Thomas R. Teehan
Senior Counsel

August 1, 2008

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 3943 – National Grid Request for Change of Gas Distribution Rates
Responses to Division, Wiley Center, TEC-RI and Rhode Island Hospital Data Requests

Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's[1] responses to the Division's twelfth set of data requests issued in the above-referenced proceeding. These responses are filed along with Data Requests WILEY-2-3 through 2-12. Also included are responses to Data Requests TEC-RI-1-34, TEC-RI 1-60, TEC-RI 1-71 and TEC-RI 1-75. Lastly, the Company has included responses to RIH-NS-4, RIH-NS-5, RIH-NS-7, and RIH-NS-8. Attached is a listing of the outstanding data requests for which the Company has not yet provided a response. The Company is endeavoring to file these responses as soon as possible. Also, please note there are no confidential exhibits or responses in this filing.

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

Very truly yours,

Thomas R. Teehan

Enclosures

cc: Docket 3943 Service List

[1] The Narragansett Electric Company d/b/a National Grid ("Company").

Outstanding Responses to Information Requests as of August 1, 2008

Data Request DIV-5-8
Data Request DIV-5-42
Data Request DIV-7-6
Data Request DIV-12-8
Data Request RIH-JS-3

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.

/S/ _____ August 1, 2008
Linda Samuelian Date

National Grid (NGrid) – Request for Change in Gas Distribution Rates
Docket No. 3943 - Service List as of 7/7/08

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Division Data Request DIV 12-1

Request:

Re: Attachment 5-9d, page 5 of 5, please:

a. Identify the source(s) of rent from gas property and identify the specific property that is rented to produce the referenced revenue for each period listed.

b. Define "Displacement Revenue" and detail the source and basis for such revenue.

Response:

a. The sources of rent from gas properties are as follows:

1) Lease of approximately 717,880 square feet of land owned by National Grid – Rhode Island Gas to KeySpan LNG, LLP related to the KeySpan LNG facility ($240,000 per year in total). This land is located northerly of Terminal Road and easterly of Allens Avenue in Providence, Rhode Island.

2) Lease of land owned by National Grid – Rhode Island Gas to St. Lawrence Cement Company ($21,000 per year). This land is located at 139 Terminal Road in Providence, Rhode Island.

3) Lease related to occupancy of unused pipe and associated facilities owned by National Grid – Rhode Island Gas in Providence, Rhode Island to MCImetro Access Transmission Services for purposes of installing a fiber optic network ($11,303 per year).

b. Displacement revenues are revenues related to the transportation of vaporized LNG (including boil-off and flash gas) from the KeySpan LNG (KLNG) facility to the Algonquin Pipeline gate station at Wampanoag trail. From there, gas is delivered by Algonquin to the storage customer. As a practical matter, the service is provided by displacing scheduled deliveries through the Algonquin gate with deliveries from the KLNG tank. The service enables the KLNG tank to serve storage customers other than National Grid – Rhode Island.

Prepared by or under the supervision of: Mike Laflamme

Division Data Request DIV 12-2

Request:

Re: Workpaper DAH-1, page 52 of 64, please provide the source document(s) from which the customer service expense amounts of $2,410 for Residential and Small Commercial and $5,665 for all other customers were derived, and explain how those amounts were computed or estimated.

Response:

The following assumptions were used to compute the unit costs referenced on Exhibit DAH-1 at pages 52-64:

(1) The Unit Cost average for 1,000 RI (conversion services) for 2007 was $3,200 for a total cost of approximately $3,200,000.

(2) The Company estimated that approximately 75% of the services installed were for residential customers, and 25% of the services were for C&I customers.

(3) Cost ratio for residential/C&I based on experience from other regions where residential cost is approximately 0.433 x cost of C/I service ($6,700), or $2900.

Based on these assumptions, the calculation is as follows:

Variables:

x = Unit Cost for C/I
y = 0.433x = Unit Cost for Residential

Total Units = 1000 at a Total Cost = $3,200,000
250 units are C&I and 750 units are residential

Therefore: $3,200,000 = 250x + 750y

$3,200,000 = 250x + 750(.433x)
$3,200,000 = 575x
$3,200,000/575 = x
x = $5,565 = Unit Cost for C/I
y = 0.433x = $2,410 = Unit Cost for Residential

Please see Attachment DIV-12-2 for the derivation of the $0.433 factor.

Prepared by or under the supervision of: Sean Mongan

Attachment DIV-12-2

2007 Metrics

	Ytd Units	Ytd Costs	Ytd Unit Cost	Monthly Units	Monthly Costs	Monthly Unit Cost	
Commercial Services							
Jan-07	73	$1,707,209	$23,386	73	$1,707,209	$23,386	
Feb-07	84	$2,161,828	$25,736	11	$454,619	$41,329	
Mar-07	116	$2,350,138	$20,260	32	$188,310	$5,885	
Apr-07	168	$2,538,984	$15,113	52	$188,846	$3,632	
May-07	236	$3,221,969	$13,652	68	$682,985	$10,044	
Jun-07	325	$3,776,832	$11,621	89	$554,863	$6,234	
Jul-07	396	$4,349,526	$10,984	71	$572,695	$8,066	
Aug-07	504	$4,921,564	$9,765	108	$572,037	$5,297	
Sep-07	626	$5,820,884	$9,299	122	$899,320	$7,371	
Oct-07	776	$6,748,270	$8,696	150	$927,387	$6,183	
Nov-07							
				776	$6,748,270	$8,696	
Residential Services							
Jan-07	298	$1,802,106	$6,047	298	$1,802,106	$6,047	
Feb-07	388	$2,224,648	$5,734	90	$422,542	$4,695	
Mar-07	519	$2,725,793	$5,252	131	$501,145	$3,826	
Apr-07	875	$3,452,750	$3,946	356	$726,957	$2,042	
May-07	1429	$5,469,080	$3,827	554	$2,016,330	$3,640	
Jun-07	1976	$7,734,025	$3,914	547	$2,264,944	$4,141	
Jul-07	2449	$9,497,316	$3,878	473	$1,763,291	$3,728	
Aug-07	2941	$10,977,175	$3,732	492	$1,479,860	$3,008	
Sep-07	3427	$13,600,768	$3,969	486	$2,623,593	$5,398	
Oct-07	4129	$16,238,686	$3,933	702	$2,637,919	$3,758	
Nov-07							
				4,129	$16,238,686	$3,933	0.452247

Division Data Request DIV 12-3

Request:

Re: the Company's response to data request DIV 5-28, please provide the source(s) of, and all supporting documents and calculations relied upon, to calculate the referenced 0.433 factor.

Response:

Please see the response to Data Request DIV-12-2.

Prepared by or under the supervision of: Susan Fleck

Division Data Request DIV 12-4

Request:

Re: the Company's response to data request DIV 5-33.a, please explain:

a. Why any part of the costs of a corporate sponsorship relating to the Northern Rhode Island Chamber of Commerce should be borne by residential customers.

b. What a Harvard University corporate sponsorship has to do with Community Relations and why such a cost is appropriately allocated on the basis of "numbers of customers."

Response:

a. The costs associated with the corporate sponsorship relating to the Northern Rhode Island Chamber of Commerce should have been allocated to non-residential customers.

b. The corporate sponsorship relating to Harvard University pertains to the Harvard Electricity Policy Group and should not have been charged to National Grid – Rhode Island Gas.

Prepared by or under the supervision of: Mike Laflamme

Division Data Request DIV 12-5

Request:

Re: the Company's response to data request DIV 5-33.c, please explain in detail what is included in "key accounts activities" and what constitutes a "key account."

Response:

Key Account activities include labor and expenses incurred by the Energy Solutions Services group in the course of their daily interaction with the Company's "key account" customers. The primary purpose of the Key Account group is to provide a single point of contact for strategic commercial, industrial, multifamily and municipal customers, and to ensure that the needs of those customers are met through proactive management of their service issues. The Company has found that this type of focused attention and proactive management is important to ensure that the unique service requirements of these customers are met in an efficient and responsive manner. The base criteria for defining a "Key Account" during the test-year period is a gas customer that consumes or has the potential to consume 12,000 dekatherms or more of natural gas per year. A summary of principal Key Account activities includes but is not limited to:

- Delivery of energy conservation and demand side management services;
- Facilitation of construction and delivery of new and upgraded service requests;
- Resolution of customer problems and customer advocacy on issues such as billing, metering and service reliability concerns;
- Development of strategies based on an account planning and market segmentation process to maintain customer and client satisfaction levels;
- Response to emergency situations at Key Account facilities (i.e. leaks and other types of outages) and coordinate work performed by the Company's field service employees with customers;
- Initiation of customer calls to implement curtailment for non-firm customers;
- Preparation and delivery of gas sales proposals;
- Support for Company operations and customer service, including, but not limited to, on-call duties, storm restoration efforts, outage coordination and support for customer service on a 24/7 basis;
- Delivery of presentations and training to local business groups and civic associations;
- Participation in local trade shows such as the Rhode Island Business Expo; and
- Management of community and municipal relationships.

Prepared by or under the supervision of: Mike Laflamme

Division Data Request DIV 12-6

Request:

Re: the Company's response to data request DIV 5-33.f, please explain in detail the activities that are included in "Retail Access Services."

Response:

Charges to "Retail Access Services" represent internal and contract labor in support of the operation of gas supply management between multiple marketers and end-use customers. A summary of principal Retail Access Services activities is provided below.

- Management of retail customer account supplier changes and communicate changes to other Company departments and to marketers;
- Adjustment of capacity assignments for marketer pools;
- Assistance of customers with business analysis for comparative pricing of energy;
- Assistance of customers with billing, usage and pricing-related issues;
- Liaison activities between the Company's Transportation Billing department and marketers;
- Distribution of reports for capacity and customer analysis to marketers;
- Management of customer enrollments, switches and drops;
- Assistance of the Company's Contact Center with FT-2 Transportation customers;
- Interpretation of tariff and rate schedule provisions for marketers;
- Preparation of monthly Rhode Island capacity calculation and report to the Company's Gas Supply department and marketers;
- Preparation of monthly Rhode Island migration report for the Company's Pricing department;
- Gate station assignments for marketers;
- Notification of marketers of any storage and peaking charges;
- Establishment of annual program in the Business Choice system with new calculations, values and pool volumes; and
- On an annual basis, compilation of the monthly volumes and review customer migration from the previous year for the Company's Pricing department's sales forecast.

Prepared by or under the supervision of: Mike Laflamme

Division Data Request DIV 12-7

Request:

Re: the Company's response to data request DIV 5-37.e, please provide the data, assumptions and calculations that the Company used to compute replacement costs for each size and type of meter for replacement costs estimates are provided in DAH-1, page 63 of 64.

Response:

For meters that the Company is currently purchasing, the replacement cost provided in Exhibit DAH-1, page 63 of 64 is the current cost of the meter. For meters that the Company has purchased in the past, the replacement cost is the current cost of the most similar meter being used by the Company.

Prepared by or under the supervision of: David Heintz

Division Data Request DIV 12-9

Request:

Re: the Company's response to data request DIV 5-44, please:

a. Provide the a detailed assessment of the costs incurred by the Company during the 12 months ended September 30, 2007 for the administration and billing of Transitional Sales Service (TSS);

b. Identify the costs of all billing system modifications required to bill TSS charges to customers who utilize that service and identify the account(s) to which those costs have been booked.

Response:

a. The Company does not track, record or otherwise separate the costs associated with the administration and billing of Transitional Sales Service (TSS) from the cost of administration and billing services to its customers. Therefore, the requested information is not available.

b. Please see the reply to (a.) above.

Prepared by or under the supervision of: Peter Czekanski

Division Data Request DIV 12-10

Request:

Re: the Company's response to data request DIV 6-13.d, please provide:

a. A summary of the substance of the referenced telephone discussions with:

   i. The group that is responsible for administering LIHEAP grants within the Company
   ii. The State Office of Energy Resources

b. Identification of the persons from each organization who participated in the referenced telephone discussions and their titles

c. The dates on which the referenced discussions occurred

Response:

The telephone discussions referenced in Data Request DIV 6-13(d) were to Mary Conroy, Manager Credit and Collections for National Grid in Rhode Island and Jennifer Feinstein, Director of Gas Pricing for National Grid. Ms. Conroy is a primary contact with the State Office of Energy Resources in the administration of the LIHEAP program and Ms. Feinstein has responsibility for gas pricing in other National Grid USA service territories. In addition, both Ms. Feinstein and Ms. Conroy have considerable experience on low-income customer billing and collection issues.

The date of the calls with Ms. Conroy and Ms. Feinstein, and the specific details of the discussion, were not recorded. However, the discussion focused on the development of a reasonable estimate of the number of residential non-heating customers who would be eligible for the proposed low-income discount service. Both of these Company representatives subsequently researched the issue through discussions with others in order to develop the estimate. Based on this research and the Company's experience, a determination was made that the percentage of residential heating customers receiving LIHEAP grants would be the best estimate of the percentage of residential non-heat customers who would be LIHEAP recipients, and therefore, eligible for the low-income discount service.

Division Data Request DIV 12-11

Request:

Re: the Company's response to data request DIV 6-13.e, please provide the data, studies, and other information the Company has relied upon to assess the willingness and ability of non-low income customers to bear the costs of the Company's proposed low income discounts.

Response:

The Company did not conduct any studies to assess the willingness and ability of non-low income customers to bear the costs of the Company's proposed low income discounts just as it did not conduct any studies to assess the willingness and ability of any customer group to bear the cost of the Company's proposed rate changes.

Prepared by or under the supervision of: Peter Czekanski

Division Data Request DIV 12-12

Request:

Re: the Company's response to data request DIV 6-20.b, please provide the studies, data, and other information relied upon to assess:

a. The extent to which demand charge billing quantities have actually been impacted by conservation among demand billed non-residential customers;

b. The extent of differences, if any, between the sensitivity of demand billing units to changes in overall billed charges for natural gas service and the sensitivity of annual gas use to changes in overall billed charges for natural gas service.

Response:

a. Demand charge billing quantities are not only affected by conservation but also by weather. The Company did not undertake any studies to isolate and assess the impact of conservation on demand charge billing quantities. The response to Data Request DIV 6-20(b) is simply pointing out that the demand charge billing quantity for each customer is recalculated each year and since it is based on a customer's actual use, it will change as a result of conservation by the customer.

b. Please see the response to (a) above.

Prepared by or under the supervision of: Peter Czekanski

Data Request RIH-NS-4

Request:

Please refer to your statement regarding the reduction of carbon emissions at lines 2-4 of page 4 of your pre-filed testimony. Does the Company have an estimate of the carbon emissions attributable to the Company's gas leaks? If so, please provide.

Response:

The Company estimates that the total annual gas-leakage rate in Rhode Island based on the year-ending December 31, 2007 population of mains and services is 306,884 Mcf/year. If this rate is multiplied by a conversion factor published by the U.S. Environmental Protection Agency, it is possible to derive an estimate of the emissions associated with the gas leaks as follows: 306,884 Mcf times a conversion factor of 0.404 results in 123,981 tons of CO_2, and times a conversion factor of 0.11 results in 33,757 tons of carbon.

As noted above, the conversion factors used in this calculation (0.404 for CO_2 and 0.11 for carbon) are published by the U.S. Environmental Protection Agency to serve as a metric in estimating the impact of natural gas emissions generally.

Prepared by or under the supervision of: Susan Fleck

Data Request RIH-NS-5

Request:

Does the Company have a target percent of unaccounted for gas to reduce as a goal for achievement through its infrastructure improvement proposal? If so, please provide.

Response:

The fundamental motivation for the Company's proposal to ramp-up efforts to eliminate gas leaks is the need to protect public safety and reliability, and therefore, the Company has not considered identifying a "target percent" of unaccounted for gas as a principal goal of the program. In addition, the total percentage of unaccounted for gas occurring each year varies depending upon a number of factors, including total throughput. Gas leaks are only one factor driving the percentage of unaccounted for gas and the quantification of the impact of gas leaks cannot necessarily be separated from other factors. However, the reduction of unaccounted for gas will inevitably result from the Company's accelerated replacement of distribution infrastructure simply because gas leaks will be eliminated.

In that regard, the Company expects to add cathodic protection to five miles of steel main and replace 14 miles of steel and cast iron per year. The total volume of gas associated with this level of replacement is approximately 2,075 Mcf per year, calculated as follows: (1) main replacements = 14 miles x 110 Mcf/mile = 1540 Mcf/year; and (2) new cathodic protection = 5 miles x (110-3) Mcf/mile = 535 Mcf/year. The reduction in gas leaks would have an impact as a percentage of this volume.

Prepared by or under the supervision of: Susan Fleck

Data Request RIH-NS-7

Request:

Please refer to your testimony at page 14 of 28, lines 14-17. In stating that National Grid does not profit from the sale of the gas commodity, are you referring to the sale of commodity to firm customers?

Response:

National Grid does not profit from the sale of gas commodity to firm or non-firm customers. The margins that the Company is allowed to retain in relation to non-firm customers is associated with the non-firm distribution rate, not the commodity portion of their service.

Prepared by or under the supervision of: Gary Beland

Data Request RIH-NS-8

Request:

If the Company does not profit from the sale of the commodity for firm customers, please explain the relative increase in distribution costs and revenues associated with the conversion of an existing residential or small commercial non-heating customer to a heating customer consistent with the Company's gas marketing initiative.

Response:

The Company's gas marketing initiative is aimed at increasing the total throughput of the gas distribution system. As with all customers, new customers added through the gas marketing program will pay for delivery services and commodity supply, with the Company's earnings arising from the delivery portion of their service. The Company does not earn any profit on the commodity sales to these new customers; costs incurred by the Company to purchase gas supply for customers are recovered from customers through the Gas Cost Recovery charge (instead of base rate), without any profit or margin for the Company.

Data Request TEC-RI 1-34

Request:

Please identify the legal basis for the company's proposal to fund a low income discount rate by charging more to the rest of the customers. Does this legal justification supersede the language of the Affordability Act of 2006, R.I.G.L. § 42-141-5(d)?

Response:

Without addressing legal arguments and analysis more appropriate for the briefing phase of this proceeding, the recovery of the Company's approved revenue requirement across customer classes is a rate-design matter that is central to a general distribution rate proceeding conducted by the Commission under its ratemaking authority. In a general distribution rate proceeding, there are a multitude of judgments and policy decisions that factor into the Commission's final determinations on rate design and the appropriate proportion of revenues to be collected from one rate class or another. The allocation of revenues for collection from the low-income rate classes involves similar judgments and policy determinations, and therefore, falls well within the Commission's discretion on rate design issues.

Prepared by or under the supervision of: David Heintz

Data Request TEC-RI 1-60

Request:

Is the Company asking the Commission to approve a specific capital expansion plan? What controls will be in place to limit the amount of capital expenditures subject to CapX?

Response:

The Company is not requesting the Commission to approve a specific capital expansion plan. The Company needs the flexibility to adjust its capital plan on an on-going basis to address replacement priorities changing assessments of operational risks system requirements.

The Company develops detailed work plans and budgets on an annual basis. The work plans and associated budgets include specific cost and workload targets. The Company reviews the workload and cost metrics on a monthly basis and adjusts the work plans and budgets as conditions require. This process and the resulting targets will provide the appropriate parameters for the capital expenditures subject to the Company's capital expansion plan.

Prepared by or under the supervision of: Susan Fleck

Data Request TEC-RI 1-71

Request:

Please identify any cases in the last 18 months leading up to September 30, 2007 where meter consolidation occurred at a customer facility: smaller meters were combined to one large master meter. Please indicate the rate classes for the old smaller meters and the rate class of the new master meter.

Response:

The Company works with individual customers to respond to their metering and billings needs, but does not maintain records specifying the circumstances where meter consolidation has occurred at a customer facility. Therefore, the requested information is not available.

Data Request TEC-RI 1-75

Request:

What additional investments did the Company make to provide firm service to any of the customers that moved from non-firm to firm service during the period September 2007 through December 2007?

Response:

Please see Attachment TEC-RI-1-75.

Attachment TEC-RI-1-75

NON-FIRM TO FIRM CONVERSIONS REQUIRING CAPITAL INVESTMENT

CUSTOMER NAME	MAIN	SERVICE	METERS	REGULATORS	FILTERS	FARM TAPS	TOTAL
[redacted]	$ -	$ 7,623	$ (670)	$ -	$ -	$ -	**$ 6,953**
	$ -	$ 1,000	$ 2,699	$ 157	$ 500	$ -	**$ 4,356**
	$ -	$ -	$ 4,117	$ -	$ -	$ -	**$ 4,117**
	$ 18,528	$ 6,474	$ 2,699	$ 157	$ 500	$ -	**$ 28,358**
	$ -	$ 2,980	$ 225	$ 5,000	$ 1,000	$ -	**$ 9,205**
	$ -	$ -	$ -	$ -	$ -	$ 2,903	**$ 2,903**
	$ -	$ 6,639	$ -	$ -	$ -	$ -	**$ 6,639**
	$ -	$ -	$ 2,950	$ 304	$ 1,000	$ -	**$ 4,254**
TOTAL	**$ 18,528**	**$ 24,716**	**$ 12,020**	**$ 5,618**	**$ 3,000**	**$ 2,903**	**$ 66,785**

NOTES: Two accounts 545 P Associates & Reynolds School were added to the list to reflect meter work.
Hudson was added because we needed to replace a tap hole.

Data Request WILEY 2-3

Request:

Please state the cost of disconnecting a residential customer due to non-payment or late payment, as well as the cost of reconnecting that customer.

Response:

The cost of disconnecting a residential customer is calculated to be approximately $46.60, with a reconnect of a residential customer costing approximately $74.51.

Prepared by or under the supervision of: Karen Czaplewski

Data Request WILEY 2-4

Request:

According to the attached "2008 Monthly Utility Shutoffs" (Shut-Off Report), by the end of May, 2008, there were 3327 total gas shut-offs and 1181 total restorations. Why are there so many fewer restorations than there are shut-offs?

Response:

There are many reasons that some customers do not request restoration of service following a termination including: relocation to another service territory (e.g., college students); a change in the customer's fuel source, service is initiated under another customer name, or the customer chooses to wait to address the account balance when there is a need for heat once again.

In addition, customers who typically are shut off outside of the moratorium would have their service restored upon the onset of cold weather when they can financially afford the required down payment or qualify for some type of assistance.

Historically the numbers indicate that at the end of each March there are approximately 1,500 to 2,200 customers terminated for non-payment between April 1st and March 31st of each year, who do not restore service in the same name. The Company expects that some percentage of that customer group will reinitiate service in the following year.

The highest numbers of disconnects during the five-month period listed on the report were in April and May; therefore many customers in this group may choose not to seek restoration until colder weather begins to occur. The disconnects occurring in May account for 45 percent (1,479) of the terminations for the five-month period and the Company's expectation is that a high percentage of those customers will reinitiate service over the months of May, June and July, with a smaller percentage seeking to restore service in the months leading up to winter and some customers waiting until the cold weather requires action. Through June 30, 2008, 49 percent of those terminated in April and May have reinitiated service.

Prepared by or under the supervision of: Karen Czaplewski

Data Request WILEY 2-5

Request:

According to the attached Shut-Off Report, by the end of May, 2008, there were 56 protected shut-offs and 177 protected restorations. Why are there more restorations than there are shut-offs?

Response:

When service to a customer is terminated, the customer will typically contact the Company to identify the steps they must take to have their service restored. The Company's representative typically explores all possible resources to enable the restoration of service. In doing so, the representative may refer the customer to various agencies for some type of monetary assistance, may inquire as to age of household members or solicit other information to assist in determining whether private or public resources may be available. If the customer indicates they believe they have qualified for heating assistance, but have not received notification of any payment or amount, the Company representative immediately contacts the heating assistance office and confirms if the customer will receive assistance. The Company's goal is to protect those that are qualified based on income, age, or health. Those that are, are immediately given the appropriate status and service is initiated as soon as possible. When these customers are counted at month end, they will be included as a protected turn-on even though they were not protected when they were terminated.

In addition, there were likely protected and unprotected customers, whose service was disconnected prior to January, who were subsequently restored in January through May 2008, with a protected status.

Prepared by or under the supervision of: Karen Czaplewski

Data Request WILEY 2-6

Request:

How many customers are currently terminated due to non-payment? How many of those customers are in the protected class?

Response:

The Company's systems are not able to discretely identify the number of customers "currently terminated due to non-payment." If queried, the customer billing system would tabulate the total number of terminated accounts (since 1999) without distinguishing the reason for the termination. In addition, once an account is terminated with a balance due and left un-restored for more than 60 days, regardless of the reason for termination, a collection code is sent and the protection code is dropped from the account. Therefore, the Company is unable to provide the information requested.

Prepared by or under the supervision of: Karen Czaplewski

Data Request WILEY 2-7

Request:

For each year for the last three years, please state the number of days a customer who is terminated remains without gas service on average before restoration.

Response:

For each of the last three annual periods running from April 1 through March 31, the average number of days between shut off and restoration of service (for customers who were shut off during a particular annual period and turned back on during the same or any subsequent annual period) is as follows:

2006: 52 Days

2007: 47 Days

2008: 37 Days

This information relates to 22,601 customers.

Please note that these totals do not include customers who are shut off prior to the start of the three-year time period, but restored during the period (1,902); those customers shut off during the three-year time period and having service restored after the three-year time period (79), or those customers who have not had service restored at the same premise and in the same name during this three-year period (16,204).

Prepared by or under the supervision of: Karen Czaplewski

Data Request WILEY 2-8

Request:

For each year for the last three years, please state the number of days a protected customer who is terminated remains without gas service on average before restoration.

Response:

For each of the last three annual periods, running from April 1 through March 31, the average number of days between shut off and restoration of service, for protected customers who were shut off during a particular annual period and restored during the same or any subsequent annual period, is as follows:

2006: 40 Days

2007: 36 Days

2008: 26 Days

This information relates to 5,480 protected customers with protective status as of the date of termination.

Please note that these totals do not include customers who are shut off prior to the start of the three-year time period, but restored during the period (1,902); those customers shut off during the three-year time period and having service restored after the three-year time period (79), or those customers who have not had service restored at the same premise and in the same name during this three-year period (16,204).

Prepared by or under the supervision of: Karen Czaplewski

Data Request WILEY 2-9

Request:

For each year for the last three years, please state the median number of days a customer who is terminated remains without gas service before restoration.

Response:

For each of the last three annual periods, running from April 1 through March 31, the median number of days between shut off and restoration of service, for customers who were shut off during a particular annual period and restored during the same or subsequent annual periods, is as follows:

2006: 7 Days

2007: 7 Days

2008: 7 Days

This information relates to 22,601 customers.

Please note that these totals do not include customers who are shut off prior to the start of the three-year time period, but restored during the period (1,902); those customers shut off during the three-year time period and having service restored after the three-year time period (79), or those customers who have not had service restored at the same premise and in the same name during this three-year period (16,204).

Prepared by or under the supervision of: Karen Czaplewski

Data Request WILEY 2-10

Request:

For each year for the last three years, please state the median number of days a protected customer who is terminated remains without gas service before restoration.

Response:

For each of the last three annual periods, running from April 1 through March 31, the median number of days between shut off and restoration of service, for protected customers who were shut off during a particular annual period and restored during the same or subsequent annual periods, is as follows:

2006: 6 Days

2007: 6 Days

2008: 6 Days

This information relates to 5,480 protected customers, with protected status as of the date of termination.

Please note that these totals do not include customers who are shut off prior to the start of the three-year time period, but restored during the period (1,902); those customers shut off during the three-year time period and having service restored after the three-year time period (79), or those customers who have not had service restored at the same premise and in the same name during this three-year period (16,204).

Prepared by or under the supervision of: Karen Czaplewski

Data Request WILEY 2-11

Request:

For each year for the last three years, please state the longest time any customer has remained terminated due to non-payment or late payment before restoration.

Response:

For each of the last three annual periods, running from April 1 through March 31, the longest time between shut off and restoration of service, for customers who were shut off a particular annual period and restored during the same or subsequent annual period, is as follows:

2006: 982 Days

2007: 674 Days

2008: 348 Days

Please note that the "longest" number of days is determined in the billing system by querying the number of customers who were terminated at a particular service address under a particular account name and then are listed in the billing system as having come back as a customer at a later date with the same service address and account name. During the intervening time period (between termination and restoration), there are a variety of circumstances that occur to account for the duration of time between the termination and restoration date. It is highly unlikely that a customer identified as having the "longest" number of days between termination and restoration was simply at the premises without service for that period.

For example, once a customer is terminated at a particular service address, the account may be immediately restored in another name and remain in that name for some period of time, at which point the service is terminated again and then restored in the first customer's name. The duration between the date of termination and the date of restoration for the first customer would be lengthy, but not because there was no service at that particular premise. Customers may also move away from a premise for some period of time and then return. The Company would need to research the service address to determine the billing and account history and to understand what may have occurred in relation to the intervening time period.

With respect to protected customers, the data presented here includes customers who were under protected status upon termination. Therefore, in terms of the "longest number of days," it cannot be assumed that a protected customer identified as having the "longest" number of days between termination and restoration was a protected customer for the entire duration of the service termination, residing at the premise without service

for that period. Any number of circumstances could have (and likely) occurred between termination of a service to a particular customer at a service address and the restoration of service to the same customer name at the same premises at a later point.

Lastly, Please note that these totals do not include customers who are shut off prior to the start of the three-year time period, but restored during the period (1,902); those customers shut off during the three-year time period and having service restored after the three-year time period (79), or those customers who have not had service restored at the same premise and in the same name during this three-year period (16,204).

Data Request WILEY 2-12

Request:

For each year for the last three years, please state the longest time any protected customer has remained terminated due to non-payment or late payment before restoration.

Response:

For each of the last three annual periods, running from April 1 through March 31, the longest time between shut off and restoration of service, for customers who were shut off a particular annual period and restored during the same or subsequent annual period, is as follows:

2006: 904 Days

2007: 610 Days

2008: 283 Days

For example, once a customer is terminated at a particular service address, the account may be immediately restored in another name and remain in that name for some period of time, at which point the service is terminated again and then restored in the first customer's name. The duration between the date of termination and the date of restoration for the first customer would be lengthy, but not because there was no service at that particular premise. Customers may also move away from a premise for some period of time and then return. The Company would need to research the service address to determine the billing and account history and to understand what may have occurred in relation to the intervening time period.

With respect to protected customers, the data presented here includes customers who were under protected status *upon termination*. Therefore, in terms of the "longest number of days," it cannot be assumed that a protected customer identified as having the "longest" number of days between termination and restoration was a protected customer for the entire duration of the service termination, residing at the premise without service for that period. Any number of circumstances could have (and likely) occurred between termination of a service to a particular customer at a service address and the restoration of service to the same customer name at the same premises at a later point.

Lastly, Please note that these totals do not include customers who are shut off prior to the start of the three-year time period, but restored during the period (1,902); those customers shut off during the three-year time period and having service restored after the three-year time period (79), or those customers who have not had service restored at the same premise and in the same name during this three-year period (16,204).

Prepared by or under the supervision of: Karen Czaplewski