

November 27, 2013

BY HAND DELIVERY & ELECTRONIC MAIL

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

RE: Rules and Regulations Governing the Termination of Residential Electric and Natural Gas Service (initiated October 25, 2013), Docket No. 4450

Dear Ms. Massaro:

I have enclosed for filing in the above-referenced matter The Narragansett Electric Company's d/b/a National Grid ("National Grid") comments concerning the Rhode Island Public Utility Commission's Proposed Rules and Regulations Governing the Termination of Residential Electric and Natural Gas Service.

Thank you for your attention to this matter. If you have any questions regarding this filing, please contact me at (401) 784-7667.

Very truly yours,



Thomas R. Teehan

Enclosure

cc: Docket 4450 Service List
Thomas Ahern, Administrator
James Lanni
William Lueker, Division

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically transmitted to the individuals listed in the Commission's service list for this docket. Copies of this filing will be hand delivered to the RI Public Utilities Commission and the RI Division of Public Utilities and Carriers.

A handwritten signature in blue ink, appearing to read "T. Teehan".

Thomas Teehan, Esq.

November 27, 2013

Date

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
RHODE ISLAND PUBLIC UTILITIES COMMISSION

**IN RE: RULES AND REGULATIONS GOVERNING THE
TERMINATION OF RESIDENTIAL ELECTRIC AND
NATURAL GAS SERVICE**

Docket No. 4450

**THE NARRAGANSETT ELECTRIC COMPANY D/B/A NATIONAL GRID'S
COMMENTS**

I. Introduction

National Grid¹ hereby submits these written comments regarding the Rhode Island Public Utilities Commission's (the "Commission") Proposed Rules and Regulations Governing the Termination of Residential Electric and Natural Gas Service dated October 25, 2013 (the "Proposed Rules"). In its Notice of Proposed Rulemaking and Hearing dated October 28, 2013, the Commission noted that the Proposed Rules comprise rules covering the specific matters that Rhode Island law directs to be the subject of the Commission's rulemaking. National Grid understands that the Rhode Island Division of Public Utilities and Carriers (the "Division"), pursuant to its statutory authority, will create rules to address the areas previously covered by the existing Commission rules that have been omitted from the Proposed Rules. National Grid looks forward to participating in the Division's rulemaking process.

II. Comments

National Grid offers the following specific comments on the Proposed Rules:

¹ The Narragansett Electric Company d/b/a National Grid (referred to herein as "National Grid" or the "Company").

A. Definitions (Section 3.0)

Section 4.0(C) of the Proposed Rules provides that “[n]o Electric Utility shall terminate service to any household in which any resident is disabled and qualifies under the definition of Financial Hardship for failure to pay an outstanding indebtedness for service without the Electric Utility or Gas Utility first complying with reasonable methods of debt collection as defined by the Division.” The Proposed Rules do not include a definition of what constitutes a “disabled” customer. The Company, therefore, requests that the Commission revise the Definitions of the Proposed Rules to include a definition of “disabled.” The Company recommends that the Commission include the following definition of “disabled”:

“Disabled” resident shall mean a full-time resident in a household who is disabled as defined by the Social Security Administration and receiving Social Security Disability Income (“SSDI”) or Supplemental Security Income (“SSI”) (if an adult) or SSI (if a minor child).

B. Life Support (General Rules Governing Termination of Service):

The Company requests that the Commission revise the General Rules Governing Termination of Service (Section 4.0 of Proposed Rules) to include specific provisions for life support customers. The current Proposed Rules include a definition for “Seriously ill”, which is defined as “an illness that is life-threatening or that will cause irreversible adverse consequences to human health or that has a significant potential to become life threatening or to cause irreversible adverse consequences to human health.” Proposed Rules at section 3.0(I), p. 2. However, there may be circumstances where this medical protection for seriously ill customers does not address those customers on life support, and the Company believes that it is important for the Commission’s rules to address life support customers. The Company, therefore, requests

that the Commission revise the Proposed Rules to include the following provisions for Life Support:

- Definitions: “Life Support” shall mean customers or residents of a household who suffer from a medical condition requiring electric service to operate a life-sustaining device as certified by a licensed medical physician, provided that the customer cannot pay overdue bills because of Financial Hardship.
- Statutory Limitations on Termination of Service: A public utility shall be permitted to maintain service to the permanent residence of the customer during such times as any resident therein is determined by the Company or the Division to fall within the definition of Life Support, as certified and periodically re-certified to the public utility or to the Division by a licensed physician.

C. Infant Protection (Statutory Limitations on Termination of Service)

The Company requests that the Commission revise the Statutory Limitations on Termination of Service (Section 5.0(C) of Proposed Rules) to include a provision that would require a customer who is seeking the protections of the infant protection provisions and who is not the parent of the child, to provide a certified court order establishing that the customer has legal custody of the child. The customer would not be required to provide a court order if the customer provides certification that the child’s parent(s) reside at the premises in the form of either a lease or notarized statement from the landlord. The Company requests that the Commission add the following italicized/bold language to section 5.0(B)(2) of the Proposed Rules regarding Infant Protection:

- “For the purpose of determining whether there is a residence in which there is a person under the age of two (2) years domiciled, the gas or electric company shall

require certification from the customer in the form of a birth certificate or other verifiable (i.e. hospital or physician) documentation within seven (7) days of claiming the protection. *When the customer is not the parent of the person under the age of two years, the gas or electric company shall require certification from the customer in the form of a lease or notarized landlord's statement that the child's parent(s) reside at the service address. If the child's parent(s) does not reside at the service address, the gas or electric company shall require certification from the customer in the form of a certified court order, which shows that the customer has legal custody of the child.* Such documentation may be mailed to the Electric Utility or Gas Utility or sent to the company by facsimile or electronic mail to a number or email address, which shall be provided to the customer by the Electric Utility, Gas Utility or the Division.”

D. Extending Financial Hardship Requirement to Seriously Ill Customers (Statutory Limitations on Termination of Service)

The Company requests that the Commission revise the Statutory Limitations on Termination of Service (Section 5.0(B)) to require that Seriously Ill customers also qualify under the financial hardship definitions of the Proposed Rules. Specifically, the Company requests that the Commission add the following italicized/bolded language to section 5.0(B) of the Proposed Rules:

- “No public utility shall disconnect service to the permanent residence of the customer during such times as any resident therein is seriously ill, as certified to

the public utility or to the Division by a licensed physician, *provided that the customer cannot pay overdue bills because of Financial Hardship.*

E. Combined Billing (General Rules Governing Termination of Service):

The Company requests that the Commission revise the General Rules Governing Termination of Service (Section 4.0) to include a provision indicating that these termination rules would not prohibit the Company from implementing a voluntary and optional combined billing system in the future should the Company decide to implement such a system and subject to Commission review and approval. As background, in January 2012, the Company converted its gas customer accounts into the billing system already used for managing electric accounts. During that conversion, gas services were set up as separate accounts and not combined with electric services into dual-service accounts. As a result, many National Grid customers in Rhode Island continue to receive and pay two bills each month. However, now that the Company has the same billing system for its gas and electric accounts, it has the future capability to combine those services into a single bill, which would simplify processes, reduce operational costs, and improve customer satisfaction. When services are combined into a single account, partial payments are typically applied to each service receivable in a pro-rata fashion. As a result, dual-service accounts in arrears would have an unpaid balance on both services, making both eligible for collection actions, including service termination. The Company is not asking the Commission to approve such a combined billing approach as part of its rule making in this docket. It is simply requesting clarification that that option is not precluded by these rules, but instead would be reserved for a future docket should the Company opt to implement combined billing. Thus, the Company requests that the Commission add the following language to Section 4.0 of the

Proposed Rules: 4.0 (F): *Nothing in these rules shall prevent the Company, subject to Commission review and approval and to such conditions as may be approved by the Commission in any future proceeding, from implementing a voluntary and optional combined billing system under which dual-service accounts in arrears would have an unpaid balance on both services, making both eligible for collection actions, including termination of service.*

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY**

By its attorney,



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Dated: November 27, 2013