

October 9, 2007

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 3876 – In re: Rules and Regulations Governing the Termination of Residential Electric, Gas and Water Utility Service National Grid Response to Motion of the George Wiley Center

Dear Ms. Massaro:

National Grid¹ does not object to the motion of the George Wiley Center (“Wiley Center”) to extend time for public comment and written comment filed on October 4, 2007, in the above-captioned proceeding.

Nevertheless, National Grid takes issue with two of the grounds described as bases for the Wiley Center motion. First, the Wiley Center states that it “needs additional time to pose appropriate data requests prior to tendering its responses at the public comment hearing and/or in writing.” As this is a Public Utilities Commission (“Commission”) rulemaking proceeding pursuant to R.I.G.L. § 42-35-3, National Grid does not believe it is appropriate or necessary for the Wiley Center to issue discovery. The Wiley Center has a “reasonable opportunity to submit data, views, or arguments, orally or in writing”, in accordance with the law. This is not a contested case.

Second, the Wiley Center motion states that it “understands that other affected parties, such as National Grid and the Division of Public Utilities and Carriers, had time respond to these proposals and to pose data requests before the proposed amendments were publicly announced.” This is simply not accurate. National Grid became aware of the proposed rules at the Commission’s Open Meeting on September 27, 2007. Although the Commission issued data requests to the Company prior to that date, the Commission did not provide the Company with any information regarding the draft rules or amendments. Finally, neither National Grid nor the Division of Public Utilities and Carriers has posed any data requests in this proceeding.

Thank you for your attention to this filing. If you have any questions, please feel free to contact me at (401) 784-7667.

Very truly yours,



Laura S. Olton

cc: Paul Roberti, Esq.
Jean Rosiello, Esq.
Leo Wold, Esq.
Steve Scialabba, Division

¹ Submitted on behalf of The Narragansett Electric Company, d/b/a National Grid (“Company”).