

October 24, 2018

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 1725 – George Wiley Center’s Request for Emergency Regulations
National Grid Comments**

Dear Ms. Massaro:

National Grid¹ submits these comments to assist the Rhode Island Public Utilities Commission (PUC) as it considers the George Wiley Center’s (Wiley Center) October 9, 2018 letter requesting that the PUC implement a temporary amendment of its billing and termination rules and institute a 10% down payment plan. In particular, the Wiley Center requests that all residential utility customers whose utility service has been terminated could restore service by making a 10% down payment of their total arrearage balance and agreeing to pay the remaining balance over an 18 to 36-month repayment plan. The Wiley Center also requests that customers who had participated in a reduced payment plan in 2017, and yet have larger arrears in 2018, not be excluded from participating. Finally, the Wiley Center requests that the interim emergency regulation be in place through the end of calendar year 2018.

The PUC has previously adopted interim emergency regulations relative to the down payment and payment plan required of certain customers in order to restore service after it has been terminated.

In 2017, the PUC issued a Report and Order allowing residential customers who had been, or were about to be, terminated to have service reinstated under terms that provided for a down payment of 10% (the Report and Order). *See* Report and Order No. 22967, issued on November 27, 2017 in Docket No. 1725. In addition to the 10% down payment, the Report and Order required a payment plan with respect to the remaining unpaid balance for either 18, 24, or 36 months, depending on the amount of the customer’s outstanding balance. Customers with balances of \$2,500 or more pay the remaining balance over 36 months; customers with balances at least

¹ The Narragansett Electric Company d/b/a National Grid.

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\$1,000 but less than \$2,500 pay the remaining balance over 24 months; and customers with balances up to \$1,000 pay the remaining balance over 18 months. The Report and Order also required that participating customers make timely payment of their current bills. Additionally, customers who had participated in a reduced payment plan in 2016, and yet had the same or larger arrears in 2017, would be excluded from participating in the reduced down payment plan offering unless the customer made an additional down payment. Furthermore, the Report and Order provided that the PUC would not make any changes to the terms of the payment plans under the new Henry Shelton Act arrearage management program, as there was insufficient data available regarding the effectiveness of the arrearage management program. The Report and Order applied to the time period of November 21, 2017 through December 31, 2017.

For 2018, National Grid would support the same conditions as the PUC implemented in 2017 in the Report and Order, including the terms and conditions related to the AMP. National Grid supports that this treatment be available through December 31, 2018, and that it apply to down payments by qualifying customers or pledged by an agency on or before December 31, 2018.

As always, National Grid's Customer Service representatives will work with individual customers to address particular customer circumstances, and National Grid will work to ensure the safety of our customers this winter. National Grid recognizes the difficulties many customers experience during the winter season and believes that the proposal outlined in last year's Report and Order would benefit National Grid's customers during this winter season – especially National Grid's income-eligible customers – while recognizing and remaining consistent with the amendments to the Henry Shelton Act.

Thank you for your attention to this matter. If you have any questions regarding this filing, please contact me at 401-784-7415.

Very truly yours,



Robert J. Humm

cc: Docket 1725 Service List
Leo Wold, Esq.
William K. Lueker, Esq., Division