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Member Agencies

Blackstone Valley
Advocacy Center

Domestic Violence
Resource Center of
South County

Elizabeth Buffum
Chace Center

Sojourner House

Women's Center
of Rhode Island

Women's Resource Center
of Newport & Bristol Counties

Task Force

Sisters Overcoming
Abusive Relationships

To: Chairperson Margaret Curran and the Public Utilities Commission

From: Deborah DeBare, Executive Director
Rhode Island Coalition Against Domestic Violence

Date: December 18, 2013

Re: **Rules and Regulations Governing the Termination of Residential
Electric and Natural Gas Service (Docket No. 4450)**

On behalf of our six member agencies and our taskforce of survivors (SOAR), the Rhode Island Coalition Against Domestic Violence wishes to express our serious concerns regarding the proposed changes to the rules governing termination of residential electric and gas service. The proposed regulations diminish protections that can be essential for victims of domestic violence and their children.

A victim whose abuser is removed from the residence may still face significant barriers to a safe living situation. Victims of physical and emotional abuse often have also been subject to financial abuse, in which the abuser has controlled the victim's money and access to financial information. Some victims may find themselves burdened with debt incurred by the abuser, making it difficult to move forward by themselves. The proposed regulations removes Section 3D ("Termination of Service in Cases Involving Marital Dispute") of the current rules, erasing a potential recourse for a married victim in this situation. We would ask that the Commission instead broaden the protections of that section to cover domestic violence situations involving unmarried intimate partners or family members as well.

We are also highly concerned about the overall tightening of these regulations, particularly at a time when Rhode Islanders are facing high levels of unemployment and financial distress. Escalating the threat of losing access to basic, necessary utilities when so many are already struggling to afford these necessities will place additional burdens on domestic violence survivors who are trying to rebuild safe lives for themselves and their children while putting individuals and families who are already experiencing intense financial strain at increased risk of domestic violence.

We ask that you consider more extensively the impact of these proposed changes on Rhode Islanders, including victims and survivors of domestic violence and that you consider strengthening, rather than weakening, protections at this difficult time for so many families.

Thank you for your consideration.