

April 4, 2026

The Honorable Robert Britto
Chairman, Senate Commerce Committee
Rhode Island State House
Providence, Rhode Island 02908

RE: S-2013 – Relating to Public Utilities & Carriers – Termination of Utility Services

Dear Chairman Britto:

On behalf of Rhode Island Energy, I write in **opposition** to S-2013, which seeks to amend Rhode Island General Laws pertaining to the termination of utility service for persons who are disabled, seriously ill, or in arrears of payment.

Rhode Island Energy appreciates the sponsor's intent with this legislation but has several concerns. First, it would extend – to a significant degree – the non-termination period for persons who are seriously ill. **This would shift the delicate balance now in place between the need to protect our most vulnerable customers while also ensuring that all other utility customers are not unduly burdened by rising costs associated with uncollectible debts.**

Existing Rhode Island law provides utility customers with the right to request a review of their circumstances with state regulators pursuant to rules, regulations, and court orders after a reasonable period extending beyond written certification of an illness. To emphasize this point, those qualifying as seriously ill today have three weeks' protection with the opportunity to extend this time frame through a request to the Division of Public Utilities & Carriers (DPUC). Extending this protection to three months is arbitrary and unnecessary given the safety net already in place with the ability to request an extension.

Rhode Island Energy also notes the following:

- Page 2, lines 2-3 establish the termination date to be “the last day of the period specified by the physician as the duration of the illness.” **The termination date cannot be the same date as the last day of the illness duration.** Should this legislation advance, we recommend revising the sentence to read as follows: “The termination date shall be no earlier than the day after the last day of the period specified by the physician as the duration of the illness.”
- Page 2, lines 3-6 insulates physicians in a manner that ultimately **shifts cost risks onto non-protected customers.** Physicians should be required to state the anticipated length of illness when known; “fail(ing) to specify” does not seem to be a reasonable excuse to extend the nontermination period out several months by default. To the extent a physician cannot ascertain the length of illness – for any reason – it is prudent to retain the existing three-week duration, which allows for a case-by-case review by the DPUC.

Nicholas S. Ucci
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Finally, please note that the final resolution of a Rhode Island Superior Court case involving the Center for Justice that was pending for eight years¹ addresses the issue at hand through an agreement and consent order, namely, the treatment of seriously ill customers from termination of utility service. Importantly, Rhode Island Energy's customer service system is in alignment with the Court's agreement and consent order. If this legislation were to advance, Rhode Island Energy would need time and resources to implement necessary billing system changes. Respectfully, **legislation of this nature should account for that implementation period and provide for the recovery of costs prudently incurred by public utilities.**

In closing, Rhode Island Energy respectfully asks the Committee to oppose S-2013.

Thank you for your consideration of these comments.

Respectfully,

A handwritten signature in blue ink, appearing to read "NSU", written over a light blue circular scribble.

Nicholas S. Ucci
Director of Government Affairs

CC: The Honorable Members of the Senate Commerce Committee
The Honorable Meghan E. Kallman, Rhode Island Senate

¹ Rhode Island Superior Court, No. PC-15-4214. Ref.: Agreement and Consent Order filed August 7, 2023.