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May 3, 2021

Ms. Luly Massaro, Clerk
Rhode Island Division of Public Utilities
and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

Re: *The Narragansett Bay Commission - Docket 5022*
In Re: Suspension Of Service Terminations And
Certain Collection Activities During The COVID-19 Emergency

Dear Ms. Massaro:

Enclosed herewith please find an original and nine copies of the Narragansett Bay Commission's Response to the Rhode Island Public Utilities Commission's Data Requests On The Quantification of Waived Fees (Spring 2021 Update).

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

Enclosures
cc: Service List via electronic mail

Comm. 1-1: Does the Narragansett Bay Commission typically charge late fees to customers? If so, please provide the tariff reference and the types of customers to whom the late fee applies.

Response: No.

Comm. 1-2: Does the Narragansett Bay Commission typically charge interest on overdue balances to customers? If so, please provide the tariff reference and the types of customers to whom the interest charge applies.

Response: Yes. Interest fees are charged to Residential, Commercial and Industrial sewer customers.

Schedule A of Tariffs of the Narragansett Bay Commission

“PAYMENT – All bills are due and payable upon receipt. Interest will be charged 30 days after the billing date at the rate of 1% per month on any unpaid balance, including any outstanding interest charges.”

Comm. 1-3: Does the Narragansett Bay Commission typically pass through to the user the so called “convenience fees” associated with paying with credit cards or debit cards?

Response: Yes, NBC’s tariffs sets forth convenience fees for credit card payments, which are paid by the customer.

Comm. 1-4: Does the Narragansett Bay Commission typically pass through to the user the so called “convenience fees” associated with paying with an ACH/electronic check?

Response: No.

Comm. 1-5: Does the Narragansett Bay Commission intend to seek recovery of the costs associated with the absorption of the applicable fees?

Response: NBC may seek recovery of costs associated with the absorption of the fees and loss of revenue.

Comm. 1-6: Please indicate the date upon which Narragansett Bay Commission ceased charging customers for late fees, interest fees, credit card/debit card payment fees, or ACH/check fees (please list each separately, even if the date is the same) as a result of the Commission's decision.

Response: Late Fees: Not applicable
Interest Fees: May 14, 2020
Credit card/debit card payment fees: April 21, 2020
ACH/Check fees: Not applicable

Comm. 1-7: Utilities only collect late fees and interest fees on accounts for which payments are made. Similarly, credit card/debit card fees and ACH/electronic check fees are only absorbed by the utility under the PUC's order if payments are made. For the period commencing on the date provided in response to number 5 through the most recent date available (identify the date), please provide the following:

- a. The total number of accounts on which payments were made.
- b. The number of accounts where payments were made and interest and/or late fees were waived.
- c. The number of accounts where payments were made by credit card/debit card.
- d. The number of accounts where payments were made by ACH/electronic check.
- e. The dollar amount of credit card/debit card fees absorbed by the utility that would have otherwise been assessed to the customer paying with a credit card/debit card.
- f. The dollar amount of ACH/electronic check absorbed by the utility that would have otherwise been assessed to the customer paying through ACH/electronic check.
- g. The dollar amount of waived late fees on accounts where payments were made.

- h. The dollar amount of waived interest fees on accounts where payments were made. If the response is that the dollar amount cannot be determined but the utility will seek cost recovery, please explain how the utility would quantify the amount to be recovered and meet a reasonable burden of proof.

Response:

- a. Total number of accounts with payments made:

Month Ending	Accounts with Payments
4/30/2020	73,269
5/31/2020	70,346
6/30/2020	74,289
7/31/2020	69,219
8/31/2020	68,225
9/30/2020	70,503
10/31/2020	71,422
11/30/2020	62,701
12/31/2020	65,599
1/31/2021	67,299
2/28/2021	65,104
3/31/2021	76,256

- b. Number of accounts where interest was waived:

Month Ending	Number of Accounts	Interest Waived
6/30/2020	21,467	\$ 87,128
7/31/2020	21,575	88,165
8/31/2020	21,683	89,203
9/30/2020	20,700	90,540
10/31/2020	20,504	85,098
11/30/2020	20,125	78,690
12/31/2020	21,468	83,740
1/31/2021	21,430	84,216
2/28/2021	19,187	76,707
3/31/2021	19,448	79,246
		<u>\$ 842,733</u>

c. Number of accounts where payments were made by credit card/debit card.

Month Ending	Credit/Debit Card Transactions	
4/30/2020	2,262	<i>April 21 - April 30</i>
5/31/2020	7,299	
6/30/2020	7,258	
7/31/2020	8,280	
8/31/2020	9,178	
9/30/2020	9,571	
10/31/2020	10,288	
11/30/2020	9,232	
12/31/2020	10,370	
1/31/2021	10,432	
2/28/2021	9,362	
3/31/2021	11,265	
	104,797	

d. Number of accounts paid by ACH/electronic check:

Month Ending	ACH/Electronic Check Transactions
4/30/2020	14,237
5/31/2020	14,865
6/30/2020	14,075
7/31/2020	14,771
8/31/2020	15,022
9/30/2020	15,296
10/31/2020	15,657
11/30/2020	14,628
12/31/2020	15,479
1/31/2021	14,727
2/28/2021	13,555
3/31/2021	14,942
	177,254

e. Total Credit Card Transaction Fees waived:

Month Ending	Credit Card Fees Waived	
4/30/2020	\$ 6,077	<i>April 21 - April 30</i>
5/31/2020	19,883	
6/30/2020	19,544	
7/31/2020	22,311	
8/31/2020	24,600	
9/30/2020	25,438	
10/31/2020	27,317	
11/30/2020	24,789	
12/31/2020	27,860	
1/31/2021	30,774	
2/28/2021	27,618	
3/31/2021	33,232	
	289,442	

f. NBC does not charge for ACH/electronic check payments.

g. Not applicable.

h. As set forth herein above, the NBC began waiving interest fees on May 14, 2020. For the period of June 30, 2020 through March 31, 2021, these fees totaled \$842,733. In addition, NBC has absorbed \$289,442 in credit card fees during the period of April 21, 2020 through March 31, 2021.

Comm. 1-8: Please indicate the first date Narragansett Bay Commission sent termination notices to customers with dates not affected by a Commission decision (in other words, the utility could follow through with a physical termination on or after the notice period if payment or a payment arrangement was not made). Please break out by customer class if applicable.

Response: NBC started sending water shut off letters on August 11, 2020.