

July 13, 2020

Secretary Michelle Phillips
New York State Public Service Commission
Empire State Plaza
Agency Building 3
Albany, NY 12223-1350

RE: Case 20-M-0266 - Proceeding on Motion of the Commission Regarding the Effects of COVID-19 on Utility Service

Dear Madam Secretary:

We, the undersigned organizations, urge the Public Service Commission to aggressively implement policies to ensure access to water during the COVID crisis.

At a time when hand-washing and proper hygiene is key to stopping the spread of the virus and preventing its resurgence, all state residents must have clean water in their homes.

In addition to our public health crisis, New York is facing an unprecedented economic crisis, evidenced by rising unemployment rates and mortgage delinquencies.

Water bills were already unaffordable for many New Yorkers, and the COVID-19 pandemic has only exacerbated underlying inequalities. Without state action to protect access to clean water and provide financial relief, many households will become buried in water bill debt, which could produce waves of water shut-offs in the future.

On June 17, Governor Cuomo signed S.8113-A/A.10521, establishing a statewide moratorium on utility shut-offs during the COVID-19 state of emergency. For New Yorkers who have experienced a change in financial circumstance due to the COVID-19 state of emergency, the legislation also bans shut-offs for 180 days after the end of the state of emergency, prohibits late fees and penalties, and guarantees access to extended or deferred repayment plans.

It is imperative that you implement policies that match the enormity and severity of our current crisis. Specifically, we urge you to:

1. Require public and private water utilities to accept a declaration from an individual as proof of "a change in financial circumstances due to the COVID-19 state of emergency."

2. Require affordable, fair, and equitable deferred payment agreements (DPAs) to be offered by public and private water utilities.
3. Require public and private water utilities to proactively and safely reconnect service to all households, including those cut off from service before the COVID-19 state of emergency began, and waive all reconnection fees.
4. Develop guidance for public and private water utilities on proactive and safe reconnection practices.
5. Halt any scheduled and future rate increases by utilities whose rates are subject to Commission regulation, and conduct audits of each water utility to determine whether recent or proposed rate increases are just and reasonable.
6. Require data collection and reporting by public and private utilities to the state.
7. Require public and private water utilities to develop Arrearage Management Plans (AMPs).

Thank you for the opportunity to provide public comment. We look forward to working with you to ensure all New Yorkers have clean, running water during COVID-19 and beyond.

Sincerely,

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