



STATE OF RHODE ISLAND

DIVISION OF PUBLIC UTILITIES & CARRIERS

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August 8, 2025

Ms. Stephanie De La Rosa, Commission Clerk
RI Public Utilities Commission
89 Jefferson Boulevard
Warwick, R.I. 02888

Re: Comments for Docket 25-28-EL

Dear Ms. De La Rosa:

The Division is in receipt of the Commission's request for comments in this docket regarding a series of potential rate adjustments, in an effort to mitigate potential "rate shock" this coming winter.

The adjustments under consideration include:

(1) whether the recovery of costs associated with the annual Energy Efficiency charge should be recovered over an 8-month period, April through November, with only the statutory renewable energy component (0.3 mills) collected over a 12-month period;

(2) whether recovery of costs associated with the Long-Term Contracting for Renewable Energy Recovery factor, inclusive of the reconciliation factor, should be recovered over an 8-month period, April through November instead of the 12-month factor currently set for January 1 each year;

(3) whether the Storm Contingency Fund Replenishment Factor should only be recovered during the months of April through November; and/or

(4) whether the Commission should consider different alternative rate recovery periods should any other sources of funding be made available through other sources to mitigate the impact on the 2025-2026 winter period rates (for example, if funding were made available for January through March, the Commission might consider only deferring or pausing recovery of certain costs for December to complete coverage of the peak heating season).

The Division understands and appreciates the Commission's thoughtful efforts at mitigating potential rate shock. We note that the Last Resort Service Rates proposed for the winter heating season for 2025-2026 are 9% less than the winter season of 2024-2025. In addition, the Division is aware of public announcement concerning an allocation of RGGI funds to low-income customer bills for this winter. Finally, while not yet through the hearing process, the Division is considering an agreement reached between Rhode Island Energy and The Division's Advocacy Section that could potentially provide substantial bill relief- not a shifting of costs to other seasons.

We note that customers often accumulate substantial arrearages during the winter moratorium and have concerns that shifting what would otherwise be winter charges to the summer rates would further exacerbate already difficult collections.

While the Division does not formally "oppose" such shifting of costs, we would urge the Commission that such cost shifting, in advance of the winter season, may not be conducive to the overall collection needs and goals. In light of the aforementioned anticipated bill reductions, additional measures may not be necessary and could lessen normal price signals.

We thank you for the opportunity to offer our comments on this issue.

Very Truly Yours,

/s/Margaret L. Hogan, Esq.
Legal Services Administrator

cc: Linda D. George
Christy Hetherington
John Bell