

The Narragansett Bay Commission  
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Vincent J. Mesolella  
Chairman

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Executive Director

October 21, 2021

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

Subject: Docket 5022 Notice to Solicit Comments Response

Dear Ms. Massaro:

Please accept this letter from the Narragansett Bay Commission (“NBC”) as its response to the September 29, 2021 Notice to Solicit Comments in Docket 5022 (“Notice”) issued by the Rhode Island Public Utilities Commission (“Commission”). As set forth in the Notice, on March 16, 2020, the Commission voted to enter an emergency order related to the COVID-19 pandemic. The order included various restrictions on several regulated utilities in the State of Rhode Island, many of which were subsequently been lifted. However, in its July 15, 2020 Order, the Commission extended the prohibition on the assessment of late fees, interest charges, credit card fees, debit card fees, and ACH fees. The Notice indicates that the Commission will consider whether to lift these prohibitions at a future open meeting and will accept written comments from the Rhode Island Division of Public Utilities and Carriers and other interested parties as to whether the prohibitions should be lifted, the amount of notice to be given to customers prior to the lifting of the prohibition, and the rationale for the position.

The NBC’s position is that the prohibitions should be lifted. The NBC does not charge late fees, but it does charge interest on past due balances. NBC views interest charges on past due balances as an incentive for customers to pay on time. Since the Commission’s suspension of interest charges in June 2020, the NBC’s over 120-day past due amount (the oldest receivables) has increased approximately \$384,000 or 4% of the total User Fee Accounts Receivable. It is difficult to quantify how much of this increase is due to the suspension of interest charges, but it is likely that some portion of the increase is due to the removal of any incentive to pay on time. Thus, the NBC believes that lifting the prohibition against charging interest will help to reduce this balance.

The NBC does not charge ACH fees, but does charge credit card fees. Currently, NBC is absorbing these fees and would prefer to continue doing so at least until it is clearer that the impacts of the pandemic have passed.

As for notice to customers, NBC would like to reinstate interest and credit card fees thirty days after the Commission lifts the prohibition. The NBC would provide notice to its customers through a message on billing invoices and would also post notices on the NBC website and customer payment portal.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Giebink', is written over the typed name.

Karen L. Giebink  
Chief Financial Officer