ORDER

On April 21, 2020, the following public utilities filed a letter request ("Letter") with the Clerk of the State Corporation Commission ("Commission"): Washington Gas Light Company; Columbia Gas of Virginia, Inc.; Roanoke Gas Company; Virginia Natural Gas, Inc.; Atmos Energy Corporation; Appalachian Natural Gas Distribution Company; Southwestern Virginia Gas Company; Aqua Virginia, Inc.; and Virginia-American Water Company. The Letter seeks the Commission’s approval "to create a regulatory asset to record incremental prudently incurred costs and suspended late payment fees attributable to the COVID-19 pandemic."¹

The Letter notes that the Commission has issued orders² taking judicial notice of the ongoing public health emergency related to the spread of the coronavirus, or COVID-19, and the

¹ Letter at 1. On April 27, 2020, Massanutten Public Service Corporation filed comments supporting the Letter and asking for the same relief.

declarations of emergency issued at both the state and federal levels. The Letter states that in response to such orders, the utilities have suspended service disconnections and the imposition of late payment fees. The Letter further states that although the signatories "are committed to working with customers by offering payment plans and other options to bring their accounts current and keep service on," they expect that after the end of the state of emergency there will still be customers who cannot pay their prior balances as well as their current bills for service.

The Letter states that the utilities therefore "fully expect that their uncollectible expense will increase well above recent levels," and that the COVID-19 pandemic will result in "a decrease in the late payment and reconnection fees, and other potential incremental prudently incurred costs in the future."

The Letter therefore asks that the utilities be permitted to create a regulatory asset in which to record: 1) the incremental uncollectible expense incurred, 2) late payment fees suspended, 3) reconnection costs incurred with the billing suspended, 4) carrying costs, and 5) other incremental prudently incurred costs associated with the COVID-19 pandemic.

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3 See, e.g., Executive Order No. 51, Declaration of a State of Emergency Due to Novel Coronavirus, COVID-19, issued March 12, 2020, by Gov. Ralph S. Northam. See also Executive Order No. 53, Temporary Restrictions on Restaurants, Recreational, Entertainment, Gatherings, Non-Essential Retail Businesses, and Closure of K-12 Schools Due to Novel Coronavirus (COVID-19), issued March 23, 2020, by Governor Ralph S. Northam, and Executive Order No. 55, Temporary Stay At Home Order Due to Novel Coronavirus (COVID-19), issued March 30, 2020, by Governor Ralph S. Northam.

4 Letter at 1.

5 Id. at 1-2.

6 Id. at 2.
The Letter further asserts that the creation of a regulatory asset "will facilitate the recovery of prudently incurred costs associated with the … efforts to accommodate customers during this time of uncertainty and distress."

NOW THE COMMISSION, upon consideration of this matter and in consultation with its Staff, is of the opinion and finds as follows.

All natural gas, electric, water and sewer utilities subject to regulation by the Commission may record deferral of the above-referenced expenses on their books, subject to the provisions of the Financial Accounting Standards Board's Accounting Standards Codification 980. The Commission emphasizes that this Order is solely for accounting purposes and has no ratemaking impact. Such expenses may be addressed in future ratemaking proceedings to the extent relevant thereto.

Accordingly, IT IS SO ORDERED, and this matter is DISMISSED.

A COPY hereof shall be sent electronically by the Clerk of the Commission to all persons on the attached service list.

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7 Id.
Appalachian Power Company
d/b/a American Electric Power Company
Mr. William A. Castle
Director, Regulatory Services, VA/TN
1051 East Cary Street, Suite 1100
Richmond, Virginia 23219

Virginia Electric & Power Company
d/b/a Dominion Energy Services, Inc.
Paul E. Pfeffer, Esquire
Riverside 2, Legal
120 Tredegar Street
Richmond, Virginia 23219

A&N Electric Cooperative
Mr. Butch Williamson
President & CEO
P.O. Box 290
Tasley, Virginia 23441-0290

B-A-R-C Electric Cooperative
Mr. Michael J. Keyser
CEO/General Manager
P.O. Box 264
Millboro, Virginia 24460-0264

Central Virginia Electric Cooperative
Mr. Gary E. Wood
President & CEO
P.O. Box 247
Lovingston, Virginia 22949

Community Electric Cooperative
Mr. Steven A. Harmon
President
P.O. Box 267
Windsor, Virginia 23487-0267

Craig-Botetourt Electric Cooperative
Mr. Shawn C. Hildebrand
General Manager
P.O. Box 265
New Castle, Virginia 24127-0265

Kentucky Utilities Company
d/b/a Old Dominion Power Company
Allyson K. Sturgeon
Sr. Counsel, Reg & Trans
LG&E and KU Energy LLC
220 W. Main Street
Louisville, KY 40202

Mecklenburg Electric Cooperative
Mr. John C. Lee
President & CEO
P.O. Box 2451
Chase City, Virginia 23924-2451

Northern Neck Electric Cooperative
Mr. Greg White
President & CEO
P.O. Box 288
Warsaw, Virginia 22572-0288

Northern Virginia Electric Cooperative
Mr. Stanley C. Feuerberg
President & CEO
P.O. Box 2710
Manassas, Virginia 20108-0875

Powell Valley Electric Cooperative
Mr. Roger Ball
President
P.O. Box 1528
New Tazewell, Tennessee 37824

Prince George Electric Cooperative
Mr. Michael Malandro, President & CEO
P.O. Box 168
Waverly, Virginia 23890-0168

Rappahannock Electric Cooperative
Mr. Kent Farmer
President & CEO
P.O. Box 7388
Fredericksburg, Virginia 22404-7388

Shenandoah Valley Electric Cooperative
Mr. Michael W. Hastings
President & CEO
P.O. Box 236
Mt. Crawford, Virginia 22841-0236

Southside Electric Cooperative
Mr. Jeffrey S. Edwards
President & CEO
P.O. Box 7
Crewe, Virginia 23930-0007
Kentucky Utilities Company
d/b/a Old Dominion Power Company
Robert M. Conroy
VP, State Regulation & Rates
LG&E and KU Energy LLC
220 W. Main Street
Louisville, KY 40202
Columbia Gas of Virginia, Inc.
Brentley K. Archer, President
1809 Coyote Drive
Chester, Virginia 23836-2400

Roanoke Gas Company
Paul W. Nester, President
P.O. Box 13007
Roanoke, Virginia 24011

Southwestern Virginia Gas Company
James E. McClain, II, President and CEO
208 Lester Street
Martinsville, Virginia 24112

Atmos Energy Corporation
J. Kevin Dobbs, President
810 Crescent Centre Drive, Suite 600
Franklin, Tennessee 37067-6226

Appalachian Natural Gas Distribution Company
John Jessee, President
220 West Valley Street
Abingdon, Virginia 24210

Virginia Natural Gas, Inc.
James R. Kibler, President
544 S. Independence Blvd.
Virginia Beach, Virginia 23452

Washington Gas Light Company
Donald 'Blue' Jenkins, President
1000 Maine Avenue, SW, Suite 700
Washington, D.C. 20024
ATTACHMENT

KESWICK ESTATES UTILITIES, INC.
701 COUNTRY CLUB DR.
KESWICK, VA 22947

MASSANUTTEN PUBLIC SERVICE UTILITIES
STEVEN UBERTOZZI, PRESIDENT
500 W MONROE ST. STE 3600
CHICAGO, IL 60661

NORTHERN NECK WATER, INC.
KEVIN L. GOULDMAN, PRESIDENT
4542 HORNERS MILL RD.
MONTROSS, VA 22520

PARK PLACE WATER WORKS, INC.
JAMES K. MCKELVEY, OWNER
400 SCRUGGS RD. STE 100
MONETA, VA 24121

PEACOCK HILL SERVICE COMPANY
KARL GASS, PRESIDENT
POB 284
IVY, VA 22945

PO RIVER WATER AND SEWER COMPANY
MATTHEW E. RAYNOR, PRESIDENT
524 MEADOW AVENUE LOOP
BANNER ELK, NC 28604

RESTON RELAC, LLC
MARK DOUGLAS WADDELL
1725 WAINWRIGHT DR.
RESTON, VA 20190

SEDLEY WATER COMPANY
ROBERT P. FINCH, PRESIDENT
PO BOX 340
TOANO, VA 23168

SOMMERSBY WATER COMPANY
JOHN W. GRIFFIN, PRESIDENT
481 PLANTATION DR.
FINCASTLE, VA 24090

SUNSET BAY UTILITIES
JOHN BURBAGE, JR., PRESIDENT
9919 STEPHEN DECATUR HIGHWAY
OCEAN CITY, MD 21842

THE HOMESTEAD WATER COMPANY, INC.
MICHAEL J. DEITEMEYER, PRESIDENT
4001 MAPLE AVE. STE 600
DALLAS, TX 75219

THOMAS BRIDGE WATER CORPORATION
HARRY DEAN, PRESIDENT
586 THOMAS BRIDGE RD.
MARION, VA 24354

TRAIL'S END UTILITY COMPANY, INC.
JACK G. SMITH PRESIDENT
POB 268
HORNTOWN, VA 23395

VIRGINIA AMERICAN WATER COMPANY
BARRY L. SUITS, PRESIDENT
2223 DUKE ST.
ALEXANDRIA, VA 22310
ATTACHMENT

VIRGINIA RIDGE WATER COMPANY
STEPHEN C. ROSSI, PRESIDENT
5 SILVERBIRCH DR.
BLUE RIDGE, VA 24064

WOODHAVEN WATER COMPANY
WILLIAM B. CHANDLER, PRESIDENT
7242-A LAKESHORE DR.
QUINTON, VA 23141-1153

WARRETON CHASE UTILITY COMPANY
STEPHEN W. RODGERS
RFI WC LC
8317 MEETZ RD.
WARRENTON, VA 20187