



State of Rhode Island and Providence Plantations

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*Patrick C. Lynch, Attorney General*

February 19, 2009

**VIA ELECTRONIC AND REGULAR MAIL**

Luly E. Massaro, Clerk  
Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02889-1046

**Re: The Narragansett Electric Company d/b/a National  
Grid's System Reliability Procurement Plan –  
PUC Docket Nos. 3931 and 4000**

Dear Ms. Massaro:

On December 15, 2008, the Public Utilities Commission (Commission) conducted a public hearing on The Narragansett Electric Company d/b/a National Grid's (National Grid) Energy Efficiency Program Plan For 2009 (Commission Docket No. 4000). As part of National Grid's presentation during that hearing, it presented a briefing and testimony on National Grid's proposed System Reliability Procurement Plan (part of Phase II of Commission Docket No. 3931). The Division of Public Utilities and Carriers (Division) was not aware that National Grid intended to raise the System Reliability Procurement Plan at the December 15, 2008, hearing and was not prepared to address the particulars of that plan. The Commission asked the Division to provide a position statement with regards to the System Reliability Procurement Plan as soon as possible. The Division provided its position statement on December 22, 2008. Comments were provided by other parties to the proceeding, and National Grid provided further clarification of its proposal. As a result of the additional input, the Commission requested final position statements from the parties by March 23, 2009. This letter, prepared with the assistance of the Division's staff and consultants, is intended to satisfy the Commission's request for an updated Division position statement.

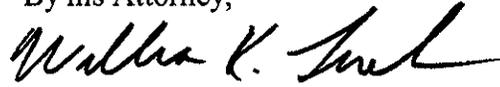
The Division's position remains unchanged from that expressed in our letter of December 22, 2008. We realize, of course, that our earlier recommendation of a one-year

trial period beginning January 1, 2009, must be adjusted to a new start date. With the exception of this single technical correction, however, our position remains the same.

Sincerely,

Thomas Ahern  
Administrator  
Division of Public Utilities and Carriers

By his Attorney,



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cc: Docket 3931 & 4000 Service Lists