

October 4, 2019

BY HAND DELIVERY AND ELECTRONIC MAIL

RE: Docket 1725 – George Wiley Center’s Request for Emergency Regulations – National Grid’s Comments

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 (Wiley Center) September 12, 2019 letter requesting that the PUC implement a temporary amendment of its billing and termination rules and institute a 10% down payment plan. Specifically, the Wiley Center requests that all residential utility customers whose utility service has been terminated could restore service by making a 10% down payment of their total arrearage balance and agreeing to pay the remaining balance over an 18 to 36-month repayment plan. The Wiley Center also requests that customers who participated in a reduced payment plan in 2018 and have larger arrears in 2019 not be excluded from participating. Finally, the Wiley Center requests that the interim emergency regulation be in place through the end of calendar year 2019.

The PUC has previously adopted interim emergency regulations that govern the down payment and payment plan required for certain customers to restore service after their service has been terminated.

In 2017, the PUC issued a Report and Order allowing residential customers with accounts that had been terminated (or pending termination) to have their service reinstated under terms that provided for a down payment of 10% (the Report and Order). *See* Report and Order No. 22967 issued on November 27, 2017 in Docket No. 1725. In addition to the 10% down payment, the Report and Order required a payment plan for the remaining unpaid balance for either 18, 24, or 36 months, depending on the amount of the customer's outstanding balance. Customers with balances of \$2,500 or more pay the remaining balance over 36 months; customers with balances at least \$1,000 but less than \$2,500 pay the remaining balance over 24 months; and customers with balances up to \$1,000 pay the remaining balance over 18 months. The Report and Order also required that participating customers make timely payment of their current bills. Additionally, customers who participated in a reduced payment plan in 2016 and had the same or larger arrears in 2017 would be excluded from participating in the reduced down payment plan offering unless the customer made an additional down payment. In addition, the Report and Order provided that the PUC would not make any changes to the terms of the payment plans under the new Henry Shelton Act arrearage management program (AMP) because there was insufficient data available regarding the effectiveness of the arrearage management program. The Report and Order applied to the time period of November 21, 2017 through December 31, 2017.

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

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For 2019, National Grid would support the same conditions that PUC implemented in 2017 in the Report and Order, including the terms and conditions related to the AMP. National Grid supports that this option be available through December 31, 2019 and that it apply to down payments by qualifying customers or pledged by an agency on or before December 31, 2019.

As always, National Grid's Customer Service representatives will work with individual customers to address particular customer circumstances, and National Grid will work to ensure the safety of our customers this winter. National Grid recognizes the difficulties many customers experience during the winter season and believes that the proposal outlined in the Report and Order would benefit National Grid's customers (especially National Grid’s income-eligible customers) during this winter season while recognizing and remaining consistent with the amendments to the Henry Shelton Act.

Thank you for your attention to this matter. If you have any questions, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

cc: Docket 1725 Service List
Leo Wold, Esq.
William K. Lueker, Esq., Division

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Raquel J. Webster, Esq.

October 4, 2019

Date

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Name/Address	E-mail Distribution	Phone
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 ;	
	Margaret.hogan@puc.ri.gov ;	
Carol Grant, Administrator RI Office of Energy Resources	Carol.grant@energy.ri.gov ;	401-574-9119
	Christopher.Kearns@energy.ri.gov ;	
Frederick Sneesby, Dept. of Human Services	Frederick.sneesby@dhs.ri.gov ;	
Camilo Viveiros The George Wiley Center	georgewileycenterri@gmail.com ;	401-728-5555
	camiloviveiros@gmail.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	mkirkwood@pud-ri.org ;	401-568-6222
	hround@pud-ri.org ;	
	trivet@pud-ri.org ;	
	llaporte@pud-ri.org ;	
Michael McElroy, Esq. (for BIPCo) Jeff Wright, President, BIPCo	Michael@McElroyLawOffice.com ;	401-351-4100
	jwright@bipco.net ;	401-466-5851
	admin@bipco.net ;	
Christy Hetherington, Esq. Dept. of Attorney General	Chetherington@riag.ri.gov ;	401-222-2424
	dmacrae@riag.ri.gov ;	
	MFolcarelli@riag.ri.gov ;	
Kevin Lynch, Division of Public Utilities	Kevin.lynch@dpuc.ri.gov ;	401-941-4500
	Jonathan.schrag@dpuc.ri.gov ;	
	thomas.kogut@dpuc.ri.gov ;	
	John.spirito@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Diana.moniz@dpuc.ri.gov ;	

Jennifer Wood, RI Center for Justice Jordan Mickman	jwood@centerforjustice.org ;	401-491-1101
	jmickman@centerforjustice.org ;	