

October 7, 2010

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket No. 1725 – Termination Rules

Dear Ms. Massaro:

National Grid ¹ submits these comments to assist the Commission as it considers the General Assembly's letter requesting a renewal of the Commission's previously adopted interim emergency regulations relative to the down payment and payment-plan required of certain customers in order to restore service after it has been terminated.

In 2009, the Commission issued an order temporarily modifying the Billing and Termination Rules (Order No. 19779). The order applied to the time period October 5 through December 1, 2009, and it allowed residential customers who had been, or were about to be, terminated to have service reinstated under terms that provided for a down payment of either 10%, 15%, or 20%, depending on the amount of the unpaid balance. The order required a payment plan with respect to the remaining unpaid balance for either 18, 24, or 36 months depending on the amount of the outstanding balance. The order also required that participating customers make timely payment of their current bills. Additionally, the customers who had participated in a reduced payment-plan in 2008, and yet had larger arrears in 2009, would be excluded from a participating in the reduced down-payment plan offering.

Recently, in response to Commission's data requests, the Company provided the billing and collections results of the 2009 program. Despite the above-described limitations on participation criteria, the overall level of participation has increased significantly since a similar program in 2008 and active outstanding arrears of participants have dropped by about a total of \$928,000 since this time last year. Taking these results into consideration, for 2010 the Company would support the same reduced down-payment plan terms and conditions as were implemented by the Commission for the designated period in 2009. We also recommend that this treatment be available for the period from October 15 up to and including December 1, 2010 and that it apply to down payments by qualifying customers or pledged by an agency on or before December 1, 2010.

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

Luly E. Massaro, Commission Clerk
Docket 1725 – Termination Rules
October 7, 2010
Page 2 of 2

As always, our Customer Service representatives will work with individual customers to deal with particular customer circumstances, and the Company will work to ensure the safety of our customers this winter.

Thank you for your consideration in this matter. If you have any questions, please contact me at (401) 784-7667.

Very truly yours,

A handwritten signature in blue ink, appearing to read "T. Teehan", with a stylized flourish at the end.

Thomas R. Teehan

Enclosure

cc: Leo Wold, Esq.