

Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, Rhode Island 02888

In Re: Response to October 23, 2017 George Wiley Center Petition

On October 23, 2017, the George Wiley Center filed a Petition with the Rhode Island Public Utilities Commission (Commission) seeking an “emergency regulation to allow affordable restoration of utility service for Rhode Islanders whose gas and electric service has been terminated.” The Rhode Island Center for Justice strongly supports this petition.

A significant percentage of the individuals and families we represent are faced with arrearages that make restoration of service an impossibility if a down payment of more than 10% is required. While many of these families would be able to enter an ongoing payment plan that they could remain current on, their back debt remains an insurmountable barrier. While this is a significant hardship at any time of the year, it can be particularly harmful to health and safety in the winter. While the Division of Public Utilities and Carriers (Division) has recently implemented significant and appreciated reforms aimed at lowering the rate of incidence of termination for inability to pay, many of the more affordable reduced down payments are not available where households, or occupants of those households, have experienced termination more than once. We look forward to continuing to work with the Division and the Commission on this vital issue, but we urge that for the present, the Commission adopt the terms proposed in the Petition to enable families to restore service.

It is important to note that we have found that Customers are routinely asked and expected to pay a 25% down payment towards a balance exceeding \$2,500. These payments are impossible to make for Rhode Island’s most vulnerable residents who are disabled and relying on Supplemental Security Income (SSI). Further, multi-family homes often have multiple occupants with prior carry over balances from previous residential properties, which can create balances that soar into the tens of thousands of dollars.

Additionally, refusing to restore service in exchange for a 10% down payment prevents National Grid from offering a realistic payment plan that will create a stream of revenue, while at the same time minimizing expenses to the state in relation to homeless services, emergency medical treatment, and child welfare. Perhaps most unfortunately, requiring down payments of more than 10% limits the number of low-income households that local community action agencies can assist, by directing more of their financial resources towards fewer households. For the reasons stated above, we urge the Commission to approve the Petition.

Sincerely,



Jennifer L. Wood, Executive Director