

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

**IN RE: SUSPENSION OF SERVICE TERMINATIONS AND
CERTAIN COLLECTION ACTIVITIES DURING THE COVID-19
EMERGENCY**

DOCKET 5022

**THE NARRAGANSETT BAY COMMISSION'S
MISCELLANEOUS PETITION RE: RECOVERY OF
ELECTRONIC PAYMENT TRANSACTION FEES**

JANUARY 19, 2022

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January 19, 2022

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 Miscellaneous Petition Re: Recovery Of Electronic Payment Transaction Fees in the above captioned docket. I have also included a copy of the proposed notice to be published in the Providence Journal and provided to the Narragansett Bay Commission's customers. I would respectfully ask that the Commission staff review the proposed notice so that it can be published and provided to customers in a timely manner.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

Enclosure
cc: Service List via electronic mail

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

**IN RE: SUSPENSION OF SERVICE TERMINATIONS AND CERTAIN
COLLECTION ACTIVITIES DURING THE COVID-19 EMERGENCY**

DOCKET 5022

**THE NARRAGANSETT BAY COMMISSION'S MISCELLANEOUS PETITION TO RECOVER
ELECTRONIC PAYMENT TRANSACTION FEES**

I. INTRODUCTION

Now comes the Narragansett Bay Commission (“NBC”) and hereby requests that the Rhode Island Public Utilities Commission (“Commission”) grant relief allowing the NBC to recover credit card, debit card and voice transaction¹ fees (“Electronic Payment Transaction Fees”) paid on behalf of its customers pursuant to Orders issued by the Commission in the above captioned Docket.

II. FACTUAL BACKGROUND

As the Commission knows, the COVID-19 pandemic was first identified at the end of 2019. On January 30, 2020, the World Health Organization (“WHO”) declared a Public Health Emergency of International Concern, and on March 11, 2020, WHO declared an international pandemic. This pandemic resulted in lockdowns in the United States and throughout the world. In response to the pandemic, the Commission opened Docket 5022, and on March 16, 2020, the Commission voted to enter an emergency order related to the COVID-19 pandemic. This order prohibited utilities from engaging in collection activities such as termination of service, sending past due accounts to collection agencies and sending termination notices. The order also

¹ A voice transaction fee is a charge by NBC’s outside vendor to process credit card and debit card transactions via an automated telephone payment system.

prevented utilities from charging late fees, interest charges, credit card fees, debit card fees, and ACH fees. Through several subsequent orders, these various restrictions were relaxed and/or lifted. In particular, at the Commission's November 5, 2021 Open Meeting, it approved an order allowing utilities to reinstate late fees and interest charges upon thirty days-notice to customers. However, the Commission's November 5, 2021 order required utilities to continue absorbing transaction fees such as credit card and debit card fees. At the November 5, 2021 Open Meeting, the Commission recognized that many utilities – such as the NBC – do not have revenues included in their costs of service to pay transaction fees on behalf of their customers. As such, the Commission allowed any such utility to file for rate recovery of any such fees already incurred, and fees it will incur on an ongoing basis, until the utility's next general rate filing. Then, in the next general rate filing any such utility must seek approval of these costs as part of its cost of service in the same manner as any other expense.

III. RELIEF REQUESTED

The NBC seeks to recover \$617,810.05 for Electronic Payment Transaction fees incurred on behalf of customers from April 1, 2020 to December 31, 2021, and any fees incurred thereafter until the date of the Commission's decision in this Docket. In addition, NBC seeks to recover \$585,984.44 per year on a going forward basis to cover the payment of these fees on an annual basis. In support of this request, the NBC relies on the testimony of Karen L. Giebink, Chief Financial Officer for the NBC, which is attached hereto and incorporated herein.

IV. CONCLUSION

WHEREFORE, for the reasons set forth herein, the Narragansett Bay Commission prays that the Rhode Island Public Utilities Commission grant the relief sought herein and all other

relief it deems meet and just.

The Narragansett Bay Commission,
By its attorney,



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STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

**IN RE: SUSPENSION OF SERVICE TERMINATIONS AND
CERTAIN COLLECTION ACTIVITIES DURING THE COVID-19
EMERGENCY**

DOCKET 5022

TESTIMONY OF

**KAREN L. GIEBINK
CHIEF FINANCIAL OFFICER
NARRAGANSETT BAY COMMISSION**

**IN SUPPORT OF
THE NARRAGANSETT BAY COMMISSION'S
MISCELLANEOUS PETITION RE: RECOVERY OF
ELECTRONIC PAYMENT TRANSACTION FEES**

JANUARY 19, 2022

1 **Q. Please state your name and address.**

2 A. Karen L. Giebink. My business address is the Narragansett Bay Commission, One Service
3 Road, Providence, Rhode Island 02905.

4
5 **Q. For whom are you employed and what is your position?**

6 A. I am employed by the Narragansett Bay Commission (NBC) as its Chief Financial Officer.
7

8 **Q. For how long have you been so employed?**

9 A. I have been employed as NBC's Chief Financial Officer since July 2018. Prior to that date,
10 I served as NBC's Director of Administration and Finance beginning in April 1997. I began
11 my employment with the NBC in 1989 and have held the positions of Policy Associate and
12 Senior Environmental Planner. The three years prior to my employment with NBC I
13 worked as an analyst for the City of San Diego Water Utilities Department.

14

15 **Q. Have you previously testified before the Rhode Island Public Utilities
16 Commission?**

17 A. Yes. I provided testimony in dockets 1968, 2216, 3162, 3409, 3432, 3483, 3592,
18 3639, 3651, 3707, 3775, 3797, 3905, 4026, 4113, 4151, 4205, 4214, 4230, 4305,
19 4352, 4364, 4376, 4478, 4562, 4602, 4885, and 4890 before the Rhode Island
20 Public Utilities Commission ("Commission"). I also provided testimony in several
21 applications for approval to enter into long-term debt with the Rhode Island
22 Division of Public Utilities and Carriers.

23

24 **Q. What is the purpose of your testimony?**

25 A. I am testifying in support of NBC's Miscellaneous Petition to recover credit card, debit
26 card and voice transaction fees ("Electronic Payment Transaction Fees") that NBC has
27 paid on behalf of our customers in conformance with orders issued by the Commission in

1 Docket 5022 – In Re: Suspension Of Service Terminations And Certain Collection Activities
2 During The COVID-19 Emergency. In particular, NBC seeks to withdraw the amount of
3 Electronic Payment Transaction Fees incurred as of the date of the Commission's decision
4 in this matter, which is estimated to be approximately \$658,553.87, from its restricted
5 debt service coverage account ("Stabilization Account") in the Debt Service Fund. NBC
6 also seeks to increase its cost of service to provide funds in an amount sufficient to cover
7 Electronic Payment Transaction Fees on a going-forward basis.

8

9 **Q. Can you please briefly review the background of events that resulted in NBC**
10 **making this request?**

11 A. Yes. As the Commission knows, the COVID-19 pandemic was first identified at
12 the end of 2019. On January 30, 2020, the World Health Organization ("WHO")
13 declared a Public Health Emergency of International Concern, and on March 11,
14 2020, WHO declared an international pandemic. This pandemic resulted in
15 lockdowns in the United States and throughout the world. In response to the
16 pandemic, the Commission opened Docket 5022, and on March 16, 2020, the
17 Commission voted to enter an emergency order related to the COVID-19
18 pandemic. This order prohibited utilities from engaging in collection activities
19 such as termination of service, sending past due accounts to collection agencies
20 and sending termination notices. The order also prevented utilities from
21 charging late fees, interest charges, credit card fees, debit card fees, and ACH
22 fees. Through several subsequent orders, these various restrictions were relaxed
23 and/or lifted. In particular, at the Commission's November 5, 2021 Open
24 Meeting, it allowed utilities to reinstate late fees and interest charges upon
25 thirty day's notice to customers. However, the Commission's November 5, 2021
26 Order required utilities to continue absorbing transaction fees such as credit
27 card and debit card fees.

1 At the November 5, 2021 Open Meeting, the Commission recognized that many
2 utilities – such as NBC – do not have revenues included in their costs of service to
3 pay Electronic Payment Transaction Fees on behalf of its customers. As such, the
4 Commission allowed any such utility to file for rate recovery of any such fees
5 already incurred, and fees it will incur on an ongoing basis, until the utility's next
6 general rate filing. Then, in the next general rate filing any such utility must seek
7 approval of these costs as part of its cost of service in the same manner as any
8 other expense.

9

10 **Q. How much has NBC paid to date to cover Electronic Payment Transaction Fees**
11 **for its customers?**

12 A. Attached to my testimony is Schedule KG-1, which shows that NBC has incurred
13 Electronic Payment Transaction Fees of \$617,810.05 from April 1, 2020 through
14 December 31, 2021. NBC anticipates incurring another \$40,743.82 by January 31,
15 2022 for a total of \$658,553.87.

16

17 **Q. What is NBC's proposal for recovering these funds that have already been**
18 **incurred?**

19 A. NBC would like permission to withdraw the amount incurred as of the date of
20 the Commission's decision, which is projected to be \$658,553.87 at the end of
21 January 2022, from the restricted Stabilization Account in the Debt Service Fund
22 for deposit into the Operation and Maintenance Fund. The balance in the
23 Stabilization Account as of December 31, 2021, is \$9,571,830.75.

24

25

26

1 **Q. What is NBC's proposal for recovering revenue required to cover Electronic**
2 **Payment Transaction Fees on a going forward basis?**

3 A. As set forth in Schedule KG-1, NBC has incurred \$617,810.05 in Electronic
4 Payment Transaction Fees from April 2020 through December 2021. The average
5 percent increase over the past fourteen months has been approximately 2.7%.
6 NBC believes that increase will continue as customers become aware that they
7 can use their credit cards – many of which provide some form of reward based
8 on spending – without being charged a fee. As such, NBC estimates annual
9 Electronic Payment Transaction Fees of \$585,984.44 and seeks rates to cover
10 these fees.

11
12 This amount would remain in NBC's cost of service until it files its next general
13 rate case, or until ordered by the Commission to revisit this issue. NBC is mindful
14 that when it files its next general rate case it will need to include an expense for
15 Electronic Payment Transaction Fees as it would any other expense it seeks to
16 recover. NBC also understands that based on the Commission's directive at its
17 November 5, 2021 Open Meeting, it will have to show that the Electronic
18 Payment Transaction Fees it seeks to recover in its next general rate filing must
19 be the "least cost" manner of covering this expense.

20

21 **Q. Has NBC calculated the impact this expense will have on rates?**

22 A. Yes. Included with my testimony are four additional schedules – KG-2 Current
23 and Proposed Rates; KG-3 Calculation of Percentage Increase in Revenue
24 Requirement and Across the Board Increase Percentage; KG-4 Rate Year Revenue
25 Check; and, KG-5 Rate Payer Impact. As shown on KG-5 the annual dollar
26 increases range from \$2.87 to \$103.08. The actual impact will depend upon the
27 user classification, meter size and consumption.

1 **Q. Does this conclude your testimony?**

2 **A.** Yes, it does.

Narragansett Bay Commission Convenience Fees to be Recovered Through Fund Transfer		
Date	Convenience Fees	Actual Growth Based on Totals
4/30/2020	6,354.50	
5/31/2020	20,688.50	225.6%
6/30/2020	20,411.75	-1.3%
7/31/2020	23,237.35	13.8%
8/31/2020	25,599.05	10.2%
9/30/2020	26,528.35	3.6%
10/31/2020	28,488.50	7.4%
11/30/2020	25,765.35	-9.6%
12/31/2020	28,939.30	12.3%
1/31/2021	31,987.90	10.5%
2/28/2021	28,717.40	-10.2%
3/31/2021	34,505.75	20.2%
4/30/2021	32,375.45	-6.2%
5/31/2021	31,960.85	-1.3%
6/30/2021	32,288.00	1.0%
7/31/2021	35,104.25	8.7%
8/31/2021	35,723.60	1.8%
9/30/2021	35,972.95	0.7%
10/31/2021	37,134.65	3.2%
11/30/2021	36,372.15	-2.1%
12/31/2021	39,654.45	9.0%
Total Through December 2021:	617,810.05	
Average Monthly Growth Over Last 14 Months:		2.7%

Date	Estimated Convenience Fees	Estimated Growth ⁽¹⁾
1/31/2022	40,743.82	2.7%
Total Through January 2022:	658,553.87	

⁽¹⁾ Used average from November 2020 through December 2021 (14 months) for estimated % increase

Narragansett Bay Commission Annual Convenience Fees to be Recovered in Rates		
Date	Convenience Fees	Actual Growth Based on Totals
2/28/2022	41,863.88	2.7%
3/31/2022	43,015.50	2.7%
4/30/2022	44,199.56	2.7%
5/31/2022	45,416.98	2.7%
6/30/2022	46,668.70	2.7%
7/31/2022	47,955.68	2.7%
8/31/2022	49,278.92	2.7%
9/30/2022	50,639.43	2.7%
10/31/2022	52,038.27	2.7%
11/30/2022	53,476.52	2.7%
12/31/2022	54,955.28	2.7%
1/31/2023	56,475.71	2.7%
Total	585,984.44	

**Narragansett Bay Commission
Current and Proposed Rates**

	Docket 4890		
	Rate Year	Adjustment	Proposed
<u>REVENUES</u>			
User Fee Revenues	\$ 104,285,931		\$ 104,285,931
Miscellaneous	2,308,165		2,308,165
	<hr/>		
Total Revenue	106,594,096	-	106,594,096
 <u>EXPENSES</u>			
Personnel Services	24,957,220		24,957,220
Operating Supplies & Expenses	17,393,725		17,393,725
Special Services	1,320,054	585,984	1,906,038
Debt Service	50,113,912	-	50,113,912
Debt Coverage	12,528,478	-	12,528,478
	<hr/>		
Total Expense	106,313,389	585,984	106,899,374
 OPERATING RESERVE	 280,707	 -	 280,707
	<hr/>		
COST OF SERVICE	106,594,096	585,984	107,180,080
 RATE YEAR REVENUES AT PRESENT RATES	 106,594,096		 106,594,096
	<hr/>		
REVENUE INCREASE	\$ -	\$ 585,984	\$ 585,984
	<hr/> <hr/>		

Narragansett Bay Commission

Calculation of Percentage Increase in Revenue Requirement

Revenue Increase (KLG-1)	<u>\$ 585,984</u>	
Test Year Revenue at Current Rates (KLG-1)	106,594,096	<u>0.55%</u>

Calculation of Across the Board Increase Percentage

Revenue Increase	<u>\$ 585,984</u>	(A)
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Revenue Items which could be increased by an across the board % Increase

Flat Fees Residential	\$ 28,657,616
Measured Fee - Residential	31,063,917
Flat Fees Commercial & Industrial	15,266,871
Measured Fee - Commercial	26,771,424
Measured Fee - Industrial	2,526,102
	<hr/>
Total Revenue Available for Increase	<u>\$ 104,285,931</u>
Across the Board Percentage Increase	<u>0.56%</u>

Narragansett Bay Commission
Rate Year Revenue Check

		Current Rate	Increase	Proposed Rates	Billing Units	Revenue at Present Rates	Revenue at Proposed Rates
Flat Fees							
Residential	Per Dwelling Unit	\$ 237.41	0.56%	\$ 238.74	120,055	\$ 28,502,258	\$ 28,661,931
Residential	Wells	\$ 539.44	0.56%	\$ 542.46	288	\$ 155,359	\$ 156,228
Commercial & Industrial							
	Meter Size						
	5/8"	563	0.56%	566	3,465	1,950,795	1,961,190
	3/4"	845	0.56%	849	999	843,656	848,151
	1"	1,408	0.56%	1,415	1,227	1,727,003	1,736,205
	1 1/2"	2,815	0.56%	2,831	809	2,277,335	2,290,279
	2"	4,504	0.56%	4,529	1,172	5,278,688	5,307,988
	3"	8,445	0.56%	8,492	81	684,045	687,852
	4"	14,075	0.56%	14,154	37	520,775	523,698
	6"	28,150	0.56%	28,308	41	1,154,150	1,160,628
	8"	45,040	0.56%	45,292	17	765,680	769,964
	10"	64,745	0.56%	65,108	1	64,745	65,108
Total Commercial & Industrial Flat Fees					7,849	15,266,872	15,351,063
Measured Fees							
Residential		3.831	0.56%	3.852	8,108,566	31,063,917	31,234,197
Commercial		5.722	0.56%	5.754	4,678,683	26,771,424	26,921,142
Industrial		3.749	0.56%	3.770	673,807	2,526,102	2,540,252
Total Measured Fees						60,361,443	60,695,591
Other Revenue						2,308,165	2,308,165
Total Revenue						106,594,097	107,172,978
Target Revenue							107,180,080
Variance							\$ 7,102

Narragansett Bay Commission
Rate Payer Impact

	Current Rates	Proposed Rates	Dollar Increase	% Increase
73.2 HCF Residential				
Customer Charge	\$ 237.41	\$ 238.74	\$ 1.33	
Consumption	280.43	281.97	1.540	
Total 73.2 HCF Residential	<u>\$ 517.84</u>	<u>\$ 520.71</u>	<u>\$ 2.87</u>	<u>0.55%</u>
5/8" meter, 244 HCF Commercial				
Customer Charge	\$ 563.00	\$ 566.00	\$ 3.00	
Consumption	1,396.17	1,403.98	7.81	
Total 5/8" meter, 244 HCF Commercial	<u>\$ 1,959.17</u>	<u>\$ 1,969.98</u>	<u>\$ 10.81</u>	<u>0.55%</u>
2" meter, 2440 HCF Commercial				
Customer Charge	\$ 4,504.00	\$ 4,529.00	\$ 25.00	
Consumption	13,961.68	14,039.76	78.08	
Total 2" meter, 2440 HCF Commercial	<u>\$ 18,465.68</u>	<u>\$ 18,568.76</u>	<u>\$ 103.08</u>	<u>0.56%</u>
5/8" meter, 244 HCF Industrial				
Customer Charge	\$ 563.00	\$ 566.00	\$ 3.00	
Consumption	914.76	919.88	5.12	
Total 5/8" meter, 244 HCF Industrial	<u>\$ 1,477.76</u>	<u>\$ 1,485.88</u>	<u>\$ 8.12</u>	<u>0.55%</u>
2" meter, 2440 HCF Industrial				
Customer Charge	\$ 4,504.00	\$ 4,529.00	\$ 25.00	
Consumption	9,147.56	9,198.80	51.24	
Total 2" meter, 2440 HCF Industrial	<u>\$ 13,651.56</u>	<u>\$ 13,727.80</u>	<u>\$ 76.24</u>	<u>0.56%</u>

STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION

**IN RE: SUSPENSION OF SERVICE TERMINATIONS AND CERTAIN
COLLECTION ACTIVITIES DURING THE COVID-19 EMERGENCY**

DOCKET 5022

**THE NARRAGANSETT BAY COMMISSION'S NOTICE OF FILING OF MISCELLANEOUS PETITION TO
RECOVER ELECTRONIC PAYMENT TRANSACTION FEES**

The Narragansett Bay Commission ("NBC") hereby gives notice that on January 19, 2022, it submitted to the Rhode Island Public Utilities Commission ("Commission") a Miscellaneous Petition To Recover Electronic Payment Transaction Fees in the above captioned docket.

On March 16, 2020, in response to the world-wide Covid 19 pandemic, the Commission opened Docket 5022 and voted to enter an emergency order related to the COVID-19 pandemic. This order prohibited utilities from engaging in collection activities such as termination of service, sending past due accounts to collection agencies and sending termination notices. The order also prevented utilities from charging late fees, interest charges, credit card fees, debit card fees, and ACH fees. Through several subsequent orders, these various restrictions were relaxed and/or lifted. In particular, at the Commission's November 5, 2021 Open Meeting, it approved an Order allowing utilities to reinstate late fees and interest charges upon thirty days-notice to customers. However, the Commission's November 5, 2021 Order required utilities to continue absorbing electronic payment transaction fees such as credit card and debit card fees ("Electronic Payment Transaction Fees"). At the November 5, 2021 Open Meeting, the Commission recognized that many utilities – such as the NBC – do not have revenues included in their costs of service to pay Electronic Payment Transaction Fees on behalf of their customers. As such, the Commission allowed any such utility to file for rate recovery of any such fees already incurred, and fees it will incur on an ongoing basis, until the utility's next general rate filing.

In its Miscellaneous Petition, the NBC seeks to recover \$617,810.05 for Electronic Payment Transaction fees incurred on behalf of customers from April 1, 2020 to December 31, 2021, and any fees incurred thereafter until the date of the Commission's decision in this Docket. In addition, NBC seeks to recover \$585,984.44 per year on a going forward basis to cover the payment of these fees on an annual basis. In NBC's next general rate filing it will be required to seek approval for any ongoing amount it seeks to pay Electronic Payment Transaction Fees on behalf of its customers, and it will have to demonstrate that the amount it seeks is the "least cost" manner of covering these fees.

A copy of the NBC's Miscellaneous Petition is on file for examination at the NBC's office at One Service Road, Providence, RI and at the offices of the Public Utilities Commission, 89 Jefferson Boulevard, Warwick, RI.

The Narragansett Bay Commission
One Service Road, Providence, RI 02905
<http://www.narrabay.com>

CERTIFICATION

I hereby certify that on January 19, 2022, I sent a copy of the within to all parties set forth herein below by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and hand delivery.

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