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Via E-mail

October 13, 2020

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

**RE: Docket No. 5022  
Suspension of Service Terminations and Certain Collections Activities During the Covid-19  
Emergency**

Dear Ms. Massaro,

I am writing you on behalf of SUEZ Water Rhode Island in response to the above referenced Docket. Enclosed are the Company's responses to the Commission's Data requests dated September 22, 2020.

Please advise if you need additional information.

Very truly yours,



Gary S. Prettyman  
*Senior Director – Regulatory Business*

cc: Cynthia WilsonFrias  
James Cagle  
Chris Jacobs

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION**

**IN RE: SUSPENSION OF SERVICE TERMINATIONS :  
AND CERTAIN COLLECTIONS ACTIVITIES : DOCKET NO. 5022  
DURING THE COVID-19 EMERGENCY :**

**PUBLIC UTILITIES COMMISSION’S DATA REQUESTS ON THE  
QUANTIFICATION OF WAIVED FEES  
(Issued September 22, 2020)**

Include Name of Utility at the start of the responses and fill in the responding utility’s name in the bracketed “Name of Utility” spots.

In Order No. 23836 (June 2, 2020), the Commission ordered:

Utilities subject to this order shall temporarily suspend late fees, interest charges, credit card fees, debit card fees and ACH fees. Each utility that charges late fees, interest charges, or passes through credit card, debit card, or ACH fees to the customer shall track the expense of late fees, interest charges not collected as well as credit card fees, debit card fees, and ACH fees absorbed by the utility which are not included in the utility’s revenue requirement, for later review by the PUC. This portion of the order will be reviewed in September 2020.

1. Does SUEZ Water Rhode Island 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

2. Does SUEZ Water Rhode Island 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: No

3. Does SUEZ Water Rhode Island typically pass through to the user the so called “convenience fees” associated with paying with credit cards or debit cards?

Response: In a letter addressed to the Commission dated July 9, 2020, the Company stated the following:

In Docket 5022, Order 23836, effective June 1, 2020, companies were ordered to temporarily suspend late fees, interest charges, credit card fees, debit card fees, and ACH fees. As a result of the Company’s last rate case, Docket No 4800, Order 23825, effective October 5, 2018, the Company was approved to stop charging credit card fees to customers. The Company was not charging the other fees mentioned.

In reviewing other matters pertaining to Docket No. 5022, Order 23836, it was discovered that the Company did not stop charging the credit card fees. As a result, it contacted its vendor to revise the program so that the credit card fees would not be charged to the customers and therefore would be charged to the Company. Additionally, all customers who have paid the credit card fees since October 5, 2018 will receive a credit

4. Does SUEZ Water Rhode Island typically pass through to the user the so called "convenience fees" associated with paying with an ACH/electronic check?

Response: No

5. Does SUEZ Water Rhode Island intend to seek recovery of the costs associated with the absorption of the applicable fees?

Response: Please see response to question 3.

If the utility answered no to each of the preceding four questions, they can stop here. There is nothing more for the Commission to consider at this time. If the utility answered yes to one or more of the questions, please continue.

6. Please indicate the date upon which SUEZ Water Rhode Island 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: As stated in response to question 3 the only fee that the Company previously charged was the convenience fee. The programming has been completed and the customers will no longer be charged the convenience fee as of September 24, 2020. Additionally, customers that were charged the convenience fee between October 5, 2018 until September 24, 2020 will receive a credit on their bill.

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:

(NBC should provide the amount after June 30; KCWA's credit card fees were addressed in its rate case, so the responses to those questions would be N/A and its interest fee waiver was through the end of the Commission's orders in this docket, which was July 17 for water utilities)

- 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.

Response: Since the Company is already collecting convenience fees through its general rates since its last rate case in 2018. The Company believes that a response is not necessary. However if the Commission would like any further information, the Company would be glad to provide same.

8. Please indicate the first date SUEZ Water Rhode Island 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: At this time the Company has not started to send termination notices on past due accounts, they are only getting a “soft” reminder that there is a payment due on their account, there is no mention of any termination of service at this time. This is the SUEZ wide policy at this point, no further indication has been given to date of when that will change.