

October 28, 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  
National Grid Response to Division Letter**

Dear Ms. Massaro:

National Grid<sup>1</sup> submits these comments in response to the October 28, 2008 letter of the Division of Public Utilities and Carriers ("Division") concerning the Company's System Reliability Procurement Plan. In its letter, due to time constraints on review of recently submitted amendments to the System Reliability Procurement Plan, the Division proposed that the Commission open a new docket and defer consideration of the proposed System Reliability Procurement Plan to that docket.<sup>2</sup>

The Company is in agreement with the Division's proposal. As described in the Company's filing, the Company's proposed Least Cost Procurement Plan is comprised of an Energy Efficiency Procurement Plan and a System Reliability Procurement Plan. The Division's proposal would allow the Commission to consider the Energy Efficiency Procurement Plan while deferring the System Reliability Procurement Plan for additional study.

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

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 ("Company").

<sup>2</sup> In its letter the Division uses the short-hand term "System Reliability," rather than the full term "System Reliability Plan." Although both terms carry different meanings, it is National Grid's understanding is that the Division proposes that the new docket be concerned only with the proposed System Reliability Procurement Plan.