

BAKER DONELSON

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July 1, 2020

TPUC Staff
Tennessee Public Utility Commission
502 Deaderick Street, 4th Floor
Nashville, TN 37243

VIA EMAIL

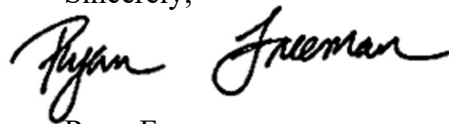
**Re: Docket No. 20-000477 – Tennessee Water Service, Inc. Response to
Consumer Advocate Letter Request for Information**

Dear TPUC Staff:

Pursuant to the Consumer Advocate Unit of the Office of the Tennessee Attorney General's request for information filed with the Tennessee Public Utility Commission on June 19, 2020 relating to deferred payment agreements, Tennessee Water Service, Inc. hereby files its response with the requested information.

Please let us know if anything further is required.

Sincerely,



Ryan Freeman
For the Firm

RAF:kcw

Enclosure



June 30,2020

Re: Response to Consumer Advocate Request for Information – Docket No. 20-00047

Tennessee Water Service, Inc. (“TWS” or “Company”) hereby files its response to the request for information from the Consumer Advocate Unit of the Office of the Tennessee Attorney General (“Consumer Advocate”), filed with the Tennessee Public Utility Commission (“TPUC”) on June 19, 2020. In its letter filing, the Consumer Advocate requested information regarding deferred payment arrangements (“PA’s”), including:

- 1) defining parameters or options for PA’s.
- 2) defining the minimum and maximum time period terms offered under its PA’s.
- 3) defining how TWS will determine a customer’s financial ability to pay.
- 4) explaining how TWS will ensure that similarly situated customers will be treated the same with PA’s.
- 5) TWS’s possible intent to require disconnected customers to pay a deposit in situations where their prior deposit has been applied to past due balances.
- 6) a copy of TWS’s correspondence with customers with past due balances to offer flexible PA’s in order to avoid future disconnects of service.
- 7) TWS’s proposed informational e-mails to its customers to raise awareness of PA options.

Please see below TWS’s responses to the Consumer Advocate’s requests.

- 1) TWS has standard practices for implementing PA’s for its customers, as authorized in *Order Approving Settlement Agreement*, Docket No 09-00017, dated September 15, 2009. The Company offers customers one three-month PA every twelve months with no interest/late fee. Additional PA’s can be implemented in the twelve-month period if the customer repaid as agreed in a previous PA. If the customer demonstrates a unique financial situation – such as a loss of job, loss of spouse, hospital stay, etc. – or a member of the household is disabled, the utility may offer a second PA.

The Company has continued to offer 3-month PA’s since COVID-19, but has offered extended PA’s up to 12 months if requested by customers.

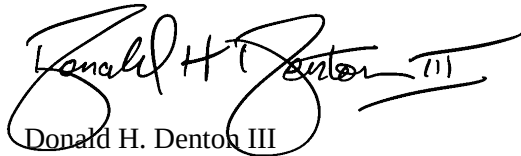
- 2) Please see response to #1 above.
- 3) The Company has made PA’s available to all customers who contact the Customer Service Center (“CSC”) with a past due balance, or request initiation of a PA. The Company allows customers to self-report any hardship consideration, and there is not otherwise a financial review for ability to pay.
- 4) Please see response to #3 above.

- 5) A customer's deposit remains on file, and the Company does not apply deposits to past due balances as long as the account is active. The deposit plus interest is credited to an active account in accordance with a standard hold time limit. If/when the account is closed and a deposit remains present on the account, the deposit is applied to the remaining ending balance and is shown on the account's final bill. The Company does not require a deposit in establishing a PA.
- 6) The Company has not issued notice regarding PA's during the COVID-19 period. The Company has included a bill message for all customers, as shown on the example bill attached as Exhibit 1, identifying that the suspension of disconnects has occurred, however customers should attempt to remain current on their account. The Company has also posted similar notice on its website and social media pages, as shown in the screenshots in Exhibit 2.
- 7) The Company has not drafted an e-mail notice to customers. However, should such a notice be prepared and issued, the format and content would be consistent with the notices shown in Exhibit 2.

Additionally, the Company notes there are only seven customers with past due balances as of June 23, 2020 (compared to four at the same time last year), and only two customers with a balance over \$500. The Company has one customer on a PA, with a term of 6 months.

The Company appreciates the review and response from the Consumer Advocate and will continue to provide ongoing updates in Docket No. 20-00047.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald H. Denton III", with a stylized flourish extending to the right.

Donald H. Denton III
President, Tennessee Water Service, Inc.

EXHIBIT 1



Tennessee Water Service
 Customer Service: (800) 531-2321
 Collections: (800) 531-2321
 Emergency Phone: (800) 531-2321
www.tennesseewaterservice.com

Bill Date	Account Number	Due Date	Please Pay
05/28/2020	9256200000	06/22/2020	\$54.88

Name **BRAD PROCTER** Primary Phone # **(615) 202-0804**
 Service Address **818 CHALET VILLAGE BLVD, GATLINBURG, TN, 37738**

Activity Since Last Bill

Previous Balance	\$54.88	
Payments received as of 05/28/2020	-\$54.88	
Balance as of 05/28/2020		\$0.00

Residential Water Service

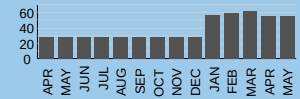
Minimum Usage Charge up to 1,000 gallons	\$50.00	
Tennessee State Tax at 9.75%	\$4.88	
Total Residential Water Service		\$54.88
Total Amount Due		\$54.88

Summary of Service

Meter Reading Meter # 45670047
 Current 88230 05/24/2020
 Previous 87400 04/24/2020
 Usage 830 Gallons
 Number of Days: 30
 Average Daily Use: 27.67 Gallons
 Average Daily Cost: \$1.83
 Register Constant: 1

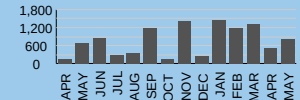
Billing History

in dollars



Consumption History for Water

in GAL



While we've suspended disconnections to help those who are facing financial hardships, we encourage you to continue to pay your bill as you normally would, if able. This will help you avoid a larger balance later. Make check payable to: Tennessee Water Service.
 Rate Schedules are available upon request. Visit www.tennesseewaterservice.com for important account offerings.

Messages

IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER IS AVAILABLE! TO VIEW YOUR 2019 WATER QUALITY REPORT, GO TO: WWW.MYUTILITY.US/TN/CCR19/424.PDF. IF YOU WOULD LIKE A PRINTED COPY OF THE REPORT CALL 800-531-2321.

 **Tennessee Water Service**
 PO BOX 160609
 Altamonte Springs, FL 32716-0609

Account Number: 9256200000
 Due Date: 06/22/2020
 Please Pay: **\$54.88**

Amount Paid

BRAD PROCTER
 915 JOHN ARMFIELD CT
 GALLATIN, TN 37066

Tennessee Water Service
 PO BOX 11025
 LEWISTON ME 04243-9476

☐ Address correction requested on back

EXHIBIT 2

 Tennessee Water Service, Inc.

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 **Tennessee Water Service, Inc.**

June 23 at 5:33 PM · 

Helpful Tips for our Customers - Avoid Large Balances!

While we've suspended disconnections to help those who are facing financial hardships, we encourage you to continue to pay your bill as you normally would, if able. This will help you avoid a larger balance later.

If you are having any difficulty paying your bill at this time, please contact our Customer Service Department (800) 531-2321 to discuss payment arrangements.



Tweet



Tenn. Water Service

@TennWaterServ



While we've suspended disconnections to help those who are facing financial hardships, we encourage you to continue to pay your bill as you normally would, if able. Please contact our Customer Service Department (800) 531-2321 to discuss payment arrangements if you need help.



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Environmental Stewardship

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Media Room

Helpful Tips for our Customers - Avoid Large Balances

Jun 23, 2020

While we've suspended disconnections to help those who are facing financial hardships, we encourage you to continue to pay your bill as you normally would, if able. This will help you avoid a larger balance later.

If you are having any difficulty paying your bill at this time, please contact our Customer Service Department (800) 531-2321 to discuss payment arrangements.

Stay tuned for any statewide media releases or announcements.

Media relations contact:

Deborah Clark, Spokesperson

Phone: (704) 525-1620

Email: