

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: NEW ENGLAND GAS COMPANY GAS : Docket No. 3696
COST RECOVERY FILING :

**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 charged by New England Gas Company [NEGC] for two months, until January, 2006, pending consideration and anticipated passage of legislation designed to assist low-income and poor NEGC customers to pay increased rates for minimal levels of gas service.

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, the new higher rate will go into effect as of November 1, just as the difficult winter season is upon them.
3. Because their incomes are low and unchanging, these customers will not have the resources to pay the increase. Arrearages will therefore increase. Those whose service has been terminated will be unable to pay enough of their arrearages to restore service, and will be unable to keep current with the payment plans which NEGC mandates.
4. The required NEGC payment plan mandates monthly payment, not only of the full amount of a rate that will now be increased 23.8% over the old rate – which low-income

and poor customers were already unable to pay -- but, in addition, monthly payment enough of any of arrearage to reduce the arrearage to zero in 24 months.

5. NEGC data demonstrates that these payment plans are too stringent for low income and poor Rhode Islanders to afford even without the increased rate. *See, Exhibit K* attached to the *Testimony of John Howat*. The most recent data entered in PUC Docket 1725 (dated October 12, 2005) shows that, in September, 2005, before the requested 23.8% increase, 980 payment plans were entered while 1644 payment plans were broken in the same month.
6. Evidence of this dire economic situation faced by low-income and poor Rhode Islanders was presented to the Commission through testimony of John Howat, Senior Policy Analyst at the National Consumer Law Center in Boston, Massachusetts as well as through exhibits which describe both inability of low-income and poor Rhode Islanders to pay this increase (*Exhibits A to K*) and the very limited resources available to assist them (*Exhibit L*).
7. 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.
8. All of this evidence is uncontradicted.
9. This evidence demonstrates that low-income and poor NEGC customers face an immediate and potentially irreparable crisis, and that these customers have no available alternatives.
10. A number of members of the Rhode Island General Assembly testified before this Commission on October 21, 2005. Every one of them asked that this Commission defer

the requested increase in order to permit the General Assembly to address this urgent issue. All stated that they understood that the General Assembly was prepared to address this issue as a first order of business in the next legislative session.

11. The NEGC witnesses who testified before the Commission on October 21, 2005 were unable to state the amount of under-collection that such a deferral would cause, but agreed to research the issue and bring the results back to the Commission.

WHEREFORE, the George Wiley Center asks that this Commission stay the imposition of any rate increase until January 1, 2006.

Respectfully submitted,
The George Wiley Center
By its attorney,

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CERTIFICATE OF SERVICE

I certify that on the 24th day of October, 2005, I caused a copy of this document to be delivered via email to the following:

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