

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: REQUEST BY NARRAGANSETT :
ELECTRIC TO INCREASE SOS RATE : Docket No. 3689

**MOTION OF THE GEORGE WILEY CENTER FOR
INTERIM RELIEF UNDER RULE 1.17**

The George Wiley Center [Wiley Center], by its attorney, moves under Rule 1.17 of the Rules of Practice and Procedure of the Public Utilities Commission [Commission] that the Commission stay any increase in the rates of A-60 customers of Narragansett Electric above the current 6.7 cents/kWh pending hearing and decision on anticipated proposals for discounts and/or other rate relief for low-income and poor customers.

The Wiley Center makes this motion respectful of the fact that it already asked for interim relief at the hearing before this Commission last week and was denied. The Wiley Center renews this request now for two reasons. First, it is concerned that it may have failed both to state the grounds for interim relief such relief with adequate clarity and to identify a source of funding for the requested relief. Second, the renewal of this motion will permit other parties to state their positions on the question of interim relief as well. The Wiley Center has been informed that other parties will be filing their positions on this question as soon as possible, hopefully sometime today, before the Commission rules on the first requested rate request tomorrow, September 29, 2005.

As grounds for this motion, the Wiley Center states as follows:

1. Low-income and poor customers of Narragansett Electric face an immediate crisis caused by dramatic increases in utility rates at a time when incomes remain low and unchanging.

2. The George Wiley Center understands that, if the requested rate increase or any portion of the requested rate increase to 8.2 cents/kWh is approved, the new higher rate will appear in the bills of low-income and poor customers in November, just as the difficult winter season is upon them. Because their incomes are low and unchanging, these customers will not have the resources to pay the increase. Arrearages will therefore increase, causing grounds for termination to spike just before the winter moratorium is to go into effect.
3. Evidence of this dire economic situation faced by low-income and poor Rhode Islanders was presented to the Commission at the Docket 3689 hearing held on September 23, 2005 by agents of Narragansett Electric Company, the Division of Public Utilities and Carriers and the George Wiley Center. All agreed that some form of relief was necessary and appropriate for low-income and poor customers in light of Narragansett's requested rate increase. No party presented any evidence to the contrary.
4. The written exhibits submitted in this proceeding recognize and agree that low-income and poor Narragansett Electric customers face an immediate and potentially irreparable crisis, and that these customers have no available alternatives. *E.g.*, Testimony of John Howat, *Wiley Center Exhibit #1*; Testimony of John Stutz, *Division Exhibit 1*.
5. The extent and nature of the crisis for low-income and poor people has been described in testimony offered at public hearings held by the Commission across the state over the past month as well.
6. Narragansett Electric Company, supported by the Division of Public Utilities and Carriers, has indicated that it intends to initiate a proceeding to consider the impact of the Company's proposed rate increases on low-income and poor customers.

7. It is the understanding of the George Wiley Center that, based on the historical kWh usage of the entire A-60 class, the difference between charging 6.7 cents and 8.2 cents per kWh to the entire class would result in a rate differential between \$240,000 and \$315,000 per month, depending upon actual kWh usage for the entire class. This estimate is based on an assumption of usage between 16,000,000 and 21,000,000 kWh per month for the entire class, that was obtained from the Company. The under recovery would be reflected in the Company's Standard Offer reconciliation account and can be addressed when the Commission considers the Company's next filing that doubtlessly will occur before the end of this year. If there is another funding source available at that time, as suggested by the Company and the Division at the hearing, such funding could be used to fund the rate differential by applying it to reduce the under recovery in the reconciliation account that is created by the interim relief.

WHEREFORE, the George Wiley Center asks that this Commission stay the imposition of any rate increase on the A-60 Class of customers pending hearing and decision on anticipated proposals for discounts and/or other rate relief for low-income and poor customers.

Respectfully submitted,
The George Wiley Center
By its attorney,

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CERTIFICATE OF SERVICE

I certify that on the 28th day of September, 2005, I caused a copy of this document to be delivered via email to the following:

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