

October 29, 2008

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket 3931 - Least Cost Procurement Plan  
Joint Comments of National Grid and the Energy Efficiency Resource Management Council  
in response to Bluewater Wind**

Dear Ms. Massaro:

National Grid<sup>1</sup> and the Energy Efficiency and Resource Management Council submit these comments in response to Bluewater Wind's October 28, 2008 letter filed with the Commission in the above-captioned proceeding.

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

Very truly yours,



Thomas R. Teehan

Enclosures

cc: Docket 3931 Service List

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<sup>1</sup> Submitted on behalf of The Narragansett Electric Company d/b/a National Grid.

**STATE OF RHODE ISLAND  
PUBLIC UTILITIES COMMISSION**

In Re: Energy Efficiency and	)	
Conservation Procurement and	)	Docket No. 3931
and System Reliability	)	
Procurement	)	

**Joint Comments of National Grid and the Energy Efficiency Resources Management Council  
in response to Bluewater Wind letter dated October 28, 2008**

National Grid <sup>1</sup> and the Energy Efficiency and Resource Management Council (“Council”) submit these comments in response to Bluewater Wind’s October 28, 2008 letter filed with the Commission.

With respect to the Bluewater Wind’s request that the Council consider its comments, the Council concurs it is imperative to solicit comment and information from all parties as per the Commission’s Standards. All Council meetings to date have been open meetings to all parties and the public with an agenda item for “Other Business” in which some participants have provided information. However, given the very aggressive schedule for Energy Efficiency Procurement and System Reliability Procurement the Council has not received as much information as desired and is planning on devoting a specific agenda item at the next two Council meetings, on November 13 and December 11, to this issue with the parties and another others.

National Grid and the Council would like to clarify the interrelationship between Energy Efficiency Procurement and System Reliability Procurement, which is the appropriate and primary focus of this docket, and supply portfolio procurement, which is a different issue and is not the intended focus of the Energy Efficiency and System Reliability Procurement Standards.

The Company’s filing in this case is comprised of Energy Efficiency Procurement and System Reliability Procurement. In keeping with that approach, in this docket the Company has submitted an over-all Least Cost Procurement Plan with two components: an Energy Efficiency Procurement Plan and a System Reliability Procurement Plan. Neither of those two plans is intended to address supply portfolio procurement, which must occur by March 1, 2009.

While § 39-1-27.7 notes that system reliability procurement and energy efficiency and conservation procurement are “complementary” to supply portfolio procurement, it specifically states that those activities are “*distinct activities*.” The legislation does not intend that these distinct activities be co-mingled in one proceeding before the Commission. Rather, in a separate statutory section, § 39-1-27.8 , the Legislature provided for an independent proceeding that would be initiated by the Company’s filing of a proposed supply procurement plan with the Commission no later than March 1, 2009. Over the next month Commission staff will be holding meetings with interested parties, such as Bluewater Wind, to develop and discuss issues in preparation for the Company’s March 1, 2009 filing. When that proceeding gets underway, the Commission will have significant flexibility to conduct a comprehensive review of the Company’s proposed supply procurement plans and to incorporate sources of supply that prove to be reasonable and least-cost alternatives.

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<sup>1</sup> Submitted on behalf of The Narragansett Electric d/b/a National Grid, which is referred to herein as “National Grid” or “Company.”

At the recent Technical Session in this matter, Bluewater Wind indicated that its intent was not to criticize the Company's proposed Energy Efficiency and System Reliability Procurement Plans, but rather to identify a forum in which to raise issues specific to renewable energy supply contracts. The Company believes that the most appropriate forum for a complete discussion of those issues is the upcoming Standard Offer supply procurement proceeding.

The Company and Council recognize the value of the open and active participation of all parties to this proceeding and anticipates working with Bluewater Wind and other parties to this docket as the new energy policies in accordance with the 2006 Energy Act begin to take shape in Rhode Island.

Respectfully submitted,

The Rhode Island Energy Efficiency  
Resource Management Council (EERMC)  
and National Grid

By Its Attorneys,

/s/ R. Daniel Prentiss

R. Daniel Prentiss  
Counsel for EERMC



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Thomas R. Teehan  
Counsel for National Grid

## Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically submitted, hand delivered and mailed to the individuals listed below.



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Joanne M. Scanlon  
National Grid

October 29, 2008

Date

**Docket No. 3931 – RI Energy Efficiency and Resource Management Council  
("EERMC") – Proposed Standards for Least Procurement Plan  
and System Reliability Procurement Plan  
Service List updated on 10/3/08**

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