

November 27, 2013

Hello,

Just a quick note to say Happy Thanksgiving, and to thank you for your kind attention to our testimony at last week's hearing.

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PUBLIC UTILITIES COMMISSION

I know you have a vote Friday on the emergency rule that David Salvatore and others addressed during public comment, but I'm not sure if you are aware that part (d) is counterproductive.

In other states, emergency restoration of service for the winter is often a flat rate (\$175 in Ohio, for instance) and households who have been in similar straits in previous years are not treated punitively, as families in Rhode Island have and would if (d) is not eliminated from the wording.

Not only is a struggling household without utility service treated punitively by including (d), but so are all the other Rhode Islanders who receive LIHEAP benefits. To wit: if someone cannot take advantage of this rule because of (d), then the CAP agency may have to disburse a larger grant to restore that household's service. This would leave less in the pot for renewal grants for other households, many of whom are likely struggling just as much but perhaps have managed not to have service terminated during the non-moratorium months.

It also adds a layer of math for those clever enough to figure it out – once again, punishing those who are not so good at math. If I now owe \$10 more than I did last year when I took advantage of the emergency restoration rule, I can pay \$15 to bring my balance down, then go to the CAP for the 10%, 15% or 20%. But the CAP agencies don't have the time or resources to spend all day researching past balances on each client's account, so they again disburse the amount demanded by the utility and -- again -- leave everyone else with less assistance after crisis grants deplete the total LIHEAP amount available to the state.

Please keep in mind that deliverable fuels are also part of the LIHEAP equation, so if National Grid is allowed to make the gutless money grab that (d) provides for, families who need oil, propane, etc will have fewer LIHEAP dollars to keep them from freezing through the winter.

I hope you have a lovely holiday and that you have much to be thankful for. I know I do.

Sincerely,

Maggi Rogers