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July 7, 2020

Ms. Luly Massaro, Clerk
RI Division of Public Utilities and Carriers
89 Jefferson Blvd.
Warwick, RI 02888

RE: RI Public Utilities Commission ("RIPUC") Docket No. 5022

Dear Ms. Massaro:

Please find enclosed herewith Kent County Water Response pursuant to the above-referenced Docket. Thank you.

Sincerely,



Mary B. Shekarchi
Attorney at Law

MBS/mdc
Enclosure

Cc: Service List via electronic mail
In docket # 5022



Kent County Water Authority

July 6, 2020

KCWA Response to Notice to Solicit

RIPUC Docket 5022

The PUC specifically requested comment on the following:

(1) whether a moratorium on service terminations should continue for all categories of customers, e.g., non-residential, standard customers, and protected customers;

KCWA COMMENT TO PUC (1)

Most KCWA customers have been paying their water bills regardless of the moratorium. The experience of KCWA over the last couple months found that despite the moratorium on shutoffs for non-payment that our collections monetarily increased. The anomalous component is that the number of delinquent accounts slightly increased over the same period when compared to last year which should have translated into reduced collections. This was certainly a surprise to KCWA as we were all expecting the opposite. It is possible that the influx of stimulus and unemployment checks were partially responsible for this trend. Other reasons why there may be success to this point is through the outreach measures employed. On May 15, 2020, KCWA provided to the Division of Public Utilities and Carriers, with a copy to the Public Utilities Commission, the respective plans for commencing full collections activities, consistent with order 23826. In this submission (copy attached), KCWA discusses the outreach measures employed. KCWA also requested and was granted a waiver on credit card and ACH fees prior to the last PUC order to do so which also could have helped customers pay their bills without additional fees.

CONCERNS:

The Authority bills one third of its customers , or approximately 9000 customers, quarterly. Meaning specific areas of the system are getting bills at different times spanning over the peak of the shutdown. This may create a lagging effect in collections. The full capture of the picture may not be in focus until the end of July and August. Also, KCWA production has increased in June 2020 by 35%, or 90.7 million gallons to date, compared to 2019. This is a strong indication

that larger bills to KCWA customers are forthcoming which could further aggravate the situation. However, KCWA fears this lagging effect based on our billing cycles coupled with the massive increase in June demand could cause issue. For these specific concerns, KCWA supports lifting the moratorium on shut offs for all customer classes. It would be the goal of KCWA to gradually deploy collection activities and continue the momentum of the successful outreach and communication. This should allow the KCWA staff enough time to the deploy resources needed while simultaneous give the customers a window of opportunity to communicate their needs. Services will not be knowingly terminated for any customers in need. All customers who are disabled, handicapped, or elderly would not be subject to termination. KCWA will work with each customer to best evaluate this response so long as the customer communicates to KCWA to make arrangements. Payment plans will be offered to all customers including residential, multi-family, commercial, and governmental. Customers who do not adhere to assigned payment plans will be subject to termination.

(2) whether there should be a lifting of the moratorium for a particular category of customer; and

KCWA COMMENT TO PUC (2)

KCWA supports lifting the moratorium on shut offs for all customer classes. KCWAs plan to gradually commence collections. If the moratorium is lifted on July 17th, KCWA would start the following procedural ramp up on collection activities and notification. Actual terminations under this plan would not occur until September 10th, 2020.

July 31st – KCWA would out a revised delinquent notice with the following language

The Kent County Water Authority realizes this may be a difficult time for our customers. KCWA would like to remind you that we have not received payment of your outstanding balance. If you are unable to pay your balance in full, we ask that you please contact our office to set up a payment arrangement by August 14th.

August 14th – KCWA would send out a second revised delinquent notice:

Continuing to encourage customers to contact KCWA to set up a payment plan if they are unable to pay balance in full.

August 25th -First Round Shut Off Notice- April Balances

KCWA will be sending the standard shut off notices to all customers with an April balance with a termination date of September 10th unless ordered by RIPUC not to do so under Docket 5022.

August 31st Second Round Shut Off Notice- May Balances

KCWA will be sending the standard shut off notices to all customers with a May balance with a termination date of September 10th unless ordered by RIPUC not to do so under Docket 5022.

In any case where KCWA is ordered to extend the moratorium on collection activities, KCWA will continue the delinquent notices and outreach.

(3) the appropriate duration of any extension of a moratorium on service terminations.

KCWA COMMENT TO PUC (3)

KCWA does not support an extension of moratorium on terminations. Further extensions will result in higher balances that will become impossible for customers to pay.

ATTACHMENT



Kent County Water Authority

May 15, 2020

KCWA Response to PUC-5

RIPUC Docket 5022 - Order 23826

PUC- 5. On or before May 15, 2020, the regulated utilities shall submit to the Division of Public Utilities and Carriers, with a copy to the Public Utilities Commission, their respective plans for commencing full collections activities, consistent with this order.

KCWA RESPONSE PUC-5

Current Outreach:

KCWA has eliminated sending out shutoff notices and have replaced them with a delinquent notice.

KCWA has changed the wording on the delinquent notice to encourage our customers to make payments on their account to avoid future large balances due for shutoff for non-payment. (example delinquent notice attached)

KCWA petitioned RIPUC and received a waiver on applying interest on overdue account balances during the pandemic.

KCWA continues to set up payment plans with customers who are unable to pay their balances by the scheduled payment date.

KCWA customer service, meter reading, and billing operations have been fully operational during the pandemic. All concerned customers who call the office regarding payment issues are presented with the most current billing information and that we are unable to shut off anyone for non-payment at this time. The customer service staff continues to encourage customers to make payments over the phone use, our online bill payment services, or set up payment plans.

KCWA has additionally provided all aforementioned information to our customers via our website, press release, and social media.

Plans for Commencing Full Collections:

May 31st – KCWA will be sending out a revised delinquent notice that includes the following:

The Kent County Water Authority realizes this may be a difficult time for our customers. KCWA would like to remind you that we have not received payment of their outstanding balance. If you are unable to pay your balance in full, we ask to please contact our office to set up a payment arrangement by June 15th.

June 15th – KCWA will be sending out a second revised delinquent notice that includes the following:

KCWA will be encouraging our customers to contact us to set up a payment plan if they are unable to pay balance in full. KCWA would also be informing the customers if they do not contact us or make the payment, they will be in jeopardy of being terminated on June 25th

June 25th –KCWA will commence termination activities for customers with a March and prior balance and have not set up a payment plan unless ordered by RIPUC not to do so under Docket 5022

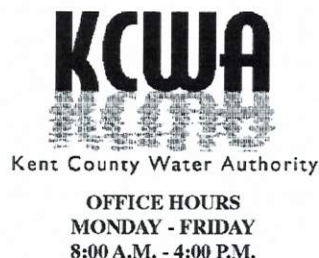
June 30th – KCWA will be sending the standard shut off notices to all customers with an April balance with a termination date of July 14th unless ordered by RIPUC not to do so under Docket 5022.

In any case where KCWA is ordered to extend the moratorium on collection activities we would continue the delinquent notices and outreach until we could do shut off for nonpayment.

KENT COUNTY WATER AUTHORITY
1072 MAIN STREET
P O BOX 192
WEST WARWICK, RI 02893-0192

DELINQUENT NOTICE

PHONE NUMBER: (401) 821-9300
E-MAIL: customerservice@kentcountywater.org



Effective Date:

Account Number:

Delinquent Amount:

Service Location:

OUR RECORDS INDICATE THAT YOU MAY HAVE OVERLOOKED PAYING YOUR WATER BILL. AS A REMINDER THIS BILL WAS DUE 30 DAYS FROM THE BILLING DATE.

PLEASE DISREGARD THIS NOTICE IF PAYMENT HAS BEEN MADE AND THANK YOU FOR YOUR PAYMENT.

CUSTOMERS ARE ENCOURAGED TO CONTINUE TO PAY THEIR BILLS TO THE EXTENT THEY HAVE THE FINANCIAL ABILITY. IF YOU ARE EXPERIENCING FINANCIAL HARDSHIP DURING THIS TIME, PLEASE CONTACT OUR OFFICE FOR A PAYMENT PLAN. FAILURE TO MAKE A PAYMENT WILL RESULT IN A HIGHER BALANCE DUE ONCE THE MORATORIUM IS OVER AND MAY BE MORE DIFFICULT TO MANAGE FULL PAYMENT.

FOR CUSTOMERS ABLE TO PAY THEIR BILL, THE FOLLOWING OPTIONS ARE ALWAYS AVAILABLE FOR PAYMENT:

- ☎ PAY BY TELEPHONE: (401) 821-9300 (secure payments M-F 7:30AM - 4:00PM)
- 🌐 TO PAY BY ACH OR CC: <https://www.ri.gov/app/kentcounty/water>
- ✉ MAIL A CHECK OR MONEY ORDER: KENT COUNTY WATER AUTHORITY
PO BOX 9901
PROVIDENCE, RI 02940-4001
- ☒ DROP OFF A CHECK OR MONEY ORDER: KENT COUNTY WATER AUTHORITY
1072 MAIN STREET
WEST WARWICK, RI 02893-0192

PLEASE MAKE CHECKS PAYABLE TO: "KENT COUNTY WATER AUTHORITY"
INCLUDE ACCOUNT NUMBER ON CHECK OR MONEY ORDER

PLEASE NOTE: IF YOUR OBLIGATION TO PAY ANY DEBT LISTED IN THIS STATEMENT IS THE SUBJECT OF A BANKRUPTCY COURT PROCEEDING, BANKRUPTCY COURT-APPROVED PLAN OR BANKRUPTCY COURT ORDER, WE ARE NOT THROUGH THIS COMMUNICATION, ATTEMPTING TO COLLECT ANY AMOUNTS FROM YOU AS A PERSONAL LIABILITY AND WILL ONLY PURSUE ANY RIGHTS WE MAY HAVE IN THE BANKRUPTCY COURTS TO THE EXTENT ALLOWED BY LAW.

Detach and Return Stub with Payment

DELINQUENT NOTICE

Service Location:

Account Number:

Delinquent Amount Due:

New Remittance Address:

Kent County Water Authority
P O Box 9901
Providence, RI 02940-4001

Amount Enclosed: \$ _____



Docket No. 5022 – COVID-19 Emergency Order
Service List as of 6/5/2020

Name/Address	E-mail Distribution	Phone
Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
	Margaret.hogan@puc.ri.gov ;	
Nicholas Ucci, Administrator RI Office of Energy Resources	Nicholas.Ucci@energy.ri.gov ;	401-574-9119
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	Joanne.scanlon@nationalgrid.com ;	
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