennessee Attorney General (Consumer Advocate) continues to monitor the responses to the Tennessee Public Utility Commission's (TPUC) requests for information by regulated public utilities, including those of Tennessee Water Service, Inc. (Tennessee Water). On June 15, 2020, Tennessee Water submitted a weekly filing.

The Consumer Advocate appreciates the efforts of Tennessee Water has undertaken to prepare "for an expected increase in customers who need to setup deferred payment arrangements" by training its representatives "to ensure they are prepared to help [its] customers setup payment arrangements."<sup>1</sup> Furthermore, Tennessee Water states that it has "prioritized planning the implementation of payment arrangements in accordance with applicable regulator orders and directives."<sup>2</sup>

After review of this recent filing, the Consumer Advocate is requesting additional details on the deferred payment arrangements that will be shared through Tennessee Water's representatives. The information we are seeking is as follows:

1. Define the parameters or options for deferred payment arrangements.

Letter to Tennessee Water Service, Inc.  
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2. Define the minimum and maximum time periods by which Tennessee Water will offer terms under deferred payment arrangements.
3. Define how Tennessee Water will determine a customer's financial ability to pay.
4. Explain how Tennessee Water will ensure that similarly situated customers will be treated the same with deferred payment arrangements.
5. Does Tennessee Water intend to require disconnected customer to pay a deposit in those situations where their prior deposit had been applied to past due balances?

The Consumer Advocate requests that Tennessee Water file a copy of (1) its correspondence with customers with past due balances to offer flexible deferred payment arrangements in order to avoid future disconnections of service, and (2) its proposed informational emails to its residential and small general service customers to raise awareness of payment arrangement options as part of Docket 20-00047.

We appreciate your time and attention to this inquiry. I hope that you remain well.

Sincerely,



**Karen H. Stachowski**  
Assistant Attorney General

cc: TPUC Docket No. 20-00047  
Kelly Cashman Grams, TPUC  
David Foster, TPUC

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<sup>1</sup> Tennessee Water Service, Inc. COVID-19 Response – Update #13 (June 15, 2020).

<sup>2</sup> *Id.*