April 30, 2020

Good afternoon Luly,

The Rhode Island Division of Public Utilities and Carriers ("Division") submits these comments in response to the invitation for comments contained in Commission Order No. 23809, issued in Docket 5022 on April 14, 2020. The Commission’s Order stated as follows:

"The PUC invites public comment to be submitted by May 4, 2020 on (1) whether a moratorium on service terminations should continue for all categories of customers (non-residential, standard customers, protected customers); (2) whether there should be a lifting of the moratorium for a category of customer; and (3) the appropriate duration of any extension of a moratorium on service terminations."

As in its previous comments in this docket, the Division has no objection to a further extension of the Commission's prohibition on "collections activities... including termination of service for nonpayment" for both residential and nonresidential customers after May 8, 2020 (See Order Nos. 23786, 23807 and 23809), if determined to be appropriate and necessary by the Commission in view of the continuing COVID-19 crisis and based on the data responses proffered by the State’s regulated water, gas and electric utility companies. The Division notes that those data responses universally reflect a reduction in utility collections during the last two months. It would also appear, however, that current cash flow reductions are not yet having a significant impact on utility operations.

Respectfully,

John Spirito, Jr.
Chief Legal Counsel, RIDPUC