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November 2, 2021

The Narragansett Bay Commission

Vincent J. Mesolella Chairman

Laurie A. Horridge Executive Director

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

Subject: Docket 5022

Dear Ms. Massaro:

I am writing in follow up to my letter dated October 21, 2021 in the above captioned Docket. My letter contains a mistake that I would like to correct. In the third paragraph, I stated that: "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." However, in the last paragraph, the letters states: "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." This paragraph should not have included the reference to "credit card fees." The paragraph should have read: "As for notice to customers, NBC would like to reinstate interest 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."

I would also note that the Division of Public Utilities and Carriers ("Division") submitted a letter on October 25, 2021, in which it recommended the reinstitution of interest and late fees. The Division also supported the continued moratorium on fees for credit cards, debit cards and ACH transactions. However, the Division coupled this recommendation with its support for recovery of fees for credit cards, debit cards and ACH transactions in future ratemaking proceedings. NBC joins in this recommendation but urges the Commission to adopt a process whereby utilities can make a filing as expeditiously as possible outside the usual ratemaking process to recoup these expenses. NBC is currently paying approximately forty-two thousand dollars (\$42,000) per month in credit card fees, which are not provided for in our cost of service. Thus, NBC would endorse a mechanism to seek a rate adjustment to cover these fees sooner than our next rate filing.

Thank you for your attention to these matters.

Sincerely,

Karen L. Giebink
Chief Financial Officer