



STATE OF RHODE ISLAND

DIVISION OF PUBLIC UTILITIES & CARRIERS

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December 17, 2025

Ms. Stephanie DeLaRosa, Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

Re: Docket No. 25-57-GE

Dear Ms. DeLaRosa:

On November 24, 2025, The Narragansett Electric Company d/b/a Rhode Island Energy (the “Company” or “Rhode Island Energy”) filed a Petition to Amend the Rhode Island Public Utilities Commission’s (the “PUC” or “Commission”) *Rules and Regulations Governing the Termination of Residential Electric, Gas, and Water Utility Service* (the “Termination Rules”). Specifically, the Company seeks to amend 810-RICR-10-00-1.8(C) (“Termination Rule 1.8(C)”) to eliminate the long-standing practice of permitting utility field employees to accept cash payments from customers on-site to avoid utility service disconnection.

Currently, Termination Rule 1.8(C) reads as follows:

If the public utility sends an employee to the customer’s premises for purposes of disconnecting service, and the customer then and there tenders payment of the bill in full or in part in accord with the provisions of the residential payment plan sections of these Rules and Regulations, the service shall not be disconnected. For purposes of this section, the public utility’s field personnel and employees shall be deemed to be authorized and shall be required to accept such payment from the customer and to give the customer a receipt for any payment made but shall not be required to make change or to enter into agreements with the customer. Any public utility employee sent to disconnect service shall bring with him either a copy of the customer’s bill showing the amount outstanding, or all the information contained therein.

The Company proposes to amend Termination Rule 1.8(C) to provide:

The public utility's field personnel shall not be required to accept cash payment, but shall accept payment by personal check, bank check, money order, credit card, or debit card. The field personnel will assist a customer who chooses to make a payment by credit card or debit card. If a customer then fails to make such payment, the public utility's field personnel may disconnect service to the customer's premises.

In support of its position, the Company cites safety concerns for its field representatives as well as greater costs associated with accepting cash payments. Moreover, the Company asserts that only a small number of residential customers tender cash on-site to avoid disconnection. Thus, the Company avers, that eliminating customers' ability to make cash payments improves field personnel safety and saves operating costs without diminishing customer protections. The Division does not agree.

Notably, the Company proposed a similar amendment to Termination Rule 1.8(C) in 2002.<sup>1</sup> The Division opposed the proposed changes, and the Commission issued Order No. 16966 declining to adopt the amendment. The Commission ultimately found that the benefit of allowing customers to make cash payments "outweighs the burden on the utility companies of continuing to require acceptance of cash payments in the field."<sup>2</sup> Both the Division, in its opposition statement, and the Commission, in its written decision, noted that there was a "lack of evidence that utility employees were at greater risk by accepting cash payments from customers in the field or that there were any discrepancies between the amounts collected in the field and the amounts turned into the utility companies by their employees."<sup>3</sup>

At present, there is likewise a lack of evidence suggesting that the Company's field employees are at greater risk by accepting cash payments or that there is an undue cost burden on the Company for having to accept cash payments in the field.

While the Division is mindful of the Company's safety concerns, the evidence does not support an assertion that this risk outweighs the benefit to customers in tendering cash payments. For example, the Company cited one incident where a customer proffered a counterfeit \$100 bill to a field employee but could not cite to any incidents within the last five years where cash was lost or stolen due to the requirement to accept cash payment.<sup>4</sup> Similarly, the Company had no records of any incidents where field personnel were at risk because of carrying cash.<sup>5</sup>

The Company states that for almost all instances when a field employee receives cash, the Company dispatches a second field employee or supervisor to meet at the Western Union to

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<sup>1</sup> See R.I.P.U.C. Docket No. 1725.

<sup>2</sup> See R.I.P.U.C. Docket No. 1725, Order No. 16966 at 14.

<sup>3</sup> See *id.*

<sup>4</sup> See Rhode Island Energy's Response to PUC 1-4.

<sup>5</sup> See Rhode Island Energy's Response to PUC 1-5.

perform a cash transfer.<sup>6</sup> This represents incremental costs of \$35.71 (for a second field representative) to \$108.82 (for a supervisor) per transaction.<sup>7</sup>

However, the Company reports that out of 35,089 “cut-off for non-payment” orders dispatched in 2025, 3,603 were postponed due to payments made to field personnel and that approximately 283 of those customers paid cash to a field representative.<sup>8</sup> This means that 0.8% of all field disconnects in 2025 were deferred due to cash payments. Thus, while *minimal* savings may accrue to the Company as a consequence of eliminating the cash payment option, the Division does not believe, on balance, that these savings justify utilities altering their historical collection practice. This is particularly true as the proposed amendment disproportionately impacts low-income customers.

These customers, more often than not, will not possess a checking account and therefore be unable to defer service termination by paying their utility bills via personal check or other means. Moreover, low-income utility customers will least be able to afford the fees associated with obtaining certified or bank checks or reconnection of their service if cash is not accepted. To many low-income ratepayers, cash is a precious commodity that must be carefully allocated to obtain the necessities essential to their daily survival. Permitting these customers to avoid service termination via cash payments affords them greater flexibility in prioritizing the allocation of their scarce resources.

In light of the challenging economic landscape that many ratepayers—especially those on the brink of termination—face today, it is important that utility customers are able to make cash payments to avoid service disconnections.

After careful review of the Company’s Petition, the Division recommends that the Commission deny the Company’s proposal as it does not reasonably achieve the Company’s asserted purposes and is contrary to the public interest.

Very Truly Yours,

*/s/ Nicole M. Corbin*

Nicole M. Corbin, Esq.  
Deputy Chief of Legal Services

cc: Linda D. George, Esq., Administrator

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<sup>6</sup> See Rhode Island Energy Response to PUC 1-7.

<sup>7</sup> *Id.*

<sup>8</sup> See Rhode Island Energy Response to PUC 1-2.