ADLER POLLOCK @ SHEEHAN P.C.

One Citizens Plaza, 8th floor Providence, RI 02903-1345 Telephone 401-274-7200 Fax 401-751-0604 / 351-4607

175 Federal Street Boston, MA 02110-2210 Telephone 617-482-0600 Fax 617-482-0604

www.apslaw.com

September 1, 2021

Via E-Mail and Regular Mail

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

Re: Woonsocket Water Division – Docket No. 5022 In Re: Suspension of Service Terminations and Certain Collection Activities During the COVID-19 Emergency [Data Requests Issued August 12, 2021]

Dear Luly:

On behalf of the City of Woonsocket, Water Division ("WWD"), attached please find an original and nine (9) copies of WWD's responses to the Commission's Fourth Set of Data Requests issued August 12, 2021 in connection with the above-mentioned docket.

Please let me know if there are any questions concerning the enclosed.

CITY OF WOONSOCKET WATER DIVISION

By its Attorneys,

/s/Alan M. Shoer Alan M. Shoer (#3248) Christine M. DiBiase (#9634)

Enclosures

cc: Service List

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

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

CITY OF WOONSOCKET, WATER DIVISION ("WWD") RESPONSES TO PUBLIC UTILITIES COMMISSION'S FOURTH SET OF DATA REQUESTS DIRECTED TO ALL REGULATED UTILITIES WAIVED FEES – AUGUST 2021 UPDATE (Please identify the utility in the response) (Issued August 12, 2021)

| PUC 4.1: | Does WWD believe that the inability to charge late/interest fees is a hinderance to collections of outstanding balances. Please explain in detail. |
|-------------|---|
| WWD 4.1: | The WWD believes that the inability to charge late/interest fees is a hindrance to collections of outstanding balances. The monthly COVID-19 impact reports support this belief. Those reports have shown that the aged accounts receivable balances have grown from prior years. Most of this growth has been with balances older than ninety (90) days. |
| Respondent: | David G Bebyn, CPA |
| Date: | September 1, 2021 |

| PUC 4.2: | If the prohibition on charging late/interest fees is lifted, what measures and means of communications would WWD utilize to inform customers that they will again be subject to these fees on overdue balances? What does WWD believe is a reasonable notice period prior to the lifting of the prohibition to properly educate customers? |
|-------------|--|
| WWD 4.2: | If the prohibition on charging late/interest fees if lifted, WWD intends to inform customers of the change by notice in local newspaper and notice to the Water Division's page on the City's website. WWD believes that 30 days would be a reasonable period to notify customers. |
| Respondent: | David G Bebyn, CPA |
| Date: | September 1, 2021 |

| PUC 4.3: | Has WWD determined if the waiver of credit card/debit card/online 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. |
|-------------|---|
| WWD 4.3: | WWD has not seen a material change in the number of customer utilizing the credit card/debit card/online check to make payments. The collections as reported in response to PUC 4-1 have not improved regardless of the late fees and credit card/debit card/online check fees being waived. Regarding these fees, WWD does not currently absorb these fees since the expenditures are not part of WWD's current revenue requirement. |
| Respondent: | David G Bebyn, CPA |
| Date: | September 1, 2021 |

| PUC 4.4: | If the Commission were to lift the prohibition on assessing credit card fees, what is WWD's intent on whether to reinstitute the fee? If the utility already absorbs the fees, this can be N/A. |
|-------------|--|
| WWD 4.4: | The WWD does intend to reinstitute these fees. These fees are not part of WWD's revenue requirement, which would be covered by base rates. Furthermore, the credit card fees cause WWD additional work because the third-party vendor that manages credit card collections charges the customer these fees, which WWD has to reimburse on the customer's subsequent bill. |
| Respondent: | David G Bebyn, CPA |
| Date: | September 1, 2021 |

CITY OF WOONSOCKET, WATER DIVISION By its Attorneys,

/s/ Alan M. Shoer

Alan M. Shoer, Esq. (#3248) Christine M. DiBiase (#9634) Adler Pollock & Sheehan P.C. One Citizens Plaza, 8th Floor Providence, RI 02903-1345 Tel: 401-274-7200 Fax: 401-751-0604 Dated: September 1, 2021

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2021, I delivered a true copy of the foregoing response to the **Commission's Fourth Set of Data Requests on the quantification of waived fees (August 2021 Update) to the Commission and via electronic mail** to the parties in the Commission's service list for this docket.

/s/ Alan M. Shoer