

## THE ENERGY COUNCIL

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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 Energy Council of Rhode Island ("TEC-RI") 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. TEC-RI is a membership organization consisting of large energy users in Rhode Island, including manufacturers, universities, hospitals, and other major employers.

TEC-RI is a member of the DSM Collaborative that reviewed the subject Energy Efficiency Plan and engaged in substantive discussions about it.

The complete filing under consideration in this Phase II of docket 3931 also includes a System Reliability Procurement Plan in addition to the Energy Efficiency Plan. At this time, TEC-RI is unable to support the funding request for the System Reliability Plan. Further study is needed. In particular, the October 24<sup>th</sup> filing did not include a demonstration that it is a cost-effective expenditure of ratepayer funds.

TEC-RI therefore supports the funding request for the Energy Efficiency Procurement Plan for the 2009 program year but withholds support for the System Reliability Procurement Plan at this time.

TEC-RI respectfully asks that you file this letter under docket 3931 for the Commission's consideration. Thank you for your assistance in this matter.

Respectfully Submitted,

## The Energy Council of Rhode Island

By Its Executive Director /s/ John Farley

Cc: Service List Docket 3931 (via e-mail)