

**STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES DIVISION**

BEFORE THE UTILITIES BOARD

IN RE: BLACK HILLS/IOWA GAS UTILITY COMPANY, LLC d/b/a BLACK HILLS ENERGY	DOCKET NO. M-0225
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BLACK HILLS ENERGY'S CUSTOMER SUPPORT PLAN

COMES NOW, Black Hills/Iowa Gas Utility Company, LLC d/b/a Black Hills Energy ("Black Hills" or "Company") and hereby submits this Customer Support Plan ("Plan") with the Iowa Utilities Board ("Board") and respectfully requests that the Board approve the measures identified in the Plan as outlined below. As the impact of the coronavirus grows, Black Hills' number one priority is the continued safety of its customers, employees and communities. To support customers that have been impacted from COVID-19, Black Hills Energy has temporarily suspended nonpayment disconnections for its customers. The Company is also reminding customers that face financial hardship that there are various assistance options and programs available to help them. Additionally, Black Hills designated \$34,000 for immediate relief efforts in the state of Iowa. These relief funds are being directed to community relief funds, to organizations addressing food insecurity, as well as to local chapters of United Way.

On March 27, 2020 the Board issued an "Order Regarding Disconnection of Electrical, Natural Gas, and Water Utility Customers" ("March 27 Order"). The ordering

clauses of the March 27 Order included provisions outlining that all investor-own natural gas utilities were restricted from disconnecting any customer until the public health emergency is lifted by written statement of Governor Kim Reynolds. By proclamation dated April 27, 2020, Governor Kim Reynolds extended the Disaster Emergency to May 27, 2020, thereby extending the disconnection moratorium through that date.

As part of its “Order Authorizing Regulatory Accounts and Establishing Additional Reporting Instructions”, issued May 1, 2020 (“May 1 Order”), the Board stated that “as such restrictions on disconnections come to an end, coordination is needed among the Board, utilities, and partner agencies to minimize ramifications while assuring both safe, reliable service to customers and just and reasonable compensation to the utilities¹.” Black Hills is filing this Plan to provide the Board with additional information on Black Hills’ efforts to assist its customers and the time frame Black Hills expects to start its disconnection process. Black Hills has also been in communications with other utilities concerning their plans concerning the disconnection process.

Black Hills is filing this Plan to provide the Board with additional information on Black Hills’ efforts in recent weeks to support our customers and steps Black Hills will be taking over the coming weeks to allow further coordination as businesses and the State of Iowa begins to reopen when the public health emergency is lifted, either in totality or on a limited basis.

¹May 1 Order at pp. 2-3.

Customer Outreach and Assistance

Black Hills is taking a proactive approach to customer outreach during the public health emergency. Black Hills' customer outreach plan to assist customers impacted by the COVID-19 pandemic includes the use of direct outbound calls, information posted on Black Hills' website, email campaigns, social media and bill inserts. As part of Black Hills' efforts to work with customers that currently have account arrearages, Black Hills' customer service representatives began contacting customers with past due amounts on May 11, 2020 and informing them of the benefits of budget billing, offering payment arrangements, and helping them identify bill payment assistance resources that are available to them such as the Low Income Home Energy Assistance Program ("LIHEAP"). Additionally, Black Hills will begin executing its planned email and social media ads directed towards all customers regardless of how much the individual engages with Black Hills on May 18, 2020. There will also be a second social media campaign beginning May 25, 2020 that will be targeted towards individuals who follow and engage with Black Hills on social media. Additionally, Black Hills will utilize bill inserts to provide customer education information starting mid-June and ending mid-July. Finally, Black Hills' website continues to be updated with assistance information and self-service functionality to simplify enrolling in budget billing and payment arrangements.

Black Hills is providing 12-month payment arrangements to both residential and commercial customers and has relaxed budget billing enrollment rules to allow delinquent customers to enroll in budget billing. Black Hills is also working to help small businesses by allowing non-residential customers on the General Service rate to enroll in budget

billing. Additionally, Black Hills is considering the refunding of customer deposits to be applied to past due balances.

Black Hills will waive late payment fees for at least 60 days after the public health emergency is lifted and will be including these costs as part of Black Hills plan to be filed pursuant to the Board's May 1 Order. Black Hills is also considering waiving re-connection fees.

Timing of Disconnections

Black Hills provides utility service to customers in 8 states and currently has a task force working to develop a plan for Black Hills to assist customers during the current pandemic and determine when the Company would re-implement the standard disconnection process. A goal would be to have a plan that is consistent throughout Black Hills' service territory. While Black Hills' task force is still finalizing its plan, Black Hills would not begin the disconnection process on residential or commercial customers any sooner than 60 days after the public health emergency is lifted.

At the end of a moratorium period, Black Hills evaluates the number of customers to start the disconnection process through a trigger amount on customer arrearages. This allows Black Hills to identify and begin the disconnection process for customers with the highest past due amounts first. Using this process, Black Hills systematically works through the customers to be disconnected. Black Hills will continue to use this staggered approach based on a trigger amount when it resumes the disconnect process this year and will determine what the appropriate trigger amount will be at the time Black Hills resumes non-payment disconnections.

Health of a Resident

Board Rules at IAC 19.4(15)“d”(8) and Black Hills’ tariff at Sheet 35 allows for postponing the disconnection of a customer for health reasons. Black Hills will consider a residence of a household having COVID-19 as qualified for a postponement of disconnection. Black Hills would not require a written statement from a doctor or public health official in order to qualify for a medical postponement. Black Hills will also be identifying specific types of customers such as hospitals or other health care facilities that will not be disconnected as Black Hills’ plan is developed.

Customer Notices Prior to Disconnection

The Board requested feedback from utilities regarding increased notice prior to a disconnection. Black Hills is willing to support an increase in notice from 24 to 48 or 72 hours to address the unique circumstances related to COVID-19 impacts. This additional time will provide opportunities for additional customer contacts and discussion regarding past due amounts.

Federal Cares Funding

Black Hills supports Federal legislation that could direct additional funds to assist residential and commercial customers manage and pay their bills.

Use of Energy Efficiency Funds

Black Hills proposes to use available energy efficiency funds, both the current assessment provided by Iowa Code § 476.10A and funds available in investor owned

utilities' current energy efficiency plans, to provide financial support to residential and small commercial customers. To the extent this proposal would require legislative approval, Black Hills would support a proposal by the Board at the Legislature to authorize this one-time redirection of customer funded dollars. Black Hills feels this type of customer support will benefit the general system by helping to avoid a loss of customers due to account arrearages and potential related impacts on customer credit.

CONCLUSION

WHEREFORE, Black Hills respectfully requests the Board implement the Company's proposed Plan for the reasons stated above.

Dated: May 15, 2020

Respectfully Submitted,

/s/ Adam P. Buhrman

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