

October 29th, 2018

Dear Commissioners,

Attached are graphs that show utility termination numbers from 2004 to 2018 (as of September, 2018). As you can see there are peaks and valleys, and we are pleased to see a downward trend in recent years.

We acknowledge and appreciate the efforts of the Commission and the Division to help mitigate the shut-off crisis. By considering a household's "special circumstances" and accordingly offering adjusted payment plans, more households can better maintain their arrearages. We recognize too the role of the Commission and the Division in helping achieve an increased low-income utility discount rate (25%) in the Docket 4770 settlement, as advocated by the George Wiley Center. These factors, along with the implementation of a new AMP (Arrearage Management Plan) and the ongoing shut-off protection for households with serious illness or disability status, have all contributed to some improvement in utility access.

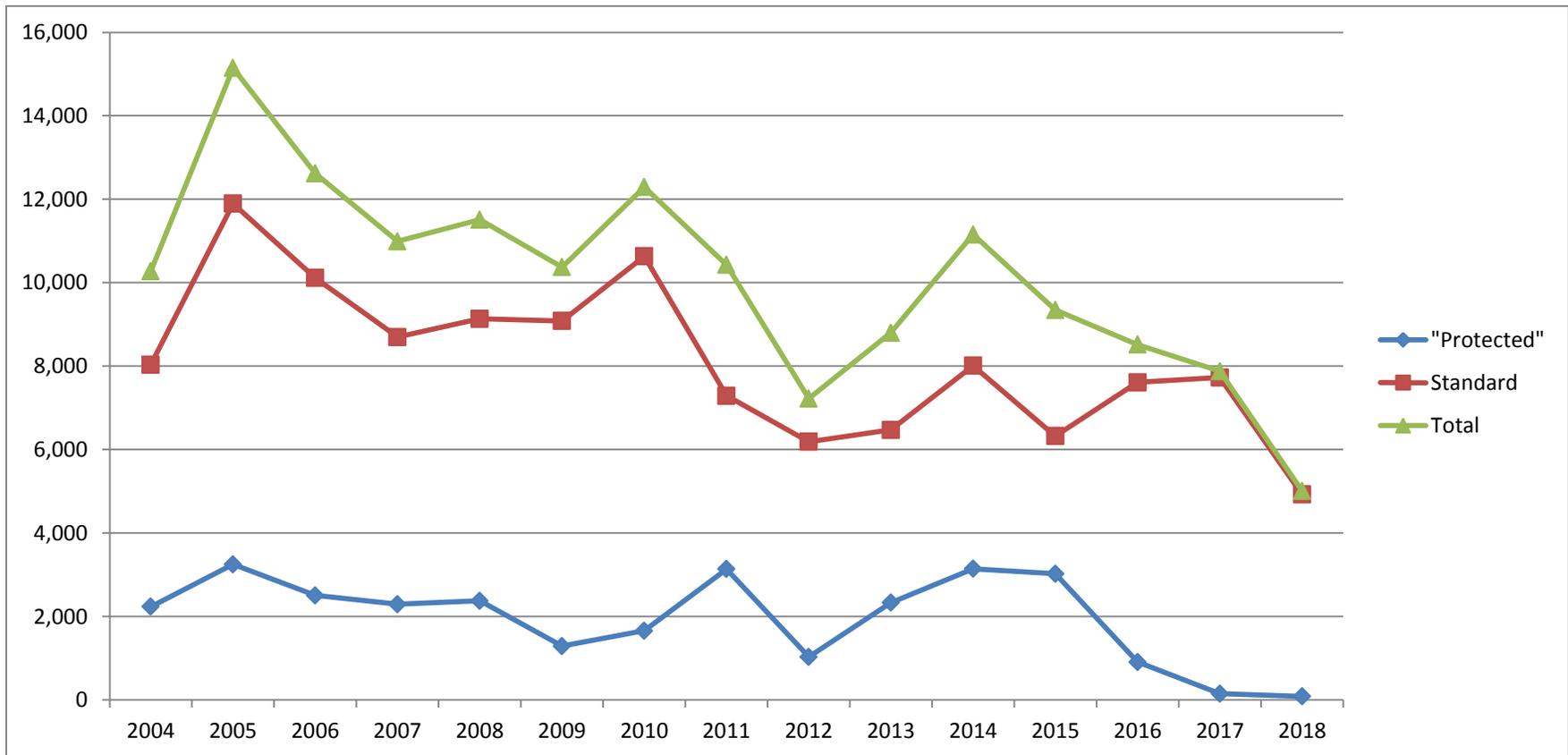
Even with these steps of progress, from our perspective, an important long-term way to ensure affordable utility service would be to implement a PIPP (Percentage Income Payment Plan) or other similar program, with tiered payment based on a household's income. Thank you to the Commissioners for convening follow-up stakeholder meetings resulting from the recent rate case settlement, and for your consideration of the challenges to utility access in Rhode Island. While we have seen some decrease of shut-offs in recent years, with yearly utility terminations close to 15,000 as of September, 2018, we hope the Commissioners agree there is still very much a need for your affirmative rule-making to allow affordable utility restoration. As recently submitted by National Grid, last year in 2017 a total of 2,277 customers participated in the specialized payment plan that was approved by the RI Public Utilities Commission on November 21, 2017. That shows how the rulemaking had a positive impact on over two thousand households, who were then better able to afford utility restoration.

At the George Wiley Center we know the need is still there, as measured by the people who call or walk in to the office every day, looking for ways to prevent or reverse utility terminations that so adversely affect daily life. This time of year preventing and reversing shut-offs is even more serious, with the onset of the cold weather. We thank the Commissioners for your consideration of our neighbors. Passing the proposed regulation will help people afford the basic need of utility service, securing this basic need before the winter. We urge you to allow these regulations for all households who are shut-off or facing shut off, regardless of their status from last year, so as not to impose punitive denial of affordable access to those who struggle with extended economic hardship.

Thank you,

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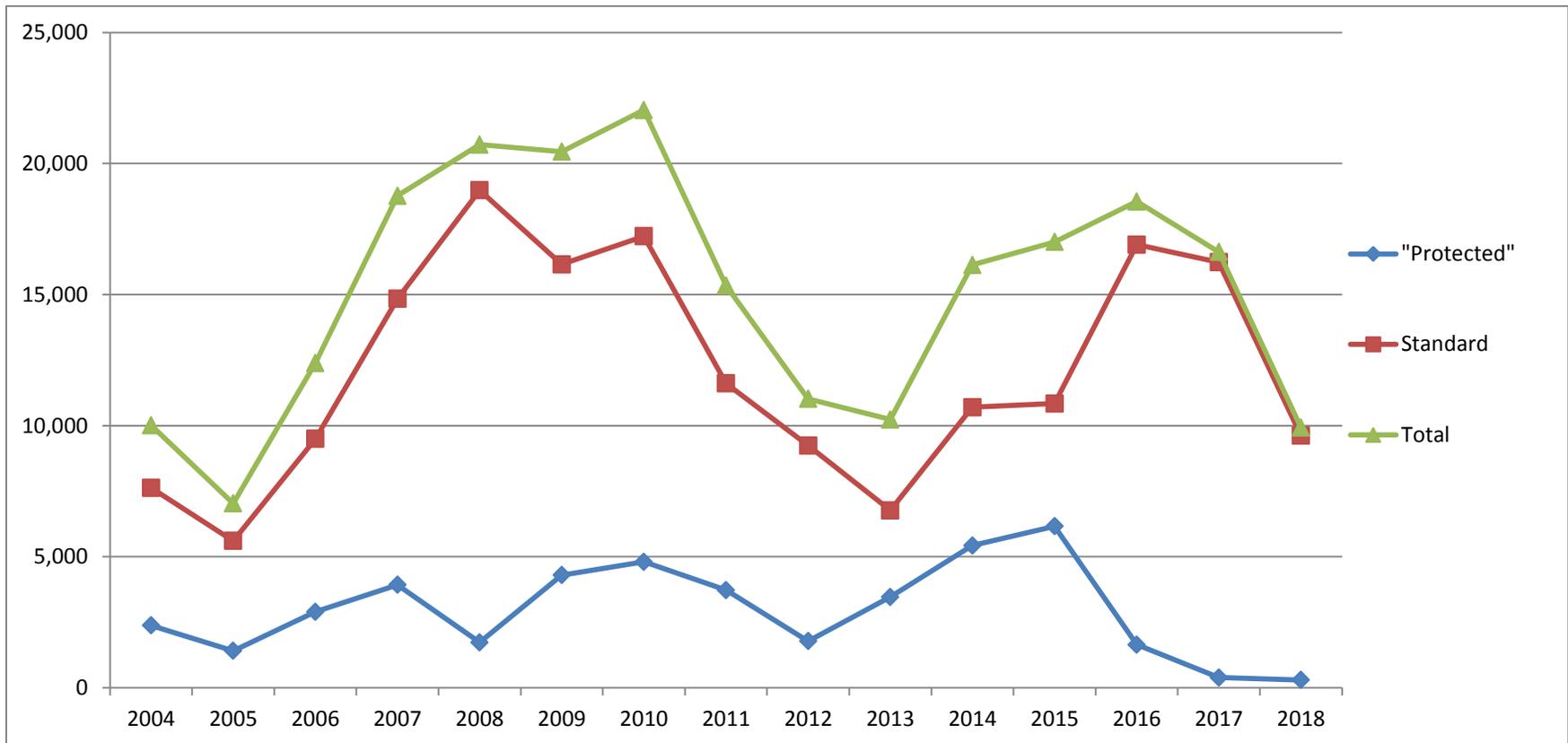
GAS Utility Terminations on Rhode Island Households



From 2004 to 2017, yearly number of gas utility terminations imposed on Rhode Island households by National Grid. This graph shows in blue the number of “protected” households terminated from service, in red standard households terminated from service, and in green the total number of households terminated.

Total gas utility terminations: **2004:** 10,273 | **2005:** 15,145 | **2006:** 12,618 | **2007:** 10,990 | **2008:** 11,509 | **2009:** 10,373 | **2010:** 12,292 | **2011:** 10,427 | **2012:** 7,222 | **2013:** 8,801 | **2014:** 11,155 | **2015:** 9,347 | **2016:** 8,518 | **2017:** 7,879 | **2018** (as of September): 5,011

ELECTRIC Utility Terminations on Rhode Island Households



From 2004 to 2018, yearly number of electric utility terminations imposed on Rhode Island households by National Grid. This graph shows in blue the number of “protected” households terminated from service, in red standard households terminated from service, and in green the total number of households terminated.

Total electric utility terminations: **2004:** 10,015 | **2005:** 7,035 | **2006:** 12,395 | **2007:** 18,767 | **2008:** 20,718 | **2009:** 20,450 | **2010:** 22,036 | **2011:** 15,341 | **2012:** 11,022 | **2013:** 10,232 | **2014:** 16,130 | **2015:** 17,009 | **2016:** 18,551 | **2017:** 16,629 | **2018** (as of September): 9,921