

October 17, 2016

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 State’s Request for
Emergency Regulations**

Dear Ms. Massaro:

National Grid¹ submits these comments to assist the Rhode Island Public Utilities Commission (PUC) as it considers the September 27, 2016 letter from Senate President Teresa Paiva-Weed and Speaker Nicholas A. Mattiello (collectively, the State) requesting that the PUC adopt emergency regulations for the restoration of services to LIHEAP-eligible gas and electric utility customers. National Grid supports the State’s September 27, 2016 request to adopt interim emergency regulations to provide reasonable payment terms for low income customers, as the PUC has adopted in prior years.

To achieve the State’s requested objective, National Grid supports the PUC’s adoption of the same interim regulations the PUC implemented in 2015. *See* PUC Minutes of Open Meeting held October 30, 2015.

In 2015, the PUC adopted emergency regulations 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 15 percent (Interim Regulations). The Interim Regulations were otherwise the same as the emergency regulations implemented by the PUC in 2014 in PUC Order No. 21710 dated November 3, 2014, and applied to the time period November 4, 2015 through December 4, 2015. In addition to the 15 percent down payment, the Interim Regulations required a payment plan with respect to the remaining unpaid balance for either 18, 24 or 36 months, depending on the amount of the 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 Interim Regulations also required that participating customers make timely payment of their current bills. Additionally, customers who had participated in a reduced payment plan in 2014, and yet had larger arrears in 2015, would be excluded from participating in the reduced down payment plan offering unless the customer made an additional down payment.

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

Luly E. Massaro, Commission Clerk
Docket 1725 – National Grid’s Comments to
State’s Request for Emergency Regulations
October 17, 2016
Page 2 of 2

For 2016, as explained above, National Grid would support the same reduced down payment plan terms and conditions as the PUC implemented for the designated period in 2015. National Grid also recommends that this treatment be available for the period of October 31, 2016 through November 30, 2016, and that it apply to down payments by qualifying customers or pledged by an agency on or before November 30, 2016. This proposal would benefit National Grid’s low income customers during the winter season, while recognizing and remaining consistent with the amendments to the Henry Shelton Act. 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 foregoing recommended interim emergency regulations are in the best interest of the customers.

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
Steve Scialabba, Division
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.

Joanne M. Scanlon

October 17, 2016

Date

**Docket No. 1725 – Termination Rules
Service List as of 10/17/16**

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