

August 17, 2007

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

Re: National Grid's Plan to Implement R.I.G.L. § 39-1.1-2.1

Dear Ms. Massaro:

The purpose of this letter is to demonstrate National Grid's¹ plan to comply with the recently enacted legislation prohibiting the termination of gas and electric service in a residence where an infant is domiciled, R.I.G.L. § 39-1.1-2.1. Specifically, the legislation provides:

No gas or electric company shall terminate gas or electric service in any residence in which there is domiciled *a person under the age of twelve (12) months and the customer's service has not been previously shut off for nonpayment before the birth of the child*; provided, that the customer cannot afford to pay any overdue bill because of *financial hardship*.

Thus, the act protects from termination gas and electric customers who have a financial hardship and an infant child under the age of twelve months residing at the location, provided that the service has not been previously shut off for nonpayment prior to the birth of the child.

Infant and Financial Hardship Requirements

In order to protect a customer, National Grid will require proof of an infant living in the house through transmittal of a birth certificate or other verifiable documentation. The Company is creating training and documentation for the internal process of tracking form letters that will be sent to customers when a protection is claimed. Customers who claim a protection will be provided the proper address to send or fax the birth certificate or hospital documentation. National Grid will manually keep a file of these accounts to be removed in twelve months.

The Company will use the definition of "financial hardship" that is contained in the Commission's Regulations Governing the Termination of Residential Service ("Termination Regulations"). According to the Termination Regulations, the financial hardship category contains those families or groups of unrelated individuals residing in one dwelling unit with a combined

¹ Filed on behalf of The Narragansett Electric Company, d/b/a National Grid ("National Grid" or the "Company") for both electric and gas operations.

gross income equal to or less than seventy-five percent of the Rhode Island median income. See Termination Regulations, Part II, Section 1(G).

Additionally, the Company interprets the requirement of the law that “the customer’s service has not been previously shut off for nonpayment before the birth of the child”, that the Company will not terminate service so long as an infant resides in the home at the time the Company initially attempts to terminate service. The Company will not restore service if an infant moves into or is born into the residence after service is terminated.

Company Training and Notification to Customers

National Grid’s customer service representatives and field collectors have been trained regarding the new protection. The Company is in the process of notifying customers of the law and making changes to the Company’s customer information systems to implement the change, as described further below.

National Grid is creating new pamphlets and inserts that contain the notification regarding the infant protection for all gas and electric accounts. Specifically, new protection information will be added to the following customer communications: termination notice insert; bi-annual insert to all customers (to be included with September or October bills); bill stock; and the Customer Bill of Rights. As you are aware, the Company currently sends out separate bills for gas and electric customers. With regard to the gas bills, the infant protection language is now included on the termination notice insert, as well as a message on the gas bill if overdue. See, e.g., Attachments 1 and 2. The electric bill termination notice insert is currently being produced with the new requirements and will be sent to termination-eligible customers by the end of the month.

Implementation

If a customer claims an infant protection by phone or in person to a field collector, a temporary hold will be placed on the account to allow the customer seven (7) days to certify the protection. Customers who have been terminated and claim an infant protection will have their service restored (as long as the birth is prior to the lock out) and seven days to document the claim. Failure to certify the protection removes the temporary suspension and the customer will once again be termination-eligible. Customers will receive a written notification either confirming or denying an infant protection as well as a letter notifying them that the protection was about to expire prior to the infant’s first birthday.

Commission Regulation

Finally, the Company recognizes that the law requires the Commission to promulgate rules and regulations to implement the law. As the law is quite specific to the requirements, the

Company proposes that the Commission adopt the following regulation as a new section of its Termination Regulations, in accordance with the administrative provisions of R.I.G.L. § 42-35-3:

X. INFANT AND FINANCIAL HARDSHIP PROTECTION

No gas or electric company subject to these regulations shall terminate the gas or electric service in any residence in which there is domiciled a person under the age of twelve (12) months and the customer's service has not been previously shut off for nonpayment before the birth of the child; provided, that the customer cannot afford to pay any overdue bill because of financial hardship, as defined in these regulations. The company shall require certification of such infancy by birth certificate or other verifiable certification. Such certification of infancy shall remain in effect without renewal until the infant reaches the age of twelve (12) months.

Thank you for your attention to our filing. Should you have any questions, do not hesitate to call me at (401) 784-7667.

Very truly yours,



Laura S. Olton

Enclosures

cc: Paul Roberti, Esq.
Steve Scialabba, Division
James Lanni, Division

03-AUG-2007 28-AUG-2007 \$241.56



This is a Utility Service Termination Notice.
Esta es su notificación de cancelación de servicio.
Esta é uma notificação sobre o encerramento dos serviços de utilidade pública.
Ceci est un Avis de Terminaison de Service d'Utilité.

Please Translate Immediately.
Por favor, hágala traducir inmediatamente.
Traduzir imediatamente.
Traduire immédiatement.

Customer Service: (401) 831-8800

Hours of Operation: 7:30 AM to 6:30 PM, Monday through Friday.
Beginning the weekend after Labor Day through the weekend preceding Memorial Day weekend, our Customer Contact Center will also be open on Saturdays from 7:30 AM to 4:00 PM

Our records indicate an unpaid balance on the account covering this residence. GAS SERVICE TO THIS RESIDENCE WILL BE TERMINATED WITHOUT FURTHER NOTICE ON OR AFTER THE DATE INDICATED ON YOUR BILL.

YOU MAY AVOID TERMINATION

Your utility service **will not** be terminated, on or before the termination date listed on your bill, if satisfactory arrangements are made to pay this balance. As a first step, you **must** call our Customer Service Department at (401) 831-8800 as soon as possible.

If a satisfactory arrangement cannot be agreed upon, you have the right to submit this matter to the Reviewing Officer of the Rhode Island Division of Public Utilities and Carriers at (401) 780-9700. If you are unable to reach a satisfactory arrangement over the telephone, you have the right to a hearing, which you must request, on whether termination is unjustified. National Grid Company will not disconnect your service pending proceedings before a reviewing officer appointed by the Administrator of the Division of Public Utilities and Carriers.

(OVER, PLEASE)

PROTECTION AGAINST TERMINATION

The Public Utilities Commission has Rules and Regulations that provide protection from termination of service for the seriously ill, handicapped and households in which all residents are at least 62 years of age.

Under certain circumstances, a customer may be protected from termination of service during the period between 12:01 AM November 1st and 11:59 PM April 15th. Please contact our Customer Service Department at (401) 831-8800 to determine eligibility.

SPECIAL CONDITIONS PREVENT TERMINATION OF SERVICE IF YOU HAVE A CHILD UNDER TWELVE MONTHS AND A FINANCIAL HARDSHIP

If you or anyone presently and normally living in your house has a child under twelve months old we will not terminate your gas service, provided you also have a financial hardship. Please call our Customer Contact Center at 831-8800 immediately if this applies to you.

LOW INCOME HEATING ASSISTANCE PROGRAM (LIHEAP)

LIHEAP provides eligible customers with public energy assistance aid. Customers who may qualify should contact their local Community Action Program.

RULES AND REGULATIONS

A copy of the Rules and Regulations Governing Termination of Residential Electric, Gas and Water Utility Service are available for review at our office located at 100 Weybosset Street, Monday through Friday, between the hours of 8:30 AM and 4:45 PM. A copy of the Rules and Regulations is also available for review at the office of the Division of Public Utilities and Carriers located at 89 Jefferson Boulevard, Warwick, Rhode Island, Monday through Friday, 8:30 AM to 3:30 PM. A copy of the Rules and Regulations may also be obtained via the Internet at www.ripuc.org/rulesregs/commrules/termination.pdf

Payment Plans

National Grid Company offers residential payment plans. Please contact our Customer Service Department at (401) 831-8800 prior to the termination date printed on your bill to arrange a payment plan that will allow you to spread out your payments as follows:

- **No Protection / No Financial Hardship**
Payments will be one-twelfth of your estimated annual gas bill (or the amount due for your current usage), plus one-sixth of your unpaid balance per month. If your service has been terminated, a down payment of 60 percent of the unpaid balance will be required with the remaining balance to be paid in three (3) monthly installments.
- **Protection / Financial Hardship**
Payments will be one-twelfth of your estimated annual gas bill (or the amount due for your current usage) less the estimated annual payment from public energy assistance programs, plus one-twelfth of your unpaid balance per month. If your service has been terminated, a down payment of 25 percent of the unpaid balance will be required with the remaining balance to be paid in 12 monthly installments.

NOTE: Subsequent broken payment plans and service termination may result in more stringent requirements.

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NATURAL GAS BILL

Account Number	Bill Date	Due Date	Amount Due
[REDACTED]	03-AUG-2007	28-AUG-2007	\$241.56

Please fill in
[REDACTED]
Amount paid

REMIT TO:

NATIONAL GRID
PO BOX 1048
WOBURN MA 01807-1048
[REDACTED]

02000090084206205770000241563

To ensure proper processing please write your account number [REDACTED] on your check or online account. Return above portion when paying by mail.

Customer Information

Customer Number
[REDACTED]

Premises Number
[REDACTED]

Account Number
[REDACTED]

Bill Date
03-AUG-2007

Due Date
28-AUG-2007

Next Read Date
31-AUG-2007 (A)

Gas Account Summary for [REDACTED]

Previous Balance	\$165.31
Your Payment	<u>\$0.00</u>
Balance Forward	\$165.31
Current Charges	<u>\$76.25</u>
Total Charges	\$241.56

Amount Due By 28-AUG-2007	\$241.56
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Customer Service

Rhode Island
(401) 831-8800

Emergency Line
(401) 272-3330

**Phone Service For Hearing
And Speech Impaired**
7-1-1

Web Site
www.nationalgrid.com

At Your Service

Please translate immediately.
Por favor, hágala traducir inmediatamente.
Traduzir imediatamente.
Traduire immédiatement.

Please see reverse side of your bill for important information.

SPECIAL CONDITIONS PREVENT TERMINATION OF SERVICE IF YOU HAVE A CHILD UNDER 12 MONTHS AND A FINANCIAL HARDSHIP
If you or anyone presently and normally living in your house has a child under twelve months old we will not terminate your gas service provided you also have a financial hardship. Please call our Customer Contact Center at 831-8800 immediately if this applies to you.

TO AVOID TERMINATION OF SERVICE, YOUR PAYMENT FOR PAST DUE BALANCE MUST BE POSTED BY 16-AUG-2007. PLEASE SEE REVERSE SIDE OF BILL. IF YOU ARE CURRENTLY ENROLLED IN A PAYMENT PLAN, PLEASE DISREGARD THIS NOTICE.

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NATURAL GAS BILL

Account Number	Bill Date	Due Date	Amount Due
[REDACTED]	03-AUG-2007	28-AUG-2007	\$241.56

Account Information Account Number [REDACTED] Rate Residential Heating

Service Name/Address
[REDACTED]

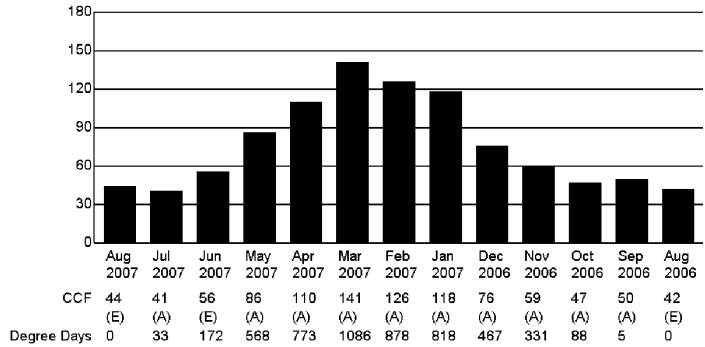
Billing Period 07/02/2007 To 08/03/2007

Meter Number [REDACTED] Next Read Date 31-AUG-2007

Meter Reading 32 Days Estimated
Present Reading 5447
Previous Reading 5403
Gas Used 44 CCF

Therm Factor 1.019
Total Consumption 44 x 1.019 = 44.836

Usage History



Detail Charges

	Quantity Used	Cost per Therm	
Delivery Charges			
Customer Charge			\$9.00
Usage Charge Step 1	30.000 Therms X	\$ 0.3600	\$10.80
Usage Charge Step 2	14.836 Therms X	\$ 0.2800	\$4.15
Distribution Adjustment Charge	44.836 Therms X	\$ 0.0003	\$0.01
Energy Efficiency Surcharge	44.836 Therms X	\$ 0.0107	\$0.48
Total Delivery Charges			\$24.44
Gas Charges			
Cost of Gas	44.836 Therms X	\$ 1.1048	\$49.53
Total Gas Charges			\$49.53
Other Charges			
Gross Earnings Tax			\$2.28
Total Other Charges			\$2.28
Total Current Charges			\$76.25

Account Number	Bill Date	Due Date	Amount Due
[REDACTED]	03-AUG-2007	28-AUG-2007	\$241.56

Account Information

Account Number [REDACTED] Rate Residential Heating

Service Name/Address[REDACTED]
[REDACTED]**Payment History**

Date	Amount	PMT Code	Date	Amount	PMT Code
06-JUN-07	\$306.13		26-SEP-06	\$89.48	
09-APR-07	\$200.00		31-AUG-06	\$77.04	
28-FEB-07	\$300.00	BVCA	01-AUG-06	\$94.14	
28-FEB-07	\$66.00	CONB			
14-FEB-07	\$300.00				
06-NOV-06	\$84.42				