

November 16, 2017

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

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

Dear Ms. Massaro:

National Grid<sup>1</sup> submits these comments to assist the Rhode Island Public Utilities Commission (PUC) as it considers the George Wiley Center’s (Wiley Center) October 23, 2017 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 2016, and yet have larger arrears in 2017, not be excluded from participating. Finally, the Wiley Center requests that the interim emergency regulation be in place through the end of calendar year 2017.

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 2016, 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. 22594, issued on November 2, 2014 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 \$1,000 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 2015, and yet had the same or larger arrears in 2016,

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

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 is currently insufficient data available to provide a cost-benefit analysis of the effectiveness of the arrearage management program. The Report and Order applied to the time period of November 2, 2016 through December 4, 2016.

For 2017, National Grid would support the same reduced down payment plan terms and conditions as the PUC implemented in 2016 in the Report and Order, including the terms and conditions related to the arrearage management program. As requested by the Wiley Center, National Grid supports that this treatment be available for the period of November 21, 2017 through December 31, 2017, and that it apply to down payments by qualifying customers or pledged by an agency on or before December 31, 2017.

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

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.

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Joanne M. Scanlon

November 16, 2017  
Date

**Docket No. 1725 – Termination Rules  
Service List as of 11/6/17**

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