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July 13, 2020

**VIA ELECTRONIC FILING**

Ms. Ectory R. Lawless, J.D.  
Tennessee Public Utility Commission  
502 Deaderick Street  
Nashville, TN 37243

In Re: Docket No. 20-00047

*Emergency Petition to Suspend Service Filed by The Consumer Advocate Unit of  
the Financial Division of the Office of the Tennessee Attorney General*

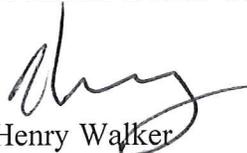
Dear Ms. Lawless:

Attached herewith for filing in the above-referenced docket is the Response of Berry's Chapel Utility Inc. (d.b.a. Harpeth Wastewater) to Staff Data Request.

Sincerely,

BRADLEY ARANT BOULT CUMMINGS LLP

By:

  
Henry Walker

HW/dbi  
Attachment

207335--301001  
4813-1825-9358.1

IN THE TENNESSEE REGULATORY AUTHORITY  
AT NASHVILLE, TENNESSEE

IN RE: )  
 )  
EMERGENCY PETITION TO SUSPEND )  
SERVICE FILED BY THE CONSUMER )  
ADVOCATE UNIT OF THE FINANCIAL ) DOCKET NO. 20-00047  
DIVISION OF THE OFFICE OF THE )  
TENNESSEE ATTORNEY GENERAL )

**RESPONSE OF BERRY'S CHAPEL UTILITY INC. (D.B.A. HARPETH  
WASTEWATER) TO STAFF DATA REQUEST**

1. Should the moratorium on disconnects for nonpayment be lifted? If the moratorium should not be lifted at this time, when should the moratorium be lifted? Please explain your answer.

**RESPONSE: Yes. It should be lifted. The only customers who are behind on their payments are the same customers (approximately six in number) who frequently pay late. No customer has indicated that their delinquency is due to COVID-19.**

2. Did you continue to accrue late charges for delinquent accounts during the moratorium period?

**RESPONSE: The company does not currently have a late charge in its tariffs but is planning on adding a charge effective August 1.**

3. Should late charges accrued during the moratorium period be billed to delinquent customers once the moratorium is lifted?

**RESPONSE: Not applicable at this time.**

4. If late charges accrued during the moratorium period are not collected from delinquent customers, do you plan to seek recovery of such charges from customers through another means? If so, please describe the mechanism you propose to recover late charges accrued during the moratorium period.

**RESPONSE: Not applicable at this time.**

5. For each customer class, please provide the (i) total number, (ii) aggregate amount excluding late charges, (iii) aggregate amount of accrued late charges, and (iv) average days overdue of delinquent accounts for each month beginning January 2020 through the most recent month the information is available at the time of your response.

**RESPONSE: As of July 10, 2020, four customers have overdue bills totaling \$998.90. No late charges have been accrued. The last payments received were in March for two customers, April for one customer and May for one customer.**

6. For each customer class, please provide the aggregate amount of delinquent customer accounts written off to bad debt expense for each month beginning January 2020 through the most recent month the information is available at the time of your response.

**RESPONSE: There have been no write-offs during this period.**

7. In the event the moratorium on customer disconnects for nonpayment is lifted, please describe the process you propose to use to commence disconnection for nonpayment. Notwithstanding current Commission rules and company tariffs, please include in your description the length of customer notice that should be given prior to disconnection of service, as well as availability of customer service representatives to address customer concerns or complaints regarding disconnection or potential disconnection of their service.

**RESPONSE: Prior to termination, the company provides first a warning letter and then a notice of termination letter ten days prior to termination. That policy will continue. A customer service representative is available during normal business hours.**

8. In the event the moratorium is lifted and the customer is unable to promptly pay overdue amounts to bring their account current within a reasonable notice period, please describe the programs, arrangements, or payment plans, if any, that you would propose to permit customers to maintain their service while paying past due balances over a reasonable time. Please state whether you would propose to apply late charges, or assess interest charges, on the unpaid balances of such arrangements provided the customer is keeping their payments current.

**RESPONSE: There are only a small number of customers who are behind on their bills and it is very unlikely that any customer will, faced with the prospect of termination, be unable to pay his bill. If that situation arises, the company will address it on a case-by-case basis and, if appropriate, work out a payment plan with the customer.**