COMMONWEALTH OF VIRGINIA

STATE CORPORATION COMMISSION

Report to the Virginia General Assembly

THE EFFECTIVENESS OF THE SERIOUS MEDICAL CONDITION POLICY

October 30, 2026

Table of Contents

EXECUTIVE SUMMARY ii
LEGISLATIVE BACKGROUND 1
DATA SOURCES AND METHODOLOGY 2
ELIGIBILITY & ENROLLMENT METRICS 2
PROCESSING TIMELINESS 4
CUSTOMER AWARENESS & ACCESSIBILITY 4
UTILITY STAFF TRAINING & RESPONSIVENESS 5
CUSTOMER EXPERIENCE & SATISFACTION 7
FINANCIAL IMPACT & COST RECOVERY 10
SYSTEM RELIABILITY AND OUTAGE PREPAREDNESS 10
POLICY EFFECTIVENESS & OUTCOMES 12
SUGGESTIONS 13

EXECUTIVE SUMMARY

Pursuant to Chapter 637 of the 2024 Acts of Assembly ("Act"), the State Corporation Commission ("Commission") has performed its first triennial review of the effectiveness of the Commonwealth's Serious Medical Condition ("SMC") policy, which provides medically vulnerable residential customers with temporary protection from utility service disconnection upon submission of a certified SMC form. As part of its review, the Commission Staff ("Staff") collected data from regulated electric, gas, water, and wastewater utilities regarding their SMC program participation, processing, customer outcomes, financial impacts, and operational considerations related to outages.

Overall, the Commission concludes that the SMC policy is effective. Utilities report that customers are generally able to utilize the SMC process to achieve delays in utility disconnections. Only a subset of utilities contacted by Staff had data available showing how many customers receiving an SMC-related delay were ultimately not disconnected even after the expiration of the protection period. The available data indicated that most customers receiving an SMC-related delay were ultimately not disconnected even after the expiration of the protection period. This outcome suggests that the SMC process provides meaningful protection to medically vulnerable customers. However, upon discovery that several utilities do not currently track whether customers are disconnected following an SMC-related delay, the Commission Staff suggests that all utilities begin tracking and reporting this metric to Staff in future years, to support more robust evaluations in future reviews, pursuant to the Act.

Utility responses also suggest that the SMC form and process are generally workable, but opportunities exist to strengthen validation, improve awareness of the SMC program, and improve clarity of the SMC form regarding acceptable equipment. Regarding validation, one suggestion received is to include the patient's date of birth on the form, as it would assist with applicant verification. On program awareness, Staff received reports from the utilities that customers may not be aware of the program. Staff is willing to work with utilities and the Commission's Information Resources Division to explore ways to improve overall customer awareness of the SMC program.

Related to the SMC form, several utilities requested clearer guidance on the types of medical equipment or conditions that qualify a customer for an SMC-related disconnection delay. While greater clarity may in some instances support a more efficient utility investigation of an SMC request with the certifying medical professional, Staff notes that the existing form language – specifically the instruction to list "equipment prescribed and/or equipment required for treatment of condition *(if any)*" (emphasis added) – suggests there may be instances where a licensed physician or licensed nurse practitioner may consider an applicant as qualifying for a disconnection delay even in the absence of medical equipment. As such, Staff does not consider provision of medical equipment information, by itself, as a qualifying factor for an SMC-related disconnection delay, and Staff suggests that the existing language should remain unchanged to preserve the professional judgment of the medical personnel.

Taken together, the utility responses and Staff's review demonstrate that the SMC policy is operating effectively, widely understood within the utility community, and providing essential protections to customers with serious medical conditions. This report includes suggested changes in data tracking, and educational outreach with the aim to improve accessibility to the SMC policy for residential utility customers.

LEGISLATIVE BACKGROUND

Chapter 637 of the 2024 Acts of Assembly ("Act") directs the State Corporation Commission ("Commission" or "SCC") to establish limitations on the authority of electric, gas, water, and wastewater utilities and cooperatives to terminate residential service for customers who submit a certification of a serious medical condition ("2024 Act"). The 2024 Act requires the Commission to adopt regulations, develop an accessible certification form, establish a cost-recovery mechanism, and submit a report to the General Assembly no later than November 1, 2026, assessing the policy's effectiveness and suggesting improvements.

This report presents the Commission's first triennial evaluation of the effectiveness of the Serious Medical Condition ("SMC") regulations,[1] based on utility responses to the Commission's 2026 SMC Questionnaire.

The 2024 Act requires utilities to limit service termination for customers who provide certification from a licensed physician or nurse practitioner that they, or a family member residing with them, have a serious medical condition. The Commission consulted with the Virginia Department of Health, the Virginia Department of Social Services, the Virginia Poverty Law Center, utility stakeholders, and others during the regulatory proceeding.

[1] *See* 20 VAC5-330 - Limitations on Disconnection of Electric, Water, Wastewater, and Natural Gas Service. The SMC Certification Forms ("SMCC Forms") are included in the regulations and at: https://ris.dls.virginia.gov/uploads/20VAC5/forms/SMCC%20Form%20rev.%208.24-20240814114226.pdf.

DATA SOURCES AND METHODOLOGY

To assess the effectiveness of the SMC regulations, the Commission Staff ("Staff") distributed a standardized questionnaire to all regulated electric, gas, water, and wastewater utilities and cooperatives. The questionnaire requested data on enrollment, processing times, customer outcomes, financial impacts, and outage protocols.

Utilities provided data responses covering the period from July 1, 2024 through June 30, 2026, and these responses form the basis for this report. Data was reviewed for consistency and reasonableness, and follow-up clarification was requested where needed.

ELIGIBILITY & ENROLLMENT METRICS

Utilities were asked to provide the number and percentage of SMCC Forms received for the annual periods ending in 2025 and 2026. The number of SMCC Forms received varied vastly by industry. Larger electric companies and cooperatives such as Virginia Electric and Power Company ("Dominion Energy" or "DEV"), Appalachian Power Company ("Appalachian Power" or "APCo"), and Rappahannock Electric Cooperative received the most SMCC Forms during the period, with DEV and APCo likely having a higher percentage rate due to their larger customer base. All electric companies and electric cooperatives reported receiving SMCC Forms with the exception of one smaller cooperative. Less than half of the gas companies who responded to the survey reported receiving SMCC Forms. Larger gas companies such as Columbia Gas and Virginia Natural Gas received the highest number of forms within their industry. Notably, only one water utility, Virginia American Water Company, reported receiving SMCC Forms since adoption of the rules. Smaller water and/or wastewater utilities reported no SMCC Forms received.

Next, utilities were asked to provide the number and percentage of SMCC Forms received after sending out a notice of intent to disconnect. Again, the number of SMCC Forms received varied greatly by industry. Larger electric and gas companies such as DEV, APCo, Columbia Gas, and Virginia Natural Gas, reported higher numbers and percentages of customers submitting the SMCC Form after receiving a disconnect notice. The data revealed that an average of 25-50% of customers submitted an SMCC form after receiving a notice of intent to disconnect. However, some utilities reported that this data was either not available or that the information is not tracked.

Lastly, utilities were asked to provide the number and percentage of SMCC Forms denied by the utility and the primary reasons for denial. A little less than half of the companies who reported receiving SMCC forms responded that zero forms were denied. Notably, all but one of these companies are electric cooperatives. Of the companies that reported denying forms, there were a variety of reasons for denial. The following is a compiled list of the top reasons for SMCC form denials:

- Incomplete or missing information
- Incorrect information
- Unable to validate form
- No medical equipment
- No medical condition
- Illegible / Unable to read
- Signature is older than 30 days
- Fraud / Doctor's credentials

Staff generally agrees with the indicated reasons for denial, with one exception being the use of "No medical equipment" as a reason for denial. This will be discussed in greater detail in the Policy Effectiveness & Outcomes section of this Report.

PROCESSING TIMELINESS

Utilities were asked to provide the average processing time from receipt of the SMCC Form relative to when the customer's account got updated. Many companies reported updating customer accounts the same day the SMCC form is received, while others reported a turnaround time of 1-2 days after receipt of the form.

Next, utilities were asked to provide the percentage of SMCC Forms processed within two business days. The majority of companies responded that 100% of the forms were processed within two days of receipt, while DEV and Columbia Gas reported 98-99% of the forms were processed within this time frame. Notably, Virginia Natural Gas reported only processing 60% of the SMCC Forms within two business days, which may indicate an internal issue with their timeliness of handling the forms. Virginia American Water Company reported that it does not track this information. Staff suggests this information be tracked by each utility.

CUSTOMER AWARENESS & ACCESSIBILITY

Utilities were asked to provide how the utility communicates information regarding the SMCC Form and how the information is conveyed to their customers. Additionally, they were asked if the SMCC Form is electronically available on the utility's website. Many utilities reported providing SMCC Form information through the following channels:

- Utility's website
- Refer to SCC website

- Customer / Customer Service Representative (CSR) communication
- By Mail when requested

Most utilities reported having an electronic version of the SMCC Form on their website; however, Columbia Gas refers its customers to the SCC's website, and most water companies do not have the form available on their website.[2]

UTILITY STAFF TRAINING & RESPONSIVENESS

Utilities were asked about any training customer service staff have received regarding SMC policy definitions. Most utilities reported incorporating SMC training into the onboarding process and providing written procedures, knowledge resources, and call guides for staff to refer to as a refresher. A&N Electric Cooperative specifically mentioned that it provides onboarding and ongoing training and communicates policy and procedural updates promptly when state requirements change. Virgina Natural Gas, Washington Gas and Light, and Powell Valley Electric Cooperative each reported offering annual refresher training for their staff to ensure proper adherence to application procedures and requirements. In contrast, several smaller utilities, including Blue Ridge Water Agency, Cascade Mountain Water Company, Inc, Life Essentials, Mountain Lakes Water Co., and Peacock Hill Service Company, reported no formal SMC-specific training or provided no substantive information regarding such training.

Next, utilities were asked how they assess the confidence level and abilities of their customer service staff to identify and guide customers with serious medical conditions. A&N Electric Cooperative stated that its staff receive ongoing coaching and have access to designated subject matter experts who can answer questions, clarify policy requirements, and assist with more

[2] 20 VAC5-330-40 B.2 requires utilities to provide the customer access to the SMCC Form via its website or advise the consumer that access can be obtained via the SCC's website.

complex customer situations. Most utilities, such as APCo, Atmos Energy, Washington Gas and Light, and Craig Botetourt Electric Cooperative, described using some combination of ongoing training, coaching, supervision, and access to procedural or knowledge resources to support customer service staff in identifying and assisting customers with serious medical conditions. Appalachian Natural Gas Distribution Company indicated that its employees are reviewed annually for overall performance, while Prince George Electric Cooperative reported conducting an annual review with its staff regarding the SMC policy that includes open discussion of the policy and related procedures. Other utilities, including Columbia Gas, Kentucky Utilities, Mecklenburg Electric Cooperative, Northern Virginia Electric Cooperative, Southside Electric Cooperative, Virginia American Water Company, and DEV, described practices such as reviewing calls, monitoring staff performance, or conducting quality-assurance checks. A considerable number of utilities such as Blue Ridge Water Agency, Cascade Mountain Water Company, Inc., Keswick Utilities, Life Essentials, and Peacock Hill Service Company, indicated that they do not have a formal assessment process for their customer service staff.

Finally, utilities were asked about any processes used to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification. Practices varied among utilities. Appalachian Power sends the incomplete form back to the customer's medical care provider, in which it provides details on the missing information. Atmos Energy indicated that customers are informed that the form has been sent to the customer's medical professional and that it is then the customer's responsibility to ensure the form is returned to the utility in a timely manner. A&N Electric Cooperative and Craig Botetourt Electric Cooperative have databases to track the status of individual SMCC Forms, which supports timely follow-ups with customers. Other Utilities such as Shenandoah Valley Electric Cooperative, Southside Electric Cooperative, and Northern Virginia Electric Cooperative, use designated staff or teams to review SMCC Forms

and address incomplete information or questions. Specifically, Shenandoah Valley Electric Cooperative has staff specializing in addressing SMC questions; Southside Electric Cooperative routes forms and questions to its Collections team; and Northern Virginia Electric Cooperative utilizes a primary contact and two backups within its customer care team. Some utilities, like Keswick Utilities, Mountain Lakes Water Co., and Thomas Bridge Water, provided no substantive information regarding any formal process for ensuring timely follow-ups with customers.

CUSTOMER EXPERIENCE & SATISFACTION

In regard to Customer Experience and Satisfaction, utilities were asked (i) approximately how many customers have had their disconnections delayed due to having a SMCC Form on file, (ii) approximately what percentage of those customers were ultimately disconnected after receiving an SMC-related delay, and (iii) how many certifications, by number and percentage, were renewed beyond their initial term. The table below consolidates the responses for July 2024 through June 2025 ("2024"), and July 2025 through June 2026 ("2025"). Several utilities reported that certain requested metrics are not tracked, or else provided numerical counts instead of the requested percentages that were requested. The table below reflects the utilities' responses as directly reported.

Table 1: SMCC-Related Delayed Disconnections, Subsequent Disconnections, and Certification Renewals

Utility Name	Utility Type	Disconnection delayed based on SMC (i)	SMC customer ultimately disconnected (ii)	SMCC Form renewed (iii)
A&N Electric Cooperative	Electric	3	1%	2024: 30, 30%; 2025: 31, 32%
Appalachian Power	Electric	2024: 377 2025: 328	2024: 48% 2025: 56%	2024: 11% 2025: 9%
Appalachian Natural Gas Distribution Company	Gas	0	0	0

Atmos Energy	Gas	2024: 0 2025: 1	1	2024: 0 2025: 0
Blue Ridge Water Agency	Water	0	0	0
Cascade Mountain Water Company, Inc.	Electric	0	0	0
Craig Botetourt Electric Cooperative	Electric	0	0%	0 certifications (0%)
Community Electric Cooperative	Electric	1 in 2024.	0	Most members renew; no number or percentage provided
Central Water Company, Inc.	Water	0	0	0
Columbia Gas of Virginia	Gas	Approximately 101 customers.	Does not track	The Company does not track this information.
Central Water Co. Inc &: Virginia Ridge Water Co. Inc. & Santilane Water Co.,	Water/Wastewater	0	0	0
Founders Bridge Utility Company	Water/Wastewater	0	0	0
Groundhog Mtn Water & Sewer Co. Inc.	Water/Wastewater	0	0	0
High Knob Utilities, Inc.	Water	0	0	0
Keswick Utilities, LLC	Water/Wastewater	0	0	0
Kentucky Utilities Company d/b/a Old Dominion Power Company	Electric	2024: 5 2025: 16	4.76% (1 account)	2024: 1 and 20% 2025: 2 and 12.5%
Life Essentials	Water	0	0	0
Mecklenburg Electric Cooperative	Electric	14	0	No number or percentage provided; new certifications are required to continue in the program
Mountain Lakes Water Co.	Water	0	0	0
Northern Neck Electric Cooperative	Electric	10	0%	2024: 21 – 58% 2025: 27 – 68%
Northern Virginia Electric Cooperative	Electric	2024: 33 2025: 28	Does not track this information currently	Does not track this information currently

Peacock Hill Service Company	Water	0	0	0
Prince George Electric Cooperative	Electric	Approximately 30 members.	Approximately 56% were disconnected.	2024: 3 - 17% 2025: 0
Po River Water and Sewer company	Water/Wastewater	0	0	0
Powell Valley Electric Cooperative	Electric	1	100%	0
Rappahannock Electric Cooperative	Electric	2024: 71 2025: 100	2024 – 4 (5%) 2025 – 6 (6%)	2024: 317 2025: 303
Roanoke Gas Company	Gas	0	0	0.
Southside Electric Cooperative	Electric	2024: 47 2025: 53	2024: ~0.12% 2025: ~0.12%	0
Southwestern Virginia Gas	Electric	0	0	0
Shenandoah Valley Electric Cooperative	Electric	2024 – 2025: 53 2025 – 2026: 57	2024: 13 2025: 10	2024: 12 and 16.9% 2025: Unknown as certifications may still be active
Thomas Bridge Water	Water	0	0	0
Virginia American Water Company	Water/Wastewater	2024 - 73 2025- 89 (Installed locks that prevented disconnection)	Does not track this information	Does not track this information
Virginia Electric and Power Company	Electric	2024: 2,413 2025: 3,450	2024: 742 (30.8%) 2025: 1,110 (32.2%)	2024: 1,446 out of 11,040 (13%) 2025: 1,272 out of 13,962 (9%)
Virginia Natural Gas	Gas	2025: 56	2025: 4%	2025: 4 or 7%.
Washington Gas and Light	Gas	0	0	0
Woodhaven Water Co	Water/Wastewater	0	0	0

Based on the data in Table 1, customers are able to utilize the SMC process to delay disconnection, and available data suggests that a majority of customers who received an SMC-related delay were not ultimately disconnected following the expiration of their protection period. However, not all utilities track this metric.

Utilities were also asked what feedback healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections. Nearly all utilities reported receiving no feedback from healthcare providers, though DEV did report that some healthcare providers have indicated that a patient's date of birth is often needed to validate SMCC Forms and related medical information, and stated that including this information on the form could support more efficient provider validation and processing.

FINANCIAL IMPACT & COST RECOVERY

2024 Virginia Acts of Assembly Chapter 637 provides that electric, gas and water and wastewater utilities may:

> *(iii) establish a cost recovery mechanism under which utilities and cooperatives that provide electric, gas, water, or wastewater services shall be authorized to recover, from approved rates collected from other customers or other sources of revenue, any losses on customer accounts the balance of which is written off or otherwise determined to be uncollectible as the result of the implementation of the regulations… .*

Most of the electric, gas water and wastewater utilities regulated by the SCC ("SCC Regulated Utilities") have experienced uncollectible account balances from customers with serious medical conditions that are eligible for a delay in termination of service as provided for in Chapter 637. Currently, all SCC Regulated Utilities recover such uncollectible customer account balances through base rates charged to all customers.

SYSTEM RELIABILITY AND OUTAGE PREPAREDNESS

Utilities were asked about the effectiveness of the SMC policy during planned or unplanned outages for customers who are reliant on medical equipment. Responses varied. Several utilities stated that they have not received any SMCC Forms, had no affected customers, or otherwise lacked sufficient experience to properly assess the effectiveness of SMC policy during outages.

A&N Electric Cooperative stated that the policy improves communication and awareness by allowing medically vulnerable customers to be identified in advance and notified, when possible, so they can implement personal emergency plans. DEV similarly indicated that customers with SMCC Forms on file may receive additional notifications for planned outages or unplanned events expected to result in an extended interruption, when practicable. APCo described broader outage-restoration practices, including prioritizing restoration effects for hospitals and other assisted living facilities, but indicated that it has not formally measured the effectiveness of the SMC policy during planned or unplanned outages. Several electric cooperatives indicated that the policy provides useful knowledge and situational awareness during storm restoration. Some utilities also described making information regarding customers with SMCC Forms available to operations or outage-management personnel to support restoration activities. Several responses also emphasized the importance of customers who rely on medical equipment maintaining appropriate contingency plans during extended outages.

Utilities were also asked about any specific outage-preparedness measures or communication tailored to customers with SMCC Forms on file. A&N Electric Cooperative and DEV described providing additional outage notifications to customers with SMCC Forms on file under certain circumstances. Other utilities, like Craig Botetourt Electric Cooperative and Kentucky Utilities, identify these customers and add them to a high-priority restoration list in order to support timely service restoration whenever practicable. Many utilities, including Community Electric Cooperative, Northern Virginia Electric Cooperative, Northern Neck Electric Cooperative, and Virginia American Water Company, described providing outage-preparedness or outage communications to customers generally rather than communications specifically tailored to SMC customers. Southwestern Virginia Gas stated that, if it is aware that a customer relies on

life-sustaining medical equipment, it will take feasible steps to provide advance notification of natural gas service interruptions.

POLICY EFFECTIVENESS & OUTCOMES

Each utility was asked to provide recommendations to improve the SMC policy's accessibility or operability. Although most utilities had no recommendations, the recommendations that were provided generally fit within the categories of i) awareness; ii) abuse of process; and iii) policy refinements.

Awareness

Many of the electric cooperatives noted that customer awareness of the SMC program is a major issue, given that many customers with serious medical conditions may not be aware of SMC policy. The cooperatives recommend broader communication and outreach from the Commission and state agencies to help improve awareness.

Abuse of Process

DEV and the electric cooperatives noted specific instances where some customers could abuse the SMC process. The types of abuse can include repeated use of the SMC form to extend disconnection relief through the changing of the account name, or otherwise restarting the SMC process, or through fraudulent signatures of medical professionals. To address these concerns, the cooperatives suggest the Commission establish a process through which SCC Staff could review repeated or suspicious filings and determine whether future forms should be accepted for particular individuals or residences. DEV recommends that SMCC Forms be submitted directly by the physician or medical provider to the utility, thereby helping to improve validation.

Policy Refinements

Several utilities suggested providing opportunities to update the SMC policies to improve the process. Southside Electric Cooperative suggested limiting customers' ability to delay disconnection to non-consecutive months so that the customer's arrearage balances do not grow to a point where the customer cannot realistically afford to pay back. DEV and Virginia American Water Company would like clear guidelines on the medical equipment and conditions that qualify a customer for delayed disconnection. Northern Virginia Electric Cooperative recommended a policy to require proactive notifications of upcoming expiration of SMC certifications so that SMC records remain accurate.

SUGGESTIONS

Based on the utility responses, Commission Staff finds that, in general, the SMC process is functioning effectively across all utility types. Customers are able to utilize the SMC process to delay disconnection, and available data suggests that a majority of customers who received an SMC-related delay were not ultimately disconnected following the expiration of their protection period. However, not all utilities track this outcome. For purposes of future reporting, Staff suggests that all utilities consistently track the percentage of customers who are ultimately disconnected after receiving an SMC-related delay, as well as the processing time for SMCC Forms. These metrics are essential to assessing the protections' long-term effectiveness.

Commission Staff is not opposed to updating the SMCC Form to include the patient's date of birth. Several utilities and healthcare providers noted that this information may assist in validating form submissions. In addition, Staff is prepared to work with utilities and the Commission's Information Resources Division to improve overall customer and provider awareness of the SMC process.

Several utilities requested greater clarity regarding the types of medical equipment or conditions that qualify a customer for a disconnection delay. Staff recognizes that clearer regulatory guidance may help standardize how utilities interpret the SMC criteria. At the same time, Staff notes that the current form language instructs physicians to list *"Equipment prescribed and/or equipment required for treatment of condition (If any)."* The phrase *"If any"* makes clear that special medical equipment is *not* a prerequisite for approval, as apparently perceived by certain utilities. In other words, instances are allowed where a customer may qualify for SMC-related delay, in the medical professional's judgment, even in the absence of identified medical equipment. In Staff's view, neither the Act nor the Commission's regulations specify that medical equipment is a prerequisite for approval of the SMC request; in Staff's view, that determination is rather appropriately left to the professional judgment of the medical professional. Staff can however conceive of instances where identification of the medical equipment could be potentially relevant. For instance, as noted by DEV, information about medical equipment could support more efficient provider validation and processing when investigating the specifics of an SMC-related request with the licensed physician or licensed nurse practitioner. Any clarification should preserve the flexibility of the medical professional such that the policy remains accessible to customers whose conditions do not require specialized equipment but who nonetheless pose a significant health risk if their service is disconnected.

Overall, the suggestions are intended to improve consistency, transparency, and usability of the SMC policy for residential utility customers while maintaining the physician-guided flexibility built into the current regulatory framework.

APPENDIX 1

Copy of Questionnaire

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name:
Utility Type (Elec/Gas/Water/Wastewater):
Contact info (Name/Email/Phone):

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?

2. What portion of these customers enter into payment plans once certification expires?

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

APPENDIX 2

Utility Questionnaire Responses

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: A&N Electric Cooperative
Utility Type (Elec/Gas/Water/Wastewater): Electric
Contact info (Name/Email/Phone):
[redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?
   7/1/2024 – 6/30/2025, 9 ; 7/1/2025 – 6/30/2026, 21
2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?
   7/1/2024 – 6/30/2025, .03% ; 7/1/2025 – 6/30/2026, .06%
3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?
   7/1/2024 – 6/30/2025, 2, .007%; 7/1/2025 – 6/30/2026, 4, .014%
4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?
   0; No member is denied so long as valid form is provided.

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?
   One business day.
2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?
   100%

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?
   All information is available on our website. https://www.anec.com/member-services/serious-medical-conditions-certification/
2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.
   https://www.anec.com/wp-content/uploads/Serious-Medical-Condition-9-27-2024.pdf

---

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?
   We provide comprehensive onboarding training for new employees, including detailed instruction on handling member interactions, completing required forms, understanding program requirements, and following established procedures. We communicate policy and procedural updates promptly whenever state requirements change. We provide ongoing training and refresher sessions on accurate form completion, processing, tracking, and documentation to ensure consistency, compliance, and effective management of member accounts.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

   The utility has assessed the confidence level and capabilities of its customer service staff through ongoing training, coaching, and access to subject matter experts who provide guidance and support related to Serious Medical Condition (SMCC) accounts. Customer service representatives receive instruction on identifying customers who may qualify for the SMCC program, understanding policy requirements, properly processing SMCC forms, and appropriately handling account-related questions and concerns.

In addition to initial training, staff have access to designated subject matter experts who are available to answer questions, provide clarification on policy requirements, and assist with more complex customer situations. This ongoing support helps ensure consistent application of the policy, increases staff confidence in assisting medically vulnerable customers, and promotes accurate and timely account management.

The utility continues to reinforce knowledge through coaching, communication of policy updates, and operational guidance to ensure customer service staff remain prepared to effectively support customers with serious medical conditions.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

   To ensure timely follow-up when SMCC forms are incomplete or require additional clarification, the department utilizes a monitored work queue and shared inbox. Incoming requests are reviewed regularly throughout the business day, allowing the next available Member Services representative to respond promptly. This team-based approach helps prevent delays by ensuring requests are not dependent on a single employee's availability. Staff contact members to obtain any missing information, clarify discrepancies, or request additional documentation needed to complete processing. This process promotes timely communication, improves workflow efficiency, and helps ensure forms are completed accurately while maintaining a high level of customer service.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?
   3
2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?
   1%
3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?
   7/1/2024 – 6/30/2025, 30, 30%; 7/1/2025 – 6/30/2026, 31, 32%

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?
   We have not received any provider feedback .

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?
   Yes
2. What portion of these customers enter into payment plans once certification expires?
   0%
3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.
   Yes. Accounts determined to be uncollectible are written off in accordance with the utility's established accounting policies. After the write-off, the outstanding balance is referred to a third-party collection agency for recovery. At the time of referral, a 30% collection fee is added in accordance with the collection agreement and applicable policies. The original uncollectible amount is recorded as a write-off on the utility's books, while any subsequent recoveries received from the collection agency are recorded in accordance with the utility's accounting procedures.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.
   7/1/24-06/30/25 – 0
   7/1/25-06/30/26 – 1, $336.86

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?
   The policy has been effective in supporting customers who rely on medically necessary equipment during both planned and unplanned outages. Medically vulnerable customers are identified in advance, allowing the utility to provide timely notifications of planned outages whenever possible. During unplanned outages, staff make every effort to communicate available information, provide outage

updates, and direct customers to appropriate resources. The policy helps ensure these customers receive priority communication and are informed so they can implement their personal emergency plans. While customers remain responsible for maintaining backup power or other contingency measures for their medical equipment, the policy has been effective in improving communication and awareness during outage events.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?
   Yes. Customers who have SMCC Forms on file with the utility receive outage-related communications tailored to their circumstances whenever feasible. For planned outages, the utility makes every effort to provide advance notification so customers have adequate time to prepare. During both planned and unplanned outages, staff proactively communicate available information, provide updates on restoration efforts when possible, discuss available options and resources, and set realistic expectations regarding outage duration and service restoration. These communications are intended to help customers make informed decisions and implement their personal emergency preparedness plans, recognizing that customers who rely on electrically powered medical equipment are encouraged to maintain appropriate backup power or alternative arrangements.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?
   At this time, the ANEC does not have any suggested changes to improve accessibility to or the practical operation of the Serious Medical Condition (SMCC) Policy. The current policy provides a clear process for residential customers to notify the utility of a serious medical condition and allows the Company to provide appropriate communication, guidance, and support related to service interruptions.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Appalachian Power
Utility Type (Elec/Gas/Water/Wastewater): Elec
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?
   I can only answer this by calendar year. Year to date (through 7/7/26) for 2026 we have received and processed 833 SMCC in Virginia. This includes forms that were incomplete and sent back for completion or forms for customers that were not eligible. It also includes duplicate forms. For the calendar year of 2025 we received 1415 forms.

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?
   7/1/2024 – 6/30/2025: .4%
   7/1/2025 – 6/30/2026: .4%

   How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?
   7/1/2024 – 6/30/2025: 48%
   7/1/2025 – 6/30/2026: 46%

3. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?
   496 forms were denied YTD in 2026 (through 7/7/26), the primary reason was the form was incomplete and missing information. Calendar year of 2025, 783 forms

were denied. Once again, the most common reason for denial was an incomplete form.

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?
   Most forms are worked within 2 hours of receipt.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?
   Nearly all forms are worked on the same business day. There may be some that are received later in the day that are worked the next business day, but this is rare.

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?
   The Company provides information regarding the Serious Medical Condition Certification process through its website, customer communications, and customer service representatives. The Company's website is maintained to reflect the current requirements of the applicable Virginia Administrative Code.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.
   Yes, med_cert.pdf

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?
   Customer service representatives receive training on medical certification requirements during new hire training and are provided access to current

procedures, call guides, and knowledge resources. Ongoing coaching and support are available to ensure representatives can reference current policies and guidelines when assisting customers.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

   The Company provides mentoring, nesting support, supervisory coaching, and access to procedural resources. The Company does not formally quantify employee confidence levels related to this process.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?
   If an incomplete form is received, it is immediately faxed back to the doctor with a cover letter explaining what information is needed. Customers are not typically contacted if the Medical Certificate is incomplete from the doctor.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?

July 2024 -June 2025: 377

July 2025- June 2026: 328

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?

July 2024 -June 2025: 48%

July 2025- June 2026: 56%

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?

July 2024 -June 2025: 11%

July 2025- June 2026: 9%

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?
   The Company does not maintain or track healthcare provider feedback regarding interactions related to serious medical condition certifications or service disconnections.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?
   Yes, they can if they do not make additional payments or enter into any arrangements and a new bill is generated during the protection period.

2. What portion of these customers enter into payment plans once certification expires?
   7/1/2024 -6/30/2025: 12.4%
   7/1/2025 – 6/30/2026: 9.3%

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 6/30/25 and 7/1/25-6/30/26.
   7/1/2024 -6/30/2025: $2,969,749.28
   7/1/2025 – 6/30/2026: $4,169,085.83

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

The Company performs switching whenever possible for hospitals and other assisted living facilities. In addition, we continue to prioritize restoration efforts and work in the safest and most efficient manner possible to restore service as quickly as conditions allow. In heavily vegetated areas where the risk of an outage is elevated, we have also begun assigning a servicer/first responder to accompany our aerial saw operations to help facilitate faster restoration should an outage occur.

Below is a sample of the message distributed to customers identified for planned outages. For customers with medical certifications, this information is entered into the system by our Customer Solutions Center.

This message from Appalachian Power is to make you aware of a power outage planned for some customers in the City area on Day, Date, from approximately start time of outage until ending time of outage. The outage is needed so line workers can safely complete work on electrical facilities that help bring power to your community.

Again, some customers in the City area will experience a power outage Day, Date, from roughly start time of outage until ending time of outage. You have been identified as having an account in the affected area. Should this planned outage be canceled for any reason, the work will be rescheduled for the following day, , during the same hours.

If you'd like to receive email or text alerts any time your power goes out, visit Appalachian Power dot com to sign up for outage alerts.

We thank you for your patience as we work to improve the reliability of your electric service. As always, if you have questions, you can contact Appalachian Power, any time, day or night, at 1-800-956-4237. Thank you.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

With respect to the overall effectiveness of the policy for outages affecting medical customers, the Company has not formally measured its effectiveness during planned or unplanned outages. That said, we remain highly attentive to customers removed from service and work closely with the DDC to coordinate switching whenever possible,

particularly for senior and medical facilities. We also make every effort to notify all customers, including those with medical certifications, of planned outages.

3.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?
   Not at this time.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Appalachian Natural Gas Distribution Company
Utility Type (Elec/Gas/Water/Wastewater): Gas
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?
    a. ANGD has not received any SMCC forms since adoption of the rules.

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?
    a. 0%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?
    a. 0

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?
    a. 0

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

a. ANGD has not received any SMCC forms since adoption of the rules.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?
    a. ANGD has not received any SMCC forms since adoption of the rules.

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?
    a. No information has been provided as ANGD has not received any SMCCs forms or requests for forms. That said the company is currently working with its third party management company that updates its internet site and is looking to provide this information electronically on its website.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.
    a. ANGD is currently working with its third-party management company that updates its internet site to provide this information electronically on its website.

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?
    a. While ANGD has not implemented a formal training on those specific policy definitions our staff is familiar with customers and medical certificates and has had discussions through this very request.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?
    a. All employees, including the customer service staff, are reviewed annually for overall performance. Additionally, ANGD has no known cases of a request

for a SMCC form.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?
    a. ANGD has not received any SMCCs forms or requests for forms.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?
    a. 0

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?
    a. 0

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?
    a. 0

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?
    a. No feedback has been provided from healthcare providers.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?
    a. ANGD has not received any SMCCs forms or requests for forms.

2. What portion of these customers enter into payment plans once certification expires?
    a. 0

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.
    a. ANGD has not received any SMCCs forms or requests for forms though its uncollectible accounts are as incurred.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.
    a. ANGD has not received any SMCCs forms or requests for forms.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?
    a. ANGD has not received any SMCCs forms or requests for forms.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?
    a. ANGD has not received any SMCCs forms or requests for forms.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?
    a. No as the company has had no activity since implementation.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Atmos Energy
Utility Type (Elec/Gas/Water/Wastewater): Gas
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?
    a. 7/01/2024 – 6/30/2025: 0
    b. 7/01/2025 – 6/30/2026: 2

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?
    a. 7/01/2024 – 6/30/2025: 0%
    b. 7/01/2025 – 6/30/2026: 0.01%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?
    a. 7/01/2024 – 6/30/2025: 0, 0%
    b. 7/01/2025 – 6/30/2026: 1, 50%
        i. The other account requested after receiving the notice of non-payment

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?
    a. Atmos Energy will accept the form once received from a medical professional indicating that the customers or a person living within the residence medical conditions could be aggravated by loss of utilities. Atmos Energy does not deny forms with a physician signature.

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?
    a. Once Atmos Energy receives the signed form from the physician the request is processed within 24 hours as these are considered very high priority. Then the account is protected by a dunning lock for 30 days, customers in Virginia can receive up to three certificates in a rolling 12 months.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?
    a. 100%

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?
    a. The medical certificate of need is not actively advertised to our customers the medical certificate would be offered if requested by the customer or it comes up in conversation with one of our customer service agents during the conversation.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.
    a. This form is requested by calling into our customer contact center, from this contact the form is sent directly to the customer's physician to be completed and submitted back to Atmos Energy once completed by the physician.

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

a. The training is provided during the onboarding process for agent around policies and procedures, the procedure is contained within Atmos Energy's knowledge documents for agents to refer if they need to recall the process.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?
    a. The agents are provided with a thorough knowledge document that contains the processes around medical certificates of need. This knowledge document allows the agents to be confident in the processes and procedures when speaking to a customer about the financial certificate of need.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?
    a. The customer is informed that the form is sent to their medical professional, from this point it is the customers' responsibility to ensure that the form is returned to us in a timely manner.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?
    a. 7/01/2024 – 6/30/2025: 0
    b. 7/01/2025 – 6/30/2026: 1

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?
    a. 1

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?
    a. 7/01/2024 – 6/30/2025: 0
    b. 7/01/2025 – 6/30/2026: 0

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?
    a. We have not received any feedback from the health care providers around medical certificates, the only communication from the health care provider we receive is the completed medical certificate of need.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?
    a. Yes, customers continue to accumulate arrearages during the protection period.

2. What portion of these customers enter into payment plans once certification expires?
    a. The accounts that were protected by a medical certificate of need did not enter into a payment plan once the protection expired.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.
    a. Customers receiving protection for a medical certificate of need are treated the same as customers who have not when it comes to write-off.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.
    a. 7/01/2024 – 6/30/2025: $0
    b. 7/01/2025 – 6/30/2026: $0, Current potential write-off exposure is $629.20

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?
    a. We currently do not have any processes in place for customers protected under a medical certificate of need. We do have processes in place to

quickly act once made aware of the need by the customer.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?
    a. Once made aware of the situation we have measures in place to assist customers.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?
    a. No further suggestions at this time.

Mike Cizenski

From: [redacted]
Sent: Monday, August 3, 2026 1:45 PM
To: Mike Cizenski
Subject: Survey

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Blue Ridge Water Agency
Utility Type (Elec/Gas/Water/Wastewater):
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? none

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? 0%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? 0

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? 0

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? 0

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? 0

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers? none

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. No

---

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? None

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions? 0

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification? None

---

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? None

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? 0

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? None

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medicall conditions or service disconnections? None

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? N/A
2. What portion of these customers enter into payment plans once certification expires? N/A
3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books. There is no written-off uncollectable accounts
4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. None

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? No customers are using these medical equipments
2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? No

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? No

Sent from my iPhone

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Cascade Mountain Water Company, Inc.
Utility Type (Elec/Gas/Water/Wastewater): Water
Contact info (Name/Email/Phone):

[redacted]

Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? None None

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? Zero Zero

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? Not Applicable

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?

Not Applicable

I. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? Not Applicable

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? Not Applicable

II. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers? None

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. No

III. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? None

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

   None

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification? Has not happened

IV. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? Not Applicable

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? Not Applicable

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? Not Applicable

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

Not Applicable

V. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? Not Applicable

2. What portion of these customers enter into payment plans once certification expires? Not Applicable

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books. Not Applicable

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. Zero Zero

---

VI. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? Not Applicable

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? Yes

---

VII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? Not Applicable

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Craig Botetourt Electric Cooperative
Utility Type (Elec/Gas/Water/Wastewater): Electric
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? 0 forms were received during each reporting period. Six forms were sent to customers between July 1, 2025, and June 30, 2026; no completed forms were returned.

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? 0% of residential customers submitted an SMCC Form during either reporting period.
3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? 0 forms (0%) were submitted after a customer received a notice of intent to terminate service during either reporting period.
4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? 0 certifications (0%) were denied during either reporting period; therefore, there were no reasons for denial.

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? Not applicable, because no signed SMCC Forms have been received since July 1, 2024.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? Not applicable, because no SMCC Forms have been received for processing since July 1, 2024.

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers? Customers are provided the SMCC Form and an accompanying letter explaining the applicable timeline and instructions for completing and returning the form to the Cooperative. Customers are also directed to our website for additional information, and any further questions are addressed by phone or email.
2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. Yes. The form is available at https://cdn.prod.website-files.com/62c445c058900406cf01bd54/63050c0a3cca7117d2a502da_Serious_Medical_Condition.pdf

---

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? Customer service staff are trained to provide and explain the SMCC process and to direct customers to the required form. The determination of whether a customer has a serious medical condition is made by the customer's referring physician, not by customer service staff.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions? The Cooperative assesses staff readiness through training and ongoing supervision to ensure customer service personnel can appropriately guide customers through the SMCC process. Staff do not make medical determinations; those determinations are made by the customer's healthcare provider.
3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification? SMCC customer information is maintained in an Excel spreadsheet to track each customer's status

and support timely follow-up when a form is incomplete or additional clarification is required.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? 0 customers had disconnections delayed due to an SMCC Form during the reporting periods. Before the reporting period, two customers with other medical information on file experienced disconnections, but neither had submitted the formal SMCC Form.
2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? 0%, because no customers received a disconnection delay based on an SMCC Form during the reporting periods. Of the two customers referenced above who had other medical information on file before the reporting period, both were eventually disconnected.
3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? 0 certifications (0%) were renewed beyond their initial term during either reporting period.
4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? The Cooperative has not received feedback from healthcare providers regarding their interactions with the utility concerning serious medical conditions or service disconnections.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? Certified customers may accumulate arrearages during the protection period. However, the Cooperative did not receive any SMCC Forms during the reporting periods.
2. What portion of these customers enter into payment plans once certification expires? The Cooperative would offer payment-plan arrangements to all affected customers following expiration of the certification. However, no SMCC Forms were received during the reporting periods.
3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the

utility's books. Yes. Costs associated with written-off uncollectible accounts are included in the base-rate cost of service as incurred.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 6/30/25 and 7/1/25-6/30/26. Customer account balances written off totaled $26,415.70 for July 1, 2024, through June 30, 2025, and $43,678.90 for July 1, 2025, through June 30, 2026.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? The policy assists operations staff in identifying customers who may require priority consideration for reconnection during planned or unplanned outages.
2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? Operations staff identify SMCC customers in the outage management system so they can be prioritized for reconnection as conditions permit. Customers are also advised to maintain an appropriate backup power source in case an outage occurs.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? The Cooperative does not recommend any changes at this time.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Community Electric Cooperative
Utility Type (Elec/Gas/Water/Wastewater): Elec
Contact info (Name/Email/Phone):

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?
   7/1/2024 – 6/30/2025 – 1(But we also had some renew)
   7/1/2025 – 6/30/2026 – 14

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?

   Less than 1%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?

   Less than 1%

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?

   None were denied

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

We do our best to enter them into the system the same day we receive. It does not take us two business days to enter the information.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?

   All

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

   We take the opportunity when talking to our members when they have questions regarding life support machines they need and talk to them about the forms either by phone or in person. We either direct them to our website for more information and how to have access to the form.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.

   Yes. Serious Medical Condition – Community Electric Cooperative

---

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

   This is part of our training when we hire a new member service representative and we explain the importance of this forms and why we need to have them on file.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

   Once we have been alerted by our members we will either have them come to the office and pick up a form and go over it again. If they are not able to come in we will mail, email or guide them to our website.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

   We will call the member and let them know that the form is incomplete and we cannot process as is at this time. We will ask the member to either pick up the form or we could email it to the providers office and hope for a quicker turn around.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?

   1 in 2024 but haven't had other that needed more than 30 days to make payments. Other members we are able to use the payment arrangements since they only need a few extra days or a week to make payment.

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?

   None

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?

   Most of the members do renew their forms when they are about to expire. We also try and call our members to notify them when it is about to expire as long as we have a good contact number for the member.

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

None

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?

   No

2. What portion of these customers enter into payment plans once certification expires?

   Less than 1%. Some of our members that have the form are just in case of and emergency and this way we could try and restore their power as quick and safe as possible.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

   Yes, they are included in the base rate cost of service.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.

   We have not done our write-offs for 7/1/24 – 6/30/25 we do them in October and I will not have the write off amount for 7/1/25 – 6/30/26 until October of 2027.

   I do have our write-offs for 7/1/23 – 6/30/24 and we wrote-off 96 Accounts totaling $26,816.17.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

The policy has been useful in providing knowledge and situational awareness during storm restoration. As the Commission is aware, however, restoration proceeds in stages designed to reconnect the greatest number of customers with each repair.

Transmission infrastructure is addressed first, followed by critical distribution facilities such as hospitals, water pumping stations, and 911 Public Safety Answering Points. Primary distribution circuits and tap lines follow, with individual service connections affecting one or two customers generally restored last. Importantly, it encourages those customers to establish contingency plans for extended outages, such as using a generator, temporarily relocating, or connecting with shelters, social services, or other public resources.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

Cooperatives include guidance in communications to all customers, emphasizing that those with medical equipment or sensitivity to heat or cold should plan in advance, because it cannot be guaranteed that all those special medical considerations participate in SMCC.

That guidance may include securing and properly fueling a generator, following generator safety precautions, arranging temporary relocation, or identifying available shelters and social services.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

   The first major issue, in the Association's view, is awareness. Many customers with serious medical conditions may not know that the SMCC exception is available. The Commission and the Commonwealth could help through broader consumer education and outreach. The second issue is abuse of the process. A small but identifiable number of customers repeatedly use the medical condition form to extend

disconnection relief, sometimes changing the account name or otherwise restarting the process for the same residence. Currently, there appears to be no practical basis for rejecting a form unless the signing medical professional is not legitimate or has provided false information. It may be helpful for the Commission to establish a process through which SCC Staff could review repeated or suspicious filings and determine whether future forms should be accepted for particular individuals or residences. This may require legislative action rather than a regulatory or policy change. In summary, my principal recommendations for the final question are to improve awareness of the program among eligible customers and to create an effective mechanism for preventing abuse.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Central Water Company, Inc.
Utility Type (Elec/Gas/Water/Wastewater): Water
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? None

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? none

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? none

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? None

---

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? No time

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? none

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers? We sent a letter to the customers and have the application on our web site

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.www.scrossi.com

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? only First Aid Training

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions? We just ask for a letter from a licensed Doctor of Medicine

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification? We would call them on the phone

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? none

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? Zero percentage

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? none

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? A local Doctor called to commend us for the service.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? Our area is approximately 66 square miles
2. What portion of these customers enter into payment plans once certification expires? We never have had one!

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books. It shows up as uncollected on our balance sheet

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. none

---

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? We have never in 26 years have an outage of water service!

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?
3. We have never experienced an outage!

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?
   There is a need for a policy to be in place to inform our customers of the availability of this program.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Columbia Gas of Virginia
Utility Type (Elec/Gas/Water/Wastewater): Gas
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?

   From 7/1/2024–6/30/2025, 100 new forms were received
   From 7/1/2025–6/30/2026, 292 new forms were received

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?

   7/1/2024-6/30/2025 - 63 Unique Accounts / 268,109 total residential customers as of 12/31/24 = .0002%
   7/1/2025-6/30/2026 - 162 Unique Accounts / 269,362 total residential customers as of 12/31/25 = .0006%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?

   From 7/1/2024-6/30/2025, 25 (25%) were submitted by customers only after they received a notice of intent to terminate service from the utility. From 7/1/2025-6/30/2026, 76 (26.03%) were submitted by customers only after they received a notice of intent to terminate service from the utility. Please note our reporting only shows unique customers and does not include customers who have used an SMCC form to delay their account more than 1 time.

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?

   The primary reasons certifications were denied were due to incomplete or missing information on the SMCC form and the absence of identifying account information needed to associate the form with a customer account.

   For the period 7/1/2024–6/30/2025, 32 medical certificate forms were initially denied. Following customer outreach, 7 forms were resubmitted and determined to be valid, resulting in 25 forms, or 25%, remaining denied.

   For the period 7/1/2025–6/30/2026, 166 SMCC forms were initially denied. Following customer outreach, 82 forms were resubmitted and determined to be valid, resulting in 84 forms, or 28.8%, remaining denied.

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

   The Company does not track the average time between receiving a signed SMCC Form and updating the customer's account. However, we do track the average time between receiving an SMCC Form and completing the follow-up call attempt to the customer to notify the customer that documentation was received. The average time from receipt of the form to completing a follow up call attempt to the customer since 7/1/2024 is 7 hours 29 minutes.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?

   The total percentage of SMCC Forms that have been processed within two business days since 7/1/2024 is 98.8%.

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

   The Company communicates information regarding the SMCC policy through multiple customer-facing channels, including the Company website, chatbot functionality, and direct interactions with customer service representatives.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.

   No, the SMCC Form is not available on the Company's website. Pursuant to 20VAC5-330-40(B)(2), CVA advises that the customer can access the form via the SCC's website.

   The Columbia Gas of Virginia website includes information explaining the medical-certification protection available to residential customers. Customers are instructed to call Columbia Gas of Virginia at 1-800-543-8911 for additional information and assistance. The applicable website page is: **Shut Off and Reconnect Process.**

Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

   Customer service staff receive training utilizing a knowledge aid tool that is used by customer service representatives when handling customer interactions. This tool provides step-by-step guidance on the appropriate actions to take when a customer indicates that a household member has a medical condition. In addition, a refresher quiz has been developed for both existing and future customer service representatives to reinforce understanding of the SMCC process and related policy requirements.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

   Columbia Gas assesses the confidence level and abilities of its customer service staff in multiple ways. Newly hired employees complete assessments at the conclusion of each training module, which includes evaluation of the SMCC process. In addition, customer service representatives are subject to randomly selected call review evaluations. These quality assurance reviews assess whether representatives are following appropriate processes, including the proper identification, guidance, and handling of customer interactions related to the SMCC process.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

   SMCC forms are typically processed on the same business day they are received during Customer Service operating hours (Monday through Friday, 7:00 a.m. to 7:00 p.m.), and any required customer callbacks are completed at that time. If a medical certificate is received outside of these business hours or on a non-business day, the certificate is processed; however, any additional follow-up required to obtain clarification on an incomplete SMCC Form and associated customer callback may not be completed until the next business working day.

Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?

   Approximately 101 customers have had their disconnections delayed due to having a SMCC Form on file with the Company. Please note that some of these customers may have been delayed multiple times.

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?

   The Company does not track this information.

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?

   The Company does not track this information.

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

   No notable feedback has been received from healthcare providers regarding their interactions with the Company related to serious medical conditions or service disconnections.

Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?

   Yes.

2. What portion of these customers enter into payment plans once certification expires?

   The Company does not track this information.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

   Those accounts with a medical certificate in use are not being sent to collections.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.

   Those accounts with a medical certificate in use are not being sent to collections.

IV. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

   The Company is not aware of any customers who have medical equipment that is solely reliant on natural gas.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

   No

V. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

   No

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Central Water Co. Inc &: Virginia Ridge Water Co. Inc. & Santilane Water Co., Inc
Utility Type (Elec/Gas/Water/Wastewater): Water
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? 0

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? 0

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? 0

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? 0

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? 0

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? 0

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers? We notified our customers and have the information in our rules.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. Yes! www.scrossi.com

---

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? They are not qualified. We require a Medical Doctors prescription.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions? We do not want them to have any confidence. It is only allowed by a medical professional,
3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification? We require pour President to see any requests.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? none

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? none

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? none

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? none

---

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? Yes!

2. What portion of these customers enter into payment plans once certification expires? We never had one.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility books. We do not allow any uncollected accounts.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. none

---

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? We have no records or notification from any customers on ventilator, Oxygen or concentrators.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? Yes, We sent notification to all customers when the rule was established and have it in our published rules.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?
   There is no reason to have a rule. If any customer has any needs that we can provide and they cannot provide them themselves. We will provide them. We would even provide ventilators or oxygen if the customer is in need and cannot provide it.

   Stephen C. Rossi, License # 1955005218

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Founders Bridge Utility Company 2026
Utility Type (Elec/Gas/Water/Wastewater): Water & Wastewateer
Contact info (Name/Email/Phone): [redacted]

[redacted]

[redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? Zero

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? 0%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? 0%

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? N/A

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? N/A no forms received

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? None Received

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?
   News Release

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. No

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? Trained to refer to senior management

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?
   No formal assessment has been made

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?
   Incomplete forms would be referred to management to personally contact the custome

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? No forms received

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? No forms received

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? No forms received

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? None

---

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?
   No interest or penalties would be applied but normal water charges would still apply

2. What portion of these customers enter into payment plans once certification expires? N/A

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books. YES

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. None as no requests have been received.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? n/a

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? They would be personally contacted

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? no

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Groundhog Mtn Water & Sewer Co. Inc.
Utility Type (Elec/Gas/Water/Wastewater): Water
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? 0

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?0

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?0

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?0

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?0

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?0

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?None

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. We have no website.

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? None

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?N/A

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?None

---

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?Zero

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?None

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?None

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?None

---

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?N/A

2. What portion of these customers enter into payment plans once certification expires?N/A

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.No

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.Zero

---

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?N/A

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?
   No

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? It is very clear what the rules are and we would abide by this

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: High Knob Utilities, Inc.
Utility Type (Elec/Gas/Water/Wastewater): Water
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? 0

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? 0

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? 0

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? 0

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? N/A

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? N/A

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers? Any information regarding the policy is listed on our website. It states that we cannot discontinue service to households that have a SMCC form for the duration of the certificate, however the customer is still responsible to make payments toward their water bill.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. Yes- https://www.hkui.org/policies

---

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? The staff has researched what it entails to have a serious medical condition and which conditions may require dependence of medical technology.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions? The utility system has not yes assessed the confidence level and abilities of its customer service staff.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification? The staff member is to follow up weekly with the customer to ensure that forms are completed properly.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? 0

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition

delay? 0

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? 0

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? N/A

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? Customers are still responsible to pay any outstanding bills and we offer payment plans to pay their bill over time rather than paying in one lump sum.

2. What portion of these customers enter into payment plans once certification expires? N/A

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books. N/A

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. N/A

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? N/A we have not received any SMCC Forms to know how effective the policy is

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? No specific outage preparedness measures or communication tailored given we only

discontinue service upon request of due to non-payment.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? None right now.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Keswick Utilities, LLC
Utility Type (Elec/Gas/Water/Wastewater): Water/Wastewater
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?0

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?0

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?0

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?0

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? N/a

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?N/A

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. We do not have a website.

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? N/A we don't have customer service staff. We have never terminated a customer (all terminations are related to people moving out of the area). We have never been asked to extend termination for any reason including but not limited to a serious medical condition.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions? See above.
3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification? We have never recevied this type of request.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? N/A we've never disconnected anyone.

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? N/A

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? N/A

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? We have never had feedback from a healthcare provider

---

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? This has never happened.

2. What portion of these customers enter into payment plans once certification expires? We've never had a payment plan-it's never been requested.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books. N/A see above.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. 0

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? N/A

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? We don't have any such forms on file.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? No.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Kentucky Utilities Company d/b/a Old Dominion Power Company
Utility Type (Elec/Gas/Water/Wastewater): Electric
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?

   KU-ODP Response:

   7/1/2024 – 6/30/2025: 5

   7/1/2025 – 6/30/2026: 16

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?

   KU-ODP Response:

   7/1/2024 – 6/30/2025: 5/22,445* = .022%

   7/1/2025 – 6/30/2026: 16/22,445* = .071%

   *Total ODP Residential Customer Count of 22,445 as of 7/15/2026.

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?

   KU-ODP Response:

   7/1/2024 – 6/30/2025: 5 and 100%

   7/1/2025 – 6/30/2026: 16 and 100%

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?

KU-ODP Response:

0 and 0% for the two date ranges.

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

   KU-ODP Response:

   Within 1-2 business days.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?

   KU-ODP Response:

   100%.

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

   KU-ODP Response:

   Customer Service Representatives explain how the SMCC policy is administered as part of the call-handling process. Customers are also directed to the Virginia State Corporation Commission website scc.virginia.gov for additional information and resources. Program details are also available on the Company's website lge-ku.com.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.

   KU-ODP Response:

   Yes, the form is located on the KU-ODP corporate website link under Assistance Programs:

   Assistance programs | LG&E and KU

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

   KU-ODP Response:

   The Company trains all its customer service representatives to assist our Virginia customers facing disconnection through a combination of instructor-led and self-paced training. The curriculum includes training on the specific process to fulfill the requirements of the ODP Serious Medical Condition Certification including training on recognizing the needs of this particular customer segment. This skill training is conducted in a hands-on training environment, facilitating the repetition and role-play necessary to build agent confidence in their new skills. The training team evaluates representatives' performance during the training, coaching them by providing insight into each individual representative's level of skill progression and confidence. The Company immediately supports representatives post-training with a multi-week, closely supervised live-call "nesting" period to further evaluate representatives' skill development and confidence. Finally, to further support our representatives post-training, the Company maintains fully detailed articles in our knowledgebase systems, accessible to all representatives.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

   KU-ODP Response:

   The Company trains all its customer service representatives on how to handle communications from customers when they inform us of a serious medical issue, understanding that the interruption of service would make their condition worse. We assess representatives' confidence in the process during our Quality Assurance call monitoring. Calls from each representative are selected and monitored monthly and assessed against our performance standards. We also hold weekly coaching and feedback sessions to review the monitored calls.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

   KU-ODP Response:

   Customers are contacted via phone if the Company receives an incomplete form.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?

   KU-ODP Response:

   7/1/2024 – 6/30/2025: 5

   7/1/2025 – 6/30/2026: 16

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?

   KU-ODP Response:

   Only 1 of the 21 accounts referenced in 1. above was disconnected after the delay ended, representing 4.76%.

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?

   KU-ODP Response:

   7/1/2024 – 6/30/2025: 1 and 20%

   7/1/2025 – 6/30/2026: 2 and 12.5%

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

   KU-ODP Response:

   None.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?

   KU-ODP Response:

   Yes.

2. What portion of these customers enter into payment plans once certification expires?

   KU-ODP Response:

   0.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

   KU-ODP Response:

   Actual write-offs and recoveries are recorded in the Company's books when incurred, but the amount reflected in cost of service is the normalized five-year average rather than the current period actual amount.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 6/30/25 and 7/1/25-6/30/26.

   KU-ODP Response:

   The statistics provided below are specific to ODP serious medical extensions concerning amounts written off after the extension.

   7/1/24 – 6/30/25 – $0

   7/1/25 – 6/30/26 – $0

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

   KU-ODP Response:

   The Company is not aware of any complaints from customers who rely on medical equipment regarding the administration of the program during planned or unplanned outages. Based on this experience, the policy has been effective in supporting communications with these customers during outage events.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

KU-ODP Response:

For planned outages, the Company notifies customers with SMCC Forms on file in advance of the outage so they can make appropriate arrangements for any medical equipment or other needs during the interruption. For unplanned outages, the Company identifies these customers through medical indicators associated with their meters and transformers, and includes them on a high-priority restoration list to support timely service restoration when practicable.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

KU-ODP Response:

This process has been serving the needs of our customers with serious medical conditions well, and the Company does not recommend any changes at this time.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Life Essentials
Utility Type (Elec/Gas/Water/Wastewater): water
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? none

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? 0%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? 0

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? 0

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? n/a

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? 0

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers? none

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. n/a

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? none

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions? n/a

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification? Standard processing, same day

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? 0

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? 0

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? 0

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? 0

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? n/a

2. What portion of these customers enter into payment plans once certification expires? n/a

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books. n/a

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. 0

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? n/a

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? n/a

---

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? No

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: **Mecklenburg Electric Cooperative**
Utility Type (Elec/Gas/Water/Wastewater): **Electric**
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? 113 total for the two date ranges.

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? 0.03%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? 14

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? Only 1 due to customer self-completion of form. Customer utilized Doctor's credentials without their knowledge.

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? Member/consumer account is updated immediately upon receiving completed form.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? 100%

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers? When requested, a letter is sent to the Member/consumer explaining the policy & instructions along with the SMCC form to be completed.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. Yes, the SMCC form can be found on MEC's website.

   chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.meckelec.org/wp-content/uploads/MEC-Serious-Medical-Form-3_2024.pdf

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? All Member Service Representative's (MSR) undergo training on policy and fully understand the SMCC policy and definitions regarding the form.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions? MEC has the upmost confidence that MSR's have knowledge of the SMCC program and the ability to explain it to our Member/consumer. Ongoing assessment is conducted as Manager reviews completed documents and reviews random member calls.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification? MSR's contact the Member/consumer upon receipt, to inform them of the form's incompleteness and then notate the account.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? 14

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? Zero

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? MEC retains all existing Certification forms received during that time period and request updates if the need for disconnection arises. New certifications are required to continue in the program.

4. What feedback has healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? Healthcare providers have not shared any interactions with SMCC Member/consumer to the utility.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? Yes

2. What portion of these customers enter into payment plans once certification expires? MEC has not had any during the time frame. We make extensions to accommodate but no payment plans were requested.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books. Yes

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. MEC does not keep reports to provide this information.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? The policy has been useful in providing knowledge and situational awareness during storm restoration. As the Commission is aware; however, restoration proceeds in stages designed to reconnect the greatest number of customers with each repair.

   Transmission infrastructure is addressed first, followed by critical distribution facilities such as hospitals, water pumping stations, and 911 Public Safety Answering Points. Primary distribution circuits and tap lines follow, with individual service connections affecting one or two customers generally restored last.

   Importantly, MEC encourages those customers to establish contingency plans for extended outages, such as using a generator, temporarily relocating, or connecting with shelters, social services, or other public resources.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? Cooperatives include guidance in communications to all customers, emphasizing that those with medical equipment or sensitivity to heat or cold should plan in advance, because it cannot be guaranteed that all those special medical considerations participate in SMCC.

   That guidance may include securing and properly fueling a generator, following generator safety precautions, arranging temporary relocation, or identifying available shelters and social services.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? A major issue is awareness. Many customers with serious medical conditions may not know that the SMCC exception is available. The Commission and the Commonwealth should help through broader consumer education and outreach.

The second issue is abuse of the process. A small but identifiable number of customers repeatedly use the medical condition form to extend disconnection relief, sometimes changing the account name or otherwise restarting the process for the same residence. Currently, there appears to be no practical basis for rejecting a form unless the signing medical professional is not legitimate or has provided false information. It may be helpful for the Commission to establish a process through which SCC Staff could review repeated or suspicious filings and determine whether future forms should be accepted for particular individuals or residences. This may require legislative action rather than a regulatory or policy change.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Mountain Lakes Water Co.
Utility Type (Elec/Gas/Water/Wastewater):
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? 0

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? 0

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? 0

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? 0

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? N/A

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? N/A

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. mtnlakeswater.com / more / helpful links

---

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? 0

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? 0

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? 0

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? 0

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?
   YES IF THEY CONTINUE TO NOT PAY THEIR BILL
2. What portion of these customers enter into payment plans once certification expires?
   0
3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.
   N/A
4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. 0

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?
   N/A
2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?
   NO

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the sericus medical condition policy for residential utility customers?

   NO

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Northern Neck Electric Cooperative
Utility Type (Elec/Gas/Water/Wastewater): Electric
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?
    a. 7/1/2024 – 6/30/2025: 36
    b. 7/1/2025 – 6/30/2026: 40

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?
    a. 7/1/2024 – 6/30/2025: 0.20%
    b. 7/1/2025 – 6/30/2026: 0.22%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?
    a. 7/1/2024 – 6/30/2025: 6
    b. 7/1/2025 – 6/30/2026: 5

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?
    a. 7/1/2024 – 6/30/2025: 0
    b. 7/1/2025 – 6/30/2026: 0

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?
    a. 0 days – apply the same day we receive the signed form

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?
    a. 100%

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?
    a. When a member notifies the Cooperative that they or a household member has a serious medical condition and cannot safely be without electric service, the member will be advised of the SMCC process. The Cooperative will mail the SMCC form, along with a letter advising the member of the date by which the completed form must be returned to qualify for the extended protection from disconnection.
    b. Information is also provided on our website.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.
   Yes; https://www.nnec.coop/my-account/additional-resources/serious-medical-condition/

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?
    a. Member services personnel have been trained on the definitions provided in 20VAC5-330-20. All member services personnel also have a copy of these definitions to refer to when needed.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?
    a. NNEC relies on documented procedures, employee training, supervisory oversight, and periodic reviews of member interactions to ensure member services personnel can appropriately identify potential serious medical condition cases and guide members through the required process.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?
    a. Upon receipt of an SMCC Form, member services personnel review it for completeness. If required information is missing or clarification is needed, NNEC contacts the member as soon as possible by telephone and/or writing to explain what additional information is needed. The member's account is documented to track the follow-up, and member services personnel monitor the account to ensure the completed information is received before the applicable deadline. If necessary, member services personnel may also contact the licensed physician or nurse practitioner to verify or clarify information on the certification.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?
    a. 10

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?
    a. 0%

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?
    a. 7/1/2024 – 6/30/2025: 21 – 58%
    b. 7/1/2025 – 6/30/2026: 27 – 68%

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

a. We have not received any feedback from healthcare providers.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?
    a. Yes

2. What portion of these customers enter into payment plans once certification expires?
    a. We have not had any members enter into a payment plan once the certification expires.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.
    a. We use a 5-year average of write-offs in our cost of service.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 6/30/25 and 7/1/25-6/30/26.
    a. 7/1/2024 – 6/30/2025: $65,015.04
    b. 7/1/2025 – 6/30/2026: $76,141.56

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?
    a. NNEC maintains SMCC accounts in our customer information system and that information is passed to our outage management system, making those easily accessible to our outage management team. We strive to restore service to members with SMCC forms on file as safely and promptly as operational conditions allow.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

a. We communicated outage-preparedness measures to all our members. We do not tailor any communications directly related to members with SMCC forms on file.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Northen Virginia Electric Cooperative
Utility Type (Elec/Gas/Water/Wastewater): Electric
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?

   07/01/2024 – 06/30/2025: 66

   07/01/2025 – 06/30/2026: 94

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?

   07/01/2024 – 06/30/2025: ~.0004

   07/01/2025 – 06/30/2026: ~.0006

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?

   NOVEC does not currently track this information.

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?

   07/01/2024 – 06/30/2025: 2

   07/01/2025 – 06/30/2026: 4

Reason: Equipment or medications necessary for the treatment of the condition do not require constant electricity.

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

   The average processing time is 2 business days

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?

   100% of applications are processed within this timeframe

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

   The information is listed on our website, and the information is provided by phone to customers by our representatives when needed.

   Policy information can also be found on the SMCC form.

2. Is the SMCC Form available electronically on the utility's website?
   Yes
   Please provide the URL. https://www.novec.com/Customer_Services/SMCC.cfm

---

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence

on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

SMCC is a part of our official new hire training for representatives, a part of refresher training and the training material is on our knowledge management shared drive as a resource.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

   We have a rigorous quality management program designed to ensure policies and procedures consistently meet established standards. We conduct ongoing monitoring of calls and have implemented continuous improvement initiatives, ensuring the knowledge is consistent and up to date.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

   When SMCC Forms are received, they are forwarded to the customer care team for review. There is a primary contact and two back-ups to ensure responsiveness. If the form is incomplete or requires additional clarification the member is notified via email within 2 business days of receipt. If the equipment required for the serious medical condition requires additional clarification, the office of the physician listed is contacted within 2 business days of receipt for confirmation. After which the member is notified via email.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?

   07/04/2024-06/30/2025 – 33
   07/01/2025-06/30/2026 - 28

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?

   NOVEC does not track this information currently

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?

   NOVEC does not track this information currently

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

   We have received no feedback from healthcare providers.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?

   Yes, arrearages accumulate plus a 1.5% per month late fee on the balance.

2. What portion of these customers enter into payment plans once certification expires?

   We do not track this information currently

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred?

   They are not as our last rate increase was 2010 and the initial law was established 2011.

   a. If not, please explain how they are recorded on the utility books.

   The uncollectible costs are recorded in the allowance for bad debt, and the administrative costs are recorded in customer service and collections.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 6/30/25 and 7/1/25-6/30/26.

   NOVEC reports write-offs on an annual basis, ex. y/e 2024, y/e 2025 rather than by period.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

   The policy has been useful in providing knowledge and situational awareness during storm restoration. As the Commission is aware, however, restoration proceeds in stages designed to reconnect the greatest number of customers with each repair.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

   NOVEC provides communications to all impacted customers, emphasizing that those with medical equipment or sensitivity to heat or cold should plan in advance, because it cannot be guaranteed that all those with special medical considerations participate in SMCC.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

   Proactive notifications of upcoming expiration of certifications could help improve the customer experience and improve operability.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Peacock Hill Service Company
Utility Type (Elec/Gas/Water/Wastewater): Water
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? 0

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? 0

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? 0

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? 0

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? N/A

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? N/A

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers? None

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. No

---

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? No training, but have read chapter 637.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions? N/A

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification? None

---

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? 0

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? 0

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? 0

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? N/A

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? N/A

2. What portion of these customers enter into payment plans once certification expires? N/A

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books. N/A

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. $0

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? N/A

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? N/A

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? We have not disconnected any customers in 5+ years. We speak with them if they are having difficulties paying their bill (which is extremely rare) and put them on a payment plan that works for them. We have not encountered any

situation in which a customer has requested or needed an SMCC, so our utility would not be a helpful resource for establishing guidance surrounding SMCC policy.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Prince George Electric Cooperative
Utility Type (Elec/Gas/Water/Wastewater): Electric
Contact info (Name/Email/Phone):

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? 17 Forms / 23 Forms

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? .16% / .21%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? 17 Forms-100% / 23 Forms 100%

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? None

---

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? Same day or next business day

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? 100%

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?
   SMCC information is given to members over the phone and via our website. Delinquent members with medical needs are advised to complete and submit an SMCC form.
2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.
   https://1ca81f2a-1e3a-4db7-9db5-6a1f92cca1cc.filesusr.com/ugd/5154ab_8fddfad75e004982befe5812d7043006.pdf

---

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? There is an annual review with staff regarding the SMCC policy with open discussions.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?
   There is an annual review with staff regarding the SMCC policy with open discussions. Management reviews SMCC orders periodically to ensure that employees are following proper procedures.
3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?
   Open contacts are placed on accounts and daily follow-ups are made until resolved.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?
   During the timeframes above, approximately 30 members have had their disconnections delayed.

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?
   Approximately 56% were disconnected.
3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?
   2024-2025 – 3 certifications and 17% of the SMCC members that returned form.
   2025-2026 – 0 certifications and 0 at this time.
4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?
   None

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?
   Yes
2. What portion of these customers enter into payment plans once certification expires? 4.7%

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.
   Recorded as Credit to AR and Debit to Accumulated Uncollectable. Annual analysis determined to record annual accrued bad debt expense.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.

   2024-25 $6,070.34

   2025-26 $2,137.99

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? Our crews work diligently to get power restored for all members as quickly

as possible. There is a specific code on member accounts that have a current SMCC on file. Our OPS and Member Services team can view these in an outage.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?
   Phone calls and emails go out for scheduled maintenance outages. We have an outage preparation page on our website.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Po River Water and Sewer company
Utility Type (Elec/Gas/Water/Wastewater): Water/WW
Contact info (Name/Email/Phone): [redacted]
I have ZERO incidents of SMCC. We are a Recreational RV park

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? ZERO

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? 0%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? NONE

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?

2. What portion of these customers enter into payment plans once certification expires?

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Powell Valley Electric Cooperative
Utility Type (Elec/Gas/Water/Wastewater):
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? 1

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? .02%
3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? 1, .02%

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? None were denied

---

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? Same day

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? 100%

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers? Customers are advised to submit this form when PVEC is made aware of a medical condition that exists or if disconnection of service may be a result of non-payment but the customer requires an extension due to medical necessity and has exhausted all other options available.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. https://www.pve.coop/about-us/member-information/policies/ Policy 100-2 E Section H

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? Customer service staff receive training during new hire training and yearly refresher training in billing staff meetings.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions? The utility assesses confidence level by the number of questions/issues that are escaladed to supervisors rather than handled on the front line. Customer service representatives are provided with information and training on where to find the documents along with how to provide the information to customers to best guide them.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification? As soon as the form comes through, a billing supervisor will assess the form and immediately contact the customer and follow up until the form is completed correctly and logged in the billing system.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? 1

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? 100%

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? 0

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? None

---

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? Yes

2. What portion of these customers enter into payment plans once certification expires? 0

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books. Yes

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. $0

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? This policy is effective in letting our engineering/dispatch know that there is a member who is medical reliant at this specific location in the event of an outage.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? Members who have made the cooperative aware of their medical reliance are coded in the system so that they show up as a medical alert on the engineering dispatch program. These members are advised to have backup plans in the event of an outage, but we are aware of their need when restoring outages as well.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? We do not have any suggestions. We attempt to provide extra opportunities for our customers prior to this form being completed to give our members the best service possible.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Rappahannock Electric Cooperative
Utility Type (Elec/Gas/Water/Wastewater): Electric
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)
   07/01/2024 – **250**
   07/01/2025 - **302**

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?
   Less than 1% (both)

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? **2024 – 78 2025 – 131**

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?
   07/01/2024 **– 2 Member's condition did not require electricity (no medical equipment etc)**
   07/01/2025 – **0**

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? **1-2 Business days**

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? **100%**

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers? **Members have been provided information about eligibility & requirements and program guidelines. The information has been conveyed to members via our website, and our member service representatives, the SMCC info letter that goes with the initial form.**

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.
   Serious Medical Condition Certification | myrec

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

Member Services personnel (including MSRs, Team Leaders, and Supervisors) receive training on the SMCC policy as part of the new hire onboarding curriculum. The topic is delivered as a dedicated module within the CIS training program and may also be provided as a standalone course when appropriate. Refresher training and targeted coaching are conducted as policy updates occur or when coaching opportunities are identified.

Training includes (but is not limited to) instruction on:

- **The purpose and intent of SMCC**
- **Policy definition and eligibility requirements**
- **Distinguishing SMCC from other payment assistance or hardship**
- **Extension provisions (including applicable timeframes and eligibility requirements.)**
- **Documentation requirements and processing procedures**
- **Escalation procedures**
- **Member communication techniques**
- **Privacy & confidentiality**

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions? **The cooperative assesses employee readiness through a combination of knowledge assessments, scenario-based training, quality assurance monitoring, and on-going coaching. Employees must achieve a minimum of 80% on the associated knowledge assessment.**

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?
   There are corresponding contacts that are placed on members account that create letters that go out to the member to let them know if it has been approved, denied or if there is any missing information that needs to be filled out for completion.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? **2024 – 71, 2025 - 100**

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?
   07/01/2024 – **4 (5%)**
   07/01/2025 – **6 (6%)**

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?
   07/01/2024 – **317**
   07/01/2025 - **303**

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? **N/A**

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?
   Yes
2. What portion of these customers enter into payment plans once certification expires?
   07/01/2024 – **63**
   07/01/2025 - **36**

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? **Yes, as any other operational debt.** If not, please explain how they are being recorded on the utility's books.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 6/30/25 and 7/1/25-6/30/26.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? **Please see VMAEC response to this question.**
2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?
   Please see VMAEC response to this question.
3. ---

VIII. Policy Effectiveness & Outcomes

4. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? **Please see VMAEC response to this question.**

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Roanoke Gas Company
Utility Type (Elec/Gas/Water/Wastewater): Gas
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?

None for either period.

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?

N/A. No SMCC forms were submitted during either period.

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?

N/A. No SMCC forms were submitted during either period.

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?

N/A. No SMCC forms were submitted during either period.

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

N/A. No SMCC forms were submitted during either period.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?

N/A. No SMCC forms were submitted during either period.

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

The Company has posted the SMCC forms on its website.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.

Yes. The SMCC forms can be found on our website here:
https://www.roanokegas.com/customer-service/payment-assistance/

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

The Company has provided the SMCC form to its call center and has instructed the call center agents to direct these customers to an in-house customer service specialist to assist.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

The Company's in-house customer service specialists are aware of the requirements related to SMCC forms and the delay to service disconnections.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

These customers will be handled on a case-by-case basis by an in-house customer service specialist. The Company has not yet received a SMCC form.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?

N/A. No SMCC forms were submitted during either period.

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?

N/A. No SMCC forms were submitted during either period.

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?

N/A. No SMCC forms were submitted during either period.

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

N/A. No SMCC forms were submitted during either period.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?

N/A. No SMCC forms were submitted during either period.

2. What portion of these customers enter into payment plans once certification expires?

N/A. No SMCC forms were submitted during either period.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

N/A. No SMCC forms were submitted during either period.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.

N/A. No SMCC forms were submitted during either period, therefore the Company has not written off any customer balances specific to SMCC delayed accounts.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

The Company has not received any SMCC forms to date and is unable to evaluate the policy's effectiveness.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

The Company has not received any SMCC forms to date but will develop a communication policy for such customers when/if a SMCC form is provided.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

Not at this time.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Southside Electric Cooperative
Utility Type (Elec/Gas/Water/Wastewater): Electric
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?
    a. 7/1/2024 – 6/30/2025: 47
    b. 7/1/2025 – 6/30-2026: 53

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?
    a. 7/1/2024 – 6/30/2025: ~.12%
    b. 7/1/2025 – 6/30-2026: ~.12%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?
    a. N/A

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?
    a. N/A

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

a. One business day

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?
    a. N/A

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?
    a. It is available on our web site, and we inform members if they inquire about it during phone calls.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.
    a. Yes, https://www.sec.coop/serious-medical-condition-form-2/

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?
    a. Verbal and written training, including going over the requirements with them in person. We do not deny many forms, so further training has not been required thus far.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?
    a. Monthly QA checks on phone calls, in person observations.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

a. Forms and questions are sent to the Collections team, who respond within one business day as a policy.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?
    a. 7/1/2024 – 6/30/2025: 47
    b. 7/1/2025 – 6/30-2026: 52

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?
    a. 35%

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?
    a. 7/1/2024 – 6/30/2025: 27 of 47 used two months, 57.4%
    b. 7/1/2025 – 6/30-2026: 31 of 53 used two months, 58.4%

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?
    a. None

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?
    a. Yes

2. What portion of these customers enter into payment plans once certification expires?
    a. 33%

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.
    a. 7/1/24 and 60/30/25: $12,885.87
    b. 7/1/25-6/30/26: $4,261.81

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?
    a. We notify members of planned outages, regardless of medical form. We have not heard any particular feedback on these forms re: outages, planned or unplanned.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?
    a. Not at this time.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?
    a. Limiting customers to non-consecutive months would help us avoid driving up arrears beyond what the member can recover from.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Southwestern Virginia Gas
Utility Type (Elec/Gas/Water/Wastewater): Gas
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?

   No forms were received by SVG.

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?

   No forms were submitted to SVG.

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?

   No forms were submitted to SVG.

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?

   No certifications were denied by SVG.

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

   No accounts were updated by SVG due to a signed form.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?

   No forms were processed by SVG.

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

   SVG is a small natural gas operator with a three-person customer service department. Well before the establishment of the new SMCC policy, our customer service team consistently assisted customers facing financial hardships due to unforeseen difficulties. Eligibility for a payment extension from SVG is not contingent upon the submission of a completed SMCC Form. The SVG practice for granting leniency is less restrictive than stipulated in the SMCC rule, and special consideration is regularly extended to customers for any manner of hardship they may be experiencing. To accommodate unique individual circumstances, under Bill Payment Assistance on our website, we direct customers affected by serious medical conditions to contact our office so we can review their accounts and offer personalized support.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.

   The SMCC Form is not available on the SVG website. Eligibility for a payment extension from SVG is not contingent upon the submission of a completed SMCC Form. Upon request, we can email or mail a copy of the SMCC Form to residential customers or provide a link to download the official version directly from the appropriate state website.

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

   Historically, our customer service staff offered case-by-case discretionary assistance to residential customers facing medical-related financial hardships. This was rare, impacting no more than five customers annually. Moving forward, our team will continue applying SVG internal guidelines, which provide an even higher level of support than the new SMCC policy requires.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

   Our customer service staff is aware that unexpected medical situations can result in financial hardships. Because every situation is unique, the team is ready to assist residential customers dealing with challenging medical issues by offering one-on-one support and flexible solutions, such as temporary payment extensions and customized payment plans.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

   Eligibility for a payment extension from SVG is not contingent upon the submission of a completed SMCC Form. Our customer service staff understands these time-sensitive situations require urgent attention. Our team is here to help residential customers with serious medical conditions by quickly setting up temporary payment extensions or customized payment plans. We will stay in touch with these customers to provide ongoing support and ensure a complete resolution.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?

No disconnections were delayed due to having a SMCC Form on file with SVG. SVG does not track hardship extensions granted to customers without a completed SMCC Form, but we estimate about 5 to 10 cases occur each year.

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?

   No customers who received a payment extension due to a serious medical condition were subsequently disconnected by SVG for nonpayment of that temporary payment extension.

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?

   No certifications were approved or renewed by SVG.

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

   No feedback from healthcare providers is available because SVG does not require medical documentation when assisting residential customers with serious medical conditions.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?

   Delaying a service disconnection for a residential customer with a serious medical condition and implementing a temporary payment extension does not pause the accrual of new charges. The customer's arrearage continues to build during this period.

2. What portion of these customers enter into payment plans once certification expires?

To support residential customers facing medical crises, SVG has consistently granted temporary payment extensions and structured payment plans tailored to individual circumstances. No approved certifications are required by SVG for this assistance.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

   Uncollectible accounts are included in the base rate cost of service through bad dept expense that is calculated based on the allowance method.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.

7/1/24 – 6/30/25	$8,317.67
7/1/25 – 6/30/26	$8,874.19

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

   SVG is unaware of any residential customers reliant on life-sustaining medical equipment who have been impacted by natural gas outages.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

   SVG is committed to proactive communication. If we are aware that a customer relies on life-sustaining medical equipment, we will take all feasible steps to provide advance notification of natural gas service interruptions through phone, email, and door hangers.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

   SVG does not currently have any suggested changes.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Shenandoah Valley Electric Cooperative
Utility Type (Elec/Gas/Water/Wastewater): Electric
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?
   7/1/2024 – 6/30/2025: 71
   7/1/2025 – 6/30/2026: 68

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?
   7/1/2024 – 6/30/2025: 0.08%
   7/1/2025 – 6/30/2026: 0.08%

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?
   7/1/2024 – 6/30/2025: 37 and 52.11%
   7/1/2025 – 6/30/2026: 50 and 73.53%

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?
   7/1/2024 – 6/30/2025: 0 and 0%
   7/1/2025 – 6/30/2026: 0 and 0%

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?
   Same Day

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?
   100%

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers? SMCC policy information is available via the SVEC website for members to read along with contact information for assistance from the cooperative should they need it. In-person assistance is available during normal business hours.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. Yes. https://www.svec.coop/wp-content/uploads/Serious-Medical-Condition-Form-2025.pdf

---

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? SVEC Member Services Representatives have guidelines providing an overview of the SMCC program and instructions to relay to members necessary information for submittal and support to participate in the SMCC program, while respecting member privacy. SVEC has Member Services staff specializing in SMCC questions to appropriately assist members with the process. SVEC staff has a general understanding regarding policy definitions, but our role is not to diagnose or evaluate members for program eligibility.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?
   As noted in Section II, SVEC's same-day processing conveys efficient assessment and confidence in the process.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?
   SVEC has Member Services staff specializing in SMCC questions to appropriately assist members with the process from beginning to end.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?
   7/1/2024 – 6/30/2025: 53
   7/1/2025 – 6/30/2026: 57

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?
   7/1/2024 – 6/30/2025: 13
   7/1/2025 – 6/30/2026: 10

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?
   7/1/2024 – 6/30/2025: 12 and 16.9%
   7/1/2025 – 6/30/2026: Unknown as certifications may still be active

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?
   SVEC has received no feedback from healthcare providers.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? Yes

2. What portion of these customers enter into payment plans once certification expires?
   0

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books. Costs associated with written-off uncollectible accounts are not captured as they incur. However, an accrual of the estimated value of uncollectible accounts is recorded monthly on the Cooperative's books. This monthly accrual impacts operating expenses and the allowance for doubtful accounts, while subsequently being recovered through the Cooperative's base rates. At the end of the calendar year, uncollectible accounts from a determined period are written-off, relieving the Cooperative's accounts receivable and the allowance for doubtful accounts. In addition, labor, software programming, and other administrative expenses that are incurred in administering the SMCC program are captured through the Cooperative's base rates.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 6/30/25 and 7/1/25-6/30/26. Neither of these periods have been approved for write-off and collection efforts are still ongoing.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? The policy has been useful in providing knowledge and situational awareness during storm restoration. As the Commission is aware, however, restoration proceeds in stages designed to reconnect the greatest number of customers with each repair. Transmission infrastructure is addressed first, followed by critical distribution facilities such as hospitals, water pumping stations, and 911 Public Safety Answering Points. Primary distribution circuits and tap lines follow, with individual service connections affecting one or two customers generally restored last. Importantly, it encourages those customers to establish contingency plans for extended outages, such as using a generator, temporarily relocating, or connecting with shelters, social services, or other public resources.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? Cooperatives include guidance in communications to all customers, emphasizing that those with medical equipment or sensitivity to heat or cold should plan in advance, because it cannot be guaranteed that all those with special medical considerations participate in SMCC. That guidance may include securing and properly fueling a generator, following generator safety precautions, arranging temporary relocation, or identifying available shelters and social services.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers? The first major issue, in the Association's view, is awareness. Many customers with serious medical conditions may not know that the SMCC exception is available. The Commission and the Commonwealth could help through broader consumer education and outreach. The second issue is abuse of the process. A small but identifiable number of customers repeatedly use the medical condition form to extend disconnection relief, sometimes changing the account name or otherwise restarting the process for the same residence. Currently, there appears to be no practical basis for rejecting a form unless the signing medical professional is not legitimate or has provided false information. It may be helpful for the Commission to establish a process through which SCC Staff could review repeated or suspicious filings and determine whether future forms should be accepted for particular individuals or residences. This may require legislative action rather than a regulatory or policy change. In summary, my principal recommendations for the final question are to improve awareness of the program among eligible customers and to create an effective mechanism for preventing abuse.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Thomas Bridge Water
Utility Type (Elec/Gas/Water/Wastewater):
Contact info (Name/Email/Phone):
[redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)? **0**

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above? **0**

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above? **0**

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial? **0**

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024? **N/A**

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024? **N/A**

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL. **N/A We have no website.**

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)? **Staff meeting along with printed information.**

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions? **N/A**

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification? **N/A**

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company? **0**

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay? **0**

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above? 0

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections? **N/A**

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period? N/A

2. What portion of these customers enter into payment plans once certification expires? N/A

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books. Yes

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26. N/A

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages? **N/A**

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility? **N/A**

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility

customers? N/A

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Virginia American Water
Utility Type (Elec/Gas/Water/Wastewater): Water/Wastewater
Contact info (Name/Email/Phone):

[redacted].

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?

   7/1/2024 – 6/30/2025: 109
   7/1/2025 – 6/30/2026: 126

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?

   For 7/1/2024-6/30/2025 0.2% of residential customers submitted an SMCC form (109/58,528 average residential customers).
   For 7/1/2025-6/30/2026 0.2% of residential customers submitted an SMCC form (126/58,784 average residential customers).

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?

   We do not track this information and are not able to provide.

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?

   7/1/2024 – 6/30/2025: Denied 36 (33%)
   7/1/2025 – 6/30/2026: Denied 36 (29%)

   Customers are denied if they do not provide sufficient documentation or determined ineligible based on prior certification date.

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

   Per Company policy, the SMCC Form and updates to the customer's account take place within one business day.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?

   The Company does not track this information. As mentioned above, it is the Company's policy to process these forms in one business day, so it would be rare for a form to take longer than one business day to be processed.

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

   Our customer care agents inform customers to make them aware of the SMCC policy as well as other options to assist with their bill when they are unable to pay their bill by the due date or termination date.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.

Yes. The SMCC form is available on our website at: https://amwater.com/vaaw/Customer-Service-Billing/customer-assistance-programs

---

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

   All customer service staff members receive training when they are hired. Customer care agents involved in the application process receive additional coaching and guidance, as necessary, to ensure proper adherence to application procedures and requirements.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

   We routinely survey customers who have had phone interactions with the Company to receive feedback on their experience and identify any process improvements. In addition, the Company's Quality Assurance team reviews customers' calls to assess and coach customer service agents on any gaps in process adherence.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

   Customers are contacted after forms are reviewed to share details of any missing information. The customer's account is noted to document what additional steps are required by the customer to complete the SMCC.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?

The Company places a lock on the customer account upon successful application. The Company does not track "delayed" disconnections and it is unclear if customers might have taken action to avoid a disconnection but for the program. The Company put locks that prevented disconnection on 73 accounts in 2024-25 and 89 accounts in 2025-2026.

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?

The Company does not track this information. Medical certifications are good for 30 days and during that time there are no disconnections. Customers are eligible for a second 30 day medical certification period which requires recertification unless the additional needed time was specified on the initial certification form by the medical professional. Upon expiration of a medical certification customers are eligible for disconnection.

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?

The Company does not track this information.

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

The Company does not track this information.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?

Yes.

2. What portion of these customers enter into payment plans once certification expires?

   We do not track this information and are not able to provide.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

   Costs associated with written-off uncollectible accounts are expensed as incurred.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 6/30/25 and 7/1/25-6/30/26.

   For SMCC accounts, $2,457 was written-off between 7/1/24 and 6/30/25 and $29,176 was written-off between 7/1/25 and 6/30/26.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

   Only home dialysis and feeding pumps require tap water. Customers are encouraged to sign up for company outage alerts including customers who are part of the SMCC program.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

All customers that are affected by the outage are notified via the Alerts (Code Red) system and there is no specific communication directed to SMCC customers.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

   The SMCC form should identify only the equipment required for treatment of conditions that require tap water from the utility provider. According to the SMCC form, there are only two types of equipment that would require tap water: Feeding Pump and Home Dialysis. By narrowing down the list, this would reduce confusion by placing emphasis on the exact equipment that qualifies for a SMCC.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Virginia Electric and Power Company **Utility Type (Elec/Gas/Water/Wastewater):** Electric
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?
    a. 7/1/24-6/30/25: 11,792 New Forms
    b. 7/1/25-6/30/26: 12,824 New Forms

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?
    a. 7/1/24-6/30/25: 9,544 out of 2,530,300 (0.37%)
    b. 7/1/25-6/30/26: 10,194 out of 2,538,215 (0.40%)

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?
    a. 7/1/24-6/30/25: 2,413 out of 1,160,025, disconnection notices (.20%)
    b. 7/1/25-6/30/26: 3,450 out of 1,153,202 disconnection notices (.28%)

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?
    a. 7/1/24-6/30/25: 3,354 forms were denied
        - 22.0% - Missing physician information
        - 21.4% - Not signed within the last 30 days by Physician
        - 13.5% - Unable to validate form (i.e., Not able to verify with physician)
        - 7.1% - No condition or equipment required
        - Remaining 36% - Other (Customer information does not match, Unable to read, no physician signature, etc.)
    b. 7/1/25-6/30/26: 3,790 forms were denied

- 18.9% - Missing physician information
- 18.8% - Not signed within the last 30 days by Physician or Customer
- 12.8% - Unable to validate form (i.e., Not able to verify with physician)
- 7.1% - No condition or equipment required
- Remaining 42.4% - Other (Customer information does not match, Unable to read, no physician signature, etc.)

II. Processing Timeliness

1. What has been the average time between receiving a signed SMC Form and updating the customer's account since 7/1/2024?

   SMC forms received by 4:00 p.m. are processed the same business day. Forms received after 4:00 p.m. are processed the next business day. If physician validation is required, processing may take up to 48 hours.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?

   Approximately 99.5% of SMCC Forms have been processed within two business days.

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

   Information about the SMCC process is available on Virginia Electric and Power Company's website and Customer Service Representatives are also equipped to provide guidance. Mailed applications include a cover letter explaining the SMCC process and available options.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.
   - Medical Conditions | Virginia | Dominion Energy (webpage)
   - https://cdn-dominionenergy-prd-001.azureedge.net/-/media/content/start-stop-service/medical-conditions/pdfs/global/serious-medical-condition-certification-form.pdf?rev=7f8616134f174c078f8ad3cd7761087b&hash=A817EA885985F285F3

7939347B467FC8 (form link on webpage)

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., “serious medical condition” includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

   Customer service staff receive comprehensive training on serious medical condition policies, processes, and definitions. In addition, staff have access to written instructional documents that provide guidance on applicable processes, timelines, and system requirements.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

   Customer service representatives receive guidance on identifying and assisting customers who may have a serious medical condition and follow established procedures when these situations arise. Performance is monitored through the Contact Center Operations’ quality assurance process.

   Escalated matters are referred to the Energy Assistance team, and feedback and coaching are provided back to the Contact Center to enhance agent knowledge. Additionally, Customer Relations supports the review and resolution of complex concerns, helping to identify training opportunities and ensure consistent application of company policies and regulatory requirements.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

   Forms that are incomplete, illegible, or missing required information, or otherwise ineligible, are reviewed and denied within the standard processing timeframe. Forms received by 4:00 p.m. are processed the same business day; forms received after 4:00 p.m. are processed the next business day. A denial letter is generated to the customer, and the account is noted with the denial reason.

When physician validation is required, outreach is initiated on the same business day. If physician validation is not obtained within two business days, the form is denied and the denial reason is documented.

V. Customer Experience & Satisfaction

1. Approximately how many customers have their disconnections delayed due to having a SMCC Form on file with the Company?
    a. 7/1/24-6/30/25: 2,413 customers submitted an SMCC form, were approved, and had their disconnect delayed during this time period
    b. 7/1/25-6/30/26: 3,450 customers submitted an SMCC form, were approved, and had their disconnect delayed during this time period

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?
    a. 7/1/24-6/30/25: Of the 2,413 who had their disconnects delayed, 742 (30.8%) were ultimately disconnected
        i. Of these 742, 678 were disconnected after using 1 extension
        ii. Of these 742, 64 were disconnected after using 2 extensions
    b. 7/1/25-6/30/26: Of the 3,450 who had their disconnects delayed, 1,110 (32.2%) were ultimately disconnected during this time period
        i. Of these 1,110, 980 were disconnected after using 1 extension
        ii. Of these 1,110, 130 were disconnected after using 2 extensions

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?
    a. 7/1/24-6/30/25: 1,446 out of 11,040 (13%)
    b. 7/1/25-6/30/26: 1,272 out of 13,962 (9%)

    This data includes customers with an active medical certification as of July 1, 2024, who completed a renewal while the certification remained active. It may include customers whose initial medical certification was applied before July 1, 2024, but who renewed after that date.

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

    The Company does not maintain a formal tracking mechanism for healthcare provider feedback specific to SMCC interactions or service disconnections. However, healthcare

providers have indicated that patient date of birth is often needed to validate SMCC Forms and related medical information. Including this information on the form would support more efficient provider validation and processing.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?

   Yes. Customers remain responsible for charges incurred while a medical certification is active. Any unpaid balance will accrue as arrearage.

2. What portion of these customers enter into payment plans once certification expires?
   a. 7/1/24-6/30/25: 3,646 out of 11,040 (33%) entered into a payment arrangement following certification expiration
   b. 7/1/25-6/30/26: 1,919 out of 13,962 (14%) entered into a payment arrangement following certification expiration

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

   For ratemaking purposes, only accounts that have been charged off as uncollectible are included in uncollectible expense. The Virginia jurisdictional share of uncollectible expense recorded during the test year is reflected in the Company's cost of service and considered in the determination of base rates.

   Amounts that remain in arrears but have not been charged off are not included in uncollectible expense for ratemaking purposes. Written-off uncollectible accounts consist of balances that have been determined to be uncollectible and charged off in accordance with the Company's established accounting policies.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.
   a. 7/1/24-6/30/25: $4.9M written off for medical customers
   b. 7/1/25-6/30/26: $2.9M written off for medical customers

---

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

   Subject to clarification regarding the intended meaning of "effective," customers with SMCC Forms on file are included in the Company's overall reliability and outage response processes. The Company does not separately measure reliability performance for this customer group. However, for planned outages or unplanned events expected to result in an extended interruption of service, the Company has a process to notify customers with SMCC Forms on file, when practicable, so they can make alternate arrangements if needed.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

   Yes. For planned outages or weather-related events expected to result in extended outages, the Company provides additional automated notifications (via automated call or letter) to customers with an SMCC Form on file, advising them of the expected outage and the need to make alternate arrangements if necessary.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

   Yes. The Company recommends the following changes to improve administration and operability of the SMCC process:

   - Require SMCC Forms to be submitted directly by the physician or medical provider to Virginia Electric and Power Company, to help improve validation and processing efficiency.
   - Add patient date of birth to the SMCC Form, as this information is often required by medical providers to validate a condition.
   - Set clear guidelines on the medical equipment and conditions that qualify for protection and require electricity to operate. Remove all other categories to ensure clarity for customers and medical providers regarding eligibility requirements and expiration criteria. Limiting the program to electric-powered medical devices will help eliminate confusion and ensure that only qualifying electric medical equipment is accepted.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Virginia Natural Gas
Utility Type (Elec/Gas/Water/Wastewater): Natural Gas
Contact info (Name/Email/Phone):

[redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?

   Response

   a. The Company implemented the SMCC process on 7/1/25. As such, the Company's responses to the remaining questions below will focus on the period beginning 7/1/25.
   b. Between 7/1/2025 - 6/30/2026, 94 SMCC forms were received.

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?

   Response

   a. Between 7/1/2025 – 6/30/2026, less than 1% of residential customers submitted a SMCC Form.

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?

   Response

   a. Between 7/1/2025 and 6/30/2026, 56 SMCC Forms were received after a notice of intent to terminate service was issued, representing 60% of all forms received.

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?

   Response

   a. Between 7/1/2025 and 6/30/2026, 38 SMCC Forms were initially denied, representing 40% of all forms received. Many of these SMCC Forms were subsequently approved, as corrected or revised forms were submitted by the customer.
   b. Primary reasons for denial:
      i. Incorrect or missing physician license number
      ii. Blank, incomplete, incorrect, or unreadable forms received

---

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

   Response

   a. Since 7/1/2025:
      i. SMCC forms were reviewed and approved within 1 business day of receipt.
      ii. SMCC form receipt, approval and any required service restorations were completed within 2-3 business days.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?

   Response

   a. Since 7/1/2025, 60% have been completed within two business days.

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

   Response

a. The SMCC policy is posted on the Virginia Natural Gas (VNG) website. During calls with the Customer Care Center, customers who indicate that they or someone in their household has a serious medical condition, or who request information about a Medical Certificate, are referred to the VNG Payment Options webpage to review the policy and access the SMCC form.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.

Response

a. Yes: vng-medical-certification-form.pdf

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

Response

a. Customer service representatives initially received training on the policy definitions on 6/27/2025, with related training materials updated on 10/1/2025. Representatives also complete annual refresher training to reinforce understanding of the policy and related customer guidance procedures.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

Response

a. The Company relies on licensed physicians or nurse practitioners to determine whether a customer has a serious medical condition through the submission of a properly completed SMCC form. Customer service representatives are trained to recognize when a customer may need information about the SMCC process and to guide them through the steps required to obtain, complete, and submit the form. Representatives' knowledge and performance are supported through annual refresher training, ongoing coaching, and procedural reinforcement to help ensure employees can accurately explain requirements, direct customers to the appropriate resources, and support timely form submission.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

Response

a. When an SMCC form is incomplete or lacks the required information, the customer is contacted and advised of the missing information and the need to resubmit a complete form. Customer follow-up typically occurs within one business day of the Company receiving and reviewing the SMCC form.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?

   Response
   a. disconnection of service was delayed for 56 customers.

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?

   Response
   a. Between 7/1/25 and 6/30/26, 4% of customers were ultimately disconnected.

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?

   Response
   a. Between 7/1/2025 and 6/30/2025, ultimately, 4 or 7% of certifications were renewed.

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

   Response
   a. To date, no feedback has been received from healthcare providers.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?

   Response
   a. Yes, customers accumulate arrearages during protection periods.

2. What portion of these customers enter into payment plans once certification expires?

   Response

a. Between 7/01/2025 - 6/30/2026, 32 customer accounts, representing 57% of those with approved SMCC's, were identified.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

   Response

   a. Yes, uncollectible dollars are included in base rates.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.

   Response

   a. Between 7/01/2025 - 6/30/2026, two accounts had outstanding balances totaling $1,637, representing a very small percentage of VNG's total uncollectibles for the period.

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

   Response

   a. The SMCC policy is designed to provide protection from service disconnection due to nonpayment for customers with qualifying serious medical conditions. The policy is not intended to guarantee uninterrupted natural gas service during a gas outage, which is very rare. In the event of an outage, the Company follows established emergency response and restoration procedures to safely restore service as quickly as possible.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

   Response

   a. The Company does not currently provide outage-preparedness communications that are specific to customers with SMCC Forms on file.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

   Response

   a. The Company does not currently have any changes to suggest.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Washington Gas and Light
Utility Type (Elec/Gas/Water/Wastewater): Natural Gas
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?
    a. Washington Gas did not receive any new SMCC Forms from disconnection-eligible customers during either reporting period.

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?
    a. See response to Part I, question 1.

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?
    a. See response to Part I, question 1.

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?
    a. See response to Part I, question 1.

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

a. See response to Part I, question 1.

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?
    a. See response to Part I, question 1.

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?
    a. Customers will receive notification verbally from a customer service representative if they call in, directing them to the Commission's website. In addition, customers will receive information about the SMCC form in the Company's fall newsletter.

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.
    a. The Company is in the process of updating the Washington Gas website with the SMCC Form.

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?
    a. Washington Gas Customer Service Representatives receive annual training on the procedures and protocols for assisting customers with serious medical conditions. The procedure includes documenting medical-related information, providing guidance on available bill payment assistance programs, and flagging the account to delay service shut-off for 30 days after we have received a signed form. In order to avoid shutoffs, customers have 15 days to provide the Company with a signed SMCC form after notifying the Company of a SMCC.

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?
    a. The utility assesses this through a combination of training, coaching, quality assurance reviews, and ongoing performance monitoring.

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?
    a. This is a customer-initiated process, and the Company follows up when it becomes aware of the issue.

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?
    a. See response to Part I, question 1.

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?
    a. See response to Part I, question 1.

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?
    a. See response to Part I, question 1.

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?
    a. This Company is not aware of any feedback from providers regarding this. See response to Part I, question 1.

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?
    a. Yes, there is no separate arrearage policy for SMCC customers. If a customer were to certify through this process, current gas charges would continue to assess on the account and arrearages would grow dependent on the

account's payment status.

2. What portion of these customers enter into payment plans once certification expires?
    a. As noted above, Washington Gas has not identified any customers certified under the Serious Medical Condition Certification (SMCC) program during the reporting period.

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.
    a. Yes, costs associated with written-off uncollectible accounts are included in base rate cost of service.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.
    a. For the requested dates the customer account balances written-off are:

7/1/24 – 6/30/25	$4,328,978.62
7/1/25 – 6/30/26	$3,730,859.09

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?
    a. Customers reliant on medical equipment are not currently considered in the Company's policy for addressing planned or unplanned outages. Washington Gas is unaware of medical equipment reliant on natural gas as the main energy input.

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?
    a. No.

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?
    a. Not at this time.

Questionnaire for Chapter 637 (HB275) from 2024 Virginia Acts of Assembly

https://law.lis.virginia.gov/uncodifiedacts/2024/session1/chapter637/
https://law.lis.virginia.gov/admincodefull/title20/agency5/chapter330/

Utility Name: Woodhaven Water Co
Utility Type (Elec/Gas/Water/Wastewater): Water
Contact info (Name/Email/Phone): [redacted]

I. Eligibility & Enrollment Metrics

1. How many new Serious Medical Condition Certification ("SMCC") Forms were received each year since adoption of the rules (7/1/2024 – 6/30/2025, 7/1/2025 – 6/30/2026)?

   NONE

2. What percentage of residential customers submitted an SMCC Form each year, for each of the two date ranges above?

   Ø

3. How many SMCC Forms (number and percentage) were submitted by customers only after they received a notice of intent to terminate service from the utility, for each of the two date ranges above?

   Ø

4. How many certifications (number and percentage) were denied for each of the two date ranges above, and in totality, and what were the primary reasons for denial?

   Ø

II. Processing Timeliness

1. What has been the average time between receiving a signed SMCC Form and updating the customer's account since 7/1/2024?

   Ø

2. What total percentage of SMCC Forms have been processed within two business days since 7/1/2024?

   Ø

III. Customer Awareness & Accessibility

1. What information has been provided to customers regarding the new SMCC policy, and how has this information been conveyed to customers?

2. Is the SMCC Form available electronically on the utility's website? Please provide the URL.

NONE

IV. Utility Staff Training & Responsiveness

1. What training have customer service staff received regarding the policy definitions (e.g., "serious medical condition" includes conditions that may require dependence on medical technology such as ventilators, dialysis machines, continuous oxygen, etc.)?

2. How has the utility assessed the confidence level and abilities of its customer service staff to identify and guide customers with serious medical conditions?

3. What processes are in place to ensure timely follow-up with customers when SMCC Forms are incomplete or require additional clarification?

NONE

V. Customer Experience & Satisfaction

1. Approximately how many customers have had their disconnections delayed due to having a SMCC Form on file with the Company?

2. Approximately what percentage of customers having had their disconnections delayed, were ultimately disconnected after receiving a serious medical condition delay?

3. How many certifications (number and percentage) were renewed beyond their initial term, for each of the two date ranges above?

NONE

4. What feedback have healthcare providers shared about their interactions with the utility regarding serious medical conditions or service disconnections?

NONE

VI. Financial Impact & Payment Assistance

1. Do certified customers accumulate arrearage during the protection period?

2. What portion of these customers enter into payment plans once certification expires?

3. Are costs associated with written-off uncollectible accounts in base rate cost of service as incurred? If not, please explain how they are being recorded on the utility's books.

4. Please quantify the amount of customer account balances written-off between 7/1/24 and 60/30/25 and 7/1/25-6/30/26.

NONE

VII. System Reliability (For Customers with Equipment)

1. For customers who are reliant on medical equipment (e.g., ventilators, oxygen concentrators), how effective has the policy been during planned or unplanned outages?

2. Are there specific outage-preparedness measures or communications tailored to, or provided to, customers who have SMCC Forms on file with the utility?

NONE

VIII. Policy Effectiveness & Outcomes

1. Does the Company have any suggested changes to improve accessibility to, or practical operability of, the serious medical condition policy for residential utility customers?

NONE