

June 4, 2020

BY ELECTRONIC MAIL

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

**RE: Docket 5022 - Suspension of Service Terminations and Certain Collections Activities
During the COVID-19 Emergency
PUC Order No. 23826 - Credit Card, Debit Card, and ACH Fees
National Grid's Motion for an Extension of Time**

Dear Ms. Massaro:

On behalf of National Grid,¹ I have enclosed the Company's motion for an extension of time to comply with the requirement in PUC Order No. 23826 relating to waiving credit and debit card fees in the above-referenced matter.

Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Sincerely,



Raquel J. Webster

Enclosure

cc: Docket 5022 Service List
Jon Hagopian, Esq.
John Bell, Division
Linda George, Division

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

IN RE: SUSPENSION OF SERVICE TERMINATIONS AND CERTAIN COLLECTIONS ACTIVITIES DURING THE COVID-19 EMERGENCY	RIPUC Docket No. 5022
---	------------------------------

**NATIONAL GRID'S MOTION FOR AN EXTENSION OF TIME TO COMPLY
WITH THE REQUIREMENT TO WAIVE CREDIT AND DEBIT CARD FEES IN PUC
ORDER NO. 23826**

Pursuant to Rule 810-RICR-00-00-1.16 of the Rhode Island Public Utilities Commission's Rules of Practice and Procedure, National Grid¹ respectfully requests an extension of time to comply with the requirement in PUC Order No. 23826 (Order) relating to waiving credit and debit card fees. In the Order, the PUC ruled in part that "[u]tilities subject to this order shall temporarily suspend late fees, interest charges, credit card fees, debit card fees, and ACH fees." Order at p. 7. National Grid requests an extension of up to July 3, 2020 time to comply with this requirement as it relates to waiving credit and debit card fees for the following reasons²:

1. National Grid utilizes Speedpay, a third-party payment processor, to handle all credit and debit card transactions.
2. Speedway has informed National Grid that it will not be able to complete the process required for National Grid to waive the credit card and debit card fees until July 1,

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

² This request only applies to credit and debit card fees because national Grid is not currently assessing late fees, interest charges, or AHS fees to any customers.

2020. Upon receiving National Grid's request, Speedway began this process on May 28, 2020 after the PUC's May 28, 2020 open meeting decision in this docket.
3. Speedway needs additional time to complete the process because it must complete code changes and conduct testing to remove the credit and debit card fee from various payment channels such as the website, interactive voice response (IVR)/pay by phone, mobile applications, and extranet (call center agent takes the customer's payment over the phone).
 4. National Grid requests an extension of up to July 3, 2020 so it can conduct the necessary testing to ensure that the payment channels are updated correctly. This testing is critical to ensure that there are no disruptions to customers' experiences as they submit payments to the Company.
 5. National Grid will continue working with Speedway and take any steps it can in efforts to achieve the go live date for the suspension of the credit card and debit card fees prior to July 1, 2020.
 6. National Grid considered the option of applying a credit to customers' accounts to cover the credit card and debit card fees between now and July 1, 2020. However, customers would still be required to pay the fee when they submit payments through the website, IVR, or mobile applications. Since this will likely result in confusion for customers, the Company is seeking an extension of time to implement the requirement to waive the credit and debit card fees.

WHEREFORE, National Grid respectfully requests that the PUC approve its request for an extension of time of up to July 3, 2020 to comply with the requirement to waive credit card and debit card fees.

Respectfully submitted,

**The Narragansett Electric Company
d/b/a National Grid**

By its Attorneys,



Raquel J. Webster, RI Bar # 9064
National Grid
40 Sylvan Road
Waltham, MA 02451
(781) 907-2121

June 4, 2020