

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS



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October 29, 2008

Via Electronic Mail and First Class Mail

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

Re: Docket 3931, The Narragansett Electric Company d/b/a National Grid, Least Cost Procurement Plan

Dear Ms. Massaro:

The Rhode Island Office of Energy Resources (“OER”) respectfully submits this letter of support for National Grid’s Energy Efficiency Procurement Plan (“Energy Efficiency Plan”) filed with the Public Utility Commission (“Commission”) on September 2, 2008. OER is a member of the Demand Side Management (“DSM”) Collaborative that reviewed the Energy Efficiency Plan and has taken part in substantive discussions about it with various parties to this proceeding.

The complete filing under consideration in this Phase II of Docket No. 3931 includes a System Reliability Procurement Plan in addition to the Energy Efficiency Plan. OER concurs with the Division of Public Utilities that there has not been enough background or discussion on the System Reliability Procurement Plan for parties to form fully-informed positions and that there is not enough time to resolve issues with the System Reliability Procurement Plan within the timeframe established for the Least Cost Procurement /Efficiency Procurement Plan.

The OER supports opening a new docket on the System Reliability Procurement Plan to allow the Commission and the other parties to discuss issues including how the System Reliability Procurement Plan is to be funded.

The OER offers these comments to Commission, and respectfully asks that you file this letter under Docket No. 3931 for the Commission's consideration. Thank you for your assistance in this matter.

Service copies of this letter will be provided by mail to you tomorrow for filing and to any other party that would like a hard copy in addition to their electronic copy.

Respectfully Submitted,

//Andrew Dzykewicz//

Andrew Dzykewicz, Commissioner