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September 8, 2025

VIA ELECTRONIC MAIL AND HAND DELIVERY

Stephanie De La Rosa, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket No. 25-21-GE – The Narragansett Electric Company d/b/a Rhode Island Energy Suspension of Service Terminations and Certain Collections Activities During the COVID-19 Emergency
Responses to Division Data Requests – Set 1 (Complete Set)

Dear Ms. De La Rosa:

On behalf of Rhode Island Energy,¹ I have enclosed the Company's responses to data requests Division 1-1 and Division 1-8, which completes the Company's responses to the Division of Public Utilities and Carriers' ("Division's") First Set of Data Requests issued in the above-referenced matter.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-316-7429.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson".

Jennifer Brooks Hutchinson

Enclosure

cc: Docket No. 25-21-GE Service List

¹ The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy" or the "Company").

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d/b/a Rhode Island Energy
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Rhode Island Energy’s Motion to Terminate Requirements
Related to Extended Payment Plans During COVID-19 Emergency
Responses to the Division’s First Set of Data Requests
Issued August 5, 2025

Division 1-1

Request:

Please fill in the chart below with the identified Dollar Value amounts in the column in bold for each year (2020, 2021, *etc.*) and category (*e.g.*, Active, Canceled, *etc.*):

		Active	\$ Value Amt. of Active Plans	Canceled	\$ Value Amt. of Canceled Plans	Defaulted	\$ Value Amt. of Defaulted Plans	Kept	\$ Value Amt. of Kept Plans
1	2020			4		55		5	
2	2021			41		624		57	
3	2022			213		1988		341	
4	2023	3		194		1950		182	
5	2024	139		229		1996		140	
6	2025	99		3		74		6	
7	Grand Total	241		684		6687		731	

Response:

Please see the updated chart below for the requested information. Please note that while preparing this data request, the Company performed an expanded analysis based on a more robust and recent (as of 8/25/2025) data set than the original data included in Table 1 of its Motion. The original review focused specifically on payment agreements with a 10% down payment and 18, 24 and 36 months. The Company has broadened the scope to include payment agreements with:

- **Terms of 18, 24, or 36 months**, which align with the durations outlined in the Public Utilities Commission’s (“Commission”) emergency orders in Docket No. 5022.
- **Down payments between 9.75% and 10.25%**, allowing for a ±0.25% range around the 10% standard.

A sample from this pool was reviewed to confirm that these payment agreements were COVID-19 extended payment plans. To maintain accuracy, the Company excluded any payment agreements that:

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Division 1-1, page 2

- Had down payments **outside the 9.75%–10.25% range**, or
- Had terms **other than 18, 24, or 36 months**.

By applying these filters, the Company is confident that the data set represents as complete a view of COVID-19 extended payment agreements as possible, while minimizing the inclusion of unrelated plans. That said, this approach may not capture all COVID-19-related payment agreements, as there are many combinations of term lengths and down payment amounts.¹ A fully exhaustive review would require manually reviewing each payment agreement individually from 2020 to 2025, which was not possible to do within the time frame provided.

	(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
1	Year	Active	\$ Value Amt. of Active Plans	Canceled	\$ Value Amt. of Canceled Plans	Defaulted	\$ Value Amt. of Defaulted Plans	Kept	\$ Value Amt. of Kept Plans	Total	Percent Defaulted from total
2	2020	0	\$0	88	\$153,644	1433	\$2,415,948	199	\$256,784	1720	83.31%
3	2021	0	\$0	980	\$2,532,173	15262	\$37,389,969	1930	\$3,542,548	18172	83.99%
4	2022	2	\$5,486	3777	\$7,539,649	34374	\$73,334,857	4994	\$7,404,453	43147	79.67%
5	2023	43	\$116,817	3311	\$6,625,702	36342	\$78,831,909	2536	\$3,373,113	42232	86.05%
6	2024	591	\$1,224,250	3500	\$14,607,578	31714	\$74,283,913	1254	\$1,801,277	37059	85.58%
7	2025	4017	\$10,053,455	1135	\$3,323,418	13774	\$41,030,139	234	\$361,044	19160	71.89%
8	Grand Total	4653	\$11,400,009	12791	\$34,782,164	132899	\$307,286,735	11147	\$16,739,218	161490	82.30%

¹ The Public Utilities Commission (“Commission”) in its emergency orders in Docket No. 5022 required the Company to offer the 18- 24- and 36- month payment plans to customers facing termination but stated the Company “may offer these [payment plans] to all customers in addition to other flexible and sensible payment options.” See *In Re: Suspension of Service Terminations and Certain Collections Activities During the COVID-19 Emergency*, Docket No. 5022, Order No. 23866 at 5 (July 15, 2020).

Division 1-2

Request:

Please explain: (a) what a "Canceled" plan means, (b) When an extended payment plan is canceled how is the account then handled/categorized, and (c) Why are "Canceled" plans included in the Grand Total in Table 1 of the Company's Motion. ¹

Response:

- a. A canceled payment agreement status indicates that an arrangement between parties for making regular payments has been terminated or rendered invalid.
- b. When a plan is cancelled, the system handles it as if that plan never existed. Meaning they would be offered the same Payment Agreement terms, step, etc.
- c. The Company included cancelled plans in Table 1 of its Motion to show the status of all payment plans, i.e., Kept, Defaulted, Canceled and Active. When a plan is canceled an account will re-enter collections and be eligible for termination or for another Extended Payment Agreement.

¹ RIE's Motion to Terminate Requirements Related to Extended Payment Plans dated June 19, 2025.

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Division 1-3

Request:

Identify and provide a detailed explanation of all the reasons for the increases in the Total Dollar Value of Delinquent Accounts in subparts a. – d. below, including in your explanation the percentage the Company attributes to each reason identified that contributed to the increases:

- a. The Total Dollar Value of the 2024 Electric Accounts that increased from \$78 M in January of 2024 to \$141 M in December of 2024.
- b. The Total Dollar Value of that 2024 Gas Accounts that increased from \$35.2 M in January of 2024 to \$60.4 M in December of 2024.
- c. The Total Dollar Value of the 2025 Electric Accounts that increased from \$154.5 M in January of 2025 to \$165.3 M in May of 2025.
- d. The Total Dollar Value of the 2025 Gas Accounts that increased from \$74.7 M in January of 2025 to \$89.5 M in December of 2025.

Response:

- a. and b. The primary drivers of the increase in electric and gas accounts during calendar year 2024 include:
 - **System Transition and Stabilization**
Collections were suspended beginning July 31, 2024, in preparation for the Customer Information System (CIS) cutover from National Grid to Rhode Island Energy systems in August. This pause extended through the post-go-live stabilization period, significantly impacting receivables.
 - **Winter Moratorium**
The annual winter moratorium (November 1 – May 1) restricted disconnection activity, contributing to a seasonal rise in arrears.
 - **Higher Winter Rates and Cold Weather**
Increased usage and higher seasonal rates during the 2024–2025 winter period led to larger balances, increased customer bills and delinquency risk.

Division 1-3, page 2

c. and d. The primary drivers of the increase in electric and gas accounts during calendar year 2025 include:

- **Staggered Resumption of Collections**
Commercial collections resumed on January 13, 2025, while residential collections remained paused without collections actions through the end of the winter moratorium on May 1, 2025.
- **Winter Moratorium**
The annual winter moratorium (November 1 – May 1) restricted disconnection activity for low-income and protected customers, contributing to a seasonal rise in arrears.
- **Higher Winter Rates and Cold Weather**
Increased usage and higher seasonal rates during the 2024–2025 winter period led to larger balances, increased customer bills and delinquency risk.

The Company cannot assign exact percentages to each contributing factor to the increase in delinquent account balances because the factors are complex, often overlap, and are not tracked in a way that allows for precise breakdowns. In general, delinquency is influenced by a mix of economic conditions, seasonal usage, timing of assistance programs, and individual customer behavior – none of which can be cleanly separated or quantified. Additionally, the Company's systems do not capture the specific cause of non-payment at the account level, making it impractical to calculate how much each factor contributed to the overall increase.

Division 1-4

Request:

On Page 12 of the Company's Motion the Company states that total arrears for gas and electric accounts in January 2022 was \$124.7 M and that this amount was reduced to \$82.8 M in October of 2022. Now the arrears balance, the Company states, has grown to \$254.9 M as of May 2025. Provide all documents, studies, analyses, *etc.* the Company has prepared identifying the cause of the increase in the balance of arrears from \$82.8 M to \$254.9 M.

Response:

The Company has not prepared any documents, studies, analyses, *etc.* that identifies the cause of the arrears increase from \$82.8M to \$254.9M; however, the Company believes that the growth in arrears has been driven by a series of documented events, regulatory actions, and customer protections between 2022 and 2025. These factors include:

1. Customer Protections and Collection Pauses

- Bennett Case Protections (2016–2023): Shielded ~5,400 customers from collections and terminations until August 2023.
- COVID-19 Collection Pauses (2020–2023): Suspension of collections actions and phased restarts delayed collections for residential and protected customers until late 2022 and 2023.
- System Cutover Moratorium (2024–2025): Collections paused for all customers starting July 2024 due to the IT system transition. Commercial collections resumed in January 2025; residential collections resumed in May 2025.

2. Arrearage Forgiveness and Credits

- PPL Acquisition/Attorney General Settlement (2022): Provided \$93.5 million in customer relief, including \$43.5 million in arrearage forgiveness. These accounts were temporarily held from collections.
- Regional Greenhouse Gas Initiative (RGGI) Grants (2022–2025): Over \$13 million in credits issued to low-income customers, reducing immediate payment obligations but not necessarily resolving underlying arrears.

Division 1-4, page 2

- Gross Earnings Tax Suspension (Dec 2023–Mar 2024): Temporarily reduced customer bills but did not address existing arrears.
- Last Resort Service (LRS) Credit (Nov 2024–Apr 2025): \$27 million in credits issued to electric customers, with staggered timing for low-income vs. non-low-income customers.

3. Seasonal and Economic Pressures

- Winter Moratoriums: Annual disconnection moratoriums (Nov–May) consistently delay collections and contribute to arrears growth.
- Higher Energy Costs: Cold winters and increased rates during the 2024–2025 season led to higher bills and increased delinquency.

4. Upcoming Impacts (2026–2027)

- Hold Harmless Credits: The anticipated Hold Harmless credits will be delivered to customers in six installments during the months of January, February, and March of 2026 and 2027, which may help mitigate future arrears but does not resolve the underlying current balance.

Division 1-5

Request:

Identify **all** means by which the Company is intending to reduce this arrearage problem. Provide a detailed explanation of each means identified.

Response:

The Company has implemented, or is in the process of implementing, the following measures to address and reduce customer arrearages:

1. Collections Process

The Company initiates collections with a written termination notice, followed by a structured call sequence to provide customers with multiple opportunities to respond. The first call is placed three days after the termination letter is issued, typically in the morning. If there is no response, a second call is made the following afternoon. If the account remains unresolved, a field order is generated to terminate service. To prevent accounts from becoming inactive, the Company has implemented an Auto-Void Non-Pay Orders process. Any termination order that is not completed is automatically voided after 30 business days, at which point the account re-enters the collections workflow. This triggers a new termination letter and follow-up call, maintaining momentum in the collections process and improving recovery outcomes.

2. Collections Order Management

Accounts are selected daily for field activity based on the highest and oldest arrears, organized by geographic "town buckets" to optimize efficiency. Residential accounts are typically scheduled Monday through Thursday, while commercial accounts are prioritized on Fridays and the day before holidays. On heat advisory days, the Company adjusts its approach to focus on commercial accounts and limits residential activity to collection-only actions, in accordance with regulatory guidelines. Oversight is maintained through weekly coordination meetings between Credit & Collections and Field Operations. These meetings are supplemented by daily communications to ensure alignment on field activity, customer concerns, and performance updates.

The Company has also begun executing its Automated Meter Functionality (AMF) strategy, targeting high-balance accounts. As installations are completed, collections activities are initiated on AMF meters. This initiative has commenced in the Westerly region, with weekly scheduled shutoffs.

Division 1-5, page 2

3. Outbound Collection Campaigns

The Company’s outbound campaigns connect customers with live agents to facilitate real-time resolution of delinquent accounts. Campaigns are segmented by customer type and delinquency status:

- Commercial accounts 60+ days past due are contacted daily.
- Residential campaigns are in development and will target:
 - Accounts 60–89 days delinquent
 - Accounts 90+ days delinquent
 - Accounts with arrears exceeding \$5,000

This segmentation ensures targeted outreach and efficient use of resources.

4. Termination Notices

The Company issues two formal communications in the residential collections process:

- A 10-Day Termination Letter, providing advance notice of potential service shutoff.
- A Final Bill Reminder Letter, serving as a final prompt for payment.

These notices are issued in accordance with internal policy and regulatory requirements to ensure transparency and due process.

5. Overdue Account Analysis

The Company conducts regular monitoring of overdue accounts, analyzing both the number of accounts and the total overdue balances. These insights inform collection strategies and help establish thresholds for action, ensuring a data-driven and targeted approach.

6. Identification Strategy

The Company employs verification tools to confirm customer identity and residency. These include Positive ID checks and Proof of Residency documentation, which help ensure that collection efforts are accurately directed.

Division 1-5, page 3

7. Customer Program Enrollment

The Company conducts monthly outreach and hosts community expos to promote customer assistance programs. Postcards are mailed to notify customers of these events. Programs promoted include:

- Arrearage Management Program (AMP)
- Low-Income Home Energy Assistance Program (LIHEAP), with fall applications sent to customers with large balances or prior participation
- Assistance Agencies
- Operation Help, which provides support for down payments and service restoration during the fall season

8. Collection Agency Management

Accounts that reach final collections status are referred to external agencies after 20 business days. These agencies pursue recovery efforts once internal options have been exhausted.

9. Managed Account Collections

Managed commercial accounts are tracked through a dedicated reporting system. Collections Specialists and Account Managers collaborate to ensure coordinated outreach and strategic engagement, both before and after termination actions. This approach supports relationship management and ensures that high-value accounts receive appropriate attention.

Division 1-6

Request:

On Page 9 of the Company's Motion the Company states, "While the Company acknowledges that customers continue to be affected by inflation and other cost pressures...", please specify what are the "other cost pressures" the Company is speaking about and for each cost pressure identified please identify how the Company believes it will affect customers' ability to pay their gas and electric bills. Also, in your response, identify which of cost pressures are "new" (*i.e.*, developing after the conclusion of the Covid-19 Pandemic).

Response:

The quoted statement in the request was intended to acknowledge that higher inflation rates, resulting in higher prices for goods and services since the COVID-19 Pandemic, and other economic factors, such as the higher cost of electricity affecting the New England region, continue to persist even after the end of the COVID-19 Pandemic. The Company is unable to speculate on how such inflation and economic factors will affect customers' ability to pay their gas and electric bills, as such determination is subjective to each individual customer and influenced by factors outside the control of the Company; however, the Company remains sensitive to the impacts these cost pressures have on customers as heard during the March 2025 public comment hearing.

The Company also notes that the clause immediately following this statement says, "these impacts are no longer the direct result of the pandemic emergency that warranted the Extended Payment Plan Requirements." The Company included a footnote to Docket No. 1725 with this statement, acknowledging the PUC's past practice of putting in place temporary, short-term modified payment plan requirements to address specific public safety concerns. The Company is unable to identify the exact timing these other cost pressures emerged; however, the objective of these statements was to distinguish the COVID-19 Extended Payment Plans, which the PUC put in place to address a specific emergency, which has now ceased, from the other types of customer protections that already exist, and are not at issue in this docket, to assist customers, who may be experiencing financial burdens, with managing and paying their gas and electric bills.

Division 1-7

Request:

If the inflation and cost pressures replicate Covid-Pandemic economic disruption, does the Company agree that maintaining some form of extended payment plan is a good idea? Why or why not? Please explain.

Response:

The Company makes no assertions or assumptions that inflation and other cost pressures replicate COVID-19 Pandemic economic disruption. Please see the Company's response to Division 1-6 for additional explanation of the Company's statements in its Motion regarding these "cost pressures." As the Company stated in its Motion, the Company does not object to the Public Utilities Commission ("Commission") implementing extended payment plans, such as the ones implemented in Docket No. 1725, on a short-term, temporary basis to address a specific public safety concern, as determined by the Commission. To that end, the Company would not oppose maintaining some form of extended payment plan through December 2025 to coincide with the start of winter rates. Any such extended payment plans should include conditions on participation in those plans, consistent with the Commission's past practice in Docket No. 1725.¹

The Company does not believe it would be a good idea to put in place extended payment plans on a longer-term basis as that may make it more difficult for customers to pay down higher balances over time.

¹ See Company's Motion at 9, fn. 22 for a discussion of the conditions in Docket No. 1725.

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Division 1-8

Request:

On Page 10 of the Company’s Motion, the Company states that the PUC’s Termination Rules does not prohibit the Company from offering “less stringent payment arrangements.” Please identify each instance by payment plan, date, amount and type of service from October 1, 2022 through May 31, 2025 when the Company has offered customers “less stringent payment arrangements” than require by the PUC’s Termination Rules.

Response:

The Company’s statement in its Motion regarding “less stringent payment arrangements” comes from the requirements for residential payment plans set forth in the Public Utilities Commission’s Rules and Regulations Governing the Termination of Residential Electric, Gas and Water Service (“Termination Rules”), 810-RICR-10-00-1.10 (“Rule 1.10”).¹

Please see Attachment DIV 1-8 for the Excel file containing the requested data sourced from the Company’s Customer Service System (“CSS”). This data includes Payment Agreements with less stringent payment arrangements than the required Step Plans in Rule 1.10, which the Company refers to as “non-standard terms.” Please note the Company has made a good faith effort to exclude from its query any Payment Agreements with terms of 18-, 24-, and 36-month terms to avoid overlap or double-counting with the required COVID-19 Extended Payment Plans of the same duration, and/or other known Payment Agreements as ordered by the Division during the requested timeframe. There may be additional instances of less stringent payment arrangements that the Company did not capture in its analysis.

¹ “Nothing in these Rules and Regulations shall prevent a gas, water or electric public utility from setting up a standard residential payment plan or a payment plan for an individual residential customer with less stringent requirements.” Rule 1.10(A).

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Due to the voluminous nature of Attachment DIV 1-8 (995 pages), the Company is providing the Excel file of this attachment.

Division 1-9

Request:

On Page 10 of the Company's Motion, the Company states that extended payment plans requirements do not include the same conditions on participation as implemented in Dkt. No. 1725 (see footnote 22), which means a customer who defaults on such a plan can reenroll in a new plan upon payment of a 10% deposit without ever paying down the outstanding balances. If the PUC added 1725 conditions to extended payment plans, would the Company's position about terminating them change in view of the public safety concerns of inflation and other cost pressures the Company has identified: (i) for Protected Customers? (ii) for Standard Customers? Please explain.

Response:

The Company's position continues to be that relief from the requirement to offer the extended payment plans in Docket No. 5022 is appropriate for the reasons set forth in its Motion. The Public Utilities Commission ("Commission") established those extended payment plans pursuant to its emergency powers in response to a declared state of emergency that has ceased.

Notwithstanding, please see the Company's response to Division 1-7 for the Company's position on implementing Docket No. 1725 extended payment plans with conditions for all customers who may be facing financial challenges.

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Division 1-10

Request:

Please provide all studies, analyses, reports, *etc.* that the Company has performed assessing the benefits / costs from a societal perspective of extended payment plans.

Response:

The Company has not conducted any studies, analyses, reports, *etc.* to assess the benefits/costs from a societal perspective of extended payment plans.

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Division 1-11

Request:

Of the subset of 731 Customers who “Kept” their extended payment plans, has the Company ascertained common customer characteristics that enabled these customers to keep their plans? Why? Or why not? Wouldn’t this be an important learning before terminating all extended payment plans for customers? Please explain.

Response:

The Company has not conducted an analysis of common customer characteristics that enabled these customers to keep their plans. Performing such a review would require a complex and resource-intensive data analysis to identify patterns or distinctions across individual accounts. Additionally, the data collected for each account can vary significantly – such as differences in reported income, geographic location, and other key variables – which further complicate any direct comparison. In addition, the reasons why some customers kept their extended payment plans and others did not could be driven by other factors that are subjective to individual customers, for which the Company cannot speculate, and which could undermine the efficacy of any such analysis.

For these reasons, the Company does not believe such an analysis would be an important learning tool in this instance. Also, to clarify, the Company is not proposing to terminate all extended payment plans for customers. The Company’s proposal is for relief from the requirement to offer the extended payment plans as directed by the Public Utilities Commission in its emergency orders in Docket No. 5022 in response to the COVID-19 emergency, because the emergency has ceased and the requirement to offer those extended payment plans provides no discretion to the Company to consider a customer’s arrears balance, prior payment history, or default history when deciding whether to offer an extended payment plan. Also, the Company’s request is prospective only. If granted, the Company is not proposing to terminate extended payment plans for customers who remain current on their plan.

Division 1-12

Request:

Why should the PUC terminate extended payment plans, favorable to customers, when the Company comes before the Commission having engaged in an “eight-month pause in collections due to the IT system cut over from National Grid?”¹ Isn’t the Company’s delinquency problem principally the result of the Company’s own decision to pause collections and the transaction and not the existence of extended payment plans? Please explain.

Response:

In the Company’s Motion, it respectfully requested that the PUC grant relief from the COVID-19 Extended Payment Plan Requirements. The Company maintains that such relief is appropriate because these plans were originally implemented to support customers during a declared national and state emergency, which has ended. Despite their lenient terms, including a 10% down payment requirement, Company data shows that over 80% of these plans are in default. This undermines fairness for customers who consistently pay on time and contributes to growing arrears.

As outlined in the Company’s Motion, the extended payment plans, which have no conditions for participation, contribute to higher balances for customers, making it more challenging for those customers to pay down their balances. This makes it more difficult for customers to reduce their debt and perpetuates a cycle of repeated defaults. The Company has documented instances where customers enter into multiple 10% down payment agreements, default each time, and continue to accumulate debt. To restore financial discipline and reduce overall accounts receivable, it is necessary to revise or terminate these plans moving forward.

The Company disagrees with the statement that the Company’s delinquency problem is primarily due to its own decision to pause collections during the IT system transition. Please refer to the Company’s response to Division 1-4, which outlines multiple contributing factors to the growth in arrears – only one of which was the system cutover moratorium. The decision to suspend collections before and after the Customer Information System (CIS) go-live followed widely accepted best practices for system transitions. Typically, collections are paused approximately 30 days before go-live and remain suspended for 2–4 months afterward to ensure operational stability and prevent erroneous disconnections. This also allowed customer service teams to focus on a successful transition during the critical stabilization period. In the Company’s case, this standard pause overlapped with the annual winter moratorium beginning November 1, 2024,

¹ Gas SQ Report at 2 (July 31, 2025).

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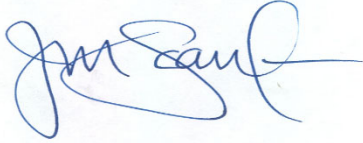
Division 1-12, page 2

resulting in an extended eight-month pause on Residential Collections. This pause is distinct from the COVID-19-related collection suspension and the Extended Payment Plan Requirements.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

September 8, 2025
Date

Docket No. 25-21-GE – Request to Terminate Requirements Related to Extended Payment Plans During COVID-19 Emergency Service List as of 8/28/2025

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