



Integrated Resource Management, Inc.
A Privately Owned Public Utility

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July 15, 2020

Mr. David Foster, Chief
Utilities Division
Tennessee Public Utilities Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

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 Mr. Foster:

Integrated Resource Management, Inc. d/b/a IRM Utility, Inc. ("IRM") respectfully submits the following responses to your questions of June 30, 2020:

Question:

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.

Answer:

It does not matter to IRM.

Question:

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

Answer:

No.

Question:

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

Answer:

No.



Question:

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 other means? If so, please describe the mechanism you propose to recover late charges accrued during the moratorium period.

Answer:

No.

Question with Answers:

5. For each customer class, please provide the,
- (i) Total number, Residential: 9; Commercial: 17
 - (ii) aggregate amount excluding late charges, Residential: \$9,895.97; Commercial \$28,639.12
 - (iii) Aggregate of accrued late charges, Residential: \$494.76; Commercial \$2,715.72
 - (iv) Average day 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.

Question:

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.

Answer:

Residential: January 5, February 4, March 5, April 5, May 7, June 6.
Commercial: January 6, February 8, March 5, April 8, May 5, June 9.

Question:

7. In the event the moratorium on customer disconnects for nonpayment is lifted, please describe the process you propose to use to commence disconnections 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.

Answer:

IRM has never disconnected service on any customers. IRM's code of Ethics (especially health reasons) would never discontinue service or turn off water services. IRM realizes that conditions even prior to COVID-19, that customers may have financial difficulties. IRM does keep a running balance and it is IRM's procedure of making a mutual agreed payment plan with the customer. IRM has found this procedure to be very successful.



*Mr. David Foster
July 15, 2020
Page 3*

Question:

8. In the event the memorandum 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 the customers to maintain their service while paying past due balances over a reasonable time. Please state whether you would propose to apply late charges, on the unpaid balances of such arrangements provided the customer is keeping their payments current.

Answer:

IRM typically considers the amount due in each case. Late charges are typically forgiven if current payments are made responsively. Depending on the amount, IRM will divide the past dues on a payment plan of six (6) to twelve (12) months.

Please call if you have any questions. I hope this is helpful in your data considerations.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Jeffrey W. Cox, Sr.", is written over a light blue horizontal line.

Jeffrey W. Cox, Sr. President

IRM Utility, Inc.

JWCSr/mjc