

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**RE: The Narragansett Electric Company d/b/a  
Rhode Island Energy**

**Docket No. 25-21-GE**

**THE GEORGE WILEY CENTER’S OBJECTION TO THE NARRAGANSETT  
ELECTRIC COMPANY D/B/A RHODE ISLAND ENERGY’S MOTION TO  
TERMINATE REQUIREMENTS RELATED TO EXTENDED PAYMEN PLANS**

The George Wiley Center, through counsel and pursuant to Rule 1.16(D) of the Rhode Island Public Utilities Commission’s Rules of Practice and Procedure, hereby objects to the “Motion to Terminate Requirements Related to Extended Payment Plans” filed by the Narragansett Electric Company d/b/a Rhode Island Energy (the “Company”) on June 19, 2025 (the “Company’s motion” or “motion”).

The Company moves the Commission to rescind its order to the Company that it offer customers “extended payment plans” whereby customers must be offered the ability to pay down arrearages over the course of 18, 24, or 36 months, after an initial 10% down payment, depending on the amount in arrears at the time the repayment plan is initiated. That order was consistent with applicable regulations, which as the Company correctly points out in its motion, specifically indicate that the Company may offer “less stringent payment arrangements” as compared with the limitations placed on the Company by the Commission’s termination rules. *See* PUC Termination Rules, Section 1.10.A. The main thrust of the Company’s argument in support of its motion are that (1) the exigence for the “extended payment plans” was the economic disruption caused by the COVID-19 pandemic, which the Company argues is no longer an appropriate factor to consider, and (2) the Company being required to offer the “extended payment plans” has resulted in an

increase in the total amount in arrears for gas and electric accounts which the Company is carrying, from a total amount of \$124.7 million in January of 2022 to \$254.9 million as of May 2025. Company's motion at 11-12.

While the economic disruption caused by the COVID-19 pandemic may not be a factor for the Commission to consider as of June 2025, the George Wiley Center, as advocates for low-income consumers, would nevertheless point out the troubling story told by the numbers cited by the Company in its own motion. The Company provided a table of year-by-year data for customers who have availed themselves of the "extended payment plans" which the Company attempts to end at page 11 of its motion. The data for only 2024 and 2025 demonstrate that 77% of customers on such extended plans have defaulted on said plans (2070 total customers who defaulted on said plans out of 2686 total extended payment plans). Presumably, if the Commission does grant the Company's motion, the Company could terminate services for customers in such a position, as it is unlikely that such customers can meet the even steeper requirements of repayment plans; given that the average household size in Rhode Island is approximately 2.4 people,<sup>1</sup> the termination of 2070 accounts could result in nearly 5000 Rhode Islanders being without gas service, electricity service, or both. Further, the Company's own data on the increase in the total amount in arrears suggests that there are a significant number of customers who continue to struggle to keep up with their bills. As such, the Commission should strongly consider whether it is appropriate to allow the Company to take action that will make it more difficult for customers to keep their utility service active at this time.

Additionally, the possibility of continued armed conflict in the Middle East could potentially cause significant shockwaves through global energy markets much like those caused

---

<sup>1</sup> United States Census Bureau, "Quick Facts Rhode Island," <https://www.census.gov/quickfacts/fact/table/RI/> (accessed June 30, 2025).

by the Russia-Ukraine conflict in 2022.<sup>2</sup> With the potential for large swings in such markets, the George Wiley Center emphasizes the need for caution with regards to any action which might make it more difficult for customers to do what is needed to keep their services active.

While the position of the Company may be understandable based on the increasing amount of arrearages, the Commission must nevertheless take into account the needs of Rhode Islanders in deciding whether to grant the Company's motion. The George Wiley Center urges the Commission to consider, in lieu of simply granting the Company's motion, ordering the Company to allow for repayment plans in line with those previously implemented in the context of Docket No. 1725, as discussed in the Company's motion at pages 9 and 10. Said plans have the advantage to customers by allowing for repayment plans to be initiated with lower down payments compared with the Step Plans the Company is otherwise required to offer. Anecdotally, the down payment portion of repayment plans is often the most difficult for customers to meet, particularly low-income consumers. As such, ordering the Company to provide repayment plans in line with those parameters allows for customers to keep their service active while likewise continuing to make progress towards repaying their account arrearage.

It is critical that the Commission ensures Rhode Islanders are able to keep their utilities on, or restore service, as a matter of public safety, particularly as summer temperatures remain high and anomalous weather events—such as the heat wave which occurred the week of June 23, setting area temperature records for the month of June—occur with increasing frequency. Accordingly, the George Wiley Center urges that if the Commission does grant the Company's motion, that it

---

<sup>2</sup> See Andy Hirschfeld, *Fragile Iran-Israel Ceasefire Calms Oil Markets*, Al Jazeera (June 24, 2025), <https://www.aljazeera.com/economy/2025/6/24/fragile-iran-israel-ceasefire-calms-oil-markets> (stating that while the calming of said conflict has brought stability to oil markets, “the risk of further volatility remains high, mirroring the energy market disruptions seen in 2022 following Russia’s invasion of Ukraine,” referencing projections by HSBC and Goldman Sachs accounting for scenarios where Iran disrupts shipping lanes through the Strait of Hormuz).

order the Company to offer repayment plans to its customers in line with the parameters of those previously offered in the context of Docket No. 1725 to ensure that customers, particularly those with limited income, can keep their essential utility services active.

Respectfully submitted,

/s/ Troy H. Lange  
Troy H. Lange (#10293)  
One Empire Plaza, Suite 410  
Providence, RI 02903  
(401) 491-1101 (o)  
(401) 228-6955 (c)  
tlange@centerforjustice.org

Dated: June 30, 2025

CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2025, I sent a true copy of this document by electronic mail to the parties in the Docket 25-21-GE Service List as of June 30, 2025.