

George Wiley Center Comments

On behalf of the George Wiley Center, the Rhode Island Center for Justice submits the following comments in response to the Public Utilities Commission’s Notice to Accept Comments on Draft Guidance Document in Docket 4600-A. The Rhode Island Center for Justice is a non-profit public interest law office dedicated to providing free civil legal assistance to low-income Rhode Islanders, conducting key litigation affecting the rights and wellbeing of thousands across the State, and engaging in legislative and policy advocacy on behalf of the communities we serve. The George Wiley Center is a grassroots group, organizing with low-income Rhode Islanders to advocate for systematic changes aimed at alleviating problems associated with poverty. Dedicated to organizing around utility access for over 30 years, the George Wiley Center is at the forefront of protecting the rights of low-income utility consumers and working toward a just, accessible utility system for all.

Introduction

George Wiley Center applauds the Commission for its leadership and foresight in opening Docket 4600, Investigation into the Changing Electric Distribution System and Modernization of Rates in Light of the Changing Distribution System, and for the tireless work of the Commission and its staff in the Docket. George Wiley Center particularly commends the Commission and the Stakeholders in this proceeding for considering the challenges low-income utility consumers face, and working jointly to assess potential protections and solutions to ensure that all Rhode Islanders have access to utility service. Of special note were the many robust conversations around burden and equity as relates to utilities. While these Comments will briefly address certain sections of the Report and Order, they are offered in the context of an ongoing collaborative effort to address these challenges. We look forward to continuing to work together toward the goal eliminating lack of access to utility service due to low income.

I. Goals

George Wiley Center believes that the overarching goals developed by the Stakeholders and outlined in the Draft Guidance Document accurately reflect the Stakeholders’ intentions. We note that the final bullet point “align distribution utility, customer, and policy objectives and interests through the regulatory framework, including rate design, cost recover, and incentives,” is appropriately broad and contains, among other things, consideration of customer burden and equity.

II. Rate Design Principles

George Wiley Center reaffirms its support for the Rate Design Principles developed by the Stakeholders and laid out in the Draft Guidance Document. We are grateful to the other Stakeholders and the Commission for acknowledging the critical importance of designing rates that provide opportunities to reduce energy burden, and address low income and vulnerable customers’ needs.

III. Benefit-Cost Framework

George Wiley Center broadly supports the Draft Guidance Document's vision for the use of the Benefit-Cost Framework. It is essential that all factors of the Framework be given appropriate weight so that the appearance of a Category or Driver in the matrix not be rendered merely symbolic. We fully expect any future proposal to address the relevant low-income sections of the Framework, particularly at the Customer and Societal Levels.

IV. Low-Income Protections (and opportunities)

While we are disappointed that the Commission declined to adopt the Stakeholders' recommendations for the creation of specific protections and opportunities for low-income consumers, George Wiley Center recognizes the Stakeholders' robust discussion of this topic and commends the Commission's direction to National Grid that it take these recommendations into account in addressing rates. **We urge the Commission to immediately take up consideration of the implementation of a tiered pricing system (such as one including a percentage of income payment plan), and we hope to work together on evaluating the merits of such a system and ultimately in designing rates the allow all Rhode Islanders meaningful access to utilities.** We would welcome the opportunity to work collaboratively with Commission staff and other Stakeholders in producing a report on this important topic.

Conclusion

Docket 4600 and the Report, Order, and Draft Guidance Document that arose from it, signal the Commission's continued acknowledgement of the severity of the crisis of access to utilities that persists in Rhode Island. Many of the elements of the Draft Guidance document will help alleviate this crisis, but more work must be done. A dedicated review of the challenges facing low-income utility consumers in Rhode Island and a vigorous analysis of best practices for preventing involuntary termination and creating opportunity to access emerging technologies is necessary to meaningfully address this crisis. We look forward to working with the Commission and the other Stakeholders on this vital issue.