

April 25, 2023

The Honorable Joseph J. Solomon, Jr.
Chairman, House Corporations Committee
Rhode Island State House
Providence, Rhode Island 02908

RE: H-5847 – Relating to Public Utilities & Carriers – Tiered Percentage of Income Payment Program (PIPP)

Dear Chairman Solomon:

On behalf of Rhode Island Energy (RIE), I write regarding H-5847, which would authorize the Public Utilities Commission (PUC) to approve a tiered percentage of income payment program (PIPP) for electric and natural gas customers. As proposed, the program would apply to customers whose household income is at or below 150% of the federal poverty level and who are eligible to receive assistance through the low-income home energy assistance program (LIHEAP) or are enrolled in Medicaid.

RIE appreciates the leadership shown by Representative Slater and community advocates in seeking ways to help utility customers better manage their energy cost burdens. This is a value important to our company, too. Today, RIE supports its customers through assistance programs that include the residential discount rate, arrearage management, and energy efficiency.¹ RIE also connects customers to other federal, state, and community-run programs that offer direct bill relief. This suite of customer programs, along with other available assistance opportunities, are intended to increase energy affordability for customers who need it most.²

RIE stands ready to work with this Committee, bill sponsors, utility regulators, and valued stakeholders in constructing a viable path forward for PIPP. For this effort to be successful, it will be important to consider the incremental costs associated with any new program to ensure that it does not result in overly burdensome administration costs, and to appropriately align that new program with other existing assistance programs, being mindful not only of our most vulnerable customers, but of all other ratepayers, too.

To facilitate a productive path forward, RIE respectfully offers the following:

- RIE is amenable to a process by which the utility would file a proposed percentage of income payment plan program design with the PUC *by July 1, 2024*, after which a PUC review process would commence.

¹ As noted, RIE implements/facilitates several important programs available to income-eligible customers, such as 25-30% bill discounts, an Arrears Management Program, budget and balanced billing, LIHEAP Enhancement Fund collections, and energy efficiency services offered at no-cost for qualified customers.

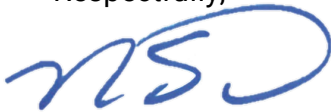
² RIE also hosts Customer Assistance Expos in local communities, which provide a "one-stop shop" for customers seeking utility and other types of assistance from partner organizations, such as the United Way and DHS. Our next expo will be held on Thursday, April 27th from 2:00–6:00 PM at the West Warwick Senior Center, West Warwick, RI.

- To the extent that the PUC were to approve a PIPP design through such a review process, we respectfully ask that program implementation coincide with approval of the electric and gas distribution company's next general rate filing. There are two important reasons for this: 1) RIE is currently transitioning all of its billing systems from the previous electric and natural gas utility; to support future implementation of a PIPP, we need time to complete this important work; and 2) integration of a PIPP within a general rate case allows the company, regulators, and stakeholders to more holistically account for rate impacts, effects on other programs and investments, and other factors.

RIE has conveyed these concerns to the sponsor and looks forward to being a productive partner in continued discussions around PIPP legislation.

Thank you for your consideration of these comments.

Respectfully,



Nicholas S. Ucci
Director of Government Affairs

CC: The Honorable Members of the House Corporations Committee