

Collection Notice Posting Fee of \$50.00. NBC also proposed to correct a spelling error in the word “embalming” in Schedule B, Section 1, Category 96 of its tariff.

The current Abatement Application Fee of \$36.00 has not changed since January 29, 2001. NBC customers who believe that more than fifteen percent of their water consumption does not enter the sewer system may apply for abatement consideration. The fee covers the cost of processing new abatement applications, which include a site visit to the customer’s property, approval or denial of the application, and the costs to administratively process notification to the customer via letter. NBC submits that its costs to process these applications have increased from 2001.³

The new Abatement Meter Reading Fee was proposed to cover the cost of NBC staff conducting site visits to obtain abatement meter readings and documenting the findings. Abatement customers are required to annually submit meter readings to NBC and they have the option to submit those readings via telephone, email, or regular mail. However, if a customer requests, the NBC staff will respond to the customer’s site and take the reading for the customer. The \$35.00 proposed fee was designed to recoup the staff costs for these onsite customer requests, for obtaining and processing the meter readings.

The \$30.00 Real Estate Closing Fee was proposed to cover the administrative costs for processing a real estate closing or refinance request. The fee covers the cost of NBC staff time to generate final charges and to issue a final bill within a forty-eight hour turnaround time. NBC staff must also monitor and update account information when payment from the closing attorney is received.

³ Letter by Karen L. Giebink, (Mar. 21, 2018); [http://www.ripuc.org/eventsactions/docket/4814-NBC-TariffFiling\(3-20-18\).pdf](http://www.ripuc.org/eventsactions/docket/4814-NBC-TariffFiling(3-20-18).pdf).

The Collection Notice Posting Fee of \$50.00 was proposed to cover staff time for physically posting notices at properties with delinquent accounts, as well as for reviewing the customer's account to determine eligibility.

3. The Division of Public Utilities and Carriers

The Division issued data requests to NBC seeking a detailed basis, together with supporting documents, to justify each of the requested fees. NBC responded by providing a detailed breakdown of each staff member's duties and time charges, plus overheads, associated with conducting the various tasks associated with each fee request.

On May 24, 2018, after conducting its discovery, the Division submitted a memorandum outlining its review and recommendations for the filing.⁴ The Division found that the NBC's approach of basing the proposed fees on the cost of providing the service was reasonable. The Division further opined that processing abatement applications, abatement meter readings, and real estate closing requests are special requests that do not benefit ratepayers in general and are not part of the NBC's core utility functions. While the Division concurred that the amounts of these fees were reasonable, the Division submitted that these fees should not be charged to all ratepayers. Rather, they should be paid by those customers requesting the service.⁵

The Division further found that the costs associated with collections and posting notices were more aligned with the utility's core function and are typically reviewed as part of a general rate filing. As such, the Division recommended that the PUC deny the request for the proposed Collection Notice Posting Fee.⁶

⁴ [http://www.ripuc.org/eventsactions/docket/4814-DIV-Memorandum\(5-24-18\).pdf](http://www.ripuc.org/eventsactions/docket/4814-DIV-Memorandum(5-24-18).pdf).

⁵ Division Memo at 2 (May 24, 2018).

⁶ *Id.*

4. NBC's Response

On May 30, 2018, NBC advised the PUC that although it disagreed with the Division's position on the Collection Notice Posting Fee, it would provide more information to the Division, in either a separate proceeding or in its next general rate case filing. Therefore, NBC withdrew its request for approval of the Collection Notice Posting Fee in this proceeding.⁷

COMMISSION FINDINGS

At a May 31, 2018 Open Meeting, the PUC considered NBC's request. The PUC concurred with the Division's recommendations and found that the proposed Abatement Application Fee, Abatement Meter Reading Fee, and Real Estate Closing Request Fee were all just and reasonable and approved the same. The PUC also approved the tariff change to correct spelling of the word "embalming."

Accordingly, it is hereby

(23212) ORDERED:

1. The request to increase the Abatement Application Fee from \$36.00 to \$70.00 is hereby approved.
2. The request to create an Abatement Meter Reading Fee in the amount of \$35.00 is hereby approved, with the proviso that such fee shall be paid by the customer requesting the service.
3. The request to create a Real Estate Closing Fee in the amount of \$30.00 is hereby approved, with the proviso that such fee shall be paid by the customer requesting the service.
4. The request to correct the spelling of the word "embalming" in Schedule B, Section 1, Category 96 is hereby approved.

⁷ [http://www.ripuc.org/eventsactions/docket/4814-NBC-Reply-Div\(5-30-18\).pdf](http://www.ripuc.org/eventsactions/docket/4814-NBC-Reply-Div(5-30-18).pdf).

EFFECTIVE MAY 31, 2018 IN WARWICK, RHODE ISLAND PURSUANT TO AN
OPEN MEETING DECISION ON MAY 31, 2018. WRITTEN ORDER ISSUED JULY 19, 2018.

PUBLIC UTILITIES COMMISSION

Margaret E. Curran, Chairperson

Marion S. Gold, Commissioner

Abigail Anthony, Commissioner

NOTICE OF RIGHT OF APPEAL: Pursuant to R.I. Gen. Laws § 39-5-1, any person aggrieved by a decision or order of the PUC may, within seven days from the date of the order, petition the Supreme Court for a Writ of Certiorari to review the legality and reasonableness of the decision or order.