

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

**IN RE: IN RE: THE NARRAGANSETT ELECTRIC : DOCKET NO.: 25-57-GE  
COMPANY D/B/A RHODE ISLAND ENERGY'S :  
PETITION FOR AMENDMENT TO, OR OTHER :  
RELIEF FROM, 810-RICR-10-00-1.8(C) OF THE :  
RULES AND REGULATIONS GOVERNING THE :  
TERMINATION OF RESIDENTIAL ELECTRIC, :  
GAS, AND WATER UTILITY SERVICE :**

**ORDER**

This matter is before the Public Utilities Commission (Commission) upon The Narragansett Electric Company d/b/a Rhode Island Energy's (Company) petition to amend or seek relief from 810-RICR-10-00-1.8(C) of the Commission's Rules and Regulations Governing the Termination of Residential Electric, Gas, and Water Utility Service (Termination Rules).<sup>1</sup>

The Commission's Termination Rules are a set of consumer protection regulations concerning, among other things, disconnection and restoration of service for residential and income-eligible customers, payment plans for accounts in arrears, and due process considerations. The section of the Termination Rules at issue in the Company's petition, 810-RICR-10-00-1.8(C) relates to a customer's ability to avoid disconnection of service by making payment in full or in accordance with a payment plan to a utility representative "in the field" (i.e., at the customer's residence). The Commission has previously interpreted this section to include cash payments.

The Company filed its petition requesting an amendment to 810-RICR-10-00-1.8(C) to insert language relieving public utility field personnel from accepting cash payments in the field. Alternatively, the Company requests a waiver of the requirement for the Company's field representatives to accept cash payments at a residential customer's premises.<sup>2</sup> The Company,

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<sup>1</sup> All filings submitted in this matter can be accessed on the Commission's website at <https://ripuc.ri.gov/Docket-25-57-GE> or at its offices at 89 Jefferson Boulevard, Warwick, RI during regular business hours.

<sup>2</sup> See generally Company's Petition (Nov. 21, 2025).

through its papers and pre-filed testimony, suggests that the proposal is made to improve the safety of its field representatives and mitigate risks of harm associated with carrying cash.<sup>3</sup>

The Commission issued Data Requests and solicited public comments on the Company's petition, and specifically to answer questions on whether the Commission should (1) deny the petition or initiate rulemaking pursuant to R.I. Gen. Laws § 42-35-6;<sup>4</sup> and (2) further consider the Company's request for a waiver from the requirement for its field representatives to accept cash payments. The Commission received comments from the Division of Public Utilities and Carriers (Division) and the George Wiley Center, both of whom are opposed to the petition.<sup>5</sup> The Commission reviewed and carefully considered the Company's discovery responses and public comments in determining an appropriate decision in this docket. After due consideration, the Commission finds that there is insufficient factual evidence in the record warranting a rulemaking proceeding or to grant the Company a waiver from the requirement for its field personnel to accept cash payments.

The Commission first notes that it has previously considered this issue in 2002. In Docket No. 1725, the Company (then doing business as The Narragansett Electric Company) and the New England Gas Company<sup>6</sup> forwarded a similar proposal to remove the requirement for public utility field representatives to accept cash payments.<sup>7</sup> That proposal was not adopted by the Commission, in part because "[d]ata responses . . . during the investigation in Docket No. 1725 showed a lack

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<sup>3</sup> See *id.* at 10-12; Santoro Test., at 6-10 (Nov. 21, 2025).

<sup>4</sup> R.I. Gen. Laws § 42-35-6 states that "[a]ny person may petition an agency to promulgate a rule. An agency shall prescribe, by rule, the form of the petition and the procedure for its submission, consideration, and disposition. Not later than thirty (30) days after submission of a petition, the agency shall: (1) [d]eny the petition in a record and state its reasons for the denial; or (2) [i]nitiate rulemaking."

<sup>5</sup> See generally Division's Position Memorandum (Dec. 17, 2025); George Wiley Center's Comments (Dec. 18, 2025).

<sup>6</sup> New England Gas Company is the predecessor gas utility to Narragansett Electric, prior to Narragansett Electric acquiring the assets and business in 2006. See *In Re: Joint Petition for Purchase and Sale of Assets by The Narragansett Electric Company and the Southern Union Company*, Division Docket No. D-06-13 (2006).

<sup>7</sup> The Narragansett Electric Company's Proposed Amendment to Termination Rules, Docket No. 1725 (Feb. 27, 2002).

of evidence that utility employees were at a greater risk by accepting cash payments from customers in the field or that there were any discrepancies between the amounts collected and the amounts turned in to the utility companies by their employees.”<sup>8</sup>

Here, the Company could only identify one instance where counterfeit money was tendered to a field representative over the past five years, and no examples where cash was stolen, lost, or missing because of the requirement to accept cash payments.<sup>9</sup> As far as safety concerns, only one incident was referenced in the Company’s testimony that was connected with a cash payment to defer disconnection of service; the remainder were not in connection with cash payments.<sup>10</sup> In addition, it does not appear that the Company has employed additional operational security measures other than a change in location where cash may be deposited. Furthermore, the Commission notes that the rollout of advanced meters may affect the Company’s service disconnection procedures and may lessen the Company’s concerns.

Another ground upon which the Commission denied the Company’s proposal in Docket No. 1725 was a finding that “the benefit of maintaining this requirement to the utility’s customers outweighs the burden on the utility companies of continuing to require acceptance of cash payments in the field.”<sup>11</sup> The Division notes in its comments that only 0.8% of all field disconnections in 2025 were deferred due to cash payments, and posits that any savings that may accrue as a result of eliminating cash payments as an option for customers do not justify altering historical collection practices. The Division also suggests that if the proposed amendment were approved, low-income customers, who may not have checking accounts or may not be able to

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<sup>8</sup> Order No. 16966, at 7, Docket No. 3423 (Apr. 16, 2002).

<sup>9</sup> Company’s Response to PUC 1-4 (Dec. 8, 2025).

<sup>10</sup> See Santoro Test., at 7-8; Company’s Response to PUC 1-5. It is also worth noting that the Company no longer applies cash payments to customer accounts at Western Union. Instead, the Company deposits cash at a bank. Company’s Petition at 12, ¶ 22.

<sup>11</sup> Order No. 16966, at 7, Docket No. 3423.

afford certified or bank checks, would be disproportionately affected. Accordingly, the Division advocates for keeping cash payments as an option to give greater flexibility to customers.<sup>12</sup>

The George Wiley Center similarly notes that without a cash payment option, a customer must have a bank account to access any of the Company's alternative payment options that are available during a service termination.<sup>13</sup> The Company's response to PUC 1-1 indicates that once a field representative arrives at a customer's premises, that customer cannot leave the premises to make a cash payment at a Western Union or to obtain a bank check or money order to avoid the disconnection of service.<sup>14</sup> Even assuming that a customer does make a payment at a Western Union or through a bank check or money order, the Company states that service would be restored within 24 hours of the Company's receipt of payment, which is not necessarily the same as when a customer may tender payment.<sup>15</sup> This raises a concern of a potential extended lag during which a customer may not have service. The Commission finds that the burden on public utilities is outweighed by the potential risks to the health and safety of ratepayers who may be without service if cash payments are not accepted in the field. Thus, the Commission finds no basis to deviate from its prior interpretation of 810-RICR-10-00-1.8(C).

Accordingly, it is hereby:

(25584) ORDERED:

1. The Company's petition to amend or seek relief from 810-RICR-10-00-1.8(C) of the Commission's Termination Rules is denied.
2. The Company's request for a waiver of the requirements under 810-RICR-10-00-1.8(C) is denied.

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<sup>12</sup> Division's Position Memorandum, at 3.

<sup>13</sup> George Wiley Center's Comments, at 6.

<sup>14</sup> Company's Response to PUC 1-1.

<sup>15</sup> *See id.*

EFFECTIVE AT WARWICK, RHODE ISLAND PURSUANT TO AN OPEN MEETING  
DECISION ON DECEMBER 23, 2025. WRITTEN ORDER ISSUED JANUARY 16, 2026.

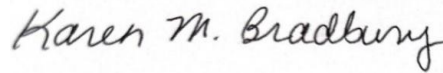
PUBLIC UTILITIES COMMISSION



Ronald T. Gerwatowski, Chairman



Abigail Anthony, Commissioner



Karen M. Bradbury, Commissioner

**NOTICE OF RIGHT OF APPEAL:** Pursuant to R.I. Gen. Laws § 39-5-1, any person aggrieved by a decision or order of the Commission may, within seven days from the date of the decision or order, petition the Supreme Court for a writ of certiorari to review the legality and reasonableness of the decision or order.