## **KEOUGH + SWEENEY, LTD.**

ATTORNEYS AND COUNSELORS AT LAW
41 MENDON AVENUE
PAWTUCKET, RHODE ISLAND 02861
TELEPHONE (401) 724-3600
FACSIMILE (401) 724-9909
www.keoughsweeney.com

RAYNHAM OFFICE: 90 NEW STATE HIGHWAY RAYNHAM, MA 02109 TEL. (508) 822-2813 FAX (508) 822-2832 JOSEPH A. KEOUGH JR.\* JEROME V. SWEENEY III\*

SEAN P. KEOUGH\*

JEROME V. SWEENEY II OF COUNSEL

\*ADMITTED TO PRACTICE IN RHODE ISLAND & MASSACHUSETTS

BOSTON OFFICE: 171 MILK STREET SUITE 30 BOSTON, MA 02109 TEL. (617) 574-0054 FAX (617) 451-1914

September 2, 2021

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

Re: The City of Newport, Utilities Department, Water Division - 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 Newport Water's Response to the Rhode Island Public Utilities Commission's Fourth Set of Data Requests in the above captioned docket.

Thank you for your attention to this matter.

Sincerely,

Joseph A. Keough, Jr.

Jough allyh Jr

**Enclosures** 

cc: Service List via electronic mail

## Docket No. 5022

## PUC Fourth Set of Data Requests Directed to All Regulated Utilities Waived Fees – August 2021 Update (Issued August 12, 2021)

## Newport Water Division Responses

1. Does the Newport Water Division (NWD) believe that the inability to charge late/interest fees is a hinderance to collections of outstanding balances? Please explain in detail.

**RESPONSE**: Yes, NWD does believe that the inability to charge interest fees has had an adverse effect on our collections of overdue balances. The NWD, on a monthly basis, issues delinquent notices to customers who have a 90+ day past due balance greater than \$500 or are 120+ days in arrears but under \$500. The delinquent notices require payment in full or an executed payment plan to avoid termination of service. NWD issues Notices of Termination to customers who are non-responsive to the original delinquent notice. We also began issuing Notices of Termination to customers who void extended payment plans, through non-payment, although they received a courtesy call as a reminder of payment due. Currently, as of August 1, 2021, the number of delinquent accounts has decreased by 20.14%, but the dollar amount of delinquent accounts only decreased by 1.42%, from the same month last year.

2. If the prohibition on charging late/interest fees is lifted, what measures and means of communications would NWD utilize to inform customers that they will again be subject to these fees on overdue balances? What does NWD believe is a reasonable notice period prior to the lifting of the prohibition to properly educate customers?

**RESPONSE**: NWD would provide an insert with the monthly bill one month prior (sufficient notice) to the reinstatement of the interest fees on overdue accounts. We do not charge late fees. NWD would include a message printed on the invoice: IMPORTANT NOTICE ATTACHED – PLEASE READ. Also, the IMPORTANT NOTICE would be posted on our website for 30 days before and 30 days after reinstatement of the interest fees.

**3.** Has NWD determined if the waiver of credit card/debit card/on-line check fees has resulted in better collections activities from any class of customers? If so, please explain/provide data. If not, please explain. If the utility already absorbs these fees, please advise.

**RESPONSE**: The waiver of credit/debit card fees has been in effect since July 1, 2020. NWD does not assess fees on ACH/electronic check transactions. On a whole, these transactions for FY 2020 to FY 2021 increased 15.52%. Dollar amount collected, during the same period, increased 20.08%.

**4.** If the Commission were to lift the prohibition on assessing credit card fees, what is NWD's intent on whether to reinstitute the fee? If the utility already absorbs the fees, this can be N/A.

**RESPONSE**: NWD would reinstitute the credit card fees, reverting the responsibility back to the customer. The total expense for FY 2021 is \$60,444.80, which is unbudgeted and expensed in bank fees account.