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June 19, 2020

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

**Re: Narragansett Bay Commission Docket 4976**

Dear Ms. Massaro:

Enclosed please find an original and 9 copies of the following documents:

1. The Narragansett Bay Commission's Response to the Rhode Island Public Utilities Commission's Data Requests (Set 1).

Please note that an electronic copy of these documents has been sent to the service list.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

JAK/kf

Enclosures

cc: Docket 4976 Service List (*via electronic mail*)

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

DOCKET NO. 4976

Response Of The Narragansett Bay Commission  
To The Rhode Island Public Utilities Commission's  
Data Requests  
Set 1

**COMM. 1-1:** Refencing to proposed sewer tie-in expense, please explain how NBC will determine the total developable land of adjacent parcels.

**Response:** NBC will determine total developable land as follows: The total developable land of adjacent properties as contemplated in the Sewer Tie-in Expense Procedures includes the area of land that lies within the sewershed associated with the main sewer line, excluding any land owned by National Grid or other utility that is undevelopable due to the presence of high tension electricity lines, further segregated into two categories: a) parcels of vacant land, and b) parcels with an existing structure.

**Prepared by:** Richard Bernier, P.E, Director of Construction and Engineering

**COMM. 1-2:** Referencing the proposed credit card fee, please explain:

- a.) Why NBC is proposing a second fee consisting of 2.95% of the transaction amount with a minimum transaction fee of \$1.95 for payments over \$400? Is this something new the vendor is offering?
- b.) The proposed tariff states:
  - A. Customers making payments for their monthly sewer user fees will be assessed a credit card processing fee of \$2.95 per transaction and credit card payments will be allowed up to a \$400 maximum per transaction.
  - B. For all other payments fees will be assessed a credit card processing fee of 2.95% of the total payment amount with a minimum fee of \$1.95.

Should it state:

- A. Customers making payments for their monthly sewer user fees up to a limit of \$400 will be assessed a credit card processing fee of \$2.95 per transaction and credit card payments will be allowed up to a \$400 maximum per transaction.
- C. For all other payments over \$400, fees will be assessed a credit card processing fee of 2.95% of the total payment amount with a minimum fee of \$1.95.

**Response:** The wording of the proposed tariff is correct and intentional.

The \$2.95 flat fee per transaction is the amount the vendor has set to recoup the costs of processing credit card payments. Per Service Fee guidelines, for invoice types other than Government or higher education payments, a flat fee must be utilized for recurring monthly utility payments. The vendor set a cap of \$400.00 which would cover most customer bills that are paid on time. This means customers who pay a monthly bill in the amount of \$400.00 or less will pay the same fee. Based on this cap, if a customer owes NBC more than \$400.00 and wants to pay by credit card, they would need to process separate transactions in maximum increments of \$400.00 until the balance is paid. Note that each transaction would incur a \$2.95 flat fee.

However, the credit card company will allow for a fee that is a percentage of the transaction rather than a flat fee for utility payments if the payments are for something other than "the

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Set 1

major payment volume for the biller (NBC)", which is NBC's monthly customer bills. This means any payments that are not recurring monthly amounts as outlined in the credit card company regulations would fall into this category. These can be Sewer Connection permit fees, Lien sale fees, Pre-Treatment application fees, other miscellaneous fees, or to pay off past due balances including late fees to prevent water shut off.

NBC's request to modify its credit card fees is intended to prevent its customer from having to process multiple payment transactions (and charged multiple flat fees) to pay the NBC for any bill other than a regular monthly bill and balances greater than \$400.00.

However, as stated in NBC's initial filing, its preference would be to eliminate these fees from its tariffs, because they are pass through charges to customers and do not yield any revenues to NBC.

**Prepared by:** Karen Giebink

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Set 1

**COMM. 1-3:** Referencing the proposed credit card fee, does NBC intend to charge the credit card fees referenced in its filing for “other” payments, such as permit fees etc., or are those subject to the Docket 5022 COVID-related moratorium, and if not, does NBC intend not to charge these until such time as the moratorium order expires?

**Response:** NBC's does intend to charge a convenience fee for permits and other “non-user-fee” items, as it did not interpret these fees as being subject to the PUC's order since they are not related to usage. However, if NBC's interpretation is incorrect, NBC could absorb the fees as is currently doing pursuant to the PUC's order for all transactions until the PUC Order suspending payment service fees is lifted.

**Prepared by:** Karen Giebink

## STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

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 Set 1

**CERTIFICATION**

I hereby certify that on June 19, 2020, I sent a copy of the within to all parties set forth on the attached Service List by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.

<b>Parties/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
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