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September 2, 2021

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

**Re: *The Narragansett Bay Commission - Docket 5022***  
***In Re: Suspension Of Service Terminations And***  
***Certain Collection Activities During The COVID-19 Emergency***

Dear Ms. Massaro:

Enclosed herewith please find an original and nine copies of the Narragansett Bay Commission's Response to the Rhode Island Public Utilities Commission's Fourth Set of Data Requests in the above captioned docket.

Thank you for your attention to this matter.

Sincerely,



Joseph A. Keough, Jr.

Enclosures  
cc: Service List via electronic mail

**Comm. 1-1:** Does Narragansett Bay Commission (NBC) believe that the inability to charge late/interest fees is a hinderance to collections of outstanding balances. Please explain in detail.

**Response:** NBC views interest charges on past due balances as an incentive for customers to pay on time. Since the PUC's suspension of interest charges in June 2020, NBC's over 120-day past due amount (the oldest receivables) has increased \$384,000 or 4% of the total User Fee Accounts Receivable. It is difficult to quantify how much of this increase is due to the suspension of interest charges, but it is likely that some portion of the increase is due to the removal of any incentive to pay on time.

**Comm. 1-2:** If the prohibition on charging late/interest fees is lifted, what measures and means of communications would Narragansett Bay Commission utilize to inform customers that they will again be subject to these fees on overdue balances? What does Narragansett Bay Commission believe is a reasonable notice period prior to the lifting of the prohibition to properly educate customers?

**Response:** NBC would include a message on its billing invoices notifying of the reinstatement of interest charges on past due balances. NBC would also post notices on the NBC website and customer payment portal. NBC would implement the reinstatement of interest fees no less than 30 days after the suspension is lifted.

**Comm. 1-3:** Has Narragansett Bay Commission determined if the waiver of credit card/debit card/online check fees has resulted in better collections activities from any class of customers? If so, please explain/provide data. If not, please explain. If the utility already absorbs these fees, please advise.

**Response:** NBC stopped charging credit card convenience fees in April, 2020 (NBC has never charged for online ACH payments). NBC does not have the information requested by customer class readily available; however, the average number of credit card transactions and payments per month increased from 4,992 and \$589,901 during the nine months prior to the fee suspension to 9,089 and \$912,371 during the 16 months after the suspension or increases of 82% and 55%, respectfully. It is difficult to determine if customers paid by credit card because they didn't have other means to make payment or because it was more convenient and no fees were charged for that convenience.

**Comm. 1-4:** If the Commission were to lift the prohibition on assessing credit card fees, what is Narragansett Bay Commission intent on whether to reinstitute the fee? If the utility already absorbs the fees, this can be N/A.

**Response:** NBC prefers to continue to absorb the convenience fees but would need to assess the long-term viability of that option since the fees are not built into the approved cost of service.