

May 7, 2021

BY ELECTRONIC MAIL

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

**RE: Docket 5022 - Suspension of Service Terminations and
Certain Collections Activities During the COVID-19 Emergency
Quantification of Waived Fees, Spring Update 2021
Responses to PUC Data Requests – Set 1**

Dear Ms. Massaro:

On behalf of National Grid,¹ I have enclosed the Company's responses to the PUC's First Set of Data Requests in the above-referenced matter.

Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Sincerely,



Raquel J. Webster

Enclosure

cc: Docket 5022 Service List
Jon Hagopian, Esq.
John Bell, Division
Linda George, Division

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

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.

May 7, 2021

Joanne M. Scanlon

Date

**Docket No. 5022 – COVID-19 Emergency Order
Service List as of 4/1/2021**

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The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5022
COVID-19 Emergency
In Re: Quantification of Waived Fees, Spring Update 2021
Responses to Commission's First Set of Data Requests
Issued on April 15, 2021

PUC 1-1

Request:

In Order No. 23836 (June 2, 2020), the Commission ordered:

Utilities subject to this order shall temporarily suspend late fees, interest charges, credit card fees, debit card fees and ACH fees. Each utility that charges late fees, interest charges, or passes through credit card, debit card, or ACH fees to the customer shall track the expense of late fees, interest charges not collected as well as credit card fees, debit card fees, and ACH fees absorbed by the utility which are not included in the utility's revenue requirement, for later review by the PUC. This portion of the order will be reviewed in September 2020.

Does National Grid typically charge late fees to customers? If so, please provide the tariff reference and the types of customers to whom the late fee applies.

Response:

Yes, National Grid typically charges late fees to non-residential customers.

Pursuant to the General Terms and Conditions of the Rhode Island Gas Tariff, R.I.P.U.C. NG-GAS No. 101 ("Gas Tariff"), Section 1, Schedule A, Sheet 7, Ninth Revision, all Rhode Island Gas non-residential customers are subjected to a late payment charge if payments are not made within 25 days of the bill date. Please see Attachment PUC 1-1-1 for this provision of the Gas Tariff.

Pursuant to the Terms and Conditions for Distribution Service, R.I.P.U.C. No. 2243 governing electric service, paragraph 13, Sheet 4, all non-residential electric customers are subject to a late payment interest charge at 1¼% per month on the outstanding balance. Please see Attachment PUC 1-1-2 for this provision of the electric Terms and Conditions for Distribution Service.

The Narragansett Electric Company
d/b/a National Grid
RIPUC NG-GAS No. 101

Section 1
General Rules and Regulations
Schedule A, Sheet 7
Ninth Revision

GENERAL TERMS AND CONDITIONS

required to correctly measure the total gas service rendered. Should the Company determine that this service be separately metered, the Company will issue a separate bill pursuant to a rate schedule applicable for the usage on the separate meter. Otherwise, if so determined by the Company to be technically feasible, the Company shall allow gas usage for emergency back-up natural gas generators to be measured by the Customer's existing meter.

For residential gas services provided pursuant to prior tariff provisions that required that gas service for use by emergency back-up natural gas generators be separately metered and billed, when both meters are served under a single residential service classification, the registrations of the meters will be combined under one customer account and the bill computed as if all service had been rendered through a single meter. Should a residential customer request the removal of one of the meters, the Customer shall bear the cost of removing the meter and the cost of piping through the remaining meter. If the Company, at its sole discretion, decides to remove the additional meter, the Company will bear the cost of the removal of the meter and any piping cost.

7.0 BILLING AND READING OF METERS:

Bills are calculated and rendered on the basis of a customer account which shall have a unique identification number established for the billing of service provided through an individual meter, except for multiple metered customer accounts established pursuant to section (1) of Item 6.0 above, or aggregation pools established pursuant to the Company's Transportation Terms and Conditions, Section 6, Schedule C of the tariff. A single Customer may have more than one customer account.

All bills are due within 25 days from the date of the bill. A late payment charge shall accrue on non-residential bills after 25 days in accordance with regulations of the PUC and the Division.

Customers receiving bills may elect to receive their bill electronically. Customers electing to receive their bills electronically will receive a paperless billing credit as identified in Section 1, Schedule A, Item 12.0.

Whenever a check or draft presented for payment of service is not accepted by the institution on which it is written, the Customer shall be charged a returned check fee, as identified in Item 12.0, per check or draft written. Such returned check charge shall be waived for customers receiving gas service on low income rate classes Rate 11 and Rate 13.

The Customer shall be responsible for all charges for distribution and gas service furnished

R.I.P.U.C. No. 2243
Sheet 4
Canceling R.I.P.U.C. No. 2217

be payable as rendered. A customer will not be assessed the initial or monthly fee until after the Company has installed the non-AMR electric meter.

Any opt-out customer who subsequently wishes to have an AMR electric meter re-installed will be charged a “re-installation fee” of \$27.00. The re-installation fee will be charged for the removal of the non-AMR meter and the installation of the AMR meter. Any customer electing re-installation will no longer be assessed the special monthly meter reading fee after the AMR meter has been re-installed.

Unauthorized and Unmetered Use

11. Whenever the Company determines that an unauthorized and unmetered use of electricity is being made on the premises of a Customer and is causing a loss of revenue to the Company, the Company may, at the Customer’s expense, make such changes in the location of its meters, appliance and equipment on said premises as will, in the opinion of the Company, prevent such unauthorized and unmetered use from being made.

Definition of Month

12. Whenever reference is made to “month” in connection with electricity delivered or payments to be made, it shall mean the period between two successive regular monthly meter readings or estimated meter readings, the second of which occurs in the month to which reference is made. If the Company is unable to read the meter when scheduled, the necessary billing determinants may be estimated. Bills may be rendered on such estimated basis and will be payable as so rendered.

Payment Due Date – Interest Charge

13. All bills shall be due and payable upon receipt. Bills rendered to customers, other than individually metered residential customers, on which payment has not been received by the “Please Pay By” date as shown on the bill, shall bear interest, at the rate of 1¼% per month on any unpaid balance, including any outstanding interest charges, from the date of receipt until the date of payment. The “Please Pay By” date corresponds to the next normal bill preparation date. Bills disputed in good faith by a Customer will not be subject to the late payment charge until after the dispute is resolved.

Customer payment responsibilities with their nonregulated power producer will be governed by the particular Customer/nonregulated power producer contract. Payments made through the Company for electricity purchased from a nonregulated power supplier will be applied first to any Narragansett charges or arrearages.

Returned Check Fee

14. A \$8.00 Fee shall be charged to the Customer for each check presented to the Company that is not honored by the financial institution. This fee shall be applicable only where the check has been dishonored after being deposited for a second time.

The Narragansett Electric Company
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RIPUC Docket No. 5022
COVID-19 Emergency
In Re: Quantification of Waived Fees, Spring Update 2021
Responses to Commission's First Set of Data Requests
Issued on April 15, 2021

PUC 1-2

Request:

Does National Grid typically charge interest on overdue balances to customers? If so, please provide the tariff reference and the types of customers to whom the interest charge applies.

Response:

Yes. National Grid charges interest on overdue balances to non-residential customers. Please see the Company's response to PUC 1-1.

The Narragansett Electric Company
d/b/a National Grid
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COVID-19 Emergency
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Issued on April 15, 2021

PUC 1-3

Request:

Does National Grid typically pass through to the user the so called “convenience fees” associated with paying with credit cards or debit cards?

Response:

While the Company offers customers the ability to use credit cards and debit cards to make one-time payments on their electric and gas bills, the processing of those payments and the assessment of the associated fee is not completed by the Company but by a third-party service provider, Speedpay, which charges the customer a “convenience fee.”

To comply with the Commission's order in this docket to suspend the assessment of fees associated with customers' use of credit cards and debit cards in the payment of utility bills while operating under the terms of its contract with Speedpay, the Company entered into an arrangement with Speedpay whereby Speedpay would assess the Company, not customers, the “convenience fee” associated with customers using credit cards and debit cards. This arrangement was effective July 1, 2020.

The Narragansett Electric Company
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RIPUC Docket No. 5022
COVID-19 Emergency
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PUC 1-4

Request:

Does National Grid typically pass through to the user the so called “convenience fees” associated with paying with an ACH/electronic check?

Response:

The Company does not assess any “convenience fees” to customers who pay their utility bills using an ACH/electronic check if they are initiating the payment from their bank account directly on the Company’s website or if they are initiating the payment through the Company’s mobile app. However, if the customer elects the option on the Company’s website to use the third-party website to initiate the ACH/electronic check, then the customer will be charged a “convenience fee” directly by the third-party. The Company is not a party to this transaction.

Please refer to the Company’s response to PUC 1-3 for additional discussion on third-party “convenience fees” after July 1, 2020.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5022
COVID-19 Emergency
In Re: Quantification of Waived Fees, Spring Update 2021
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Issued on April 15, 2021

PUC 1-5

Request:

Does National Grid intend to seek recovery of the costs associated with the absorption of the applicable fees?

If the utility answered no to each of the preceding four questions, they can stop here. There is nothing more for the Commission to consider at this time. If the utility answered yes to one or more of the questions, please continue.

Response:

Yes. The Company intends to seek recovery of the costs associated with the absorption of the applicable fees.

The COVID-19 Pandemic ("Pandemic") has created significant economic hardships for many customers in the short term. The Company continues to assess these impacts on customers and to monitor the underlying economic conditions in the Company's service territory. Because it is not possible to predict the depth or duration of the economic downturn related to the Pandemic or the near and long-term implications on customers' ability to pay their electric and gas bills, the Company believes that a recovery mechanism is appropriate to address specific financial impacts of the Pandemic in the areas of uncollectible accounts costs, lost fee revenue, and credit/debit card fees assessed to the Company.

The Company is continuing to work with the Rhode Island Public Utilities Commission ("PUC") in Docket No. 5022 to address the impacts of the Pandemic. The impact of the Pandemic and the PUC's order in Docket No. 5022 is likely to have a significant financial impact on the Company beyond the level of costs recovered through rates. On April 30, 2021, the Company submitted a petition to the PUC requesting the ability to record to a regulatory asset for the increased cost of customer account receivables that the Company will be unable to collect as a result of the Pandemic and the lost fee revenue and credit/debit card fees assessed to the Company as a result of the PUC's orders relating to the waiver of fees in Docket No. 5022.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5022
COVID-19 Emergency
In Re: Quantification of Waived Fees, Spring Update 2021
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PUC 1-6

Request:

Please indicate the date upon which National Grid ceased charging customers for late fees, interest fees, credit card/debit card payment fees, or ACH/check fees (please list each separately, even if the date is the same).

Response:

The Company ceased charging customers credit card/debit card payment fees and ACH/check "convenience fees" on July 1, 2020. Please refer to the Company's response to PUC 1-3 for additional discussion on "convenience fees" after July 1, 2020. The Company ceased charging customers for late fees/interest fees on March 31, 2020.

PUC 1-7

Request:

Utilities only collect late fees and interest fees on accounts for which payments are made. Similarly, credit card/debit card fees and ACH/electronic check fees are only absorbed by the utility under the PUC's order if payments are made. For the period commencing on the date provided in response to number 5 through the most recent date available (identify the date), please provide the following:

- a. The total number of accounts on which payments were made.
- b. The number of accounts where payments were made and interest and/or late fees were waived.
- c. The number of accounts where payments were made by credit card/debit card.
- d. The number of accounts where payments were made by ACH/electronic check.
- e. The dollar amount of credit card/debit card fees absorbed by the utility that would have otherwise been assessed to the customer paying with a credit card/debit card.
- f. The dollar amount of ACH/electronic check absorbed by the utility that would have otherwise been assessed to the customer paying through ACH/electronic check.
- g. The dollar amount of waived late fees on accounts where payments were made.
- h. The dollar amount of waived interest fees on accounts where payments were made. If the response is that the dollar amount cannot be determined but the utility will seek cost recovery, please explain how the utility would quantify the amount to be recovered and meet a reasonable burden of proof.

Response:

- a. The table below identifies the number of accounts on which payments were received from April 15, 2020 thru March 31, 2021. An account is only counted once during this period.

	Number of Accounts	
	Residential	Commercial
Electric	519,623	71,883
Gas	286,742	28,138

- b. Because the Company does not track waived late fees, the Company cannot determine which non-residential accounts had late fees waived. However, based upon the revenue from late payment charges the Company reflected as a credit against its electric and gas revenue requirements in the test year in its last rate case in Docket 4770, a representative level of late payment revenue not billed for the period

PUC 1-7, page 2

October 2020 through March 2021, (the period since the Company's prior response, which covered through September 2020) is \$857,506 for electric and \$214,183 for gas. For the 12 months of April 2020 through March 2021, the amounts of late payment revenue in base distribution rates are \$1,657,294 for electric and \$409,651 for gas.

Although the Company has continued to provide customers this revenue credit in base distribution rates, it has not been charging customers any late payment fees, which has created a revenue shortfall since late payment revenue is not included in the Company's Revenue Decoupling Mechanisms. Based on the increased level of arrears during the same period, the Company believes that if late payment charges had been assessed during this period, they would likely have been higher than the historic test year amounts that were included in Docket 4770.

- c. The table below identifies the number of accounts where payments were made by credit card/debit card from July 2020 through March 2021.

Month	Number of Accounts
Jul-20	32,035
Aug-20	33,137
Sep-20	34,939
Oct-20	36,869
Nov-20	34,223
Dec-20	35,722
Jan-21	39,742
Feb-21	38,174
Mar-21	46,985

- d. The table below identifies the number of accounts where payments were made by ACH/electronic check from July 2020 through March 2021.

PUC 1-7, page 3

Month	Number of Accounts
Jul-20	1,647
Aug-20	1,679
Sep-20	1,698
Oct-20	1,616
Nov-20	1,622
Dec-20	1,683
Jan-21	1,771
Feb-21	1,908
Mar-21	2,629

- e. The table below identifies the dollar amount of credit card/debit card fees charged to the Company by Speedpay, as described in the Company’s response to PUC 1-3, that would have otherwise been assessed to customers paying with a credit/debit card from July 2020 through March 2021.

Month	Dollar Amount
Jul-20	\$75,623.45
Aug-20	\$79,052.20
Sep-20	\$83,859.75
Oct-20	\$88,924.75
Nov-20	\$81,913.05
Dec-20	\$86,575.50
Jan-21	\$95,246.75
Feb-21	\$91,926.70
Mar-21	\$112,705.15

- f. The table below identifies the dollar amount of ACH/electronic check fees charged to the Company by Speedpay, as described in the response to PUC 1-3, that would have otherwise been assessed to the customer paying through ACH/electronic check from July 2020 through March 2021

The Narragansett Electric Company
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RIPUC Docket No. 5022
COVID-19 Emergency
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PUC 1-7, page 4

Month	Dollar Amount
Jul-20	\$4,053.55
Aug-20	\$4,167.85
Sep-20	\$4,340.09
Oct-20	\$3,636.00
Nov-20	\$3,991.42
Dec-20	\$4,342.51
Jan-21	\$4,439.47
Feb-21	\$4,824.10
Mar-21	\$6,648.45

- g. The Company cannot track the dollar amount of waived late fees on accounts where payments were made because the Company began waiving Late Payment Charges on March 31, 2020. However, as discussed in the response to subpart (b) above, the Company's electric and gas revenue requirements from its last rate case contain revenue credits of \$1,657,294 and \$409,651, respectively. These amounts are a representative level of revenue from late payment charges for a test year that had lower non-residential arrears, and the revenue that would have been generated during April 2020 through March 2021 likely would have been higher due to higher non-residential arrears.
- h. The Company does not differentiate between interest fees and late fees. Please see the Company's response to subpart 7(g) above.

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COVID-19 Emergency
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PUC 1-8

Request:

Please indicate the first date National Grid sent termination notices to customers with dates not affected by a Commission decision (in other words, the utility could follow through with a physical termination on or after the notice period if payment or a payment arrangement was not made). Please break out by customer class if applicable.

Response:

The first Commercial and Industrial disconnect notices the Company sent to customers with dates not affected by a Commission decision were sent on September 2, 2020.

National Grid began sending disconnect notices to Residential customers on April 30, 2021.