



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

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Peter F. Kilmartin, Attorney General

October 28, 2014

Ms. Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Blvd
Warwick, RI 02888

Re: Docket No. 1725

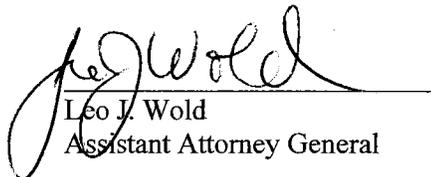
Dear Ms. Massaro,

The Division of Public Utilities and Carriers ("Division") writes to provide the Commission with its comments regarding an October 20, 2013 letter received by the Public Utilities Commission from the George Wiley Center. As in prior years, to mitigate customer hardship occasioned by delays in obtaining LIHEAP-eligibility certification and to provide lower down payments to restore gas and electric services, the Division recommends that the Commission also adopt a regulation (on an emergency basis from 10/31/14 to 11/30/14) that permits all residential customers (both Standard and Protected) to re-establish utility service or prevent termination on the same terms and conditions as implemented in 2013. See Docket No. 1725, Report No. 21266. That is, residential customers who are subject to termination or who have been terminated (with certain designated balances) and who: (i) make down payments of 10%, 15% or 20% within the designated time periods, (ii) did not participate in the plan in the prior year or who possess a balance due on his or her utility account that is the same or less than the customer possessed upon enrollment in the plan in the prior year, and (iii) pay their current bills within the time period allowed by National Grid, will not be subject to termination or will have their utility service restored.

Contrary to what has been proposed, the Division believes the Commission should not eliminate the tiered nature of the emergency regulation (requiring down payments of 10%, 15% or 20% with specified balances and within the designated time periods) or that part of the rule that requires the customer to possess a balance that is the same or less than the customer possessed upon enrollment in the plan in the prior year. The former aspect ensures that smaller balances will be paid over shorter periods of time. The latter aspect ensures that a customer does not use the rule to increase the size of his balance due and owing. Both aspects of the rule are reasonable and possess justification.

Respectfully submitted,

Division of Public Utilities and Carriers


Leo J. Wold
Assistant Attorney General

Service List