



**Statement to the Rhode Island Public Utilities Commission Requesting  
an Extension of the Moratorium on Utility Shutoffs**

**April 9, 2020**

**Stephanie Geller, Deputy Director**

**Rhode Island KIDS COUNT**

Rhode Island KIDS COUNT would like to thank the Public Utilities Commission (PUC) for suspending service terminations and collection activities through April 15, 2020. But it is critical that the PUC do more. As a result of COVID-19 and the Governor's Stay-at-Home order put in place to protect our residents' public health, families are home from work, school, and child care. During this period, they need consistent and reliable access to utilities to meet their basic needs, ensure their health and safety, and support children's access to distance learning.

We ask that the PUC extend the moratorium on shutoffs for low-income households through at least the end of this school year or end of June.

Thank you for making decisions that support the well-being of Rhode Island children and families during this public health crisis.



## CITY OF PROVIDENCE

Jorge O. Elorza, Mayor

April 9, 2020

**TO:** Margaret Curran, Chairwoman  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

Dear Chairwoman Curran,

Firstly, on behalf of the residents of Providence, I'd like to thank you and your colleagues on the Commission for taking swift action to support residents experiencing financial hardship due to the outbreak of COVID-19. The steps you took helped provide stability and peace of mind to our residents during this unprecedented and uncertain time.

I'd also like to thank our utility partners that have voluntarily extended the moratorium beyond the initial guidance provided by the Commission.

I am writing to express my support for an extension of the existing moratorium on utility shut-offs. I am also asking that the Commission consider extending the moratorium until the Governor's Emergency Declaration has ended.

Thank you for your consideration in this matter.

Sincerely,

A handwritten signature in black ink, appearing to be "J-O-Elorza", with a long horizontal stroke extending to the right.

Jorge O. Elorza

Mayor, City of Providence

### OFFICE OF THE MAYOR

Providence City Hall | 25 Dorrance Street Providence, Rhode Island 02903

401 421 2489 ph | 401 455 8823 fax

[www.providenceri.com](http://www.providenceri.com)

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: SUSPENSION OF SERVICE TERMINATIONS :  
AND CERTAIN COLLECTIONS ACTIVITIES : DOCKET NO. 5022  
DURING THE COVID-19 EMERGENCY :

**PUBLIC COMMENT**  
**Submitted by the R.I. Center for Justice**  
**on behalf of the George Wiley Center**

On March 16, 2020 and March 30, 2020, the Public Utilities Commission (PUC) voted to enter emergency orders, effective through April 15, 2020, to prohibit regulated electric, natural gas, water, and sewer utilities to cease termination of service for nonpayment, cease sending past due accounts to collection agencies, and to refrain from sending termination notices with shut-off dates prior to April 15, 2020 for all customers. **Absent a vote to continue the order or modify the orders, they will both terminate at 12:01 a.m. on April 16, 2020. The PUC will consider whether to continue or modify the order on April 13, 2020.**

We write to advocate that the PUC continue in full effect its COVID 19-related Emergency Orders prohibiting regulated electric, natural gas, water and sewer utilities from terminating service for nonpayment, sending past due accounts to collection agencies, and sending termination notices with shut-off dates prior to April 15, 2020 for all customers.

The PUC acted affirmatively on March 16 and March 30 to protect Rhode Island businesses and individuals during an unprecedented public health emergency. This important step, initiated by the PUC itself, has been a tremendously important and positive step in permitting individuals to follow governmental instructions to remain at home, work from home and maintain social distancing and quarantine in service to saving lives and limiting the spread of the pandemic. It has also provided much needed protection and utility continuation to businesses that have largely been shut down, and thus separated from their revenue stream, by critically important public health orders.

As discussed more fully below we request that the PUC Emergency Orders continue in effect at least until the conclusion of the declared state of emergency, and for residential customers and low-income customers, for specific periods beyond the conclusion of the state of emergency.

**A) The Public Health Imperative for Utility Continuity During the Pandemic Justifies the Economic Impact of the Continuation of the Emergency Orders:**

The PUC has been diligently gathering detailed information from utility providers to ensure that the critical public health infrastructure services provided by the regulated utilities for sanitation and sheltering in place are maintained during the duration of the emergency and are sustainable after the emergency ends. Utility responses to the PUC requests for information about the impact of the emergency orders generally report that although revenues from both business and residential accounts are significantly diminished for some, but not all, regulated utilities due to the public health emergency, the utilities are projecting an ability to maintain positive cash flow and continue operations notwithstanding those temporary revenue reductions. This argues in favor of continuation of the Emergency Orders given their important public health impact. Many utilities have indicated their willingness to continue to forego termination activity during the pandemic in support of the health of the community.

The Governor and the Director of Health need Rhode Islanders to stay at home in order to save lives. They have asked almost all public-facing businesses to remain closed to the public or severely curtail their public operations. The continuation of the PUC's appropriate action in protecting businesses and individuals from utility termination activities at this critical time is strongly supportive of these public health imperatives. Businesses and individuals would be less able to accept these necessary public health restrictions if they are concerned that their compliance will result in utility terminations. Essential hygiene and public health requirements make it absolutely imperative that utility service continue in homes where Rhode Islanders have been asked to remain, now more than ever.

**B) Schools, Retail Businesses and Courts Remain Physically Closed At Least Through Mid-May and the PUC Emergency Orders Should Remain in Place During the Duration of These Closures:**

Governor's Executive Order 20-18, issued on April 8, extended the state of emergency through at least May 8, 2020<sup>1</sup> and this continuation of the state of emergency is projected to extend beyond that date depending on the ongoing and changeable modeling of the duration of the epidemic itself in Rhode Island. This ongoing state of emergency is accompanied by a wide array of Executive Orders significantly curtailing public activity for businesses and individuals designed to support social distancing and self-quarantine. These measures serve to slow the spread of the virus and save lives in Rhode Island.

The R.I. Supreme Court issued Executive Order 2020-09, also on April 8, extending the closure of the R.I. courts for all but emergency matters through May 17<sup>2</sup>. This action is taken to avoid the congregation of the public in courthouses and thus serves to slow the spread of the virus and save lives in Rhode Island.

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<sup>1</sup> <http://www.governor.ri.gov/documents/orders/Executive-Order-20-18.pdf>

<sup>2</sup> <https://www.courts.ri.gov/Courts/SupremeCourt/SupremeExecOrders/20-09.pdf>

All Rhode Island elementary and secondary schools are closed until at least May 1, 2020<sup>3</sup>, a closure which may well continue through the end of the traditional school year. Rhode Island institutions of higher education have closed their physical campuses and are operating exclusively online for the balance of the semester. Higher education institutions have rescheduled graduation exercises previously scheduled to occur during May and June. Most of these graduations are now projected to take place in the Fall. The Governor and the Director of Health have determined that these drastic measures are necessary to save lives.

While the state of emergency continues and the courts remain closed, utility customers cannot conduct their businesses as usual and cannot resolve economic disputes through the courts. This may significantly impair the ability of some business and individual customers to balance economic pressures and meet their utility payments. If the economy is to recover after the immediate public health emergency has passed, these customers should be protected from utility terminations at least during the duration of the official state of emergency and period of limited access to the courts. This protection is absolutely critical to the ability of these businesses and individuals to return to their economic activities and enable them to pay their utility bills when they resume post-state of emergency activity.

All of the above policy bases for the continuation of the PUC Emergency Orders apply to all Rhode Island utility consumers. For low-income utility consumers however, one of the most important considerations for continuation of the Emergency Orders may be the impact of utility continuity on public education during this public health crisis.

*As long as public education is being conducted through distance learning in the homes of Rhode Island's 150,000 school children, residential consumers must be protected from utility termination.* The requirement for access to public education is specifically provided for in the Rhode Island Constitution<sup>4</sup> and in a myriad of statutes found at Title 16 of the R.I. General Laws. The most basic of these is the mandatory attendance or truancy law<sup>5</sup>. Without utility service Rhode Island's students literally cannot access their public education as long as their physical school sites remain closed. Distance learning does not exist without utility service in the home. A utility termination during a pandemic-imposed period of distance learning becomes a public education termination. Rhode Island's schoolchildren are relying on the PUC to extend protection from utility termination for at least low-income residential customers until such time as they are again able to attend a physical school.

### **C) Record Breaking Unemployment Levels Require the Continuation of the PUC Emergency Orders:**

There were over 15,000 unemployment claims filed in a single day on Tuesday, April 7<sup>th</sup>. This volume of claims surpassed the filings during the highest month of filings for the prior year and this single day of filings represents an amount equal to roughly 25% of *all claims* filed during the past year. Over 100,000 unemployment claims have been filed in Rhode Island since March 9.<sup>6</sup>

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<sup>3</sup> <https://www.ride.ri.gov/>

<sup>4</sup> R.I. Constitution, Art. XII, §1

<sup>5</sup> R.I.G.L. 16-19-1

<sup>6</sup> *R.I. Sets New Daily Record for Unemployment Claims, Providence Journal, April 8, 2020.*

The over 100,000 unemployment claims filed since the public health emergency began represents nearly 20% of the roughly 550,000 members of the civilian labor force in Rhode Island.<sup>7</sup> This is a staggering and entirely unprecedented level of unemployment in our state. These workers have been abruptly separated from employment and from stable income due to no fault of their own by the action of a global pandemic. These residential households should be protected from utility termination at least during the duration of the state of emergency and the many Executive Orders restricting their economic activity. This protection is needed to literally save lives by slowing the spread of the virus. Low-income utility consumers should be protected for a further specific period, best determined in consultation with public health officials at the appropriate time, in order to ensure that the basic residential public health and hygiene requirements for which utility continuity is essential are met in order to prevent a second round of epidemic spread.

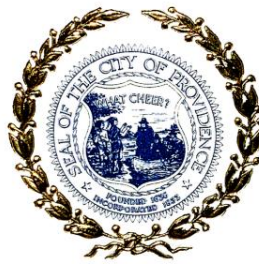
Respectfully submitted,



Jennifer L. Wood #3582  
Executive Director  
Rhode Island Center for Justice  
1 Empire Plaza, Suite 410  
Providence, RI 02903  
(401) 491-1101  
jwood@centerforjustice.org

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<sup>7</sup> U.S. Bureau of Labor Statistics, [R.I. Labor Force Data, Data for 2019 extracted April 8, 2020](#).



Sabina Matos  
Council President

**VIA – Email**

April 8, 2020

Margaret Curran, Chairwoman  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Suspension of Service Terminations and Certain Collection Activities During the COVID-19 Emergency – Docket #5022**

Dear Chairwoman Curran,

The Members of the Providence City Council urge you to continue your agency's moratorium of utility shut-offs until the COVID-19 pandemic has subsided. Additionally, we wish to extend our gratitude to National Grid and other agencies who have already stated that they would extend the moratorium under their own volition.

We appreciate the proactive action you took in March, and hope that you will continue the moratorium until the Emergency Declaration issued by Governor Raimondo is lifted.

Please know that you have the full support of the City of Providence regarding this matter, and in fact we are requesting that you extend the moratorium further if the Governor extends her Emergency Declaration around COVID- 19.

Thank you for your advocacy for the residents of Rhode Island.

Sincerely,

Sabina Matos, President  
Providence City Council  
Councilwoman – Ward 15

## Massaro, Luly (PUC)

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**From:** Ritchie, Dannie <dannie\_ritchie@brown.edu>  
**Sent:** Thursday, April 9, 2020 4:13 PM  
**To:** Massaro, Luly (PUC)  
**Cc:** georgewileycenterri@gmail.com  
**Subject:** [EXTERNAL] : RI Public Utilities Commission Order No. 23786 Comment

Dear Luly Massaro,

It is commendable that Order 23786, to suspend utilities shut-offs, was issued by the Public Utilities Commission. This is a great step to help protect the public health of our families, friends and neighbors during this COVID-19 crisis. However, if anything this crisis has made clear is how many low-income people live lives that are very unstable because of their low wages. Many are juggling to cover rent, food, transportation and utilities and many times are not able to afford to pay the expensive utility bills as a trade off to maintain a roof over their head and not go hungry. It is through no fault of their own that they are in such precarious positions, they are the unseen people that have been essential to our economy but yet expendable. I write to ask the Commission to recognize and see that the people who work so hard and are not seen and place a permanent moratorium against utility terminations and to improve accessibility to utilities.

However, the way to make a real and even more meaningful difference, especially for low-income people, is in addition to putting in place a permanent moratorium on shut-offs for low-income households that you enact emergency utility restoration for all low-income households without any down payment as well as implement an immediate percentage income payment plan. These acts by the Commission will go far to create more livable conditions for some of the most essential people in RI and make utilities affordable for everyone

Most sincerely,

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Dannie Ritchie, MD, MPH  
Founder, Community Health Innovations of Rhode Island  
401 359 3315  
[dannie\\_ritchie@brown.edu](mailto:dannie_ritchie@brown.edu)  
Website: [chi-ri.org](http://chi-ri.org) [[chi-ri.org](http://chi-ri.org)]  
[www.facebook.com/chirihealth](https://www.facebook.com/chirihealth) [[facebook.com](https://www.facebook.com)]  
[Plan4Health Mt Hope](https://www.facebook.com/Plan4HealthMtHope) [[facebook.com](https://www.facebook.com)]



The Honorable Margaret Curran  
Chairperson  
Rhode Island Public Utilities Commission  
89 Jefferson Blvd  
Warwick, RI 02888

April 8, 2020

Dear Chair Curran:

I write today to respectfully ask the Public Utilities Commission to extend the prohibition on regulated electric, gas, water, and sewer utilities from cutting off service for nonpayment until the state's public health emergency declaration is lifted.

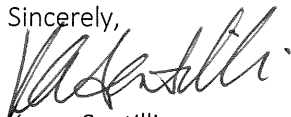
Research has shown over and over again that housing is health care. It's also shown that a utility shut off can often be the catalyzing event that forces an individual or a family to lose their home, sending them scrambling in search of emergency shelter.

In order to fight the coronavirus crisis, Rhode Islanders need to maintain safe, secure housing. Extending the Commission's prohibition on service cut offs will save lives. Families and individuals experiencing homelessness are more vulnerable to infectious diseases due to lack of access to primary care, mobility, and poor health status from extended episodes of homelessness. During this state of emergency and the economic upheaval it has caused, we must do all we can to mitigate the spread of coronavirus, and that includes taking every measure possible to ensure that emergency shelters are not overrun.

I have been inspired and deeply grateful for the proactive measures many utility companies have taken to suspend shut offs. We cannot, though, rely solely on corporate altruism. We need to maintain regulatory action that protects Rhode Islanders who have lost their jobs or struggling through no fault of their own.

I personally appreciate your action on this topic. Crossroads RI joins other shelter providers from across Rhode Island to strongly urge the Commission to extend all prohibitions on utility cut offs until Governor Raimondo lifts the public health state of emergency.

Sincerely,



Karen Santilli  
President & CEO  
Crossroads RI



April 9, 2020

Public Utilities Commission

Re: Docket No. 5022

To the Commission:

The Economic Progress Institute (EPI) is a nonpartisan research and policy organization dedicated to improving the economic well-being of low- and modest-income Rhode Islanders. We write to strongly urge the PUC to continue the emergency orders to prohibit regulated electric, natural gas, water, and sewer utilities to cease termination of service for non-payment, cease sending past due accounts to collection agencies and to refrain from sending termination notices.

Protecting customers against utility shut-offs for the duration of the state of emergency is critical. But it is equally important to restore service to customers and to put in place a long-term solution to make utilities affordable. Therefore, we also request that the Commission take two additional steps: provide for emergency utility restoration for all low-income households without requiring a down payment and implementation of the Percentage of Income Payment Plan (PIPP).

Maintaining utilities during this emergency is vital to support the Governor's orders designed to protect public health and economic stability, including stay-at-home order, distance learning, working from home, frequent hand-washing and maintaining a virus-free environment at home.

Low-income residents, those who work at low-wage jobs and those who rely on public assistance programs, have always struggled to meet basic needs of housing, utilities, food, and clothing. Those who have already lost utility services – particularly electricity – should have service restored as quickly as possible so they can comply with the public health requirements. Restoring the PIPP will promote payment of bills by low-income residents.

We do not minimize the need for utility companies to be paid for services provided so they can meet their financial obligations. At this moment, however, the needs of customers to critical services must be paramount. Federal and state relief may be available over time to ensure that utility companies are able to continue to provide services.

Thank you for your consideration of these comments.

Linda Katz

Policy Director

## Massaro, Luly (PUC)

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**From:** Paula McFarland <pmcfarland@pawthousing.org>  
**Sent:** Thursday, April 9, 2020 12:00 PM  
**To:** Massaro, Luly (PUC)  
**Subject:** [EXTERNAL] : RE: STOP Termination of Vulnerable Residents of RI  
  
**Importance:** High

### PUC Hearing scheduled for April 13, 2020

In making its decision, the PUC will consider whether the State of Rhode Island is still under a state of emergency, whether businesses are open, whether people are still under a “stay at home order,” the unemployment rate in Rhode Island, if known, and whether collections have significantly impaired or are likely to impair the ability of the utilities, particularly non-investor owned utilities from meeting financial obligations, among any other information make available to the PUC.

### Our comments are as follows:

The PUC should cease any termination of services for nonpayment of rent until more than 30 days after the call by the Governor of the State of RI in returning our State to work and play. The PUC should come under the guidance of the Governor of the State of RI when deciding to prohibit the regulations of electric, natural gas, water and sewer utilities for termination of these services for nonpayment, cease sending out any past due accounts to collection agencies and refrain from sending termination notices with shut-off dates at least 30 days after the Governor has allowed the State of Rhode Island to return to regular activities of work and play environments.

It is essential as children need to learn, families, disable, and elders residents of Rhode Island need access to food, and their food supplies are generated by electricity. They need access to warm water, which is generated by natural gas or electricity. It is not the time to effectively put vulnerable residents of Rhode Island in furthering socio-economic disruption.

Thank you in advance, as I’m sure you will make the right decision for all the residents of Rhode Island.

Stay safe,

Paula McFarland  
Executive Director  
Pawtucket Housing Authority  
214 Roosevelt Avenue  
P.O.Box 1303  
Pawtucket, RI 02862-1303  
Direct Line: (401) 721-6010  
Cell Line: (401) 255-0607  
Fax: (401) 723-3970



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April 9, 2020

To: Margaret Curran  
Chairperson, RI Public Utilities Commission

Re: Docket No. 5022, Suspension of Service Terminations and Certain Collections Activities During the COVID-19 Emergency

Dear Chair and Commissioners,

422 Post Road  
Warwick, RI 02888  
401-467-9940  
www.ricadv.org  
ricadv@ricadv.org  
24-hour Helpline:  
800-494-8100

On behalf of the Rhode Island Coalition Against Domestic Violence, its network of member agencies, and SOAR, our taskforce of survivors, we are submitting comments in response to Docket No. 5022, Suspension of Service Terminations and Certain Collections Activities During the COVID-19 Emergency. Domestic violence victims are at a heightened risk of further abuse as the “stay at home” order keeps victims in close quarters with their abusers. COVID-19 has severely impacted employment and resulted in loss of wages for many low-income families, particularly domestic violence victims and their children.

#### **Member Agencies**

Blackstone Valley  
Advocacy Center  
  
Domestic Violence  
Resource Center of  
South County  
  
Elizabeth Buffum  
Chace Center  
  
Sojourner House  
  
Women’s Resource  
Center

**Last year in 2019, our member agencies served over 10,000 individual victims and their children, many of whom were from low-income families.** Poverty and income inequality are root causes of domestic violence. Financial insecurity is a prominent reason that victims are unable to leave an abusive relationship and leads to homelessness and housing insecurity. No victim of domestic violence should have to choose between economic security and their own safety, particularly if they are housing insecure. Abusers often sabotage a victim’s employment options, force them to surrender their wages, or damage their credit, furthering their financial insecurity.

#### **Task Force**

Sisters Overcoming  
Abusive Relationships

**We ask that the Public Utilities Commission consider domestic violence survivors and their families when considering these policy recommendations:**

- **Put in place a permanent moratorium against utility terminations and improve accessibility to utilities during the COVID-19 public health crisis.**

Now is the time for RI to lead on this issue and break the cycle of unfair shut offs on low-income families who have for too long have been forced to pay disproportionately higher utilities compared to more affluent households.

- **Emergency Utility Restoration for all low-income households without any down payment.**

The RI PUC passed a 10% deposit of back bills down for restoration which we support for affluent households but we demand that those who can’t afford the 10% (those eligible for LIHEAP assistance) should not be punished with higher health risks based on their inability to pay a 10% deposit to profit the utility company. The RI PUC should mandate that all utilities restore electric, gas and water to low-income households. RI needs to follow the lead of water departments who have agreed to reconnect households currently without running water without fees to address the coronavirus pandemic.

- **Immediate Implementation of the Percentage Income Payment Plan (PIPP).**

With this order the RI PUC says that: “*Utilities are encouraged to offer flexible payment plans to all customers facing financial hardship, even short-term, during this time.*” We know that utilities need clear instruction and enforcement. Therefore, we expect our public officials to be more specific and to order that utilities not charge LIHEAP eligible consumers more than 2% of their income for electric and not charge a total of more than 4% of their income for electric and heat or electric and gas.

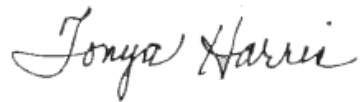
#### **Affiliate Members**

Center for Southeast  
Asians  
  
Crossroads Rhode Island  
  
Family Service of Rhode  
Island  
  
Progreso Latino  
YWCA Rhode Island

We expect National Grid to voluntarily agree to these fairer percentages to avoid adding regressive costs to low-income households' energy burden. National Grid should stop jeopardizing the health of low-income households who continue to suffer from disproportionately high utility costs because of the lack of a Percentage Income Payment.

It is imperative that domestic violence victims and their families continue to have these protections during this public health and economic crisis. Domestic violence survivors may suffer further harm, including homelessness and severe violence, if they cannot pay their utilities. For all of these critical reasons, the Rhode Island Coalition Against Domestic Violence strongly encourages the proposed policies regarding continued suspension of service terminations and certain collections activities during the COVID-19 emergency. Thank you for the opportunity to submit comments regarding this moratorium and for your consideration of our concerns.

Sincerely,

A handwritten signature in cursive script that reads "Tonya Harris".

Tonya Harris  
Executive Director  
RI Coalition Against Domestic Violence



133 Delaine Street  
Providence, RI 02909

Dear Luly Massaro,

SISTA Fire is a member-led organization that is building collective power with and by women of color for social, economic and political transformation in Rhode Island. As an organization that works directly with Black, Southeast Asian, and Latinx communities - we are seeing firsthand the economic impact of the COVID-19 pandemic. For example, a single mother household with children are not able to keep up with their bills because their hours were cut at work or they were laid off due to this public health crisis.

**We have witnessed people having to choose whether to purchase food, pay rent, or utilities.**

This is not the time to create further barriers for community members, but the time to work through this together. If one community is struggling, then all communities are struggling. A family shivering in the cold during this COVID-19 pandemic is more likely to get sick and contract the virus because of the cold. A family that is not able to access gas to make food can end up being malnourished causing the immune system to be compromised. Both scenarios can further exacerbate the public health crisis!

We are deeply concerned with the lack of response by political officials and the RI Public Utilities Commission to support vulnerable communities during the COVID-19 pandemic.

We are asking you to:

- Immediately enact a permanent moratorium on shut-offs for low-income households in Rhode Island.
- The Restoration of Emergency Utility (Gas & Electricity) for all low-income households without any down payment in Rhode Island.
- The immediate implementation of the Percentage Income Payment Plan (PIPP) for low-income households and the working poor.

In Community,

**Ditra Edwards**  
Director

**Chanravy Proeung**  
Political Director

50 Valley Street  
Providence, RI 02909-2459  
Phone (401) 444.0600  
Fax (401) 444.0635  
[www.LIVEUNITEDri.org](http://www.LIVEUNITEDri.org)



April 9, 2020

**The Honorable Margaret Curran  
Chairperson  
Rhode Island Public Utilities Commission  
89 Jefferson Blvd  
Warwick, RI 02888**

**Dear Chair Curran:**

United Way of Rhode Island (UWRI) urges the Public Utilities Commission to extend the emergency order that prohibits collection activities and service terminations for regulated utilities including electric, gas, water and sewer. During the COVID-19 crisis we have been hearing daily from Rhode Islanders about their struggles through 2-1-1, our 24hr. information and referral line. 2-1-1 has received 500 calls a day and many of those calls have been related to basic supports around housing and utilities. Before COVID-19, the need for utility assistance ranked high for Rhode Islanders with over 57,000 requests for utility assistance in 2019. With data pointing to so many Rhode Islanders in need of relief we must take action to ensure our community has access to safe, secure housing.

This is an unprecedented crisis and we applaud the Public Utilities Commission for taking immediate action at the beginning of this endeavor. We encourage you to continue and we recommend further action such as mandating restoration of gas, electric and water for low-income individuals. Also, we encourage implementation of the Percentage Income Payment Plan (PIPP) to create clear instruction and enforcement for utility companies to support low-income Rhode Islanders during this time. Taking these actions will help fight against the spread of the virus but also provide much needed financial supports to those in need.

Thank you for your time and consideration.

**GIVE. ADVOCATE. VOLUNTEER.**



George Wiley Center Comments  
RE Docket 5022  
Submitted April 13, 2020  
To: the Rhode Island Public Utilities Commission

Dear Commissioners,

Please accept these updated comments from the George Wiley Center. Thank you for your directives last month to provide relief for Rhode Island utility customers. We are writing to encourage you to continue and strengthen the utility protections set forth due to the ongoing Covid19 pandemic. This moment in history has shown the gaps in our society's social safety net, even in prior "normal" times. There has been a spotlight on various issues of economic and social inequality, including morbidity disparities in marginalized and communities of color, unsustainable low wages for many frontline workers, unequal access to healthcare, housing, and food, and also on utility service as a basic need. Around the country and world, elected officials and community members are pushing for protections to ensure that utility services of heat, electricity, water, sewage, and communication remain in place for households during this crisis. The silver lining in these times is that we are given an opportunity to solve some of society's inequities, not only in the short term, but also more long term, to create compassionate policies for a more humane and sustainable future.

The George Wiley Center is a grassroots group with a major focus in recent decades on advocating for utility consumer rights. While our office is currently closed to walk-ins and in-person meetings, and most of our staff and volunteers are at home, we are still communicating and offering assistance to people facing shut-off, via phone, email, and social media. I have personally heard from many people who are facing multiple issues, concerned not only about utility termination, but also eviction, deportation, and food access. Our lives and concerns are intertwined, and we see how an inability to afford utility service can exacerbate other challenges and access to basic needs, and vice versa. In this era when everyone is under stress, we hope the PUC will take decisive action to alleviate the extra stress of worrying about utility termination.

When the state of Rhode Island tells residents to shelter at home for their and the entire state's well-being, homes must be habitable. Having access to running water, hot water, heat, electricity, and sewer are necessities of a habitable home, now more than ever. In addition to access to utility service, there comes an extra anxiety if a household is protected for only a short period of time, yet left with the perpetual fear of imminent shut-off. We are asking the PUC to extend shut-off protections, allow immediate utility restoration with no down payment for low-income households, to find ways in which payments can be alleviated rather than left to accrue, as well as provide a path toward a long term fix by implementing a PIPP (percentage income payment plan).

For people who have never been shut off or faced shut-off, utility service is something that plays as a background to daily life. It's one of those things that many don't recognize how important it is until it's gone, whether due to the occasional weather outage or deliberate shut-off for nonpayment of bills. The George Wiley Center strongly advocates for utility service as a basic need at all times, pre- and post-pandemic as well, and during these times the stakes are even higher.

With many people staying at home nearly 24/7 during the pandemic, our homes' livability is critical. We need heat to keep ourselves warm and healthy. We need electricity to attend school and work meetings, charge our phones to keep in touch with loved ones we can't visit, and stay informed of daily news and updates. Per governmental directive, we use water to wash our hands, do our laundry, and clean our homes. We store extra food in freezers and refrigerators and cook meals at home all day long. We use our computers and phones to access vital services such as unemployment insurance, updating our healthcare plans, and consulting our doctors. From home we rely on our utilities to reach mental health services, peer and recovery support groups. We plug in electric wheelchairs to get charged up, we turn on our sewing machines to make protective cloth masks, we put on the tv to watch movies and unwind from the extra stress of the pandemic. In addition to the ways in which homes are typically used, they have now also become de facto schools for kindergarten through college. Homes are now workplaces, illness recovery centers, restaurants, gyms, doctor's offices, public meeting spaces, and public service arenas. And for those who have no access to utility service, there is no escape to the public library or cafe or church to warm your hands, use the internet, or charge your cell phone.

Even in times prior to the pandemic, many households have to juggle bills, deciding from one month to the next what will get sacrificed: food or a child's new shoes, electricity or health insurance. With the current crisis and unemployment sky rocketing, these bill juggling decisions have become more widespread and more intensified for those who had already faced longer term economic insecurity. Even in pre-pandemic times the charitable organizations that help people pay utility bills are overwhelmed, but now with the extra multiple areas of need we can not expect these organizations to be able to cover everyone's bills. Furthermore, social service agencies, food banks, and hotlines are being inundated, making it even more difficult for people to seek assistance. With utility shut-offs often being a factor that leads to homelessness, it is vital to keep as many people in their homes at this time, when congregate settings are deemed a high risk for contagion and homeless shelters are stretched thin with services. Many people who have applied for Unemployment Insurance are still waiting to receive benefits and have experienced a major loss of income. And with people staying at home all day using additional utility services (that would normally be used at their schools, workplaces, etc.), we can anticipate that incurred utility bills will be even higher than normal. This is a terrible combination: relying on services that are critical to most aspects of life, facing higher payments for such services at the moment when you can least afford it, and living with the ongoing stress of an upcoming termination after the crisis is over because back bills have piled up.

For the above reasons, we hope the PUC agrees that utility services, including water, electricity, gas, and sewer are basic needs, now and always. The George Wiley Center is asking that you implement the following using your powers in the interest of public health and well-being:

1. Continue a moratorium on utility shut-offs for the duration of the pandemic and implement a permanent moratorium on shut-offs for low-income households
2. Require restoration of utility service with no down payment for low-income households
3. No penalties for missed payments, including for the AMP program, for the duration of the pandemic
4. Cancel or deeply discount utility payments, so as not to accrue large back debts, for low-income households for the duration of the pandemic
5. Emergency implementation of a PIPP (percentage income payment plan) program for the long term, for low-income households

While we thank National Grid for acting in accordance with the PUC's directives, we also think the company can do more. For instance, due to the Covid19 pandemic, Cox Communications has offered to provide internet service to low-income households for free for the first month, with a deeply discounted \$10/month bill in the months after. We saw the data from National Grid in answer to the questions raised by the PUC regarding any changes in the company's income. National Grid reported a dip in income, but did not quantify or correlate the corresponding rise in temperature and length of daylight, which could also contribute to a decrease in demand and therefore income for the company. When further analyzing National Grid's financial status, we recommend the following additional inquiries:

What is the yearly and monthly profit from National Grid's business in RI (electric and gas) for the past 5 years?

What is the difference in profit National Grid has made, comparing month to month averages, in the time period since the company's allowable profit margin was significantly increased as part of the rate case settlement in 2018?

The company cites extra costs incurred for cleaning during the pandemic. It would be useful to know other cost differences that have resulted from the pandemic. For instance, what if any cost differences has the company incurred or saved on, due to staff largely working from home and offices being semi-shut (ie not using company office utility services), if applicable? What if any savings has the company had in terms of staffing expenses, if any employees have been laid off due to the pandemic?

We are aware that National Grid has been in communication with the federal government, inquiring about "critical services infrastructure". What if any funds does the company anticipate receiving from the federal government? This is a moment when large corporations such as National Grid can step up to support the communities that have enriched them. We think there are many ways the company could voluntarily alleviate utility bill burden, for example creating a hardship fund, using some profits from prior years to forgive bills for low-income households, volunteering to forgo profits during the economic crisis, cutting CEO and executive salaries and bonuses, committing to pass on federal Covid19 stimulus funds to ratepayers, deeply discounting rates for low-income households, and/or implementing a PIPP program.

In addition to National Grid's role, we hope the PUC and Division of Public Utilities will also use their power and relationship with various stakeholders to come up with creative solutions to protect our communities while keeping the various local utility companies whole. This could include working with elected officials on the federal and local level to use any CARES Act or other federal funds toward maintaining public utility service and directly paying consumers' bills, or as previously mentioned enacting a PIPP program.

While no one can physically attend today's open meeting, many are waiting in anticipation for the PUC's decision. Over the past few years we have had almost two thousand Rhode Islanders sign our petition for PIPP, both people who have themselves struggled with affording utilities and people who are concerned for our fellow community members' access to basic needs. Below are just a few statements from people who have signed in the past few weeks.

*"Currently no heat or hot water. Also have three school age children in my home. One of whom has a "medical protection" in place. All three boys started colds yesterday. National Grid refuses to take a down payment of a huge bill to restore service. My boys have started colds due to no heat or hot water to fight the germs. I have called them numerous times at an attempt to pay a down payment and restore service, each time being told the whole bill needs to be paid to restore. \$2,700 of the bill isn't even mine to pay. That amount was transferred to me the day I turned the gas on! National Grid set me up in the hole that I can't get out of." - Amie from Riverside (EP) 3/22/2020*

*"It was about 2 weeks, and due to being laid off from work. It made living there difficult, especially when it was cold. I relied on going to other buildings or my car to stay warm, and buying gallons of water and refilling them for showers and cooking." - Dominique, Cumberland 3/22/2020*

*"For about a week. It was awful because I have children so it was really hard for them due to the fact that it was the cold around the time that it happened." -Tatiana, Johnston 3/22/2020*

*"There have been times when I was threatened to have my power shut off and had it shut off once. I had to take out a loan to have power restored, unable to pay these loans back I had to file bankruptcy, in turn this damaged my credit making it difficult to rent."-Jay, West Warwick 3/20/2020*

*"I remember it was for a few months. Showering cold was very uncomfortable. Heat was off and made living in the house difficult without always wearing multiple layers. Access to in home utilities such as tap water, heat, electricity, and natural gas, should be, in my opinion, a human right." -Christopher, Johnston 3/19/2020*

*"Due to another tenant in my dwelling not being able to afford the bill & not being able to access the dwelling, they shut off service to the entire dwelling." -Dwayne, Providence 3/18/2020*

In this moment, we hope the PUC will consider this opportunity to fix structural inequities that have existed in our utility service systems for too long. We urge you to enact protections for an extended time so people don't have to carry the extra stress of not knowing when they may be shut off, once the crisis is officially deemed to be over. We also hope you will find a way to eliminate accruing bill payments for low-income Rhode Islanders for the duration of the pandemic, so when the economy opens back up there will not be a spike in shut-offs and an intensification of existing economic inequality. Thank you for your leadership on this issue and for considering the public health and well-being of Rhode Islanders.

Sincerely,

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