

November 21, 2017

Re: George Wiley Center's request for emergency affordable utility restoration

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PUBLIC UTILITIES COMMISSION

Dear Honorable Commissioners,

While the George Wiley Center appreciates our ongoing proactive dialogue with the Division of Public Utilities and the positive changes that have been or will be made within Division practices under new leadership, we are concerned by the Division's submitted comments questioning the necessity of proposed emergency regulations for affordable utility regulation. The Division states: "The Rhode Island Division of Public Utilities and Carriers ("Division") believes that the Wiley Center's proposal, may not, if approved by the Commission, provide superior relief than the relief currently available under the new Division payment plan protocols. In support of this position, the Division relies on the multitude of steps that have been taken by the Division in 2017 to expand opportunities for income eligible gas and electric customers to enter into more affordable payment plans, which has resulted in fewer service shutoffs."

We are aware of some relief from shut-offs over the past few years, in part due to our push for a new version of the "Henry Shelton" Arrearage Management Plan, as well as a result of increased protections for approximately 7,000 eligible utility consumers after we helped bring a lawsuit against the Division and National Grid for unjust terminations on medically vulnerable "protected" households. Some of the decrease could also be a result of the Division's reformed practices, increasingly offering lower down payments within the informal/formal hearing process, by considering special circumstances. Because there are several factors at play, it would be difficult to directly attribute a slight downward trend in shut-offs solely to one program, one lawsuit, or one change of agency practice. Moving forward we do agree with the Division's stated comments: "Our goal with these policy changes is to fundamentally reform our collection and termination practices, and in doing so, to render unnecessary future emergency regulations aimed at adjusting these practices." We look forward to this day too, and are encouraged to see inter-agency support for moving on the path to dramatically decreasing utility terminations. Unfortunately, however, we are not there yet, and because of that we find our proposed regulation for affordable utility restoration to be necessary for public health and well-being.

Although there has been a slight decrease in shut-offs in 2017, the numbers still remain unacceptably high if we want to live in a state that values access to basic needs for all our residents. Included are graphs showing the number of Rhode Island households imposed with utility termination since 2004 to the present (with data for 2017, as of October, prepared by the George Wiley Center using National Grid's monthly electric and gas shutoff reports under Docket 1725). You may notice there is some fluctuation over the years, but as the graphs show, there is still a high utility shut-off rate in Rhode Island, hovering in the tens of thousands. This year of 2017 (as of October) there have been 16,627 electric service terminations and 7,877 gas service terminations. Those numbers are for households, so please consider that each number represents not just a single person but all who live together and rely on a shared necessity of utility access—a family, a couple, children, grandparents, friends, relatives, etc. So the number of affected Rhode Islanders is much higher than those numbers, and much greater still when considering the effect on the community through social services and other additional resources those in hardship may require. At the same time National Grid reported over \$4 billion in profit in 2016.

We are glad the Division has made shifts in collection and payment policies, particularly for “protected” utility consumers, but we are also aware there are many in our state who may not be registered in a protected category, but are still very much at risk of further hardship and harm to health when they lose necessary utility service they can’t afford. We look forward to continuing to find ways to end the shut-off crisis in Rhode Island, specifically through implementation of a PIPP program (Percentage Income Payment Plan) or other tiered income-sensitive payment plans, and to benchmark and measure future success of utility access by seeing a stark downward trend in total number of shut-off households. Systematic changes to make the basic need of utility service affordable will be the most effective and lasting way to end the cycle of shut-offs, and should be an integral element of future rate design under Docket 4600.

The George Wiley Center hopes to continue to collaborate with the Division and Commission as we move toward the goal we share of protecting public health and well-being. While we are encouraged that in the future such emergency regulations may not be needed, we hope the Commission will consider the current need and act on behalf of our families and neighbors across Rhode Island.

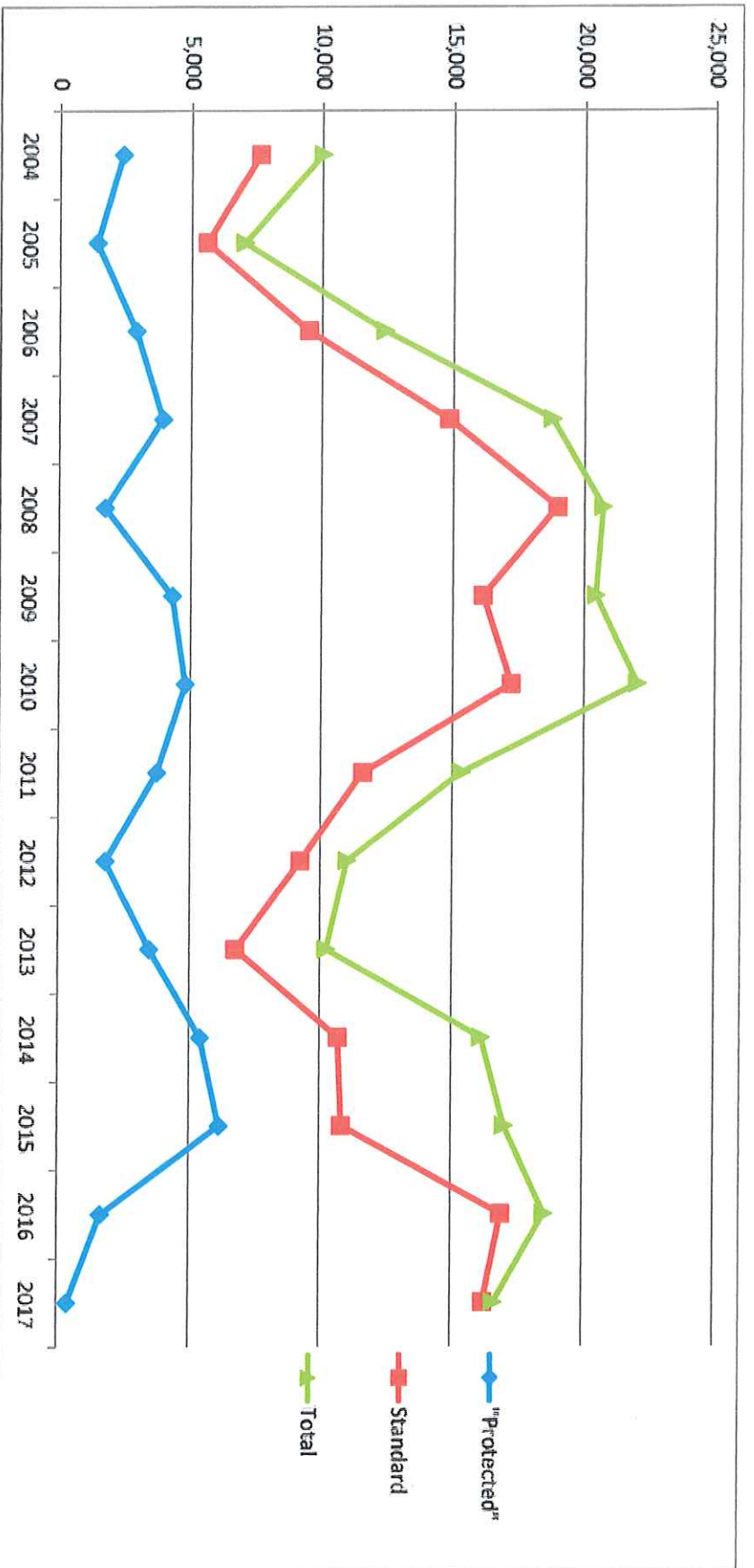
Thank you for understanding the importance of this issue.

Camilo Viveiros, Coordinator

And members of the George Wiley Center

George Wiley Center  
32 East Ave  
Pawtucket, RI 02860  
Office: 401-728-5555  
georgewileycenterri@gmail.com  
www.georgewileycenter.org

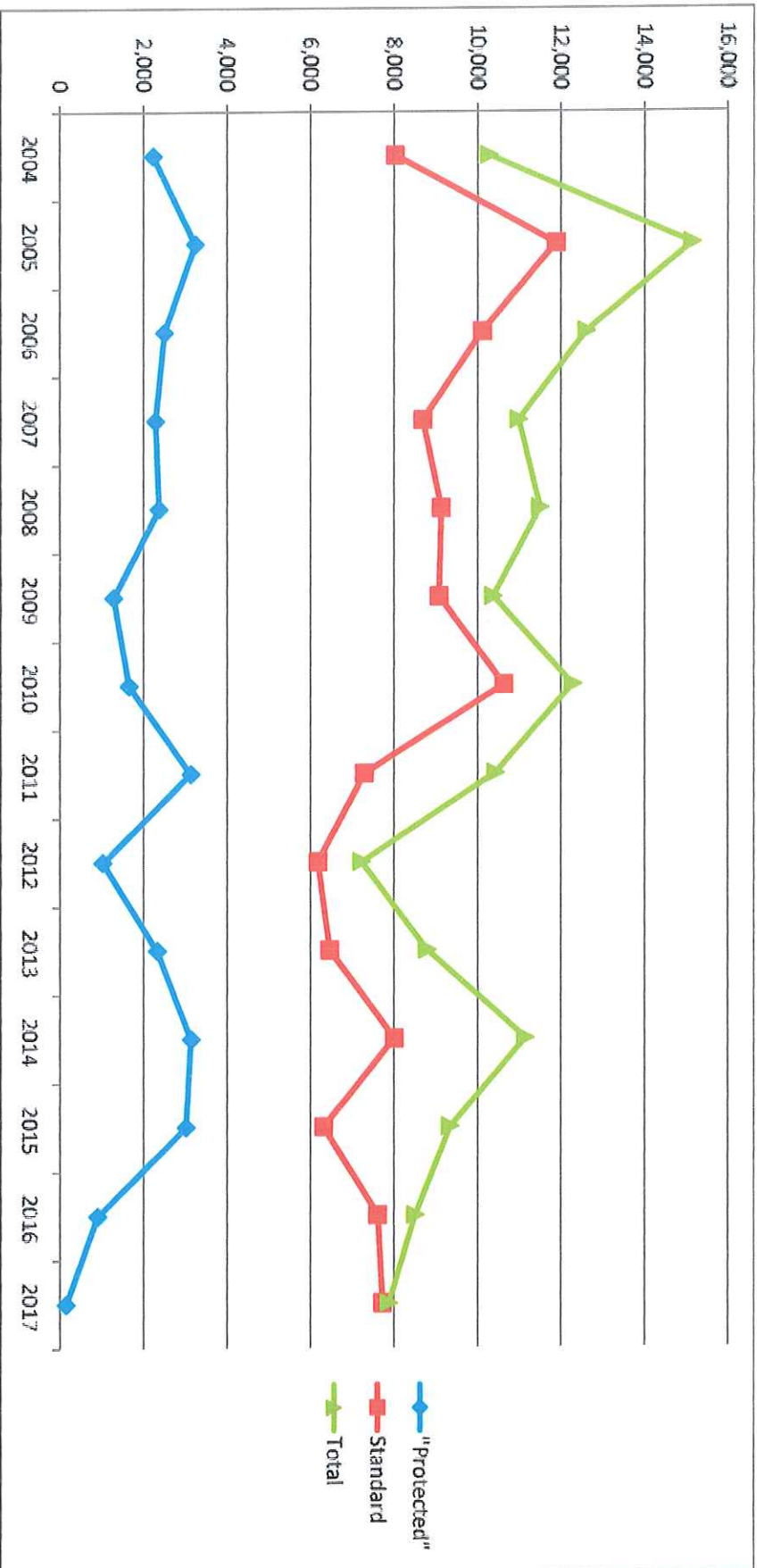
## ELECTRIC Utility Terminations on Rhode Island Households



From 2004 to 2017, yearly number of electric utility terminations imposed on Rhode Island households by National Grid. This graph shows in blue the number of "protected" households terminated from service, in red standard households terminated from service, and in green the total number of households terminated.

Total electric utility terminations: 2004: 10,015 | 2005: 7,035 | 2006: 12,395 | 2007: 18,767 | 2008: 20,718 | 2009: 20,450 | 2010: 22,036 | 2011: 15,341 | 2012: 11,022 | 2013: 10,232 | 2014: 16,130 | 2015: 17,009 | 2016: 18,551 | 2017 (as of October): 16,627 ]

## GAS Utility Terminations on Rhode Island Households



From 2004 to 2017, yearly number of gas utility terminations imposed on Rhode Island households by National Grid. This graph shows in blue the number of "protected" households terminated from service, in red standard households terminated from service, and in green the total number of households terminated.

[ Total gas utility terminations: 2004: 10,273 | 2005: 15,145 | 2006: 12,618 | 2007: 10,990 | 2008: 11,509 | 2009: 10,373 | 2010: 12,292 | 2011: 10,427 | 2012: 7,222 | 2013: 8,801 | 2014: 11,155 | 2015: 9,347 | 2016: 8,518 | 2017 (as of October): 7,877 ]