

October 31, 2016

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 4651 - Arrearage Management Program Provision
RIPUC No. 2130 and RIPUC NG-GAS No. 101
Responses to PUC Data Requests – Set 2**

Dear Ms. Massaro:

Enclosed please find 10 copies of National Grid's¹ responses to the second set of data requests issued by the Rhode Island Public Utilities Commission (PUC) concerning the above-referenced matter.

Thank you for your attention to this matter. If you have any questions concerning this filing, please contact me at 401-784-7415.

Very truly yours,



Robert J. Humm

Enclosures

cc: Docket 4651 Service List
Leo Wold, Esq.
Steve Scialabba, Division

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Joanne M. Scanlon

October 31, 2016
Date

**Docket No. 4651 - National Grid – Arrearage Management Program
Service List updated 10/20/16**

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Marie Ganim	Mganim@rilegislature.gov ;	

PUC 2-1

Request:

How will the Company coordinate with the Department of Human Services to validate customer eligibility?

Response:

The Company will coordinate with the Department of Human Services (DHS) in the following ways:

- i) Telephone – the DHS will call the Company to notify the Company of a customer's eligibility;
- ii) Email – the DHS will send an email to the National Grid Regulatory mailbox to notify the Company of a customer's eligibility; and/or
- iii) Electronic – the DHS will submit to the Company electronic eligibility files during the LIHEAP certification season (October - April).

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4651
In Re: Arrearage Management Program Provision
RIPUC No. 2130 and RIPUC NG-GAS No. 101
Responses to the Commission's Second Set of Data Request
Issued October 19, 2016

PUC 2-2

Request:

When will a customer in danger of defaulting from the AMP receive a letter from the Company advising him or her of the risk of default? Please provide a copy of the letter.

Response:

When a customer misses his or her first payment, the Company will send a letter to the customer to inform the customer of the missed payment and that the Payment Plan is overdue. A copy of this letter is provided as Attachment PUC 2-2-1.

When a customer misses his or her second payment, the Company will send a letter to the customer advising that the customer is in jeopardy of defaulting from the Arrearage Management Plan. A copy of this letter is provided as Attachment PUC 2-2-2.

2212

IMPORTANT NOTICE

Dear Customer:

We regret we must inform you that your Arrearage Management Program (AMP) Payment Plan is now overdue.

In order to continue to receive the benefits of the AMP, your payment of <ATCC_AT_AMOUNT_1_INTRFCE> must be received and posted by the due date of your most recent bill. **Failure to make this payment may result in the loss of scheduled benefits and removal from the AMP.**

As a reminder, to remain current with the AMP, the following conditions need to be met:

- Miss no more than 2 payments in a 12-month period covered by the Payment Plan (partial payments are considered missed payments); and
- The amount due under the Payment Plan is paid in full by the conclusion of the 12-month period of the Payment Plan.

Please contact National Grid at 1-888-211-1313 if you have any questions about your enrollment in the AMP.

Sincerely,

National Grid

2213

IMPORTANT NOTICE

Dear Customer:

According to our records, your last payment for the Arrearage Management Program (AMP) was not received by the agreed upon due date and your enrollment in the program is now at risk of termination.

In order to continue to receive the benefits of the AMP, your payment of <ATCC_AT_AMOUNT_1_INTRFCE> must be received and posted each month by the due date. **Failure to make this payment by the due date may result in the loss of scheduled benefits and removal from the AMP. Any other missed payments may also result in the loss of scheduled benefits and removal from the AMP.**

If you have made your payment after the due date, it is still treated as a missed payment and may result in your removal from the plan. Please make every effort to make all future payments by the due date to avoid removal from the AMP. Payments must be received before your account will be eligible for a monthly arrears forgiveness credit.

If you have not made the full payment, please make it as soon as possible. If you miss more than two payments, your enrollment in the AMP will be terminated and your account will be returned to active collections. Additionally, if the amount due under the Payment Plan is not paid in full by the conclusion of the 12-month period of the Payment Plan, your enrollment in the AMP will be terminated and your account will be returned to active collections.

Please contact National Grid at 1-888-211-1313 if you have any questions about your enrollment in the AMP.

Sincerely,

National Grid

The Narragansett Electric Company
d/b/a National Grid
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PUC 2-3

Request:

In referencing the gas cost recovery tariff, please confirm that the proposed incremental costs associated with the AMP, including but not limited to, the amount of arrearage forgiven and any costs associated with implementation of, evaluation of and reporting on the effectiveness and results of the AMP, are the costs that the Company seeks to recover under RIGL 39-1-27.12. Additionally, please confirm that the Company seeks to recover such costs through an Arrearage Management Adjustment Factor to the Distribution Adjustment Charge.

Response:

The Company is proposing recovery of arrears forgiven associated with the Arrearage Management Program (AMP) under R.I. Gen. Laws §§ 39-2-1(d)(2)(x) and 39-2-1(d)(2)(xiv). In addition, the Company is proposing recovery of incremental administrative costs for the implementation and operation of the AMP, as those costs will be incremental to those currently recovered through base distribution rates. Although this ratemaking treatment is not specifically provided for in R.I. Gen. Laws § 39-2-1(d)(2), such recovery is not prohibited. In addition, it is consistent with the recovery of administrative costs associated with the LIHEAP Enhancement Plan pursuant to R.I. Gen. Laws § 39-1-27.12(e). The Company is proposing recovery of such costs from gas customers through an Arrearage Management Adjustment Factor to the Distribution Adjustment Clause.

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PUC 2-4

Request:

In referencing the electric cost recovery tariff, please confirm that the proposed incremental costs associated with the AMP, including but not limited to, the amount of arrearage forgiven and any costs associated with implementation of, evaluation of and reporting on the effectiveness and results of the AMP, are the costs that the Company seeks to recover under RIGL 39-1-27.12. Additionally, please confirm that the Company seeks to recover such costs through an Arrearage Management Adjustment Factor to the Distribution Adjustment Charge.

Response:

The Company is proposing recovery of arrears forgiven associated with the Arrearage Management Program (AMP) under R.I. Gen. Laws §§ 39-2-1(d)(2)(x) and 39-2-1(d)(2)(xiv). In addition, the Company is proposing recovery of incremental administrative costs for the implementation and operation of the AMP, as those costs will be incremental to those currently recovered through base distribution rates. Although this ratemaking treatment is not specifically provided for in R.I. Gen. Laws § 39-2-1(d)(2), such recovery is not prohibited. In addition, it is consistent with the recovery of administrative costs associated with the LIHEAP Enhancement Plan pursuant to R.I. Gen. Laws § 39-1-27.12(e). The Company is proposing recovery of such costs through an Arrearage Management Adjustment Factor from electric customers. There is no Distribution Adjustment Charge for the electric business, so this charge will be included in the distribution energy charge on customers' bills.