

Senior Agenda Coalition of Rhode Island

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The Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick RI 02888

Re: Docket 4450

Dear Members of the Commission:

On behalf of the Senior Agenda Coalition of Rhode Island, I offer the following public comments on the revised regulations regarding eligibility of persons aged 62 and older for special protection against shutoffs.

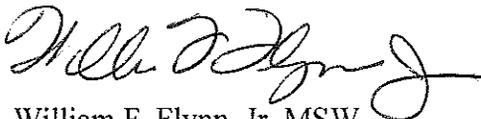
We strongly recommend that the age for a household of seniors to qualify for shutoff protection remain at 62 because low-income seniors in the age 62-65 range are particularly vulnerable financially for several reasons:

- 1) They are typically collecting Social Security at a reduced rate because they have opted for the minimal benefit due to unemployment or part-time work status.
- 2) They do not qualify for Medicare below age 65, and therefore are likely to be uninsured or to have high-deductible health insurance policies.
- 3) Their unemployment rate is higher than younger seniors in the 55-65 age bracket.

Therefore the policy of raising the age to qualify for protection as seniors, although it appears on its face to be "covering those more in need", paradoxically takes away protection from a group of younger seniors, some of whom have greater financial need and poorer health due to lack of Medicare coverage.

We urge you to reconsider that provision within the proposed new regulations.

Sincerely,



William F. Flynn, Jr. MSW
Executive Director

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