

**Luly Massaro - Addition to multi-organizational letter opposing utility shutoff rule**

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**From:** Karen Pace <karen@leadsafekids.org>  
**To:** <Luly.Massaro@puc.ri.gov>  
**Date:** 12/19/2013 5:22 PM  
**Subject:** Addition to multi-organizational letter opposing utility shutoff rule  
**CC:** Laura Brion <laura@leadsafekids.org>, Roberta Hazen Aaronson <roberta@le...>

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Please note the addition of Rhode Island Kids Count at the end of the letter.

Thank you.

Childhood Lead Action Project

1192 Westminster Street, Providence, RI 02909

December 19, 2013

Luly E. Massaro, Commission Clerk

Rhode Island Public Utilities Commission

89 Jefferson Blvd, Warwick, RI 02888

To the Public Utilities Commission of Rhode Island:

We the undersigned group of organizations working to protect the health and wellbeing of children and infants are deeply concerned about Rhode Island's proposed harmful changes to the "Rules and Regulations Governing the Termination of Residential Electric and Natural Gas Service"; **Docket No. 4450**. In addition, we urge the Commission to consider community involvement and allow for a more inclusive democratic process by extending public hearings to other cities and towns in Rhode Island.

We strongly urge the Commission to reconsider making any decisions until more public hearings are held. The proposed rules will affect people from all areas of the state. Hearings need to be held in Providence, Newport, Woonsocket, South County, Pawtucket, East Providence, and other locations. The public hearings should include evening times to ensure that working people, who are most affected by this issue, can attend.

The proposals would have a serious negative effect, decreasing protection for Rhode Island's most vulnerable populations: infants and children, the elderly, disabled, unemployed and under employed, families ineligible for LIHEAP such as undocumented immigrants, and more. Every year, Rhode Island households experience 20-30,000 utility termination, a very high number that would increase if these

new proposed rules are accepted. In addition to causing extreme discomfort and loss of dignity, living without heat or electricity can be life-threatening and cause serious harm.

There is solid, empirical evidence that many Rhode Island households simply lack sufficient income to pay for basic necessities. A 2012 report by The Economic Progress Institute found that, based on a no frills household budget, “many Rhode Island households did not earn enough to make ends meet. Over 85% of Rhode Island single-parent families and 28% of two-parent families raising two or more children earn less than the income required to make ends meet. Over 40% of individuals earn less than the amount needed to meet basic needs.” The report further found that “it costs a single parent family \$49,272, and a two parent family \$54,024, to raise a toddler and school-aged child. It costs an individual \$19,944 to meet his or her basic needs.” When looking at these numbers, it becomes how difficult making payments can be for families living at or below the poverty level.

Instead of voting to implement harmful changes to the termination rules we recommend that you postpone your vote to learn about positive reforms that are needed. For example, households with an infant under 2 years old are protected from termination only if they qualify under “financial hardship” *and* have not been shut-off previous to the child’s birth. We believe the proposed rule puts infants at undue risk for health problems or possible death. Furthermore, the proposed rule allows for utility termination based on the family’s history of economic hardship. We also request that protection be extended through the age of five years when the child is enrolled in school.

Again, we urge you to reconsider both the changes proposed for the “Rules and Regulations Governing the Termination of Residential Electric and Natural Gas Service”; **Docket No. 4450**, as well as hold more public hearings. We believe it is important to support Rhode Island’s vulnerable populations in a non-punitive manner, and to promote health and wellbeing especially for infants and children.

We thank you for your time and consideration.

The Childhood Lead Action Project

Rhode Island Center for Law and Public Policy

Rhode Island Medical-Legal Partnership

The Environmental Justice League

Rhode Island Parent Information Network

Rhode Island Kids Count

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