

October 28, 2014

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket 1725

Dear Ms. Massaro:

National Grid¹ submits these comments to assist the Rhode Island Public Utilities Commission (PUC) as it considers the George Wiley Center's October 20, 2014 letter requesting the PUC to implement a temporary amendment of its Billing and Termination rules and institute a ten percent down payment plan under which LIHEAP eligible customers whose utility service has been or is about to be terminated could restore service or prevent termination by making a ten percent down payment of the arrearage balance and agreeing to a 36-month repayment plan.

The PUC has previously adopted interim emergency regulations relative to the down payment and payment-plan required of certain customers in order to restore service after it has been terminated.

In 2013, the PUC issued an order allowing residential customers who had been, or were about to be, terminated to have service reinstated under terms that provided for a down payment of either 10%, 15%, or 20%, depending on the amount of the unpaid balance. The order applied to the time period November 29, 2013 through December 31, 2013, and required a payment plan with respect to the remaining unpaid balance for either 18, 24, or 36 months depending on the amount of the outstanding balance. Customers with balances of \$2,500 or more pay 10% down and the remainder over 36 months, customers with balances at least \$1,000 but less than \$2,500 pay 15% down and the remainder over 24 months, and customers with balances up to \$1,000 pay 20% down and the remainder over 18 months. The plan also required that participating customers make timely payment of their current bills. Additionally, the customers who had participated in a reduced payment plan in 2012, and yet had larger arrears in 2013, would be excluded from participating in the reduced down payment plan offering unless the customer makes an additional down payment.

For 2014, the Company would support the same reduced down-payment plan terms and conditions, as were implemented by the PUC for the designated period in 2013. The Company also recommends that this treatment be available for the period from October 31, 2014 up to, and including November 30, 2014, and that it apply to down payments by qualifying customers or pledged by an agency on or before

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

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November 30, 2014. As always, our Customer Service representatives will work with individual customers to deal with particular customer circumstances, and the Company will work to ensure the safety of our customers this winter.

Thank you for your consideration in this matter. If you have any questions, please contact me at (781) 907-2153.

Very truly yours,

A handwritten signature in blue ink that reads "Celia B. O'Brien". The signature is written in a cursive style.

Celia B. O'Brien

cc: Docket 1725 Service List
Leo Wold, Esq.
Steve Scialabba, Division
James Lanni, Division

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically transmitted and sent via U.S. Mail to the individuals listed below. Copies of this filing were hand delivered to the RI Public Utilities Commission and to the RI Division of Public Utilities Carriers.

Joanne M. Scanlon

October 28, 2014

Date

Docket No. 1725 – Termination Rules Service List as of 4/3/14

Name/Address	E-mail Distribution	Phone
File original & nine (9) copies file w/ Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov	
	Alan.nault@puc.ri.gov	
	Todd.bianco@puc.ri.gov	
Marion S. Gold, Administrator RI Office of Energy Resources	Marion.Gold@energy.ri.gov	401-574-9119
	Joyce.discuillo@energy.ri.gov	
Christopher Kearns, Program Service Officer RI Office of Energy Resources	Christopher.Kearns@energy.ri.gov	
	Lewis.Babbitt@dhs.ri.gov	
Henry Shelton The George Wiley Center	debbiec@georgewileycenter.org	401-728-5555
	b.flambeau@juno.com	
	camiloviveiros@gmail.com	
	jrosiello@mgolaw.com	
Raquel Webster, Esq. National Grid	raquel.webster@nationalgrid.com	781-907-2121
	celia.obrien@nationalgrid.com	
	Joanne.scanlon@nationalgrid.com	
Michael R. Kirkwood, General Mgr./CEO Pascoag Utility District	mirkwood@pud-ri.org	401-568-6222
	Jallaire@pud-ri.org	
Michael McElroy, Esq. (for BIPCo)	Michael@McElroyLawOffice.com	401-351-4100
Leo Wold, Esq. Dept. of Attorney General	Lwold@riag.ri.gov	401-222-2424
	dmacrae@riag.ri.gov	
	jmunoz@riag.ri.gov	
Jim Lanni, Division of Public Utilities	Jlanni@dpuc.ri.gov	401-941-4500
	tkogut@dpuc.ri.gov	
	Jspirito@dpuc.ri.gov	
	Dmoniz@dpuc.ri.gov	
Jane Briesemeister, AARP	JBriesemeister@aarp.org	
Deanna Casey, AARP	dcasey@aarp.org	
Marie Ganim	mganim@rilin.state.ri.us	
Steven Hartford, Governor's Office Policy Dir.	steven.hartford@governor.ri.gov	401-222-8135