



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

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Peter F. Kilmartin, Attorney General

December 27, 2016

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

Re: Docket No. 3569

Dear Ms. Massaro,

The Division of Public Utilities and Carriers (“Division”) submits the following as its Comments to the Public Notice of Proposed Rule-Making dated November 23, 2016 and response to National Grid’s Comments dated December 27, 2016. The Division does not oppose the Commission’s decision to repeal the *Rules Governing the Acceptance of Credit Cards by Utility Companies* (the “Rules”). Although repeal would “neither require nor prohibit the charge of a convenience fee by the utility,” repeal will hopefully facilitate more efficient management of utilities’ accounts receivable through expanded use of bill payment by credit cards.

The Division’s decision not to oppose the proposed repeal of the *Rules*, however, should not be deemed approval of any utility’s selection of a third-party vendor or bank used to process a customer’s credit card payment, the convenience fee imposed by the third-party vendor or bank, or approval of any other issue related to the customer’s payment by credit card. Rhode Island public utilities remain responsible to act in a reasonable and prudent manner on behalf of their customers at all times. The Commission should continue to monitor customer issues relating to the use of third-party vendors or banks for processing credit card payments for overall reasonableness.

Very truly yours,

Leo J. Wold
Assistant Attorney General