

## **Comments of the George Wiley Center in Docket #4770 re: National Grid’s Application for Approval of a Change in Electric and Gas Base Distribution Rates**

On behalf of the George Wiley Center (GWC), the Rhode Island Center for Justice (CFJ) respectfully submits the following comments regarding the Application for Approval of a Change in Electric and Gas Base Distribution Rates filed by National Grid (“the Company”) on November 27, 2017 in Docket #4770. GWC is grateful for the opportunity to participate in this critically important proceeding and offers the following comments related to the needs of low-income utility consumers.

### **Current Challenges Facing Low-Income Utility Consumers**

We are grateful for the recent efforts of the Public Utilities Commission (Commission) and the Division of Public Utilities and Carriers (Division) in working toward a comprehensive approach to addressing the challenges faced by low-income utility consumers and creating opportunities for to participate and have access to beneficial and cost-reducing programs and technologies. We further appreciate the ongoing examination of these issues and the understanding demonstrated by the Commission and Division that these issues are multifaceted and evade easy solution.

Unfortunately, despite the efforts described above, Rhode Island remains in a crisis of involuntary loss of utility service due to inability to pay. GWC has worked with thousands of households facing the loss of their utility services and the picture that emerges is both consistent and grim: even at current rates, many thousands of Rhode Islanders simply cannot have secure access to utility service due to the cost burden. Many of these consumers are disabled or elderly, living on fixed incomes already inadequate to pay for housing, utilities, and basic needs. Others are working families with young children facing the increasing costs associated with childcare. The downstream negative impacts of loss of utility service are as well-documented as they are devastating: loss of housing, negative health outcomes, economic instability and unemployment, and family separation. Each of these outcomes comes at a tremendous cost to the individuals or families experiencing them and the State.

### **Rate Design**

Rhode Island is at a critical juncture in modernizing and improving our delivery of utility services. It is vitally important that these efforts include the goal of ending the termination crisis and ultimately reducing the rate of incidence of involuntary loss of service due to inability to pay to zero. We believe that this proceeding offers a key opportunity to address these issues. Ultimately, we respectfully urge the Commission to act on its recognition that the challenges facing low-income consumers are unique and adopt an approach that treats this class of consumer accordingly.

#### *Tiered/Income-sensitive Rates*

We respectfully recommend that the Commission work with GWC, National Grid and other stakeholders to implement a rate schedule that is tiered and sensitive to the income levels of consumers, and, at the lowest tiers, is tied directly to the income of the consumers. This type of

income-sensitive rate plan has been shown to be a successful mechanism both for reducing the rate of terminations and in increasing revenue. We have long advocated for this solution and believe it is ideally suited to addressing the challenges facing low-income utility consumers.

### *Total Bill Discount*

While we strongly believe that a total bill discount is a less precise and effective means of addressing the issues highlighted above, we would note two elements of the current proposal. The first is, while we approve of the notion that any discount should apply to the whole bill, the proposed fifteen percent (15%) reduction is simply and wholly inadequate. Based on the input of the communities we work with and the collective experience of the GWC and those it works with, the figure would have to be closer to a 35% or greater total discount to begin to alleviate the cost burden for low-income consumers.

### **Conclusion**

We thank the Commission once again for the opportunity to present these comments and respectfully urge the Commission to adopt the recommendations above and begin to work with us and other stakeholders on implementation of a tiered/income-sensitive rate plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Willumsen-Friedman', with a stylized flourish at the end.

John Willumsen-Friedman  
*On behalf of the George Wiley Center*