

October 17, 2016

VIA HAND DELIVERY & ELECTRONIC MAIL

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

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

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 (Center) August 16, 2016 letter requesting that the PUC implement a year-round emergency regulation allowing utility consumers to have service restored after termination, with a 10 percent down payment plan. In particular, the Center requests that all residential utility customers can restore service or prevent termination of service by making a 10 percent down payment of their arrearage balance and agreeing to pay the remaining balance over a 36-month payment plan.² The Center also requests that the PUC not include in the emergency regulations any language that would prohibit or limit a customer’s eligibility for such a payment plan based on the customer’s previous enrollment in a payment plan.

National Grid does not support the Center’s August 16, 2016 request as stated. However, National Grid has no objection to the PUC’s adoption of the same interim regulations the PUC implemented in 2015. *See* PUC Minutes of Open Meeting held October 30, 2015.

In 2015, the PUC adopted emergency regulations 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 15 percent (Interim Regulations). The Interim Regulations were otherwise the same as the emergency regulations implemented by the PUC in 2014 in PUC Order No. 21710 dated November 3, 2014, and applied to the time period November 4, 2015 through December 4, 2015. In addition to the 15 percent down payment, the Interim Regulations required a payment

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

² The Center’s request mirrors the payment plan terms of the former version of the Henry Shelton Act, which provided for a 10 percent down payment and 36-month payment plan. The Henry Shelton Act was amended in 2016 to provide, in pertinent part, different payment plan terms. The payment plan under the current version of the Henry Shelton Act, which became effective on June 24, 2016, requires eligible low income customers whose service has been terminated to make a 25 percent down payment and participate in a 12-month payment plan, unless the PUC has adopted emergency regulations. *See* R.I. Gen. Laws § 39-2-1(d)(2). Thus, the Center appears to request that the emergency regulations be a permanent, year-round return to the old payment plan, which was superseded by the legislative changes to the Henry Shelton Act.

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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 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 Interim Regulations also required that participating customers make timely payment of their current bills. Additionally, customers who had participated in a reduced payment plan in 2014, and yet had larger arrears in 2015, would be excluded from participating in the reduced down payment plan offering unless the customer made an additional down payment.

For 2016, as explained above, National Grid would support the same reduced down payment plan terms and conditions as the PUC implemented for the designated period in 2015. National Grid also recommends that this treatment be available for the period of October 31, 2016 through November 30, 2016, and that it apply to down payments by qualifying customers or pledged by an agency on or before November 30, 2016. This proposal would benefit National Grid’s low income customers during the winter season, while recognizing and remaining consistent with the amendments to the Henry Shelton Act. 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 foregoing recommended interim emergency regulations are in the best interest of the customers.

Thank you for your attention to this matter. If you have any questions regarding this filing, please contact me at 401-784-7415.

Very truly yours,



Robert J. Humm

cc: Docket 1725 Service List
Steve Scialabba, Division
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.

Joanne M. Scanlon

October 17, 2016

Date

**Docket No. 1725 – Termination Rules
Service List as of 10/17/16**

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