

**Comparison of Rule Changes (Current vs. Proposed)
for the PUC (Public Utilities Commission) of Rhode Island for**

“Rules and Regulations Governing the Termination of Residential Electric and Natural Gas Service”

OLD (Currently Existing) Rules	NEW (Proposed) Rules
“Rules and Regulations Governing the Termination of Residential Electric, Gas and <u>Water</u> Utility Service”	“Rules and Regulations Governing The Termination of Residential Electric and Natural Gas Service” (no “Water”, mentioned only once in the document p.8, Part 6.0 E)
55 page document	8 page document: Are there a separate set of rules for the Division?
Termination notices in English, Spanish, Portuguese, French, and other languages deemed appropriate. p.15 Part III, Section 4 D	No mention of language accessibility considerations when notifying customers of termination.
Termination notices sent as letters at least 10 days in advance, posted visibly if residence different from mailing address, 2 calls/ contacts with adult 48 hours before shut-off. p.12-16, Part III, Section 4 (A-G)	Termination notices <u>written or sent electronically</u> (if agreed by customer) at least 10 days in advance. No other details about contact to residents leading up to termination (visits, posted notices, calls, etc.) . p.2, Part 3.0 (J)
“Financial Hardship” defined as combined gross income <= 75% RI median income. p.2, Part II, Section 1 G	“Financial Hardship” defined as combined gross income <= 60% RI median income. p.1, Part 3.0(D)
“Protected Status Customer”: Unemployed, Elderly, Disabled, LIHEAP eligible, seriously ill, in household with financial hardship and infant under age 2 p.1-2, Part II, Section E (1-5)	No mention of “Protected Status Customer” as a category- those previously in this category treated differently, see below.
Unemployed customers as “Protected Status Customer” p.1, Part II, Section 1 E(1)	Unemployed customers not mentioned, do not receive protected status.
Elderly customers as “Protected Status Customers”. p.1, Part II, Section 1 E (2) No termination without written approval from Division of Public Utilities. p.9, Part III, Section 3E(2,3)	Elderly customers protected from termination <u>only in the case of “Financial Hardship.”</u> p.2, Part 4.0(B)
Elderly status (as consideration in utility termination protection) defined as all adult residents <u>sixty-two (62) years</u> or older. p.8, Part III, Section 3 E(1)(a)	Elderly status (as consideration in utility termination protection) defined as all adult residents <u>sixty-five (65) years</u> or older. p.2, Part 4.0(B)

OLD (Currently Existing) Rules	NEW (Proposed) Rules
<p>Disabled customers as “Protected Status Customers”. p.1, Part II, Section 1 E (2) No termination without written approval from Division of Public Utilities. p.9, Part III, Section 3 E(2,3)</p>	<p>Disabled customers protected from termination <u>only in the case of “Financial Hardship.”</u> p.3, Part 4.0(C)</p>
<p>“Infant Protection”: no termination of service where there is an infant under age two (2) AND no previous shut-off before birth of child AND financial hardship. p.10, Part III, Section 3F (1)</p>	<p>Essentially the same limited “Infant Protection”, with same contradiction of must have “financial hardship” but have “no previous shut-off”. p.5, Part 5.0 (C)(1)</p>
<p>“Utility Termination Moratorium Period” (increased shut-off protection) from <u>November 1st- April 15th.</u> p.3, Part II, Section 1 (I)</p>	<p>“Winter Moratorium Period” (increased shut-off protection) from <u>November 1st- March 31st.</u> p.2, Part 3.0 (K)</p>
<p>During winter “Moratorium Period” (Nov 1- April 15) no termination for “Protected Status Customers”. p.7, Part III, Section 3 C(2)</p>	<p>During “Winter Moratorium Period” (Nov 1- March 31) no termination for households in “Financial Hardship” (<= 60% RI median income) p.3, Part 5.0 (A)</p>
<p>During winter “Moratorium Period” (Nov 1- April 15) no termination for nonpayment when utility primary source of heat and balance < \$500, if not primary source of heat no termination when balance < \$200. p.6, Part III, Section 3 C(1)</p>	<p>No mention of service continuation during “Winter Moratorium” based on utility as primary heat source or based on outstanding balance amount.</p>
<p>Summer Moratorium: no termination for nonpayment during heat advisory days in RI. p. 45, Part VIII</p>	<p>No mention of Summer Moratorium</p>
<p>Consideration for protection against termination in “Cases involving Marital Disputes.” p. 7-8, Part III, Section 3 D</p>	<p>No mention of consideration in cases involving marital disputes.</p>
<p>Consideration of negotiation against termination for current residents, in cases where utility bill is in the name of a person no longer at the residence. p.13, Part III, Sect. 4 B</p>	<p>No consideration for residents where a utility with outstanding balance is in the name of someone who no longer is at the residence.</p>
<p>Insufficient reason for termination: nonpayment of rentals, merchandise, appliances, service calls. p.5, Part III, Section 3 A(1)</p>	<p>No mention of this.</p>

OLD (Currently Existing) Rules	NEW (Proposed) Rules
<p>Insufficient reasons for termination: -nonpayment for concurrent service at different metering point, residence, or location. -nonpayment for different class or type of utility service at same or different location. p.5, Part III, Section 3 A (2,3)</p>	<p>No mention of this.</p>
<p>At time of shut-off, customer may make a partial or complete payment of existing balance directly to utility field employee, who must have a copy of the bill and is authorized to accept payment in order to avoid utility termination. p. 19, Part IV, Section 3</p>	<p>No mention of this.</p>
<p>Termination must not occur Fri-Sun, on a holiday or the day before a holiday, and must take place during the utility’s office hours, with personnel available 3 hours after shut-off, so they may be contacted and immediately restore service in the case of an error or Protected Status. p.16, Part III, Section 5</p>	<p>No mention of this.</p>
<p>Detailed procedures involving Informal Reviews, Hearings, and Appeals, for utility customers to contest or negotiate against termination of service. p.18, p.39-45</p>	<p>No mention of Customer Reviews, Hearings, Appeals, etc. Will these sections now appear in a separate set of rules for the Division?</p>
<p>After termination, service may be immediately restored in emergency situations, as deemed by the Division of Public Utilities, or the PUC. p.17-18, Part III, Section 6</p>	<p>No mention of this.</p>
<p>Detailed outline of varying payment plans, including “Arrearage Forgiveness Payment Plan.” p.20-39</p>	<p>No mention of payment plans other than “Arrearage Forgiveness Program”. p.7-8, part 6.0</p>

Submitted on at the RI PUC hearing on November 21, 2013 by HAND by
Camilo Viveiros, lead organizer,
George Wiley Center
32 East Ave
Pawtucket, RI 02860
camiloviveiros@gmail.com cell: 401-338-1665