

August 17, 2006



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

Dear Ms. Massaro,

New England Gas Company ("Company" or "NEGC") is in receipt of the Rhode Island Public Utilities Commission's ("Commission") memorandum, issued on August 4, 2006, calling for comments regarding the Wiley Center's proposal to institute a summer moratorium on utility shut-offs on days when the temperature reaches 90 degrees or above. The Commission requested comments from electric, gas, and water companies and other interested parties, and docketed this proceeding as Docket No. 3761. The Company appreciates the opportunity to respond to the Wiley Center's request.

As a preliminary matter, the Company agrees with the comments presented by both the Lieutenant Governor and the Division of Public Utilities and Carriers ("Division"), in that the petition is a more appropriate discussion regarding a customer's electricity service rather than all utility services. The Company is not aware of any residential customers who use gas to supply their premises with air conditioning or other temperature control on days of extreme heat, and if such customers exist they are certainly in the minority. This is unlike the winter months when many customers heat their homes with gas. Therefore, the Company is unclear what, if any, benefit would be derived from a summer moratorium on shut-offs for NEGC.

Also, as already raised by National Grid and the Division, there are a number of implementation issues that would need to be clarified by the Commission should it chose to adopt a summer moratorium. These issues relate to the forecast to be relied upon, the customers to be protected in such a moratorium, the duration necessary for a moratorium threshold to be met, as well as the various administrative implementation issues that such a moratorium would pose. It would also be important to know whether the Commission intends for the summer moratorium to be a permanent forward-looking policy or something that is being sought for a limited duration in light of the extreme heat seen in Rhode Island two weeks ago.

Thank you again for the opportunity to provide comments in this proceeding. Should you have any questions please contact me directly at (401) 574-2212.

Sincerely,

A handwritten signature in black ink that reads "Kevin F. Penders". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kevin F. Penders, Esq.
Manager, Regulatory Relations

cc: Service List, Docket No. 3761

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