

October 16, 2008

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02889

**RE: Docket 3943 – National Grid Request for Change of Gas Distribution Rates
Responses to Data Requests and Record Requests**

Dear Ms. Massaro:

Enclosed please find eight (8) copies of National Grid's¹ responses to Data Requests COMM 3-2 and 3-8, along with responses to the Wiley Center's third set of data requests. In addition, the Company is providing responses to the following outstanding record requests: AG-1, OER-1, ENE-1, DIV-3, COMM-2, COMM-6, COMM-7, COMM-9, COMM-10, COMM-12, COMM-14, and COMM-21. Attached is a listing of the outstanding data/record requests for which the Company has not yet provided a response. The Company is endeavoring to file these responses as soon as possible.

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 Data/Record Requests as of October 16, 2008

Data Request COMM 2-9
Record Request COMM-8
Record Request COMM-11
Record Request COMM-13
Record Request TECRI-1
Record Request DIV-1
Record Request DIV-2
Record Request DIV-4
Record Request DIV-5
Record Request DIV-6
Record Request DIV-7
Record Request DIV-8
Record Request DIV-9
Record Request DIV-10

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/
Linda Samuelian

October 16, 2008
Date

**National Grid (NGrid) – Request for Change in Gas Distribution Rates
Docket No. 3943 - Service List as of 9/15/08**

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	rkoontz@env-ne.org	
Glenn R. Friedemann, Esq. Rhode Island Hospital The Coro Building, Suite 2B 167 Point St. Providence, RI 02903	gfriedemann@lifespan.org	401-444-3103 401-444-3302
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	dsharkey@rubinrudman.com	
	RClifford@rubinrudman.com	
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	jmusgrave@rcfp.com	
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Jeffrey H. Gladstone, Esq. Robert K. Taylor, Esq. Partridge Snow & Hahn LLP 180 South Main St. Providence, RI 02903	jhg@psh.com	401-861-8242 401-861-8200
	rkt@psh.com	

File original & nine (9) copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02889	Lmassaro@puc.state.ri.us	401-780-2107
	Tmassaro@puc.state.ri.us	401-941-1691
	Anault@puc.state.ri.us	

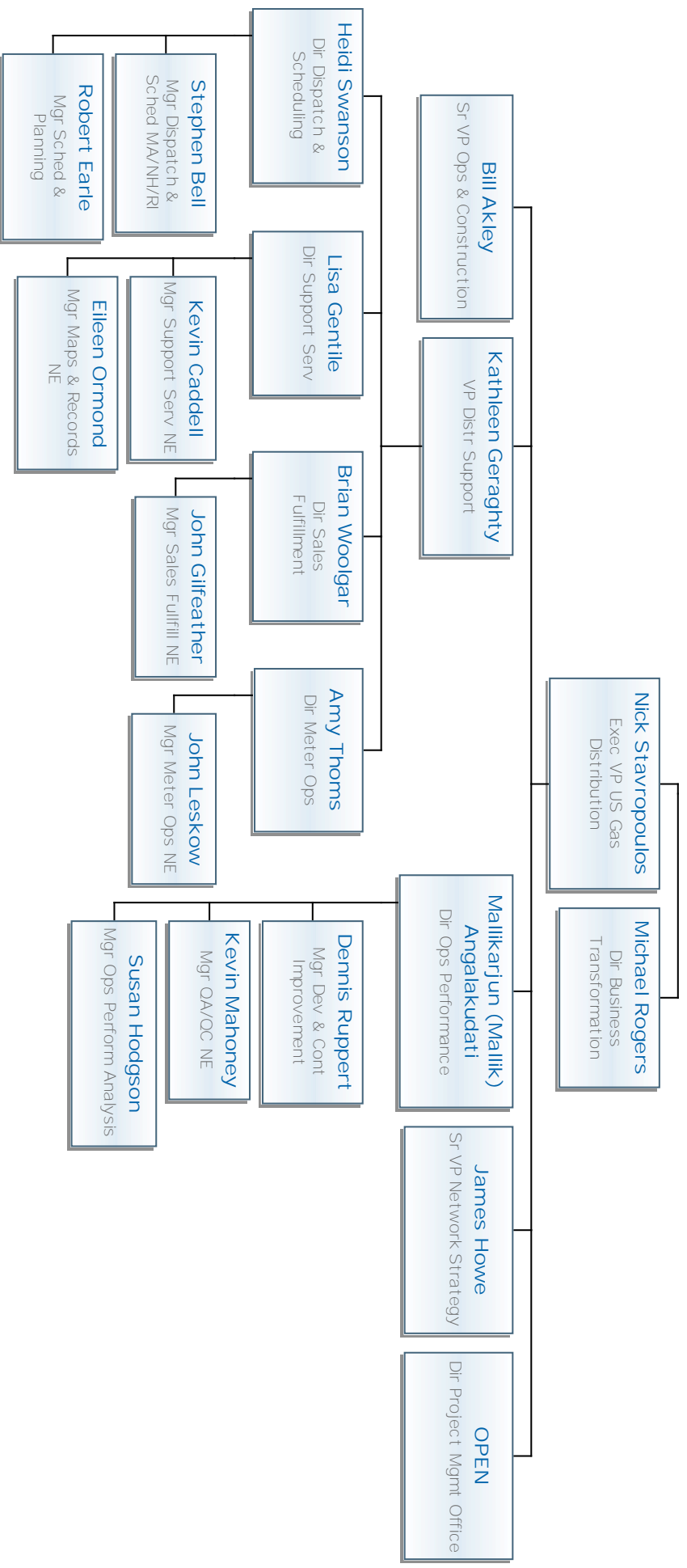
Data Request COMM 3-2

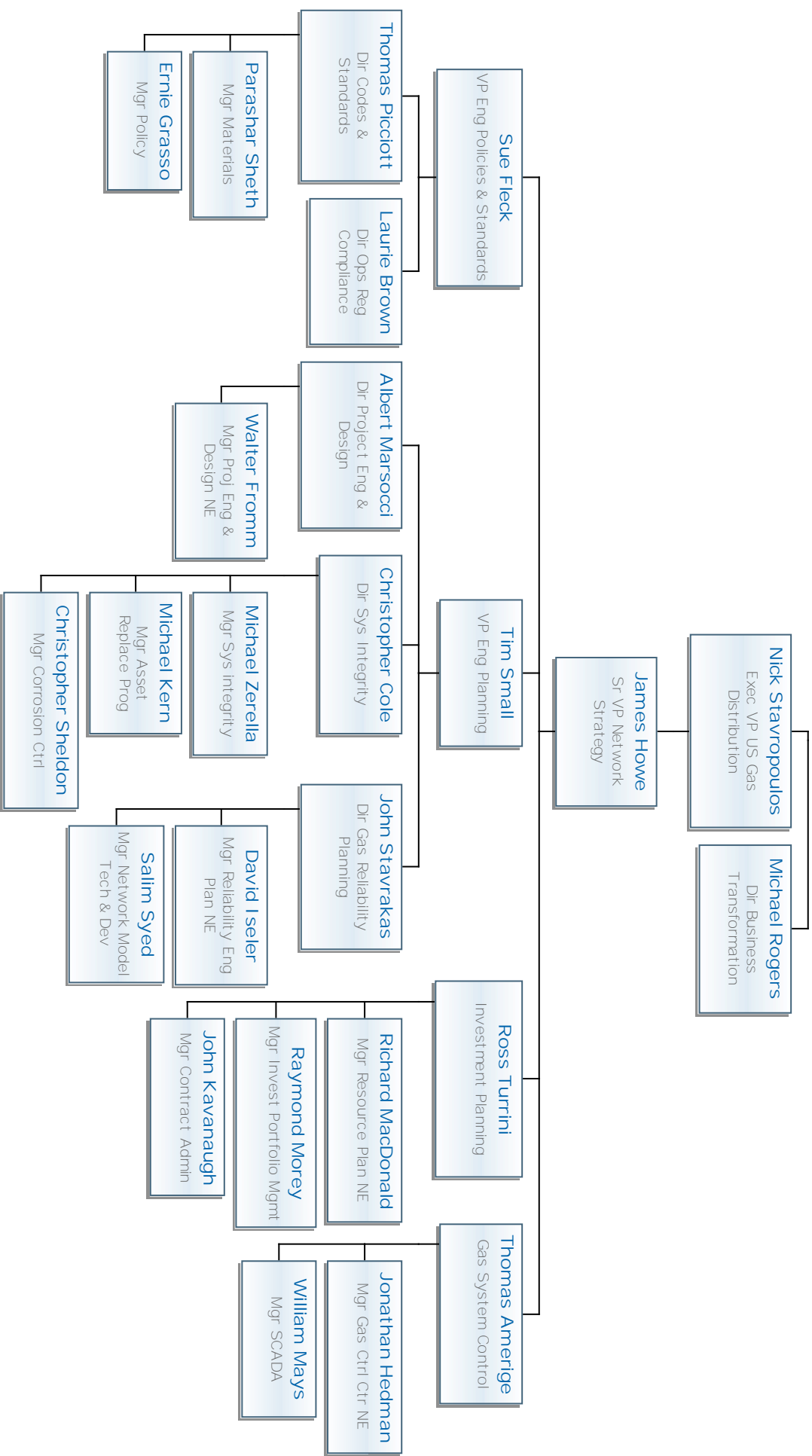
Request:

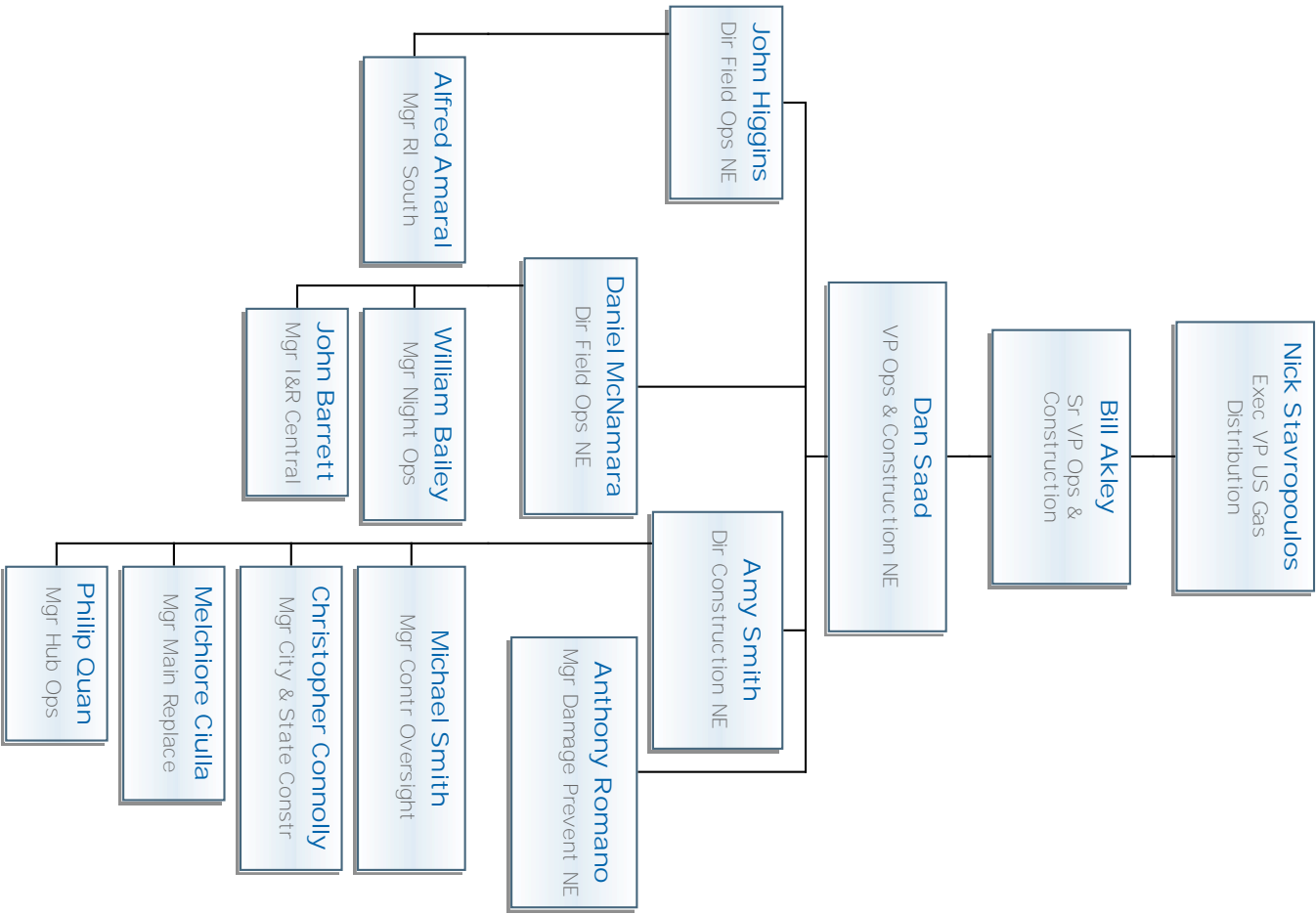
Provide an organizational chart showing all management level positions. Please provide titles and the names of individuals. If an individual has responsibilities for both gas and electric operations, indicate the approximate percentage of the individual's time that is spent on/allocated to gas operations.

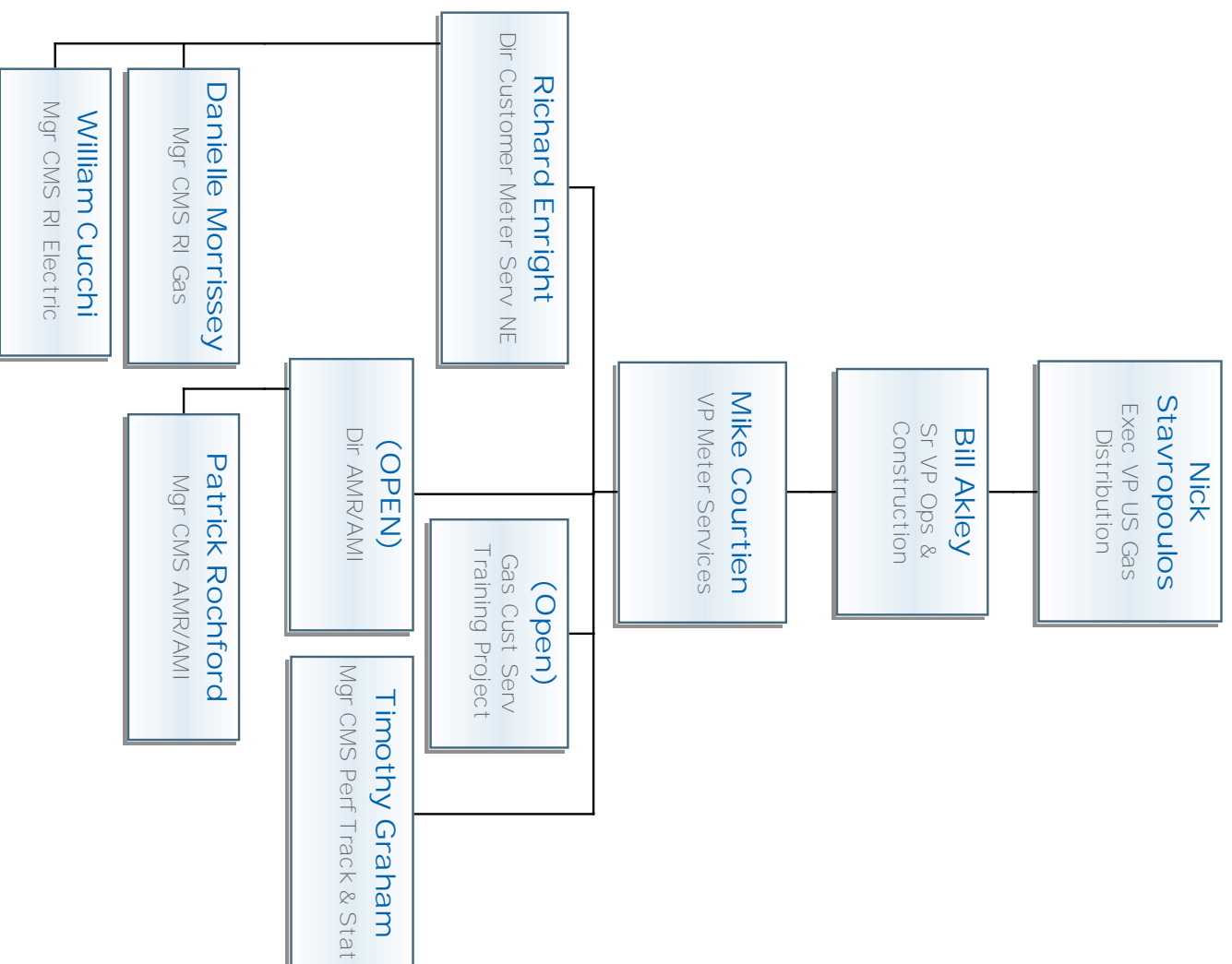
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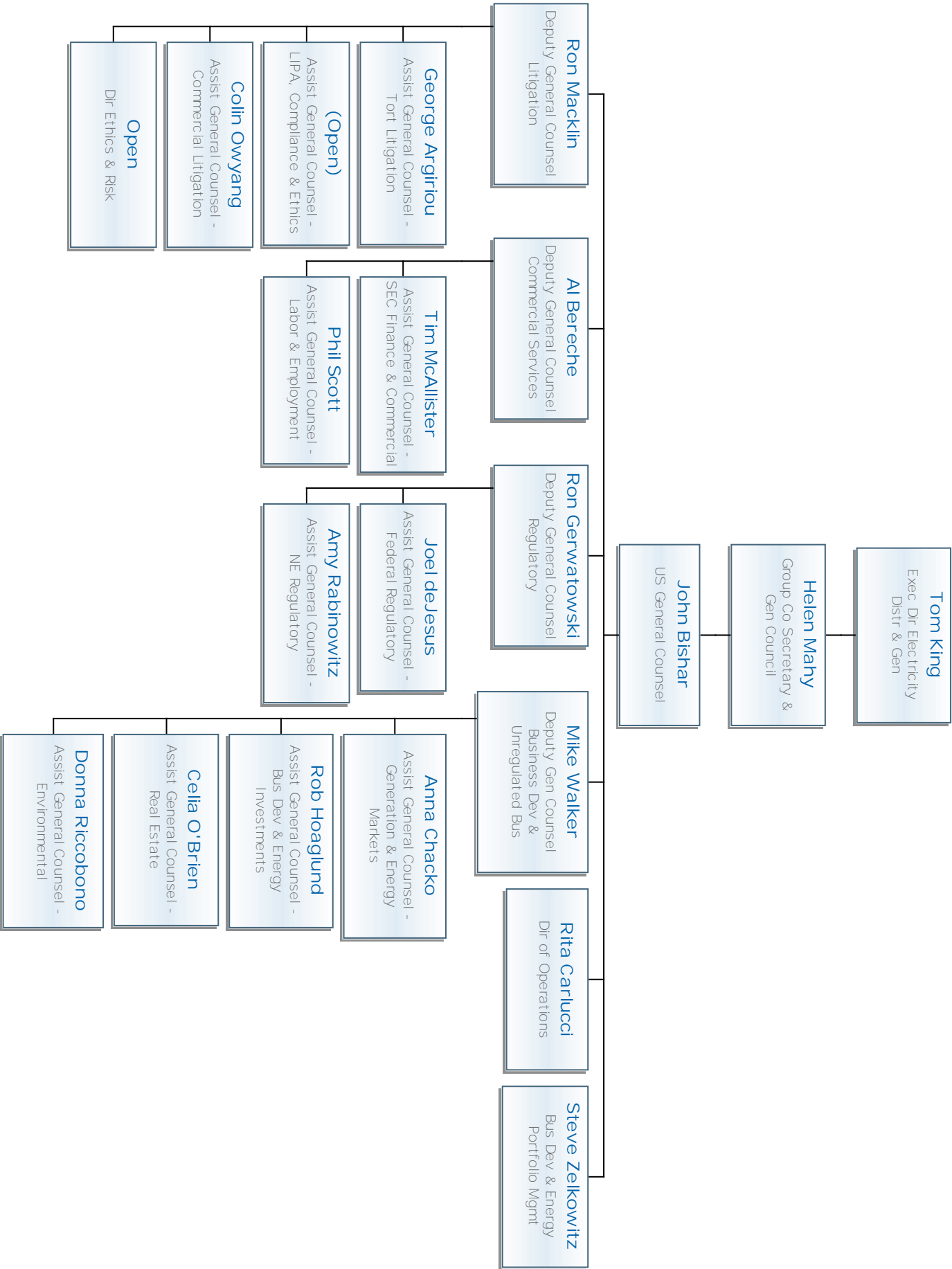
Please see Attachment COMM 3-2.

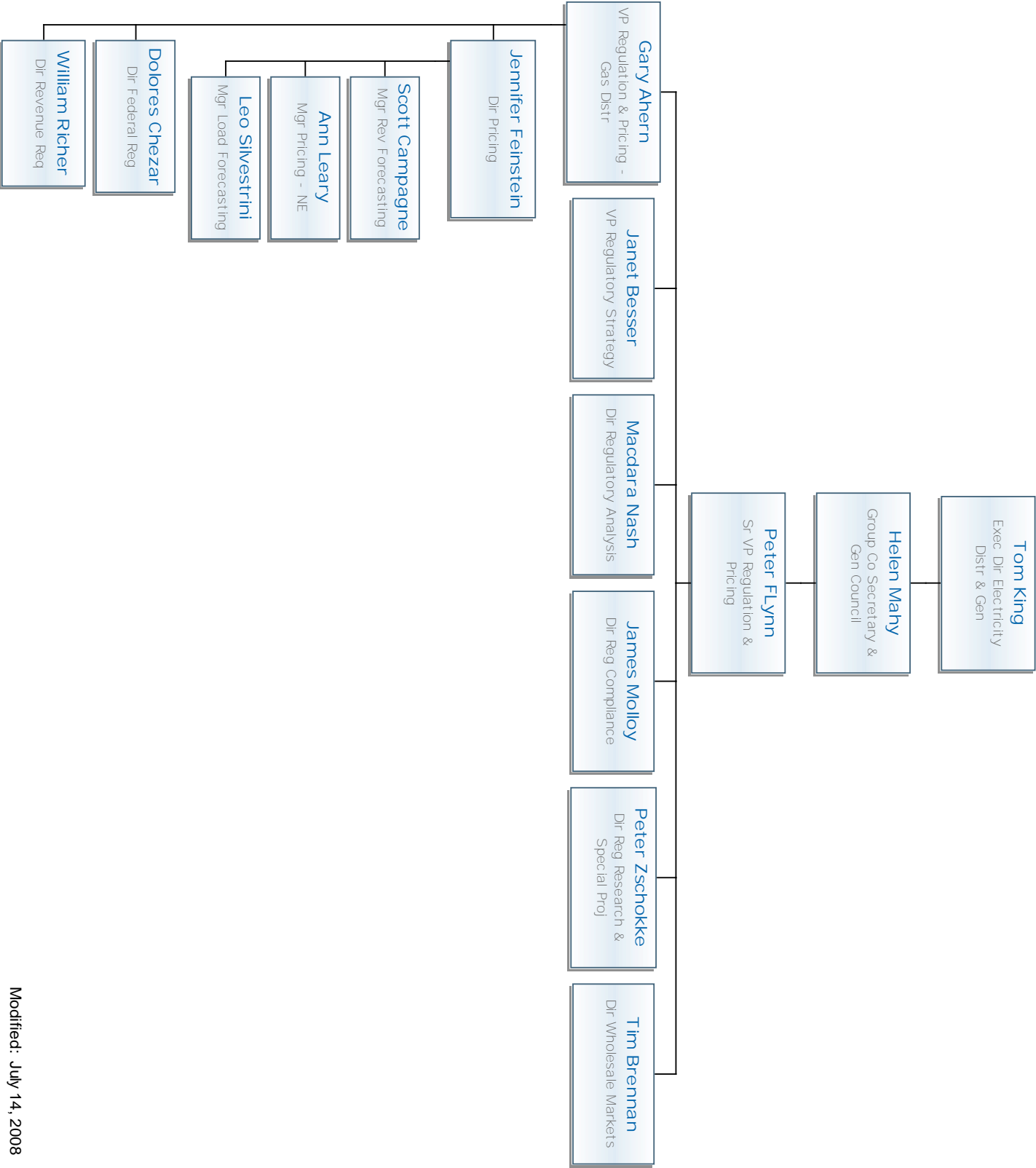


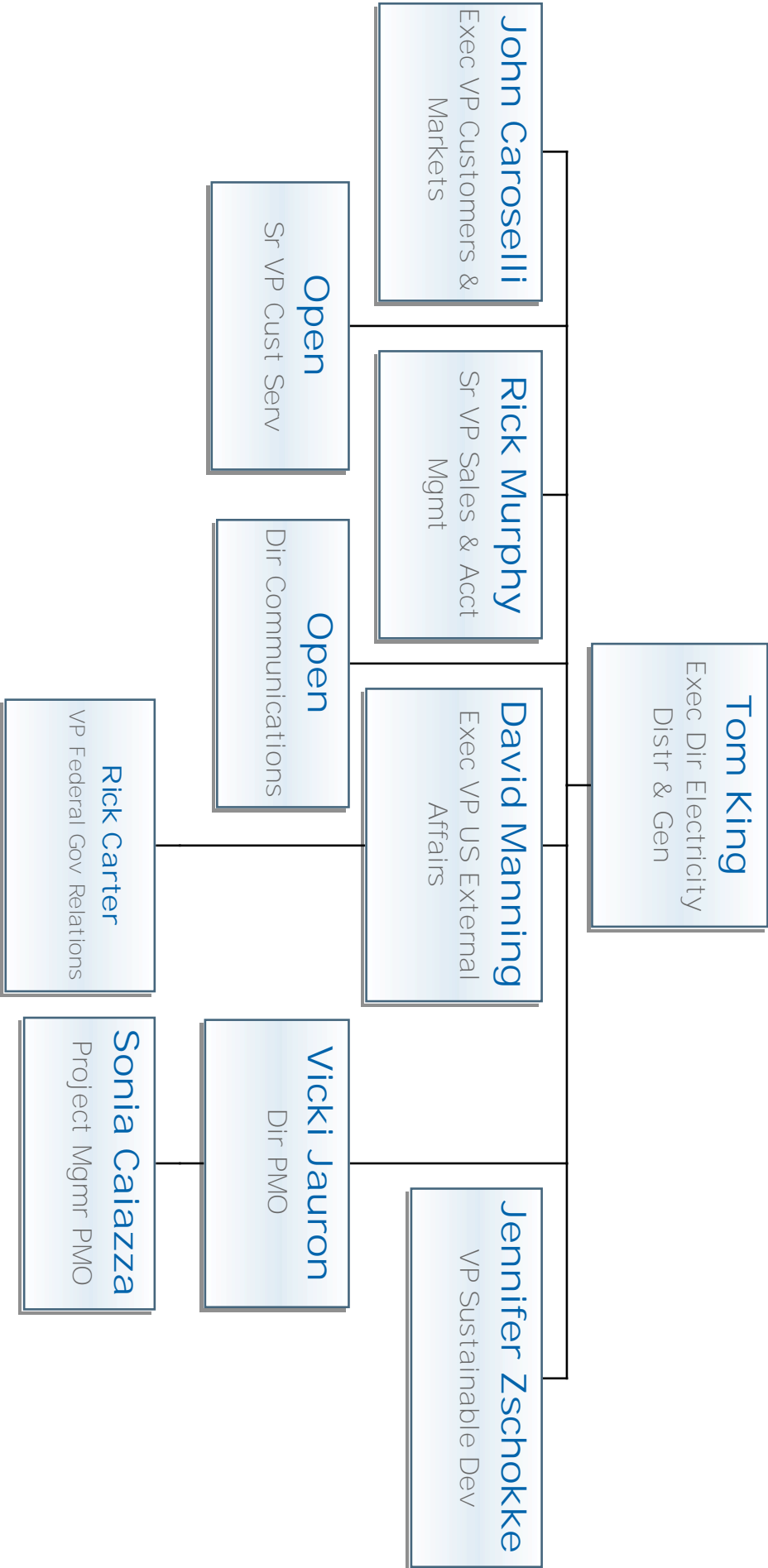


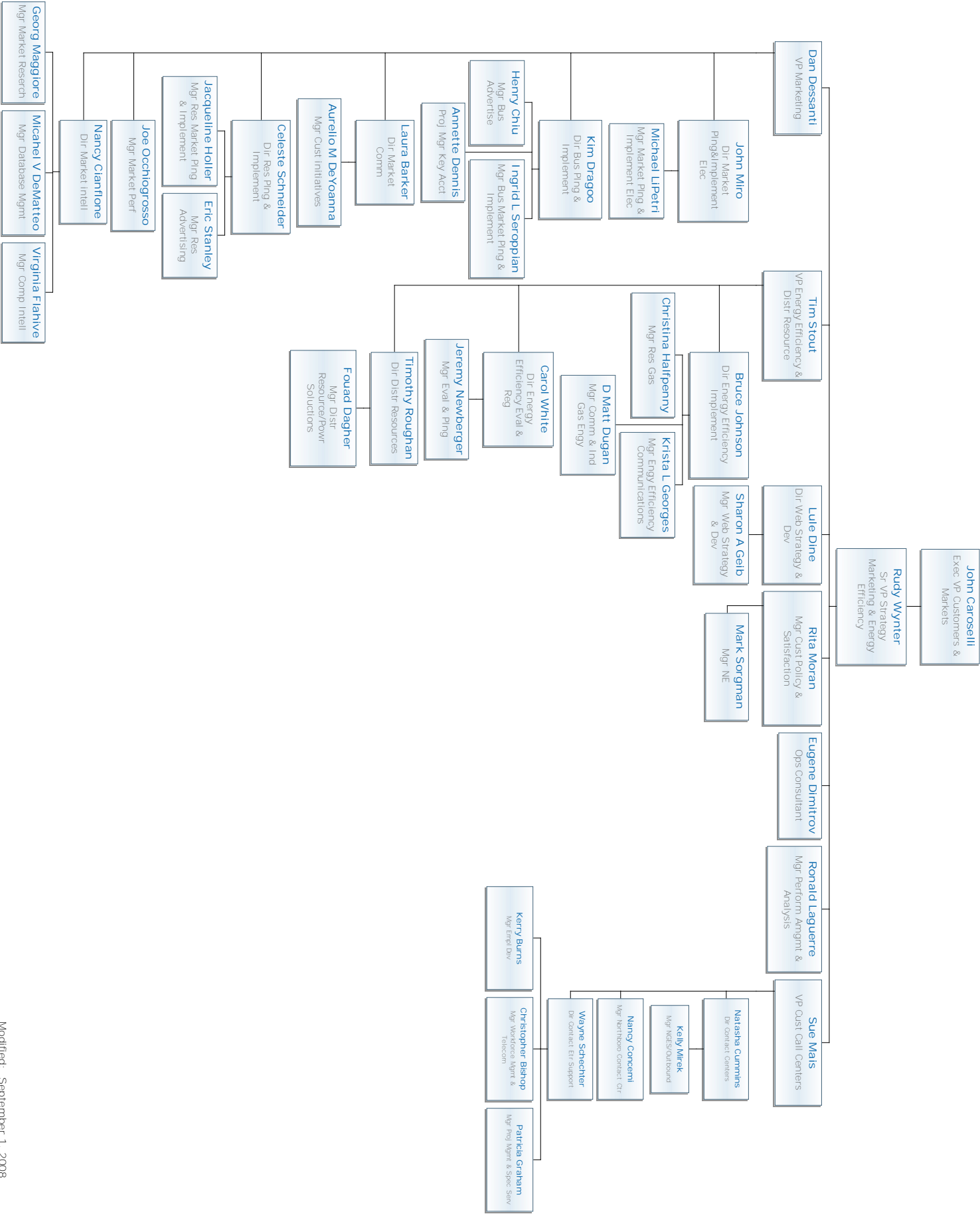


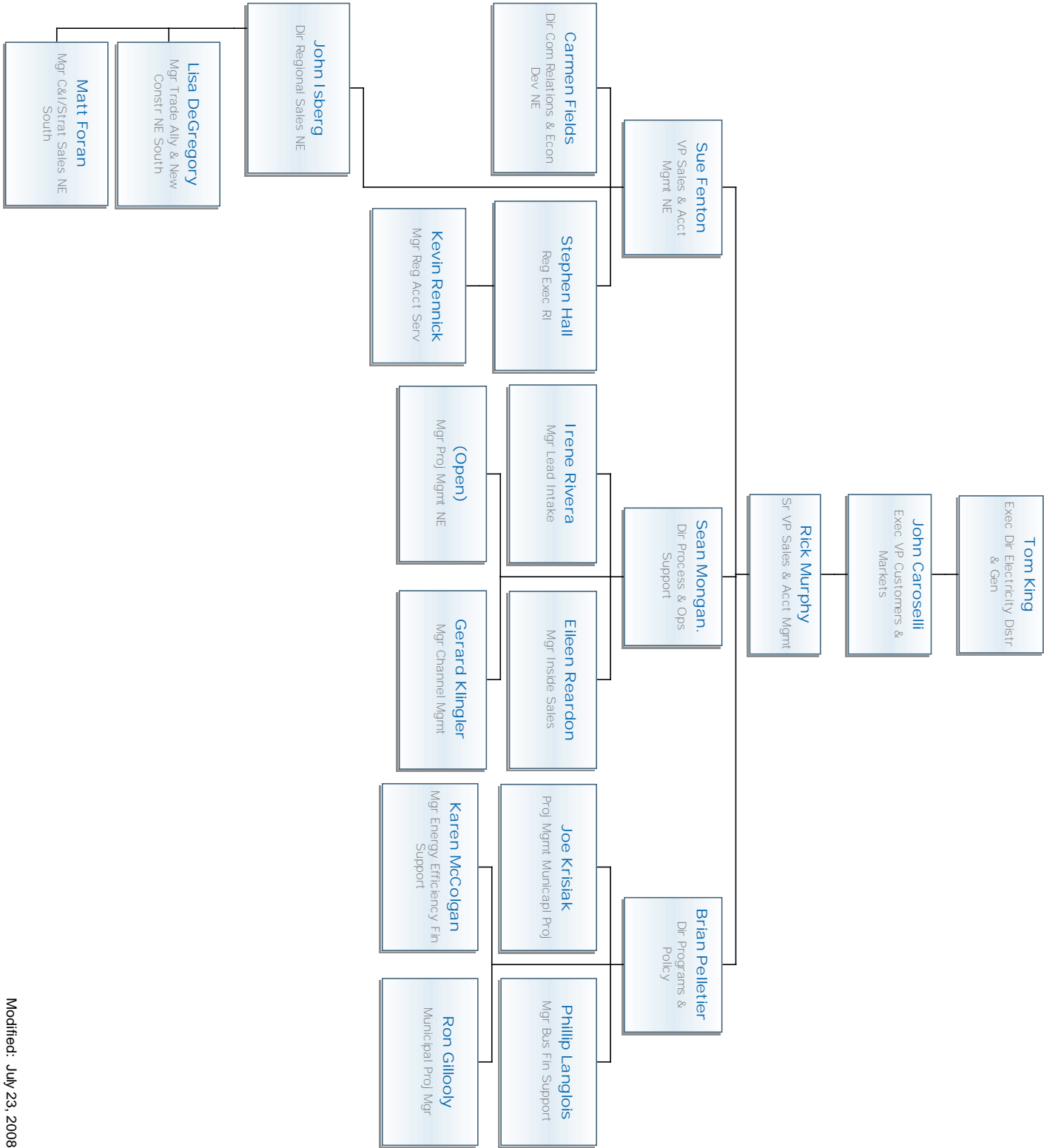


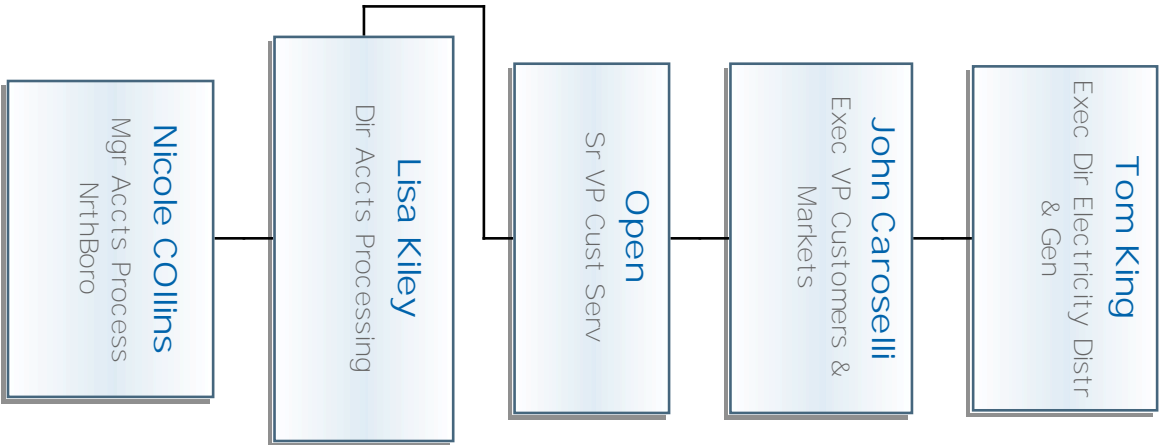


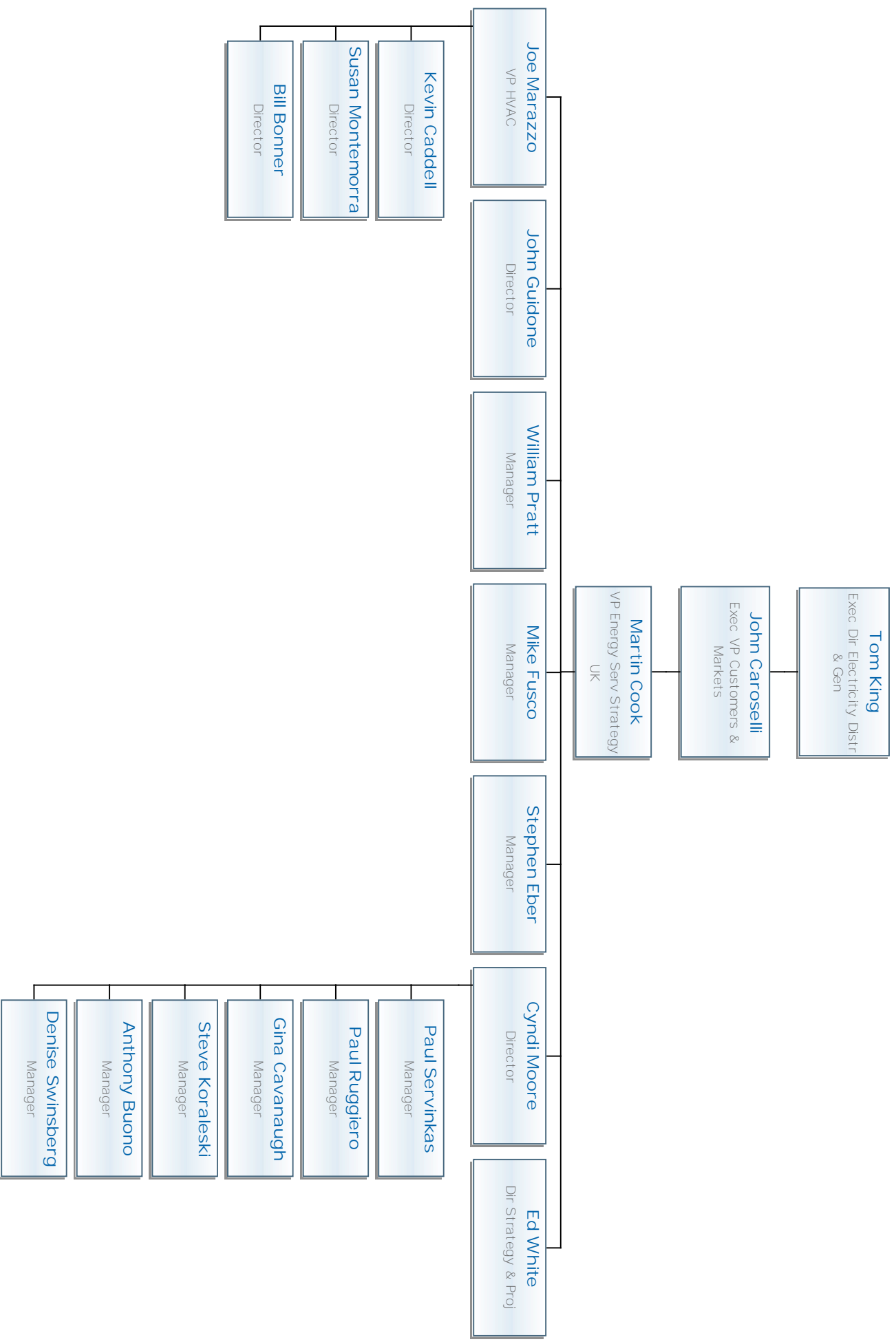




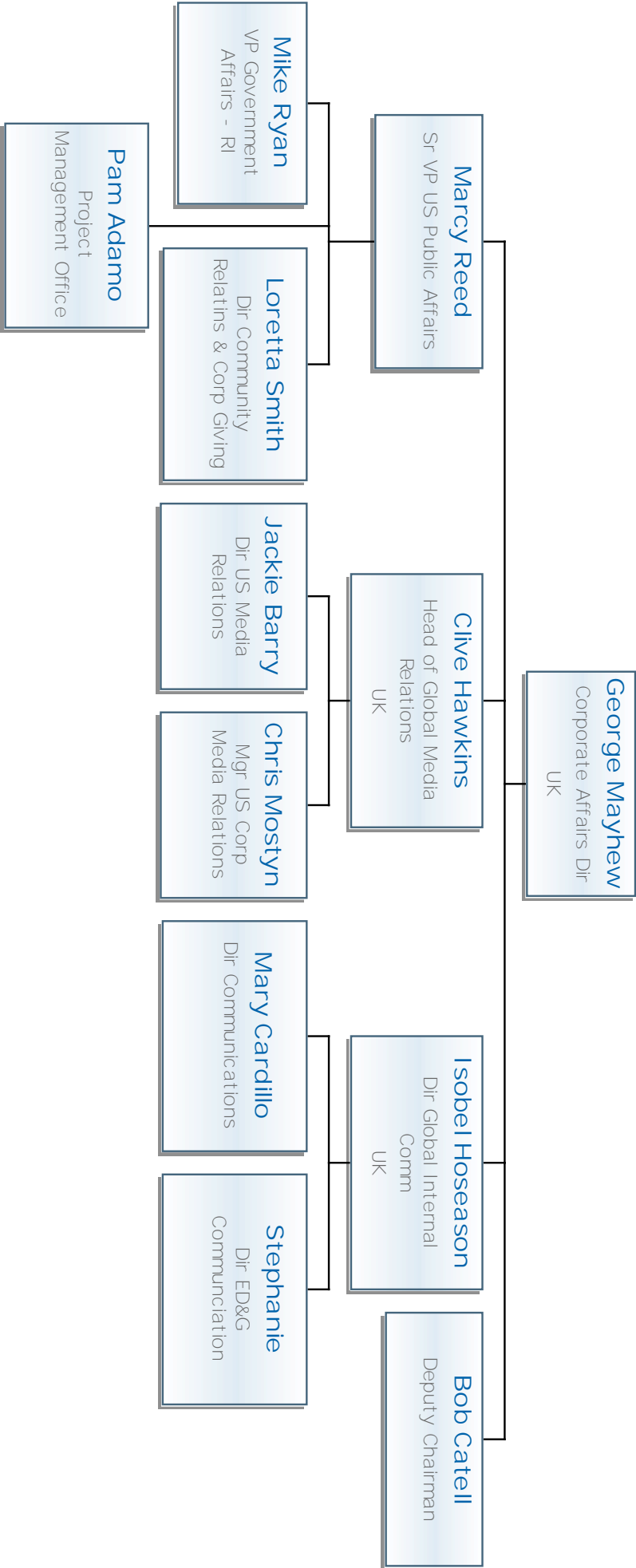




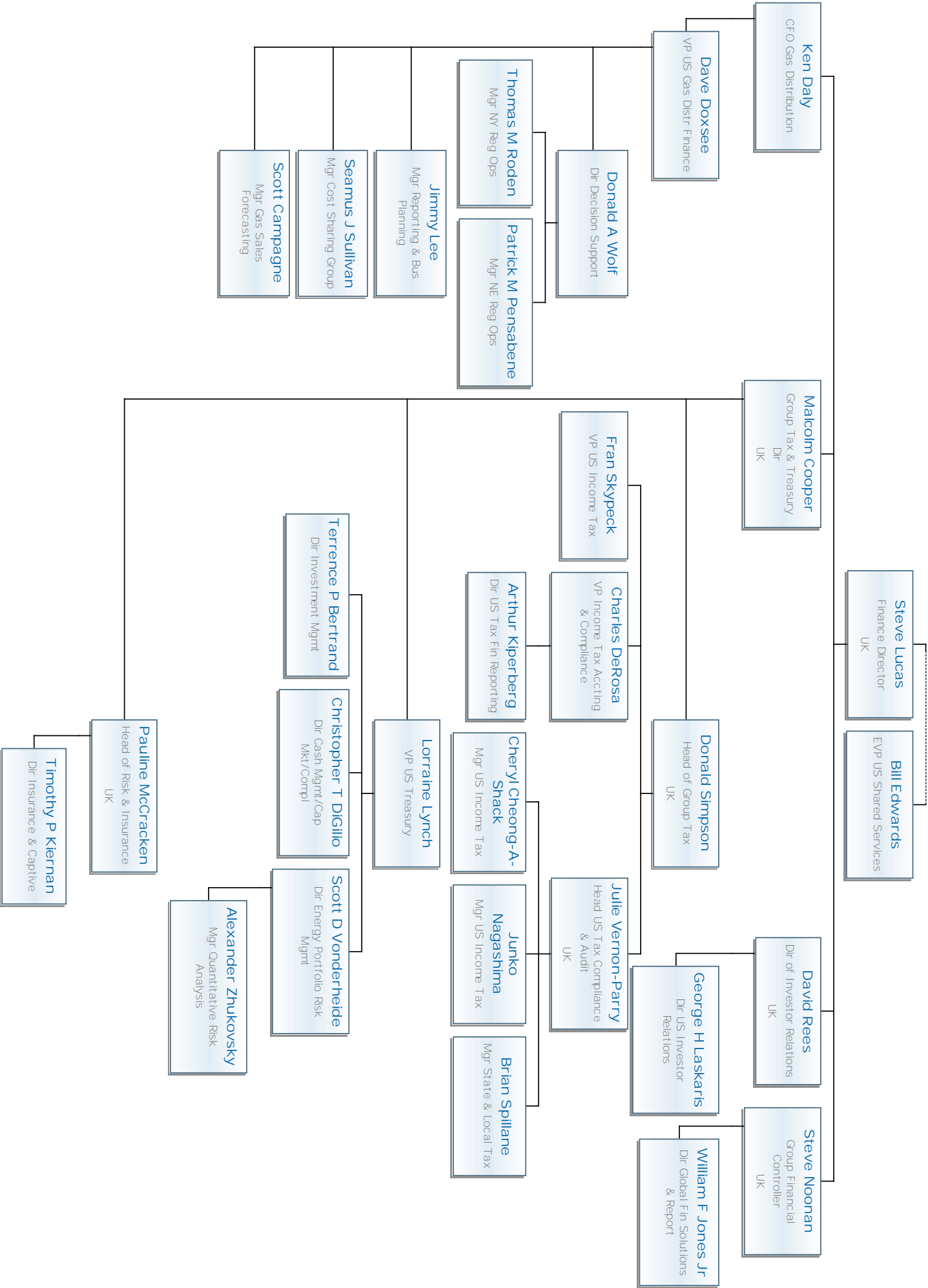




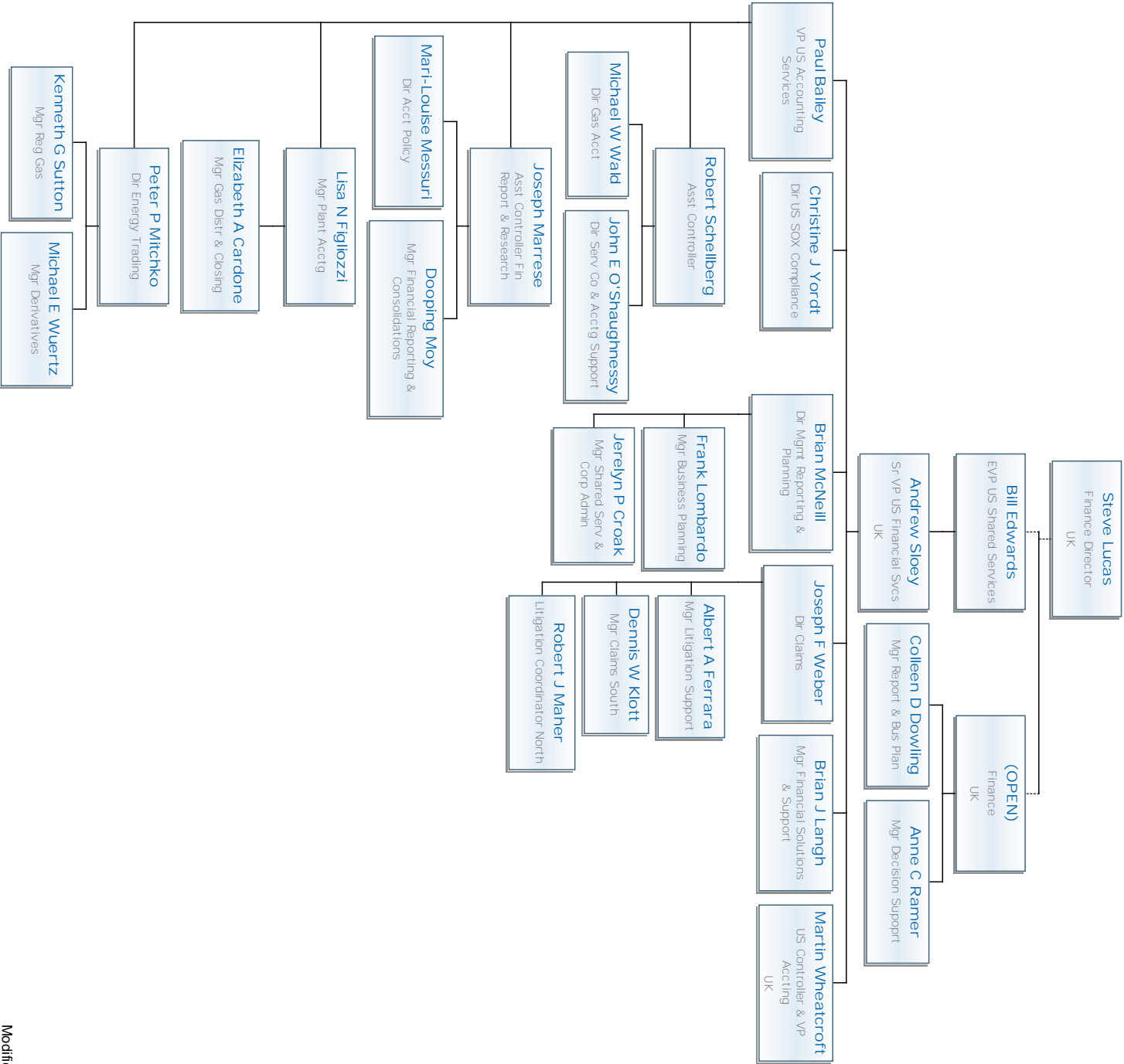
Corporate Affairs



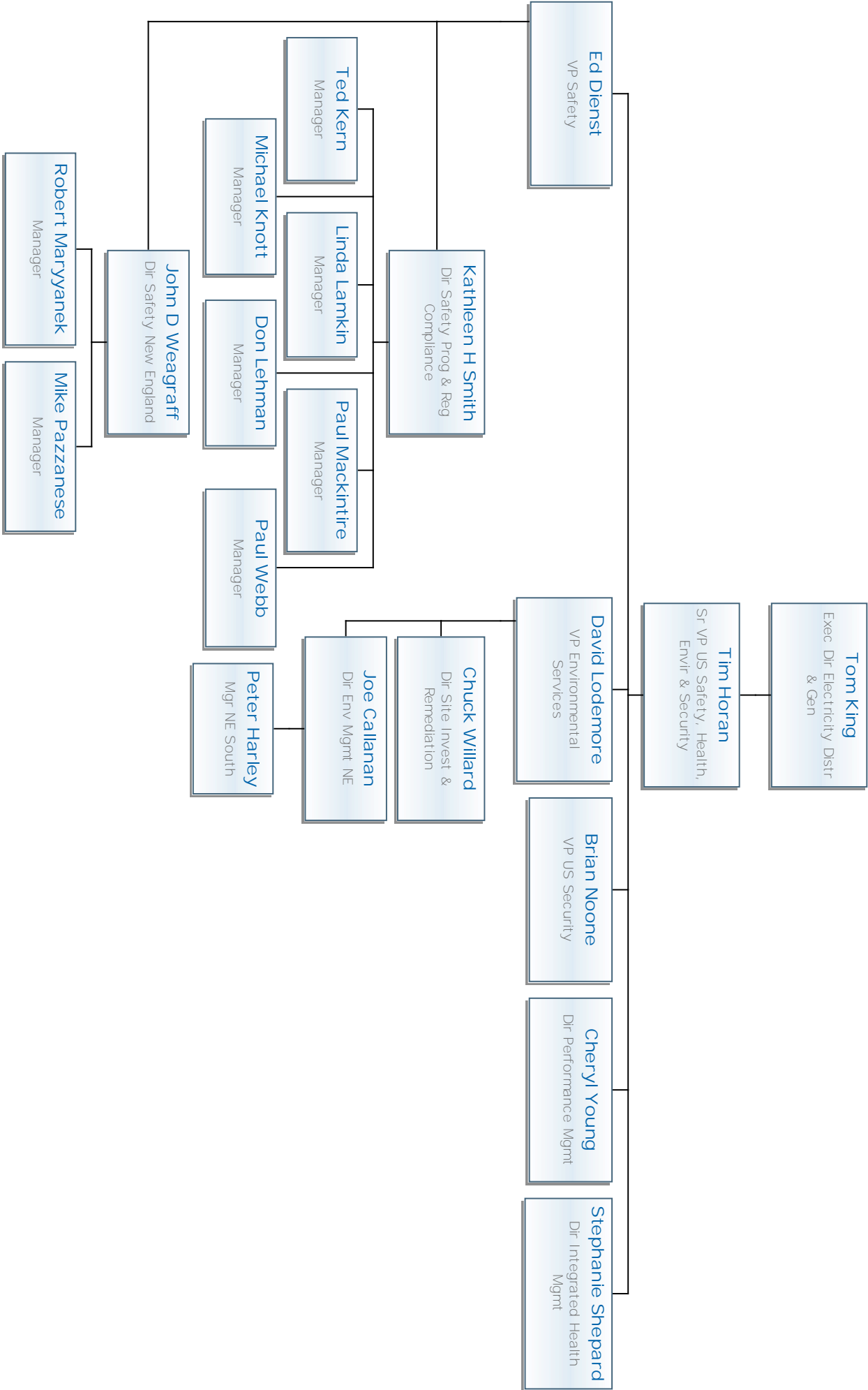
Integrated Finance Organization - Page 1



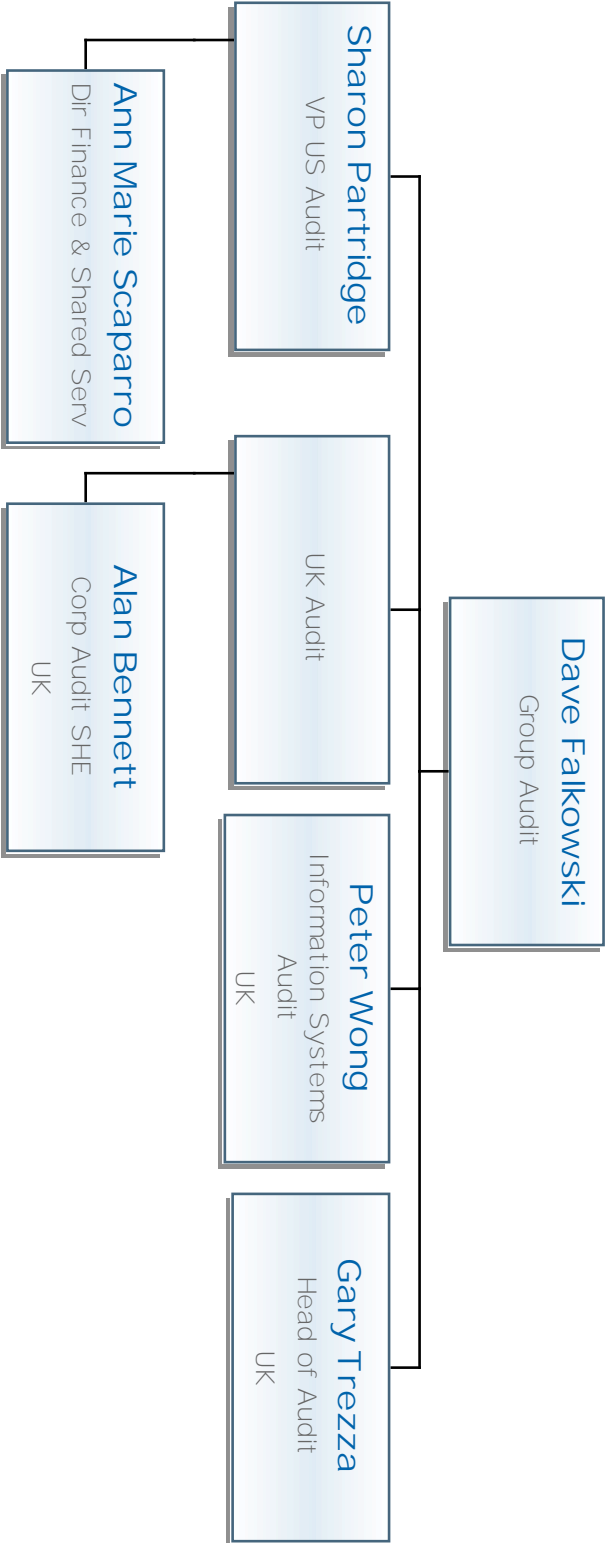
Integrated Finance Organization - Page 2

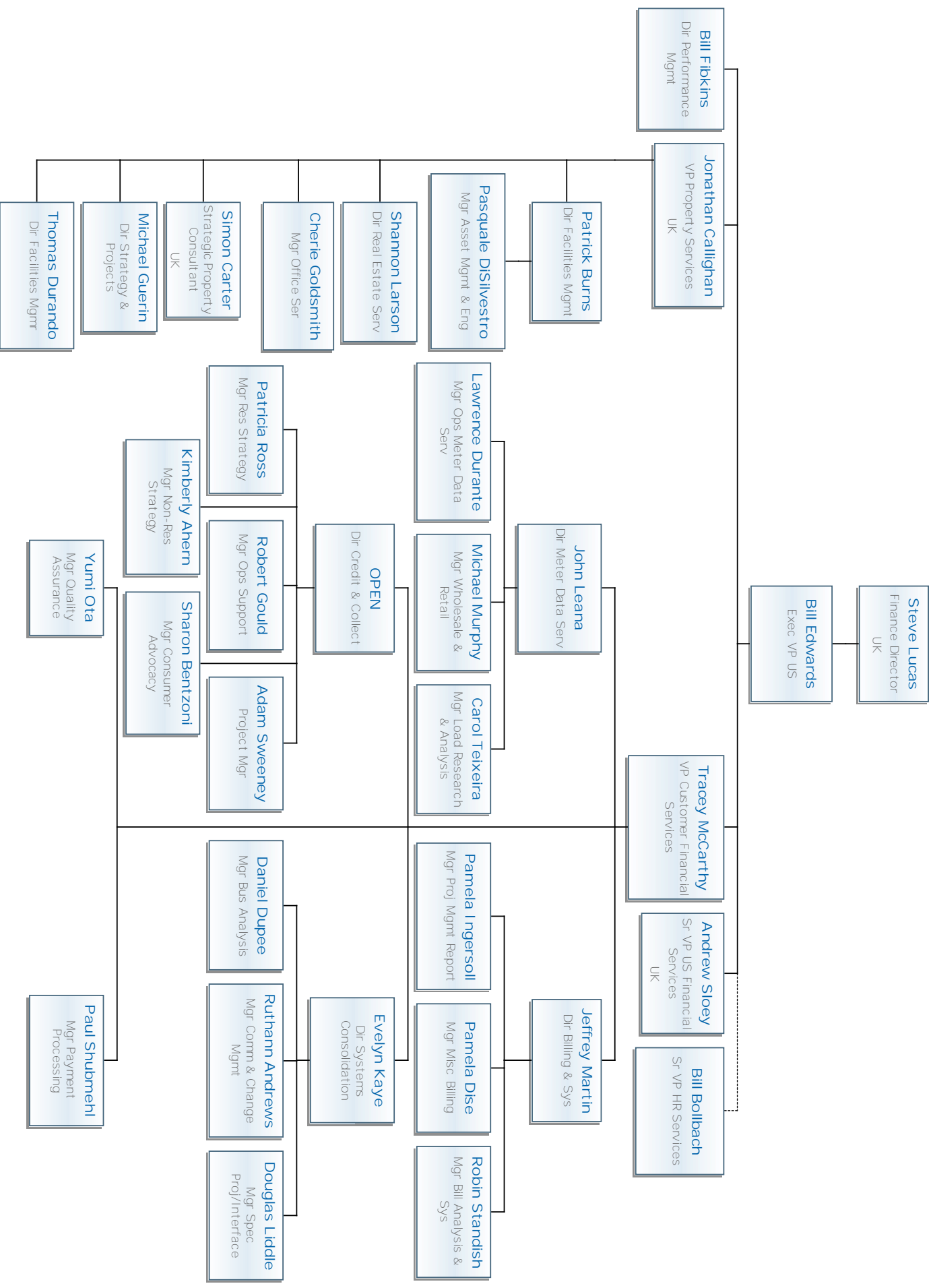


US SHES

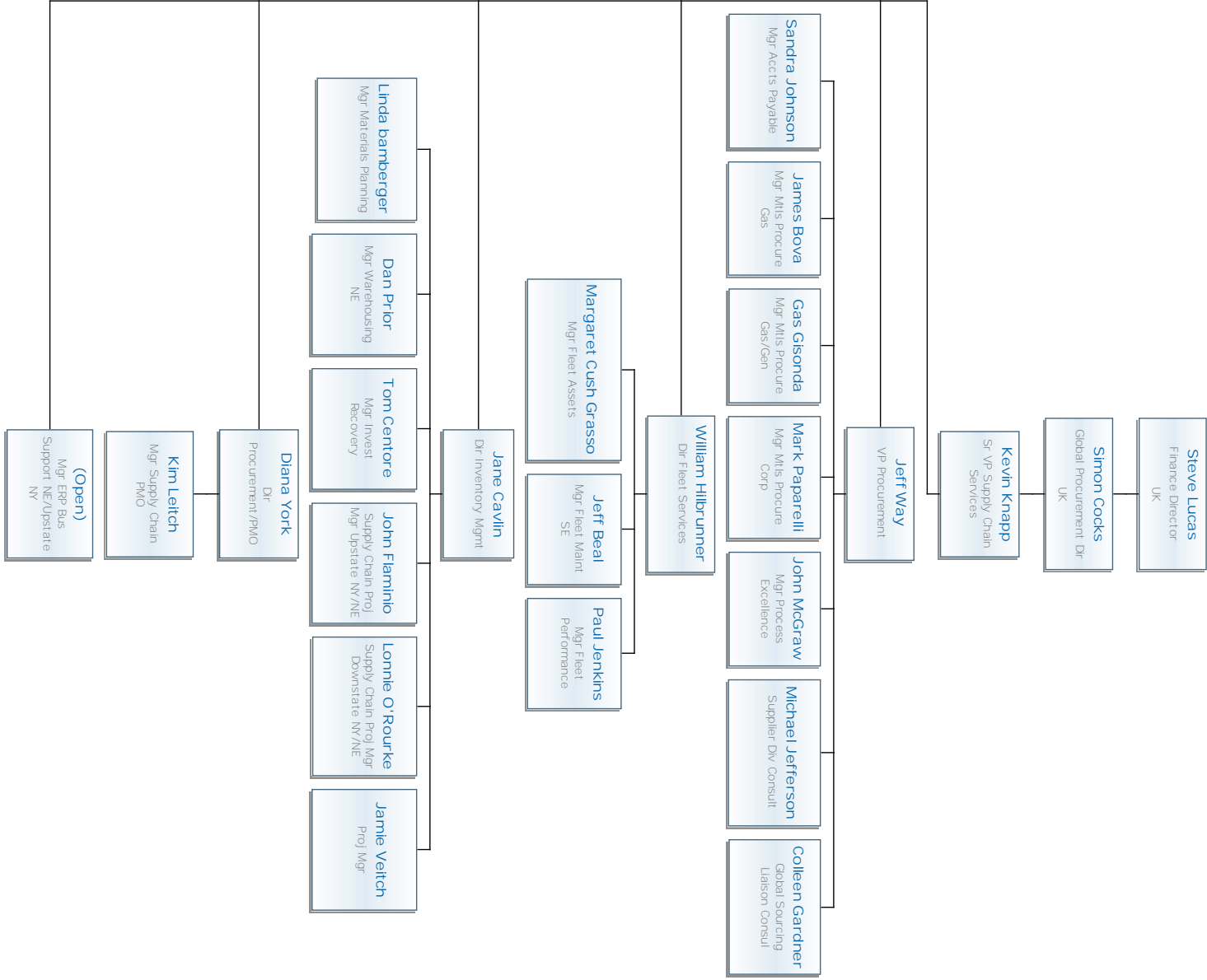


Group Audit

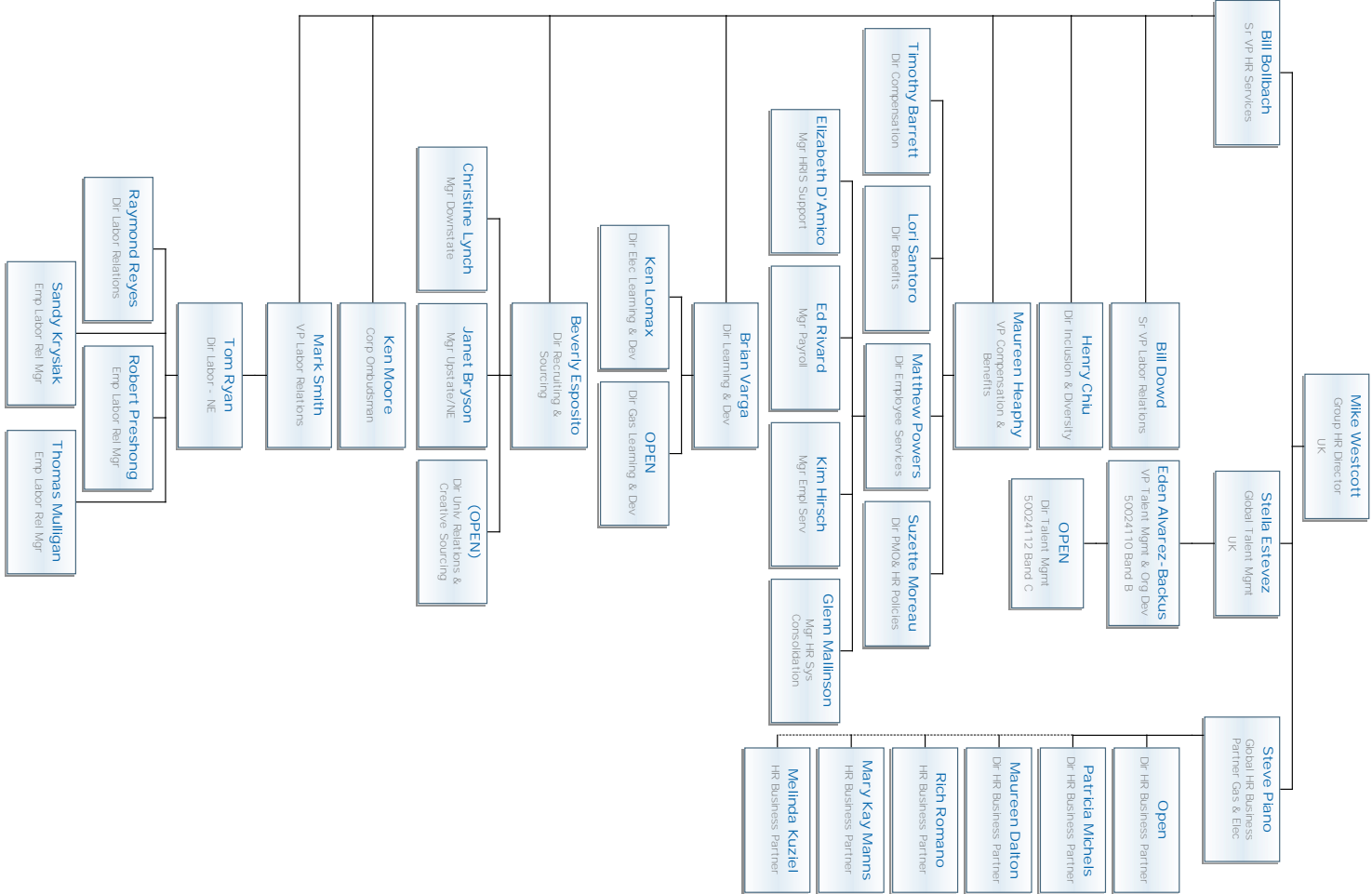




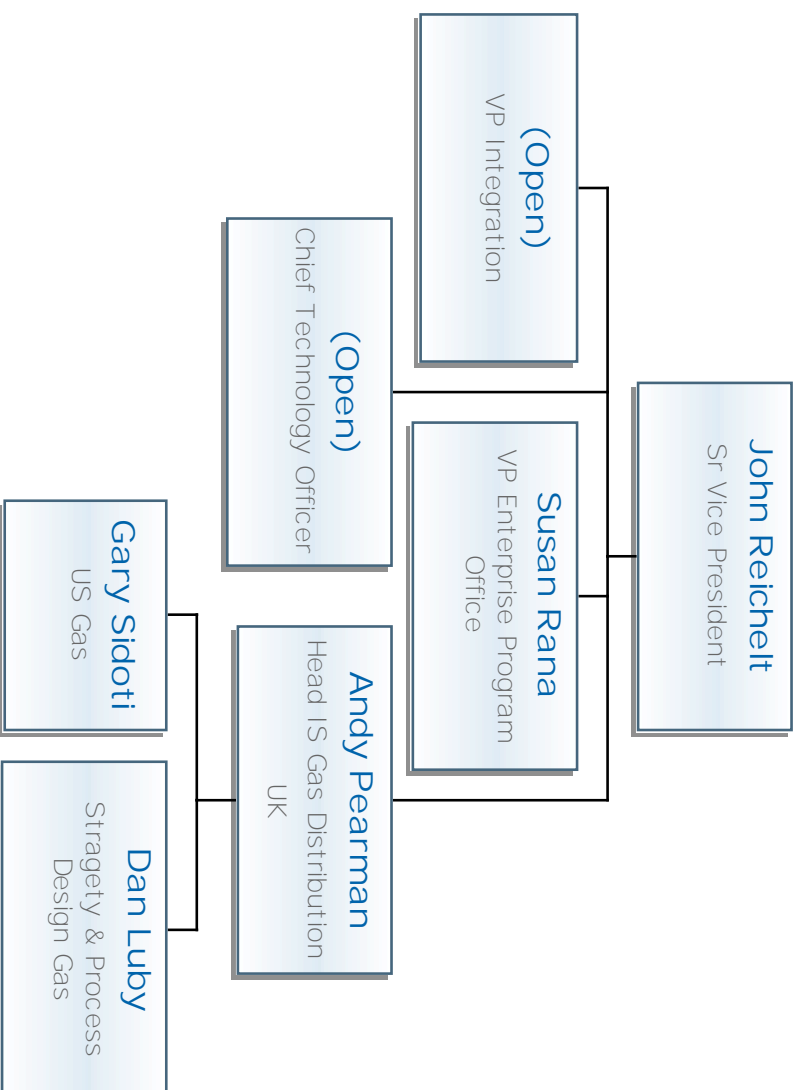
US Shared Services Shared 2



Human Resources



Global Information Services



Data Request COMM 3-8

Request:

How many residential non-heating customers have converted to gas heating over the last 36 months? Provide the total and the number for each month.

Response:

Please see Attachment COMM 3-8 for residential heating conversions by month in 2007 and through August 2008. Non-heating customer who have converted to gas heating are listed as “low-use upgrades” in Attachment COMM 3-8.

Please note that Southern Union did not conduct a program to encourage conversions of low-use customers who are connected to the gas distribution system or heating customers who are located on the gas distribution system but not taking gas service of any type. As a result, Southern Union did not track or record the number of new customers converting to gas heating service from these two categories, which means that data on the number of low-use customer upgrades is not readily available prior to 2007. Records for the number of new services are available, but these totals include new construction (not part of the Gas Marketing Program) and understate the number of new heating customers because low-use conversions typically do not require the installation of a new service. As a result, these types of conversions are not reflected in new customer counts based on service installations.

Lastly, in viewing the data set forth in Attachment COMM 3-8, please note that the Company’s initial customer outreach efforts took place in Fall 2007, but were not broadly implemented until Spring 2008.

Attachment COMM 3-8
National Grid -- Rhode Island

MONTHLY LOAD GROWTH 2007												
COMPLETED- WITH ACTIVE METER	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual
RESIDENTIAL CONVERSIONS	11	18	7	12	8	10	16	17	16	19	34	6
RESIDENTIAL LOW USE UPGRADE	120	92	50	46	23	11	18	6	19	36	59	49
TOTAL HEATING CONVERSIONS	131	110	57	58	31	21	34	23	35	55	93	55
												703

MONTHLY LOAD GROWTH 2008												
COMPLETED- WITH ACTIVE METER	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	2008 Actual	2008 Actual	2008 Actual	2008 Actual	2008 Actual	2008 Actual	2008 Actual	2008 Actual	2008 Actual	2008 Actual	2008 Actual	2008 Actual
RESIDENTIAL CONVERSIONS	19	15	107	128	81	87	125	335				897
RESIDENTIAL LOW USE UPGRADE	33	48	17	72	72	236	191	51				720
TOTAL HEATING CONVERSIONS	52	63	124	200	153	323	316	386				1,617

COMPARISON OF MONTHLY UPGRADES AND CONVERSIONS 2007-2008												
COMPLETED- WITH ACTIVE METER	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual	2007 Actual
2007 RESIDENTIAL CONVERSIONS & UPGRADES	131	110	57	58	31	21	34	23				465
2008 RESIDENTIAL CONVERSIONS & UPGRADES	52	63	124	200	153	323	316	386				1,617
YEAR OVER YEAR DIFFERENCE	(79)	(47)	67	142	122	302	282	363				1,152

Data Request WILEY 3-1

Request:

If the customer charge for residential customers remains at \$9, what will be the financial impact on National Grid? Please answer this question first assuming that the proposed 10% low-income discount is adopted and then assuming that it is not.

Response:

Based on the billing determinants shown on Attachment NG-DAH-4, changing the proposed Residential Heating customer charge from \$16.00 to \$9.00 and the Residential Heating Discount customer charge from \$14.40 to \$9.00, without making any offset to the proposed reduction in the residential heating variable distribution charge would create a revenue shortfall of \$16,152,572. Please note that these proposed rates were based on the Company's original revenue requirement of \$20.4 million and the Company has not calculated proposed rates under the Company's rebuttal revenue requirement of \$18.5 million.

Assuming that the proposed 10% low-income discount is not approved, the revenue requirement would change for all rate classes and would change the proposed rates. As a result, the Company cannot answer the question under the assumption that the 10% low-income discount is not approved.

Data Request WILEY 3-2

Request:

Would you please provide the Docket 1725 termination report for gas and electric as soon as possible, preferably before the hearing date?

Response:

Attachments WILEY 3-2(a) and (b) present a copy of the most recent termination report provided in Docket 1725 for electric and gas service, respectively.



Thomas R. Teehan
Senior Counsel

September 15, 2008

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 1725 – National Grid Monthly Responses
Electric Termination Report – August 2008**

Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's¹ responses to the Commission's on-going monthly data requests regarding termination information for electric customers in the above-captioned proceeding.

This report contains residential termination information for August 2008, as well as information dating back to April 2004 in Excel format. Pursuant to the Commission's recent request, the Company has added a line to the report indicating the number of flexible payment plans entered into with customers during the month.

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

Very truly yours,

A handwritten signature in blue ink that reads "T. R. Teehan".

Thomas R. Teehan

Enclosures

cc: Docket 1725 Service List

¹ Submitted on behalf of The Narragansett Electric Company d/b/a National Grid ("Company").

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.



Joanne M. Scanlon
National Grid

September 15, 2008
Date

**Docket No. 1725 – National Grid and Pascoag Utility District – Filing of monthly activity of service terminations, termination notices sent, customers balances and payment plans entered/broken.
Service List updated 10/03/07**

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	Joanne.scanlon@us.ngrid.com	
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Original & nine (9) copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02889	Lmassaro@puc.state.ri.us	401-780-2107 401-941-1691
	Cwilson@puc.state.ri.us	
	Anault@puc.state.ri.us	
	PatriciaL@gw.doa.state.ri.us	

UTILITY NAME: **National Grid - Electric Report**
REPORT DATE: **September 15, 2008**
PERIOD ENDED: **August 31, 2008**

	<u>Apr-08</u>	<u>May-08</u>	<u>Jun-08</u>	<u>Jul-08</u>	<u>Aug-08</u>	<u>Sep-08</u>	<u>Oct-08</u>	<u>Nov-08</u>	<u>Dec-08</u>	<u>Jan-09</u>	<u>Feb-09</u>	<u>Mar-09</u>	<u>Total</u>
Total Physical Terminations	940	2,954	3,182	3,213	2,980								13,269
Protected Terminations	6	34	37	38	370								485
Non-Protected Terminations	934	2,920	3,145	3,175	2,610								12,784
Average Balance of Those Terminated	\$587	\$715	\$583	\$399	\$474								\$2,759
Terminations in Excess of \$1,000	113	502	380	183	266								1,444
Termination Notices Sent	21,150	21,445	25,648	34,661	37,082								139,986
Payment Plans Negotiated	5,597	6,668	5,476	5,884	6,456								30,081
Payment Plans Broken	2,927	5,394	6,283	6,583	6,893								28,080
Flexible Payment Plans	518	577	750	704	756								3,305
Actual A/R Write off *	\$765,176	\$993,555	\$1,004,638	\$1,212,952	\$1,846,656								5,822,977
Recoveries *	(\$321,266)	(\$270,799)	(\$285,933)	(\$279,795)	(\$261,073)								(\$1,418,865)
Net A/R Write off *	\$443,911	\$722,756	\$718,706	\$933,157	\$1,585,583								4,404,112

* Combined Residential & Commercial Data

As of August 31, 2008	120	protected accounts terminated on or after April 15, 2008 have not been restored.
As of August 31, 2008	3,648	non-protected accounts terminated on or after April 15, 2008 have not been restored.
As of August 31, 2008	N/A	non-heating accounts terminated on or after April 15, 2008 have not been restored.

UTILITY NAME: **The Narragansett Electric Company, d/b/a National Grid**
REPORT DATE: **MARCH**
PERIOD ENDED: **March 31, 2008**

	<u>Apr-07</u>	<u>May-07</u>	<u>Jun-07</u>	<u>Jul-07</u>	<u>Aug-07</u>	<u>Sep-07</u>	<u>Oct-07</u>	<u>Nov-07</u>	<u>Dec-07</u>	<u>Jan-08</u>	<u>Feb-08</u>	<u>Mar-08</u>	<u>Total</u>
Total Physical Terminations	1,100	2,252	2,571	3,047	3,092	3,004	3,701	0	0	0	0	0	18,767
Protected Terminations	0	571	599	663	702	708	687	0	0	0	0	0	3,930
Non-Protected Terminations	1,100	1,681	1,972	2,384	2,390	2,296	3,014	0	0	0	0	0	14,837
Average Balance of Those Terminated	\$859.20	\$1,025.96	\$819.64	\$730.80	\$655.28	\$588.59	\$597.81	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$5,277
Terminations in Excess of \$1,000	310	980	701	672	526	359	460	0	0	0	0	0	4,008
Termination Notices Sent	30,460	43,130	37,550	36,494	39,482	45,376	38,296	14,982	21,409	17,988	22,156	15,372	362,695
Payment Plans Negotiated	5,139	5,673	4,738	4,467	3,845	5,159	5,371	3,569	2,619	3,821	4,787	5,493	54,681
Payment Plans Broken	3,657	3,899	3,765	4,319	4,464	6,144	5,368	4,440	3,283	4,930	4,692	5,816	54,777
Special Agreements											649	636	1,285
Actual A/R Write off	\$995,000	\$1,015,000	\$960,000	\$1,025,000	\$1,525,000	\$1,818,000	\$1,426,000	\$1,401,000	\$1,344,000	\$839,000	\$559,996	\$688,833	13,596,829
Recoveries	(\$275,000)	(\$476,000)	(\$214,000)	(\$140,000)	(\$373,000)	(\$200,000)	(\$203,000)	(\$279,000)	(\$341,000)	(\$155,000)	(\$418,367)	(\$340,227)	(\$3,414,594)
Net A/R Write off	\$720,000	\$539,000	\$746,000	\$885,000	\$1,152,000	\$1,618,000	\$1,223,000	\$1,122,000	\$1,003,000	\$684,000	\$141,629	\$348,606	10,182,235

As of	March 31, 2008	109	protected accounts terminated on or after April 15, 2007 have not been restored.
As of	March 31, 2008	811	non-protected accounts terminated on or after April 15, 2007 have not been restored.
As of	March 31, 2008	N/A	non-heating accounts terminated on or after April 15, 2007 have not been restored.

UTILITY NAME: **The Narragansett Electric Company, d/b/a National Grid**
REPORT DATE: **April 15, 2007**
PERIOD ENDED: **March 31, 2007**

	<u>Apr-06</u>	<u>May-06</u>	<u>Jun-06</u>	<u>Jul-06</u>	<u>Aug-06</u>	<u>Sep-06</u>	<u>Oct-06</u>	<u>Nov-06</u>	<u>Dec-06</u>	<u>Jan-07</u>	<u>Feb-07</u>	<u>Mar-07</u>	<u>Total</u>
Total Physical Terminations	1,266	2,744	2,730	1,590	1,453	761	1,851	0	0	0	0	0	12,395
Protected Terminations	145	737	603	414	312	200	486	0	0	0	0	0	2,897
Non-Protected Terminations	1,121	2,007	2,130	1,176	1,141	561	1,365	0	0	0	0	0	9,501
Average Balance of Those Terminated	\$825.00	\$892.00	\$721.00	\$644.07	\$785.40	\$763.20	\$1,355.37	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
Terminations in Excess of \$1,000	384	953	592	290	351	169	393	0	0	0	0	0	3,132
Termination Notices Sent	38,953	38,294	35,700	29,206	37,241	48,864	14,917	24,584	14,373	23,335	19,476	22,898	347,841
Payment Plans Negotiated	5,839	4,889	3,815	3,196	3,822	4,795	3,997	3,403	2,483	2,904	3,027	3,491	45,661
Payment Plans Broken	3,565	3,422	3,645	3,395	4,148	5,837	4,299	3,803	2,816	3,626	3,953	2,682	45,191
Actual A/R Write off	\$766,000	\$809,000	\$834,000	\$1,058,000	\$1,859,000	\$1,463,000	\$1,400,000	\$1,281,000	\$1,270,000	\$1,287,000	\$966,000	\$777,000	13,770,000
Recoveries	(\$33,000)	(\$622,000)	(\$202,000)	(\$216,000)	(\$518,000)	(\$224,000)	(\$334,000)	(\$254,000)	(\$329,000)	(\$393,000)	(\$258,000)	(\$365,000)	(\$3,748,000)
Net A/R Write off	\$733,000	\$187,000	\$632,000	\$842,000	\$1,341,000	\$1,239,000	\$1,066,000	\$1,027,000	\$941,000	\$894,000	\$708,000	\$412,000	10,022,000

As of	March 31, 2007	51	protected accounts terminated on or after April 16, 2006 have not been restored.
As of	March 31, 2007	330	non-protected accounts terminated on or after April 16, 2006 have not been restored.
As of	March 31, 2007	N/A	non-heating accounts terminated on or after April 16, 2005 have not been restored.

UTILITY NAME: **The Narragansett Electric Company, d/b/a National Grid**
 REPORT DATE: **April 15, 2007**
 PERIOD ENDED: **March 31, 2007**

	<u>Apr-05</u>	<u>May-05</u>	<u>Jun-05</u>	<u>Jul-05</u>	<u>Aug-05</u>	<u>Sep-05</u>	<u>Oct-05</u>	<u>Nov-05</u>	<u>Dec-05</u>	<u>Jan-06</u>	<u>Feb-06</u>	<u>Mar-06</u>	<u>Total</u>
Total Physical Terminations	647	1,226	897	731	1,361	947	1,226	0	0	0	0	0	7,035
Protected Terminations	26	341	156	176	294	186	250	0	0	0	0	0	1,429
Non-Protected Terminations	621	885	741	555	1,067	761	976	0	0	0	0	0	5,606
Average Balance of Those Terminated	\$781.70	\$836.90	\$674.81	\$686.79	\$575.32	\$549.48	\$575.07	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	
Terminations in Excess of \$1,000	161	369	160	154	170	125	139	0	0	0	0	0	1,278
Termination Notices Sent	27,549	28,743	24,907	25,329	18,624	23,176	18,267	10,354	11,912	11,376	15,063	18,697	233,997
Payment Plans Negotiated	4,617	4,215	3,374	2,970	2,888	3,939	4,295	3,172	2,135	2,613	2,767	3,352	40,337
Payment Plans Broken	2,791	3,207	3,021	3,100	3,385	4,392	3,957	3,086	2,762	3,550	3,382	1,932	38,565
Actual A/R Write off	\$401,000	\$560,000	\$669,000	\$780,000	\$956,000	\$862,000	\$760,000	\$745,000	\$999,538	\$872,000	\$908,000	\$949,000	9,461,538
Recoveries	(\$168,000)	(\$181,000)	(\$291,000)	(\$300,000)	(\$185,000)	(\$226,000)	(\$166,000)	(\$176,000)	(\$173,000)	(\$197,000)	(\$243,000)	(\$250,000)	(\$2,556,000)
Net A/R Write off	\$233,000	\$379,000	\$378,000	\$480,000	\$771,000	\$636,000	\$594,000	\$569,000	\$826,538	\$675,000	\$665,000	\$699,000	6,905,538

UTILITY NAME: The Narragansett Electric Company, d/b/a National Grid
 REPORT DATE: April 15, 2007
 PERIOD ENDED: March 31, 2007

	Apr-04	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04	Jan-05	Feb-05	Mar-05	Total
Total Physical Terminations*	922	2,203	2,200	1,438	951	1,344	957	0	0	0	0	0	10,015
Protected Terminations*	180	582	513	290	259	314	245	0	0	0	0	0	2,383
Non-Protected Terminations*	742	1,621	1,687	1,148	692	1,030	712	0	0	0	0	0	7,632
Average Balance of Those Terminated*	\$673,79	\$669,58	\$527,98	\$506,87	\$551,67	\$501,42	\$552,65	\$0,00	\$0,00	\$0,00	\$0,00	\$0,00	
Terminations in Excess of \$1,000*	188	353	208	122	118	118	113	0	0	0	0	0	1,220
Termination Notices Sent	21,829	19,117	14,930	14,457	12,094	18,671	18,156	8,406	10,050	10,946	13,739	11,280	173,675
Payment Plans Negotiated	4,198	3,891	3,023	2,565	2,464	3,222	3,455	2,167	1,755	1,990	2,464	3,182	34,376
Payment Plans Broken	2,700	3,197	2,742	2,991	3,105	2,964	4,184	2,969	2,143	3,252	2,585	1,689	34,521
Actual A/R Write off	\$489,000	\$476,000	\$833,000	\$731,000	\$911,000	\$923,000	\$714,000	\$629,000	\$636,000	\$654,000	\$548,000	\$582,000	8,126,000
Recoveries	(\$167,000)	(\$268,000)	(\$202,000)	(\$134,000)	(\$272,000)	(\$233,000)	(\$178,000)	(\$152,000)	(\$162,000)	(\$574,000)	(\$204,000)	\$189,000	(2,357,000)
Net A/R Write off	\$322,000	\$208,000	\$631,000	\$597,000	\$639,000	\$690,000	\$536,000	\$477,000	\$474,000	\$80,000	\$344,000	\$771,000	5,769,000

*April 2004 Data is for April 16-30 only



Thomas R. Teehan
Senior Counsel

September 15, 2008

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 1725 – National Grid Monthly Responses
Gas Termination Report – August 2008**

Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's¹ responses to the Commission's on-going monthly data requests regarding termination information for gas customers in the above-captioned proceeding.

This report contains residential termination information for August 2008, as well as information dating back to April 2004 in Excel format. Pursuant to the Commission's recent request, the Company has added a line to the report indicating the number of flexible payment plans entered into with customers during the month.

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

Very truly yours,

A handwritten signature in blue ink, appearing to read "T. R. Teehan".

Thomas R. Teehan

Enclosures

cc: Docket 1725 Service List

¹ Submitted on behalf of The Narragansett Electric Company d/b/a National Grid ("Company").

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.



Joanne M. Scanlon
National Grid

September 15, 2008
Date

**Docket No. 1725 – National Grid and Pascoag Utility District – Filing of monthly activity of service terminations, termination notices sent, customers balances and payment plans entered/broken.
Service List updated 10/03/07**

Name/Address	E-mail Distribution	Phone/FAX
Thomas R. Teehan, Esq. National Grid 280 Melrose St. Providence RI 02907	thomas.teehan@us.ngrid.com	401-784-7667 401-784-4321
	michael.guerin@us.ngrid.com	
	Peter.Czekanski@us.ngrid.com	
	Joanne.scanlon@us.ngrid.com	
Judy Allaire Pascoag Utility District 253 Pascoag Main St. PO Box 107 Pascoag RI 02859	Jallaire@pud-ri.org	401-568-6222 401-568-0066
	hround@pud-ri.org	
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence RI 02903	Lwold@riag.ri.gov	401-222-2424 401-222-3016
Jim Lanni Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick RI 02888	jlanni@ripuc.state.ri.us	401-941-4500
	lclement@ripuc.state.ri.us	
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Matt Guglielmetti RI Office of Energy Resources	MatteoG@gw.doa.state.ri.us	401-222-3370
Jean Rosiello	jeanrosiello@cox.net	401-751-5090
Original & nine (9) copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02889	Lmassaro@puc.state.ri.us	401-780-2107 401-941-1691
	Cwilson@puc.state.ri.us	
	Anault@puc.state.ri.us	
	PatriciaL@gw.doa.state.ri.us	

UTILITY NAME: **National Grid - RI Gas Division**
REPORT DATE: **08/01/08**
PERIOD ENDED: **08/31/08**

	2008	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08	Jan-09	Feb-09	Mar-09	Total
Total Physical Terminations		1,047	1,479	1,622	2,080	1,266								7,494
Protected Terminations		0	56	338	894	287								1,575
Non-Protected Terminations		1,047	1,423	1,284	1,186	979	0	0	0	0	0	0	0	5,919
Average Balance of Those Terminated		\$1,570	\$1,317	\$1,461	\$1,785	\$1,481								
Terminations in Excess of \$1,000		728	970	1,071	1,619	806								5,194
Termination Notices Sent		66,056	57,548	52,656	45,996	38,018								260,274
Payment Plans Negotiated		5,020	4,294	2,398	1,746	1,302								14,760
Payment Plans Broken		993	1,463	2,359	2,126	1,673								8,614
Flexible Pymt plans		0	0	0	0	0								
<div> <div>As of July 31, 2008</div> <div>955</div> <div>protected accounts terminated on or after May 1, 2008 have not been restored</div> </div> <div> <div>As of July 31, 2008</div> <div>3,017</div> <div>non-protected accounts terminated on or after April 16, 2008 have not been restored</div> </div>														
Actual A/R Write Offs		\$ 699,090	\$ (71,253)	\$ (97,469)	\$ 1,019,110	\$ 24,181								\$ 1,573,659
Recovery of A/R		\$ 209,665	\$ 178,859	\$ 96,667	\$ 264,036	\$ 43,983								\$ 793,210
Net Write Offs		\$ 489,426	\$ (250,112)	\$ (194,136)	\$ 755,074	\$ (19,802)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 780,449

UTILITY NAME: **National Grid - RI Gas Division**
REPORT DATE: **08/01/08**
PERIOD ENDED: **08/31/08**

2007	<u>Apr-07</u>	<u>May-07</u>	<u>Jun-07</u>	<u>Jul-07</u>	<u>Aug-07</u>	<u>Sep-07</u>	<u>Oct-07</u>	<u>Nov-07</u>	<u>Dec-07</u>	<u>Jan-08</u>	<u>Feb-08</u>	<u>Mar-08</u>	<u>Total</u>
Total Physical Terminations	1,241	1,983	1,396	1,298	1,311	1,036	1,812	118	56	183	153	465	11,052
Protected Terminations	0	362	270	366	326	351	601	16	0	0	0	0	2,292
Non-Protected Terminations	1,241	1,621	1,126	932	985	685	1,211	102	56	183	153	465	8,760
Average Balance of Those Terminated	\$1,425	\$1,621	\$1,580	\$1,541	\$1,460	\$1,335	\$1,041	\$1,319	\$945	\$1,256	\$1,521	\$1,466	
Terminations in Excess of \$1,000	959	1,657	1,158	970	965	708	732	49	13	81	78	292	7,662
Termination Notices Sent	42,620	20,051	54,280	46,100	37,907	34,823	34,422	10,929	12,959	18,714	24,357	26,309	363,471
Payment Plans Negotiated	5,874	5,082	2,538	1,775	1,513	1,140	1,282	676	459	727	1,010	1,653	23,729
Payment Plans Broken	1,093	1,789	2,801	1,991	1,813	1,435	1,325	1,111	908	796	511	561	16,134
Flexible Pymt plans											0	0	

As of March 31, 2008 **310** protected accounts terminated on or after **April 16, 2007** have not been restored
As of March 31, 2008 **1,897** non-protected accounts terminated on or after **April 16, 2007** have not been restored

Actual A/R Write Offs	\$ 324,474	\$ 866,492	\$ 536,628	\$ 865,148	\$ 711,698	\$ 662,968	\$ 230,406	\$ 273,793	\$ 296,377	\$ 755,256	\$ 149,205	\$ 7,344,790	\$ 13,007,236
Recovery of A/R	\$ 214,167	\$ 206,116	\$ 231,874	\$ 203,541	\$ 156,924	\$ 217,635	\$ 253,978	\$ 260,422	\$ 185,165	\$ 178,306	\$ 191,326	\$ 193,090	\$ 2,492,544
Net Write Offs	\$ 110,307	\$ 660,377	\$ 304,754	\$ 661,607	\$ 554,774	\$ 435,333	\$ (23,572)	\$ 13,371	\$ 111,212	\$ 576,951	\$ 340,531	\$ 7,151,700	\$ 10,897,345

UTILITY NAME: **National Grid - RI Gas Division**
REPORT DATE: **08/01/08**
PERIOD ENDED: **08/31/08**

	2006	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06	Jan-07	Feb-07	Mar-07	Total
Total Physical Terminations		1,355	1,949	1,964	1,414	1,828	1,346	1,481	123	158	86	180	473	12,357
Protected Terminations		96	284	550	364	441	370	399	0	0	0	0	0	2,504
Non-Protected Terminations		1,259	1,665	1,414	1,050	1,387	976	1,082	123	158	86	180	473	9,853
Average Balance of Those Terminated		\$1,348	\$1,530	\$1,857	\$1,530	\$1,233	\$1,314	\$1,083	\$1,090	\$1,226	\$1,587	\$1,324	\$1,682	
Terminations in Excess of \$1,000		911	1,511	1,474	826	952	779	592	28	69	50	112	428	7,732
Termination Notices Sent		50,381	24,123	45,083	28,319	24,544	14,957	7,071	1,851	2,678	4,232	6,010	9,845	219,094
Payment Plans Negotiated		6,833	3,992	4,438	2,271	1,610	1,390	1,290	734	708	1,065	908	2,006	27,245
Payment Plans Broken		1,055	1,821	1,822	2,152	2,546	1,947	1,298	1,353	1,111	794	627	788	17,314

As of Mar 31, 2007 **401** protected accounts terminated on or after **April 16, 2006** have not been restored
As of Mar 31, 2007 **1,724** non-protected accounts terminated on or after **April 16, 2006** have not been restored

Actual A/R Write Offs	\$	221,371	\$	849,744	\$	983,085	\$	838,729	\$	1,039,201	\$	532,507	\$	347,623	\$	156,668	\$	369,699	\$	122,113	\$	497,485	\$	6,370,937	\$	12,329,161
Recovery of A/R	\$	200,234	\$	200,822	\$	227,029	\$	239,604	\$	262,987	\$	239,450	\$	238,566	\$	253,716	\$	283,810	\$	204,618	\$	221,778	\$	242,665	\$	2,815,280
Net Write Offs	\$	21,137	\$	648,922	\$	756,056	\$	599,125	\$	776,214	\$	293,057	\$	109,057	\$	(97,048)	\$	85,888	\$	(82,506)	\$	275,707	\$	6,128,271	\$	9,513,881

UTILITY NAME: **National Grid - RI Gas Division**
REPORT DATE: **08/01/08**
PERIOD ENDED: **08/31/08**

2005	<u>Apr-05</u>	<u>May-05</u>	<u>Jun-05</u>	<u>Jul-05</u>	<u>Aug-05</u>	<u>Sep-05</u>	<u>Oct-05</u>	<u>Nov-05</u>	<u>Dec-05</u>	<u>Jan-06</u>	<u>Feb-06</u>	<u>Mar-06</u>	<u>Total</u>
Total Physical Terminations	1,274	2,189	2,325	2,013	2,590	1,755	1,885	161	107	324	236	440	15,299
Protected Terminations	126	531	529	345	466	844	408	0	0	0	0	0	3,249
Non-Protected Terminations	1,148	1,658	1,796	1,668	2,124	911	1,477	161	107	324	236	440	12,050
Average Balance of Those Terminated	\$1,538	\$1,650	\$1,059	\$911	\$1,062	\$1,009	\$897	\$1,016	\$990	\$1,189	\$1,383	\$1,388	
Terminations in Excess of \$1,000	964	1,650	1,847	868	1,021	737	519	23	47	169	141	338	8,324
Termination Notices Sent	55,170	37,523	38,594	35,174	26,059	25,220	18,847	5,535	7,580	11,398	6,345	12,645	280,080
Payment Plans Negotiated	3,279	2,863	2,621	1,854	1,652	980	1,543	1,274	802	743	815	1,891	20,317
Payment Plans Broken	875	1,307	2,062	1,804	1,724	1,644	1,273	1,291	1,553	1,017	698	850	16,098

As of March 31, 2006 **72** protected accounts terminated on or after April 16, 2005 have not been restored
As of March 31, 2006 **1,369** non-protected accounts terminated on or after April 16, 2005 have not been restored

Actual A/R Write Offs	\$ 990,022	\$ 687,963	\$ 988,693	\$ 967,131	\$ 582,165	\$ 682,876	\$ 577,676	\$ 114,832	\$ 4,076,465	\$ 335,546	\$ 3,346,531	\$ 37,479	\$ 13,387,379
Recovery of A/R	\$ 339,840	\$ 200,812	\$ 198,881	\$ 198,125	\$ 205,650	\$ 194,648	\$ 242,056	\$ 227,654	\$ 179,937	\$ 249,908	\$ 222,603	\$ 295,810	\$ 2,755,924
Net Write Offs	\$ 650,182	\$ 487,151	\$ 789,812	\$ 769,006	\$ 376,515	\$ 488,228	\$ 335,620	\$ (112,822)	\$ 3,896,528	\$ 85,638	\$ 3,123,928	\$ (258,331)	\$ 10,631,455

UTILITY NAME: **National Grid - RI Gas Division**
REPORT DATE: **08/01/08**
PERIOD ENDED: **08/31/08**

2004	Apr-04 *	May-04	Jun-04	Jul-04	Aug-04	Sep-04	Oct-04	Nov-04	Dec-04	Jan-05	Feb-05	Mar-05	Total
Total Physical Terminations	1,026	1,646	1,728	1,326	1,234	1,613	1,457	120	123	176	213	457	11,119
Protected Terminations	171	538	483	320	203	291	231	0	0	0	0	0	2,237
Non-Protected Terminations	855	1,108	1,245	1,006	1,031	1,322	1,226	120	123	176	213	457	8,882
Average Balance of Those Terminated	\$3,222	\$1,662	\$1,448	\$1,143	\$1,149	\$1,056	\$1,043	\$1,126	\$1,126	\$1,234	\$1,523	\$1,694	
Terminations in Excess of \$1,000	968	1,468	1,639	748	482	573	549	45	46	65	47	111	6,741
Termination Notices Sent	27,548	44,176	40,849	36,728	28,964	28,920	21,256	5,171	7,029	10,414	6,869	11,936	269,860
Payment Plans Negotiated	2,480	2,676	2,103	1,667	1,212	1,196	683	402	502	827	870	1,548	16,166
Payment Plans Broken	729	1,748	2,232	1,864	1,495	1,327	1,077	983	955	816	508	781	14,515
Actual A/R Write Offs	\$ 3,774,910	\$ 791,871	\$ 1,202,465	\$ 1,662,896	\$ 1,126,779	\$ 1,162,956	\$ 822,172	\$ 475,913	\$ 280,727	\$ 715,296	\$ 350,098	\$ 304,731	\$ 12,670,814
Recovery of A/R	\$ 108,763	\$ 97,140	\$ 115,115	\$ 199,530	\$ 195,603	\$ 261,875	\$ 411,170	\$ 409,402	\$ 219,934	\$ 335,272	\$ 184,142	\$ 290,669	\$ 2,825,615
Net Write Offs	\$ 3,666,147	\$ 694,731	\$ 1,087,350	\$ 1,463,366	\$ 931,176	\$ 901,081	\$ 411,002	\$ 66,511	\$ 60,793	\$ 380,024	\$ 165,956	\$ 14,062	\$ 9,842,199

As of April 15, 2004 **114** protected accounts terminated on or after April 16, 2004 were not restored
As of April 15, 2004 **930** non-protected accounts terminated on or after April 16, 2004 were not restored
As of April 15, 2004 **100** non-heating accounts terminated on or after April 16, 2004 were not restored

* April 2004 Data is for April 16-30 only

Wiley Data Request 3-3

Request:

On page 12 of the Rebuttal Testimony of James D. Simpson, Mr. Simpson states that “[t]he increase in rates over the long run from the two approaches will be approximately the same ...” Does the term “over the long run” assume that customer usage will increase over time as well as decline? If customer usage only declines, but does not increase, will the increase in rates with and without decoupling still be “approximately the same”?

Response:

The statement that “[t]he increase in rates over the long run from the two approaches will be approximately the same ...” is equally true if customer usage were to increase, decrease, or remain constant over time. Rate cases and the Company’s proposed decoupling mechanism would both serve to re-set the Company’s rates to reflect changes in customer usage; the difference between the two approaches is that the proposed decoupling mechanism would result in more frequent, but smaller rate adjustments and a rate case would result in less frequent but larger increases. In addition, in periods that customer usage was decreasing, the Company would not have a reasonable opportunity to earn a fair rate or return on its investments.

Wiley Data Request 3-4

Request:

On page 12 of the Rebuttal Testimony of James D. Simpson, Mr. Simpson states that a customer who conserves greatly will benefit immediately from a lower bill due to lower usage. Will the RDM delay the benefit of any portion of the impact of reduced usage, including reduction in the distribution charge?

Response:

The Company's proposed RDM will not delay the benefit of any portion of the impact of reduced usage. However, as explained in Mr. Simpson's Rebuttal testimony, pages 18 and 19, overall customer conservation will result in increases to distribution rates, either as a result of base rate increases or decoupling rate adjustments. With either approach, the customer who "conserves greatly" will save on the gas cost portion of the bill, assuming that gas costs remain constant; the annual savings of the distribution portion of the bill will be affected by the conservation activities of all other customers in the customer's rate class. In addition, the customer who conserves greatly will benefit from gas bills that will be lower in all components of the bill (i.e. base charges, GCR charges and DAC charges) than if that customer did not conserve.

Attorney General Record Request No. 1

Request:

Please prepare a decoupling example showing the impact of excluding low-income customers from the decoupling mechanism similar to the treatment proposed for large and extra-large rate classes.

Response:

In this proceeding, National Grid entered Exhibits 33 and 34 into the record to provide a simplified calculation of the decoupling mechanism and showing the impacts of excluding the large and extra-large C&I rate classes from the decoupling mechanism. Attachments RR-AG-1(a) and (b), provided herewith, are modified versions of NGRID Exhibits 33 and 34 showing a similar exclusion of the residential low-income rate classes. To perform this analysis, the Company has assumed that the average use for a low-income customer is the same as the non low-income customer. Therefore, both revenues and customer counts for the Residential Non-Heat and Residential Heating are uniformly reduced such that the average revenue per customer is unchanged. The number of customers for the low-income rate classes are set at the same level as reflected in the current rate proposal and revenues are discounted by 10 percent. Please note that it is the Company's expectation that a weather-normalization mechanism would continue to apply to customer classes excluded from the decoupling mechanism.

Hypothetical Decoupling with Low Income Discount

Rate Year Docket No. 3401

Line No.	Description	Compliance	Average	Revenue Per
		Target	Number of	Customer
		Revenues Jul 02 - Jun 03	Customers	(RPC)
1	Residential Non-Heat [1]	\$6,097,790	33,334	\$183
	Low Income Res Non-Heat [2]	\$407,633	2,475	\$165
2	Residential Heating [1]	\$74,369,893	164,022	\$453
	Low Income Res Heating [2]	\$6,523,200	16,000	\$408
3	Small C&I	\$11,164,537	18,427	\$606
4	Medium C&I	\$14,824,179	4,137	\$3,583
5	Large Low Load C&I	\$5,546,792	329	\$16,860
6	Large High Load C&I	\$1,799,717	152	\$11,840
7	Extra Large Low Load C&I	\$868,189	34	\$25,535
8	Extra Large High Load C&I	\$2,534,746	50	\$50,695
9	Total	\$124,136,676	238,960	

Actual Revenues

Description	Base Revenue 12-mths ended June 30, 2005	Average Number of Customers	Revenue Per Customer (RPC)	True up to Target	Base Revenue 12-mths ended June 30, 2006	Average Number of Customers	Revenue Per Customer (RPC)	True up to Target
10 Residential Non-Heat	\$5,453,323	31,747	\$172	\$354,233	\$5,702,238	33,294	\$171	\$388,311
Low Income Res Non-Heat	\$382,659	2,475	\$155	\$24,973	\$381,497	2,475	\$154	\$26,135
11 Residential Heating	\$77,116,366	171,342	\$450	\$572,594	\$72,084,671	172,598	\$418	\$6,173,702
Low Income Res Heating	\$6,481,041	16,000	\$405	\$42,159	\$6,014,086	16,000	\$376	\$509,114
12 Small C&I	\$10,477,876	17,751	\$590	\$276,885	\$9,889,848	17,820	\$555	\$906,617
13 Medium C&I	\$15,582,264	4,565	\$3,414	\$773,783	\$14,612,322	4,424	\$3,303	\$1,239,074
14 Large Low Load C&I	\$6,741,416	422	\$15,962	\$378,934	\$6,675,467	430	\$15,515	\$578,355
15 Large High Load C&I	\$1,867,451	162	\$11,557	\$45,735	\$1,749,210	154	\$11,334	\$78,134
16 Extra Large Low Load C&I	\$1,063,182	38	\$27,917	(\$90,725)	\$961,511	36	\$26,833	(\$46,508)
17 Extra Large High Load C&I	\$2,652,668	56	\$47,796	\$160,900	\$2,908,183	58	\$50,213	\$27,898
18 Total	\$127,818,245	244,557		\$2,539,472	\$120,979,033	247,289		\$9,880,832
19							2006 vs 2005	\$7,341,360

Description	Base Revenue 12-mths ended June 30, 2007	Average Number of Customers	Revenue Per Customer (RPC)	True up to Target	Base Revenue 12-mths ended June 30, 2008	Average Number of Customers	Revenue Per Customer (RPC)	True up to Target
20 Residential Non-Heat	\$5,126,640	29,988	\$171	\$359,127	\$5,202,771	29,331	\$177	\$162,780
Low Income Res Non-Heat	\$380,801	2,475	\$154	\$26,831	\$395,115	2,475	\$160	\$12,518
21 Residential Heating	\$79,513,671	190,641	\$417	\$6,925,728	\$79,334,780	192,052	\$413	\$7,744,273
Low Income Res Heating	\$6,006,032	16,000	\$375	\$517,168	\$5,948,500	16,000	\$372	\$574,700
22 Small C&I	\$10,003,318	17,992	\$556	\$897,914	\$9,963,471	18,102	\$550	\$1,004,003
23 Medium C&I	\$14,184,855	4,383	\$3,237	\$1,519,326	\$14,153,401	4,417	\$3,205	\$1,672,912
24 Large Low Load C&I	\$6,875,512	447	\$15,393	\$655,087	\$6,665,103	451	\$14,778	\$938,554
25 Large High Load C&I	\$1,656,949	154	\$10,794	\$160,528	\$1,786,519	164	\$10,910	\$152,321
26 Extra Large Low Load C&I	\$865,581	33	\$26,296	(\$25,055)	\$981,839	36	\$27,210	(\$60,452)
27 Extra Large High Load C&I	\$3,115,079	62	\$49,975	\$44,905	\$3,619,350	72	\$50,269	\$30,684
28 Total	\$127,728,438	262,175		\$11,081,560	\$128,050,849	263,099		\$12,232,294
29				2007 vs 2006			2008 vs 2007	\$1,150,734

notes: [1] Hypothetical reduces Dkt 3401 revenue and customers
by projected low income customers and avg revenue per customer

Sum of 4 years \$35,734,158

Hypothetical Decoupling with Low Income Discount

Rate Year Docket No. 3401

Line No.	Description	Compliance Target	Average	Revenue Per
		Revenues	Number of	Customer
		Jul 02 - Jun 03	Customers	(RPC)
1	Residential Non-Heat [1]	\$6,097,790	33,334	\$183
	Low Income Res Non-Heat [2]	\$407,633	2,475	\$165
2	Residential Heating [1]	\$74,369,893	164,022	\$453
	Low Income Res Heating [2]	\$6,523,200	16,000	\$408
3	Small C&I	\$11,164,537	18,427	\$606
4	Medium C&I	\$14,824,179	4,137	\$3,583
5	Large Low Load C&I	\$5,546,792	329	\$16,860
6	Large High Load C&I	\$1,799,717	152	\$11,840
7	Extra Large Low Load C&I	\$868,189	34	\$25,535
8	Extra Large High Load C&I	\$2,534,746	50	\$50,695
9	Total	\$124,136,676	238,960	

Actual Revenues

Description	Base Revenue	Average	Revenue Per	True up to Target	Base Revenue	Average	Revenue Per	True up to Target
	12-mths ended June 30, 2005	Number of Customers	Customer (RPC)		12-mths ended June 30, 2006	Number of Customers	Customer (RPC)	
10 Residential Non-Heat	\$5,453,323	31,747	\$172	\$354,233	\$5,702,238	33,294	\$171	\$388,311
Low Income Res Non-Heat	\$382,659	2,475	\$155		\$381,497	2,475	\$154	
11 Residential Heating	\$77,116,366	171,342	\$450	\$572,594	\$72,084,671	172,598	\$418	\$6,173,702
Low Income Res Heating	\$6,481,041	16,000	\$405		\$6,014,086	16,000	\$376	
12 Small C&I	\$10,477,876	17,751	\$590	\$276,885	\$9,889,848	17,820	\$555	\$906,617
13 Medium C&I	\$15,582,264	4,565	\$3,414		\$14,612,322	4,424	\$3,303	
14 Large Low Load C&I	\$6,741,416	422	\$15,962	\$773,783	\$6,675,467	430	\$15,515	\$1,239,074
15 Large High Load C&I	\$1,867,451	162	\$11,557		\$1,749,210	154	\$11,334	
16 Extra Large Low Load C&I	\$1,063,182	38	\$27,917		\$961,511	36	\$26,833	
17 Extra Large High Load C&I	\$2,652,668	56	\$47,796		\$2,908,183	58	\$50,213	
18 Total	\$127,818,245	244,557		\$1,977,496	\$120,979,033	247,289		\$8,707,704
19								2006 vs 2005 \$6,730,209

Description	Base Revenue	Average	Revenue Per	True up to Target	Base Revenue	Average	Revenue Per	True up to Target
	12-mths ended June 30, 2007	Number of Customers	Customer (RPC)		12-mths ended June 30, 2008	Number of Customers	Customer (RPC)	
20 Residential Non-Heat	\$5,126,640	29,988	\$171	\$359,127	\$5,202,771	29,331	\$177	\$162,780
Low Income Res Non-Heat	\$380,801	2,475	\$154		\$395,115	2,475	\$160	
21 Residential Heating	\$79,513,671	190,641	\$417	\$6,925,728	\$79,334,780	192,052	\$413	\$7,744,273
Low Income Res Heating	\$6,006,032	16,000	\$375		\$5,948,500	16,000	\$372	
22 Small C&I	\$10,003,318	17,992	\$556	\$897,914	\$9,963,471	18,102	\$550	\$1,004,003
23 Medium C&I	\$14,184,855	4,383	\$3,237		\$14,153,401	4,417	\$3,205	
24 Large Low Load C&I	\$6,875,512	447	\$15,393	\$1,519,326	\$6,665,103	451	\$14,778	\$1,672,912
25 Large High Load C&I	\$1,656,949	154	\$10,794		\$1,786,519	164	\$10,910	
26 Extra Large Low Load C&I	\$865,581	33	\$26,296		\$981,839	36	\$27,210	
27 Extra Large High Load C&I	\$3,115,079	62	\$49,975		\$3,619,350	72	\$50,269	
28 Total	\$127,728,438	262,175		\$9,702,096	\$128,050,849	263,099		\$10,583,969
29				2007 vs 2006 \$994,392				2008 vs 2007 \$881,873

notes: [1] Hypothetical reduces Dkt 3401 revenue and customers by projected low income customers and avg revenue per customer

Sum of 4 years \$30,971,265

Office of Energy Resources Record Request No. 1

Request:

Please state what the outcome was of the joint resolution submitted by the AGA and the Natural Resources Defense Council to NARUC, referenced on page 31 of the testimony of Mr. Simpson.

Response:

The attached resolution on Gas and Electric Energy Efficiency was sponsored by the NARUC Natural Gas Task Force, Committee on Gas, Committee on Consumer Affairs, Committee on Electricity, and Committee on Energy Resources and the Environment. The resolution was adopted by the NARUC Board of Directors July 14, 2004. The joint resolution submitted by the AGA and the Natural Resources Defense Council is referenced in this resolution, page 2, paragraph 2.

Resolution on Gas and Electric Energy Efficiency

WHEREAS, The National Association of Regulatory Utility Commissioners (NARUC), at its July 2003 Summer Meetings, adopted a *Resolution on State Commission Responses to the Natural Gas Supply Situation* that encouraged State and Federal regulatory commissions to review and reconsider the level of support and incentives for existing gas and electric utility programs designed to promote and aggressively implement cost-effective conservation, energy efficiency, weatherization, and demand response in both gas and electricity markets; *and*

WHEREAS, The National Petroleum Council (NPC), in its September 25, 2003 report on *Balancing Natural Gas Policy – Fueling the Demands of a Growing Economy*, found that greater energy efficiency and conservation are vital near-term and long-term mechanisms for moderating price levels and reducing volatility and recommended all sectors of the economy work toward improving demand flexibility and efficiency; *and*

WHEREAS, The NPC, in its report, identified key elements of the effort to maintain and continue improvements in the efficient use of electricity and natural gas, including (but not limited to):

- (i) enhanced and expanded public education programs for energy conservation, efficiency, and weatherization,
- (ii) DOE identification of best practices utilized by States for low-income weatherization programs and to encourage nation-wide adoption of these practices,
- (iii) a review and upgrade of the energy efficiency standards for buildings and appliances (to reflect current technology and relevant life-cycle cost analyses) to ensure these standards remain valid under potentially higher energy prices
- (iv) promote the use of high-efficiency consumer products including advanced building materials, Energy Star appliances, energy “smart” metering and information control devices
- (v) on-peak electricity conservation to minimize the use of gas-fired electric generating plants,
- (vi) the use of combined-cycle gas-fired electric generating units instead of less-efficient gas-fired boilers, and
- (vii) clear natural gas and power price signals; and
- (viii) remove regulatory and rate structure incentives to inefficient use of natural gas and electricity; and

WHEREAS, The NARUC, at its November 2003 annual convention, adopted a *Resolution Adopting Natural Gas Information “Toolkit”* which encouraged the NARUC Natural Gas Task Force, to review (among other things) the findings and recommendations in the NPC report that have regulatory implications for State commissions for improving and promoting energy efficiency and conservation initiatives, including consumer outreach and education, review of regulatory throughput incentives; *and*

WHEREAS, The American Council for an Energy-Efficient Economy (“ACEEE”), in its December 2003 report on *Responding to the Natural Gas Crisis: America’s Best Natural Gas Energy Efficiency Programs*, (i) identified States and utilities with programs that many would consider best practice or model programs for all types of natural gas customers and all principal natural gas end-use technologies, and (ii) found that these programs are concentrated in relatively few States and regions and could be expanded in other parts of the country to great benefit; *and*

WHEREAS, the Natural Resources Defense Council (NRDC), the American Gas Association (AGA) and the ACEEE have recently adopted a Joint Statement noting that traditional rate structures often act as disincentives for natural gas utilities to aggressively encourage their customers to use less gas. Therefore, the NRDC, AGA, and the ACEEE have urged public utility commissions to align the interests of consumers, utility shareholders, and society as a whole by encouraging conservation. Among the mechanisms supported by these groups are the use of automatic rate true-ups to ensure that a utility’s opportunity to recover authorized fixed costs is not held hostage to fluctuations in retail gas sales; *now therefore be it*

RESOLVED, That the Board of Directors of the National Association of Regulatory Utility Commissioners (NARUC), convened in its 2004 Summer Meetings in Salt Lake City, Utah, encourages State commissions and other policy makers to support the expansion of natural gas energy efficiency programs and electric energy efficiency programs, including those designed to promote consumer education, weatherization, and the use of high-efficiency appliances, where economic, and to address regulatory incentives to address inefficient use of gas and electricity; *and be it further*

RESOLVED, That the Board of Directors of the NARUC, encourages State and Federal policy makers to: (i) review and upgrade the energy efficiency standards for buildings and appliances, where economic, to ensure these standards remain valid under potentially higher energy prices, and (ii) promote the use of high-efficiency consumer products, where economic, including advanced building materials, Energy Star appliances, and energy “smart” metering and information control devices; *and be it further*

RESOLVED, That Board of Directors of NARUC encourages State Commissions to review and consider the recommendations contained in the enclosed *Joint Statement of the American Gas Association, the Natural Resources Defense Council, and the American Council for an Energy-Efficient Economy*; *and be it further*

RESOLVED, That the Board of Directors of the NARUC recognizes that the best approach towards promoting gas energy efficiency programs and electric energy efficiency programs for any single utility, State or region may likely depend on local issues, preferences and conditions.

*Sponsored by the NARUC Natural Gas Task Force, Committee on Gas, Committee on Consumer Affairs, Committee on Electricity, and Committee on Energy Resources and the Environment
Adopted by the NARUC Board of Directors July 14, 2004*

Environment Northeast Record Request No. 1

Request:

Please provide a calculation of what the customer charge would be by rate class if the customer charge was designed to collect all of the Company's allowed distribution revenue.

Response:

Please see Attachment RR-ENE-1 for the rate calculations and bill impacts.

NationalGrid RI
Docket No. 3943
Proposed Rate Design

Line No.	Description (A)	Block Break (B)	Determinant (C)	Distribution Rate (D)	Distribution Revenues (E)
<u>Residential Non-Heat</u>					
1	Customer Charge		332,584	\$ 17.37	\$ 5,776,984
2	Distribution Charge (per therm)		5,249,245	\$ -	-
3	Total		5,249,245		\$ 5,776,984
4	Target Revenue				5,776,319
5	Over/(Under)				\$ 665
<u>Residential Non-Heat Discount</u>					
6	Customer Charge		29,700	\$ 15.63	\$ 464,300
7	Distribution Charge (per therm)		468,107	\$ -	-
8	Total		468,107		\$ 464,300
9	Full Rate Revenue				515,889
10	Discount				\$ 51,589
<u>Residential Heat</u>					
11	Customer Charge		2,159,396	\$ 40.69	\$ 87,865,823
12	Distribution Charge (per therm)				
12	Peak Head Block	125	97,906,081	\$ -	\$ -
13	Peak Tail Block		33,038,600	\$ -	-
14	Total Peak		130,944,681		\$ -
15	Off-Peak Head Block	30	23,477,266	\$ -	\$ -
16	Off-Peak Tail Block		11,075,546	\$ -	-
17	Total Off-Peak		34,552,812		\$ -
18	Total Distribution Charge		165,497,493		\$ -
19	Total				\$ 87,865,823
20	Target Revenue				87,856,318
21	Over/(Under)				\$ 9,505
<u>Residential Heat Discount</u>					
22	Customer Charge		192,000	\$ 36.62	\$ 7,031,232
23	Distribution Charge (per therm)				
23	Peak Head Block	125	8,621,746	\$ -	\$ -
24	Peak Tail Block		2,909,425	\$ -	-
25	Total Peak		11,531,171		\$ -
26	Off-Peak Head Block	30	2,099,634	\$ -	\$ -
27	Off-Peak Tail Block		990,515	\$ -	-
28	Total Off-Peak		3,090,149		\$ -
29	Total Distribution Charge		14,621,320		\$ -
30	Total				\$ 7,031,232
31	Full Rate Revenue				7,812,480
32	Discount				\$ 781,248

NationalGrid RI
Docket No. 3943
Proposed Rate Design

Line No.	Description (A)	Block Break (B)	Determinant (C)	Distribution Rate (D)	Distribution Revenues (E)
<u>Small C&I</u>					
33	Customer Charge		223,069	\$ 56.66	\$ 12,639,090
	Distribution Charge (per therm)				
34	Peak Head Block	135	9,714,984	\$ -	\$ -
35	Peak Tail Block		9,646,836	\$ -	\$ -
36	Total Peak		19,361,821		\$ -
37	Off-Peak Head Block	20	1,156,562	\$ -	\$ -
38	Off-Peak Tail Block		3,133,532	\$ -	\$ -
39	Total Off-Peak		4,290,094		\$ -
40	Total Distribution Charge		23,651,915		\$ -
41	Total				\$ 12,639,090
42	Target Revenue				12,639,841
43	Over/(Under)				\$ (752)
<u>Medium C&I</u>					
44	Customer Charge		54,207	\$ 303.94	\$ 16,475,676
45	Demand Charge (per MADQ therm)		3,520,189	\$ -	-
46	Distribution Charge (per therm)		52,727,447	\$ -	-
47	Total		52,727,447		\$ 16,475,676
48	Target Revenue				16,475,872
49	Over/(Under)				\$ (197)
<u>Large Low Load Factor C&I</u>					
50	Customer Charge		5,292	\$ 1,431.46	\$ 7,575,286
51	Demand Charge (per MADQ therm)		1,948,145	\$ -	-
52	Distribution Charge (per therm)		26,556,458	\$ -	-
53	Total		26,556,458		\$ 7,575,286
54	Target Revenue				7,575,323
55	Over/(Under)				\$ (36)
<u>Large High Load Factor C&I</u>					
56	Customer Charge		1,956	\$ 1,071.00	\$ 2,094,876
57	Demand Charge (per MADQ therm)		511,582	\$ -	-
58	Distribution Charge (per therm)		10,344,001	\$ -	-
59	Total		10,344,001		\$ 2,094,876
60	Target Revenue				2,094,929
61	Over/(Under)				\$ (53)

NationalGrid RI
Docket No. 3943
Proposed Rate Design

Line No.	Description (A)	Block Break (B)	Determinant (C)	Distribution Rate (D)	Distribution Revenues (E)
<u>Extra Large Low Load Factor C&I</u>					
62	Customer Charge		456	\$ 2,999.00	\$ 1,367,544
63	Demand Charge (per MADQ therm)		613,406	\$ -	-
64	Distribution Charge (per therm)		12,066,568	\$ -	-
65	Total		12,066,568		\$ 1,367,544
66	Target Revenue				1,367,769
67	Over/(Under)				\$ (225)
<u>Extra Large High Load Factor C&I</u>					
68	Customer Charge		888	\$ 4,857.00	\$ 4,313,016
69	Demand Charge (per MADQ therm)		1,497,057	\$ -	-
70	Distribution Charge (per therm)		49,479,796	\$ -	-
71	Total		49,479,796		\$ 4,313,016
72	Target Revenue				4,313,186
73	Over/(Under)				\$ (170)
<u>Natural Gas Vehicle Service</u>					
74	Customer Charge		84	\$ 5.00	\$ 420
75	Distribution Charge (per therm)		126,640	\$ 0.2049	25,949
76	Total		126,640		\$ 26,369
77	Target Revenue				26,365
78	Over/(Under)				\$ 4
79	<u>Gas Lamps</u>				
80	Monthly Charge (per lamp)		2,577	\$ 8.29	\$ 21,360
81	Target Revenue				21,361
82	Over/(Under)				\$ (1)

NationalGrid RI
Docket No. 3943

Bill Impact Analysis with Various Levels of Consumption:

Current Distribution, GCR, DAC and Energy Efficiency Rates vs. Proposed Rates

Difference due to:

Line No.	Rate Class (A)	Annual Consumption (Therms) (B)	Proposed Rates (C)	Current Rates (D)	Difference (E)	% Chg (F)	Base Rates (G)	GCR (H)	DAC (I)	EnergyEff (H)
Residential Heating:										
1		600	\$1,145	\$978	\$167	17.0%	\$165	\$1.58	\$0.00	\$0.00
2		664	\$1,215	\$1,071	\$144	13.5%	\$142	\$1.77	\$0.00	\$0.00
3		730	\$1,287	\$1,166	\$121	10.4%	\$119	\$1.94	\$0.00	\$0.00
4		794	\$1,357	\$1,258	\$99	7.9%	\$97	\$2.10	\$0.00	\$0.00
5		857	\$1,426	\$1,347	\$79	5.9%	\$77	\$2.27	\$0.00	\$0.00
6	Average Customer	922	\$1,497	\$1,438	\$59	4.1%	\$57	\$2.44	\$0.00	\$0.00
7		987	\$1,568	\$1,529	\$39	2.6%	\$37	\$2.64	\$0.00	\$0.00
8		1,051	\$1,638	\$1,619	\$20	1.2%	\$17	\$2.79	\$0.00	\$0.00
9		1,114	\$1,707	\$1,706	\$1	0.1%	(\$1)	\$2.96	\$0.00	\$0.00
10		1,180	\$1,780	\$1,797	(\$17)	-1.0%	(\$21)	\$3.11	\$0.00	\$0.00
11		1,247	\$1,853	\$1,889	(\$36)	-1.9%	(\$40)	\$3.35	\$0.00	\$0.00
Residential Non-Heating:										
12		123	\$343	\$276	\$66	24.0%	\$66	(\$0.04)	\$0.00	\$0
13		137	\$358	\$297	\$60	20.3%	\$61	(\$0.07)	\$0.00	\$0
14		147	\$369	\$313	\$56	18.0%	\$56	(\$0.10)	\$0.00	\$0
15		161	\$384	\$334	\$50	15.1%	\$50	(\$0.09)	\$0.00	\$0
16		176	\$400	\$356	\$44	12.3%	\$44	(\$0.08)	\$0.00	\$0
17	Average Customer	189	\$415	\$376	\$38	10.2%	\$39	(\$0.07)	\$0.00	\$0
18		202	\$429	\$396	\$33	8.3%	\$33	(\$0.11)	\$0.00	\$0
19		217	\$445	\$419	\$27	6.4%	\$27	(\$0.08)	\$0.00	\$0
20		231	\$461	\$440	\$21	4.7%	\$21	(\$0.09)	\$0.00	\$0
21		241	\$471	\$455	\$16	3.6%	\$17	(\$0.12)	\$0.00	\$0
22		256	\$488	\$478	\$10	2.1%	\$10	(\$0.13)	\$0.00	\$0

NationalGrid RI
Docket No. 3943

Bill Impact Analysis with Various Levels of Consumption:

Current Distribution, GCR, DAC and Energy Efficiency Rates vs. Proposed Rates

Difference due to:

Line No.	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	GCR	DAC	EnergyEff
	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(H)
C & I Small:									
23	824	\$1,582	\$1,367	\$214	15.7%	\$212	\$2	\$0	\$0
24	916	\$1,682	\$1,495	\$187	12.5%	\$185	\$2	\$0	\$0
25	1,003	\$1,778	\$1,616	\$162	10.0%	\$159	\$3	\$0	\$0
26	1,092	\$1,875	\$1,739	\$136	7.8%	\$133	\$3	\$0	\$0
27	1,179	\$1,970	\$1,858	\$112	6.0%	\$109	\$3	\$0	\$0
28	Average Customer	\$2,069	\$1,981	\$88	4.4%	\$85	\$3	\$0	\$0
29	1,359	\$2,167	\$2,103	\$64	3.1%	\$61	\$4	\$0	\$0
30	1,447	\$2,263	\$2,222	\$41	1.9%	\$37	\$4	\$0	\$0
31	1,535	\$2,360	\$2,342	\$18	0.8%	\$14	\$4	\$0	\$0
32	1,622	\$2,455	\$2,460	(\$5)	-0.2%	(\$9)	\$4	\$0	\$0
33	1,715	\$2,557	\$2,586	(\$30)	-1.1%	(\$34)	\$5	\$0	\$0
C & I Medium:									
34	7,117	\$11,435	\$9,965	\$1,470	14.8%	\$1,445	\$26	\$0	\$0
35	7,884	\$12,275	\$10,981	\$1,294	11.8%	\$1,266	\$28	\$0	\$0
36	8,649	\$13,112	\$11,994	\$1,118	9.3%	\$1,087	\$31	\$0	\$0
37	9,416	\$13,951	\$13,010	\$942	7.2%	\$908	\$34	\$0	\$0
38	10,185	\$14,793	\$14,028	\$765	5.5%	\$728	\$37	\$0	\$0
39	Average Customer	\$15,630	\$15,041	\$589	3.9%	\$549	\$39	\$0	\$0
40	11,715	\$16,467	\$16,054	\$413	2.6%	\$371	\$42	\$0	\$0
41	12,484	\$17,309	\$17,073	\$236	1.4%	\$191	\$45	\$0	\$0
42	13,251	\$18,148	\$18,088	\$60	0.3%	\$12	\$48	\$0	\$0
43	14,016	\$18,985	\$19,101	(\$116)	-0.6%	(\$167)	\$51	\$0	\$0
44	14,783	\$19,824	\$20,117	(\$293)	-1.5%	(\$346)	\$53	\$0	\$0

NationalGrid RI
Docket No. 3943

Bill Impact Analysis with Various Levels of Consumption:

Current Distribution, GCR, DAC and Energy Efficiency Rates vs. Proposed Rates

Difference due to:

Line No.	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	GCR	DAC	EnergyEff
	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(H)
C & I LLF Large:									
45	37,532	\$58,249	\$51,122	\$7,127	13.9%	\$7,143	(\$16)	\$0	\$0
46	41,573	\$62,671	\$56,510	\$6,161	10.9%	\$6,179	(\$18)	\$0	\$0
47	45,616	\$67,095	\$61,900	\$5,195	8.4%	\$5,214	(\$19)	\$0	\$0
48	49,660	\$71,520	\$67,292	\$4,228	6.3%	\$4,250	(\$21)	\$0	\$0
49	53,699	\$75,940	\$72,678	\$3,263	4.5%	\$3,286	(\$23)	\$0	\$0
50	57,742	\$80,365	\$78,068	\$2,296	2.9%	\$2,321	(\$25)	\$0	\$0
51	61,785	\$84,789	\$83,459	\$1,330	1.6%	\$1,357	(\$26)	\$0	\$0
52	65,824	\$89,209	\$88,844	\$365	0.4%	\$393	(\$28)	\$0	\$0
53	69,868	\$93,634	\$94,236	(\$602)	-0.6%	(\$572)	(\$30)	\$0	\$0
54	73,911	\$98,058	\$99,626	(\$1,568)	-1.6%	(\$1,536)	(\$32)	\$0	\$0
55	77,952	\$102,480	\$105,014	(\$2,534)	-2.4%	(\$2,501)	(\$33)	\$0	\$0
C & I HLF Large:									
56	37,970	\$52,910	\$47,422	\$5,488	11.6%	\$6,005	(\$517)	\$0	\$0
57	42,061	\$57,226	\$52,415	\$4,811	9.2%	\$5,384	(\$573)	\$0	\$0
58	46,151	\$61,541	\$57,407	\$4,134	7.2%	\$4,763	(\$629)	\$0	\$0
59	50,240	\$65,855	\$62,397	\$3,458	5.5%	\$4,142	(\$684)	\$0	\$0
60	54,329	\$70,169	\$67,388	\$2,781	4.1%	\$3,521	(\$740)	\$0	\$0
61	Average Customer	\$74,483	\$72,379	\$2,104	2.9%	\$2,900	(\$796)	\$0	\$0
62	62,508	\$78,798	\$77,371	\$1,427	1.8%	\$2,279	(\$851)	\$0	\$0
63	66,596	\$83,111	\$82,360	\$751	0.9%	\$1,658	(\$907)	\$0	\$0
64	70,686	\$87,426	\$87,351	\$74	0.1%	\$1,037	(\$963)	\$0	\$0
65	74,775	\$91,740	\$92,342	(\$602)	-0.7%	\$416	(\$1,018)	\$0	\$0
66	78,867	\$96,057	\$97,336	(\$1,280)	-1.3%	(\$205)	(\$1,074)	\$0	\$0

NationalGrid RI
Docket No. 3943

Bill Impact Analysis with Various Levels of Consumption:

Current Distribution, GCR, DAC and Energy Efficiency Rates vs. Proposed Rates

Difference due to:

Line No.	Annual Consumption (Therms)	Proposed Rates	Current Rates	Difference	% Chg	Base Rates	GCR	DAC	EnergyEff
	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(H)
C & I LLF Extra-Large:									
67	189,450	\$243,303	\$228,523	\$14,780	6.5%	\$14,273	\$507	\$0	\$0
68	209,855	\$265,632	\$252,748	\$12,884	5.1%	\$12,322	\$562	\$0	\$0
69	230,255	\$287,956	\$276,968	\$10,988	4.0%	\$10,372	\$616	\$0	\$0
70	250,655	\$310,280	\$301,188	\$9,092	3.0%	\$8,421	\$671	\$0	\$0
71	271,059	\$332,608	\$325,412	\$7,196	2.2%	\$6,470	\$726	\$0	\$0
72	291,462	\$354,935	\$349,635	\$5,299	1.5%	\$4,519	\$780	\$0	\$0
73	311,865	\$377,262	\$373,859	\$3,403	0.9%	\$2,568	\$835	\$0	\$0
74	332,269	\$399,590	\$398,083	\$1,507	0.4%	\$618	\$889	\$0	\$0
75	352,669	\$421,914	\$422,303	(\$389)	-0.1%	(\$1,333)	\$944	\$0	\$0
76	373,069	\$444,237	\$446,523	(\$2,285)	-0.5%	(\$3,284)	\$999	\$0	\$0
77	393,474	\$466,567	\$470,748	(\$4,182)	-0.9%	(\$5,235)	\$1,053	\$0	\$0
C & I HLF Extra-Large:									
78	369,323	\$447,920	\$430,972	\$16,947	3.9%	\$18,228	(\$1,280)	\$0	\$0
79	409,095	\$489,879	\$476,996	\$12,883	2.7%	\$14,302	(\$1,418)	\$0	\$0
80	448,869	\$531,841	\$523,021	\$8,820	1.7%	\$10,376	(\$1,556)	\$0	\$0
81	488,643	\$573,802	\$569,047	\$4,756	0.8%	\$6,450	(\$1,694)	\$0	\$0
82	528,415	\$615,762	\$615,070	\$692	0.1%	\$2,524	(\$1,832)	\$0	\$0
83	568,188	\$657,722	\$661,094	(\$3,372)	-0.5%	(\$1,402)	(\$1,970)	\$0	\$0
84	607,961	\$699,683	\$707,119	(\$7,436)	-1.1%	(\$5,328)	(\$2,108)	\$0	\$0
85	647,733	\$741,642	\$753,142	(\$11,500)	-1.5%	(\$9,254)	(\$2,245)	\$0	\$0
86	687,507	\$783,604	\$799,168	(\$15,564)	-1.9%	(\$13,180)	(\$2,383)	\$0	\$0
87	727,281	\$825,565	\$845,193	(\$19,628)	-2.3%	(\$17,107)	(\$2,521)	\$0	\$0
88	767,053	\$867,525	\$891,216	(\$23,692)	-2.7%	(\$21,033)	(\$2,659)	\$0	\$0

Division Record Request No. 3

Request:

Please calculate what the return on equity would have been in those years listed in the response to Data Request TEC-RI 1-7, assuming that decoupling was in place.

Response:

Based on the information provided in the Company's response to Data Request TEC-RI 1-7, and assuming that the Company's proposed decoupling mechanism had been in place excluding large and extra-large C&I customers, the estimated return on equity (ROE) for the twelve months ended June 30, 2005, 2006, 2007 and 2008 are as follows:

<u>Twelve Months Ended June 30,</u>	<u>ROE</u>
2005	12.17%
2006	9.34%
2007	5.23%
2008	6.98%

Please note that the ROE for the twelve months ended June 30, 2005 includes the estimated impact of the Company's earnings sharing mechanism for earnings above 11.25%. Also, for purposes of responding to this request, it was assumed that the weather normalization adjustments for each of the years in question was replaced with the decoupling adjustments, with the exception of weather normalization amounts allocated to the large and extra-large C&I customer classes based on a proration of billing units in each year.

Record Request No. 2

Request:

Please describe the pension and PBOP recovery provided for in other jurisdictions in which the Company serves.

Response:

Please see Attachment RR-COMM-2.

NATIONAL GRID

Summary of Pension/OPEB Regulatory Recovery Mechanisms and Funding Requirements

Jurisdiction	Regulatory Recovery Mechanism	Funding Requirement
NY PSC		
NIMO	Reconciliation with deferred amounts collected/credited in next rate case	Fund rate allowance plus actual capitalized costs
NIMO	Reconciliation with deferred amounts collected/credited in next rate case	Fund rate allowance plus actual capitalized costs
KEDNY	Reconciliation with deferred amounts collected/credited in next rate case	Fund rate allowance plus actual capitalized costs
KEDLI	Reconciliation with deferred amounts collected/credited in next rate case	Fund rate allowance plus actual capitalized costs
MA DPU		
MA Electric	Base rates; no true up	None
Nantucket	Base rates; no true up	None
Boston Gas	Reconciliation with deferred amounts collected/credited over 3 years through LDAC	None
Colonial	Base rates; no true up	None
Essex	Base rates; no true up	None
NH PUC		
Energy North	Base rates, no true up. Proposed reconciling mechanism in current rate case.	None
Granite State	Base rates; no true up.	None

Record Request No. 6

Request:

Please provide national or regional statistics on leak rates to provide context for RI leak rates.

Response:

After researching this request, the Company has been unable to locate any published national or regional statistics on leak rates. Comparative statistics are available for the Company's operations in New York, Massachusetts and New Hampshire. These comparative statistics are as follows:

Mains (in Leak Repairs per Mile)

RI: 0.7
MA: 0.6 (Boston-1.0, Colonial-0.1, Essex 0.4)
NY: 0.3 (New York City-0.7, Long Island-0.2, Upstate-0.1)
NH: 0.2

(National Grid Average: 0.4)

Services (in Leak Repairs per 1,000 Services)

RI: 3.6
MA: 5.0 (Boston-5.8, Colonial-2.8, Essex-5.6)
NY: 2.9 (New York City-2.1, Long Island-4.6, Upstate-2.2)
NH: 3.2

(National Grid Average: 3.5)

Record Request No. 9

Request:

Please refer to Attachment NG-SLF-2, which was included as an exhibit to Ms. Fleck's testimony in the Company's original filing. Please verify that the total growth capital listed for the years 2008 through 2012 is accurate. Please indicate whether the growth capital includes amounts relating to customer additions made as a result of the Gas Marketing Program. Please state what was planned for customer additions in 2008 and how much is completed to date. Please compare this rate to the last three years prior to merger. Total growth capital increases by approximately 15% between 2008 and 2009, what is the basis for this increase? Does the even spending each year thereafter imply that no new growth is anticipated?

Response:

Referring to the figures listed on Line 4 of Attachment NG-SLF-2:

- (a) The figures listed are correct in Attachment NG-SLF-2 (Line 4).
- (b) The figures listed on Line 4 include anticipated customer additions resulting from (1) new construction, (2) low-use conversions to heating service, and (3) conversions of new customers already located on the system.
- (c) Please see the Company's response to Data Request COMM 3-2 comparing total heating conversions in 2007 and to date in 2008. As stated therein, data on the number of low-use and new customer conversions were not tracked by Southern Union, and therefore, is not readily available prior to 2007.
- (d) The figure listed on Line 4 for the Forecasted Budget FY2008 of \$8,021,470 includes was a projection made in Nov-07 for fiscal year end 07/08 and included meter purchase costs for both growth and non-growth programs. No capital costs associated with the Gas Marketing Program are included in that total since implementation of the program was not anticipated prior to the year end for FY2008 (March 31, 2008). The actual budget for growth capital for FY2008 was \$5.574 million.
- (e) The capital associated with the Gas Marketing Program is incremental to the "baseline" amount of growth capital typically needed in a year. The baseline amounts of growth capital reflect the addition of 750 residential services and 250 commercial services, which includes new construction

and conversion customers. The increase from 2008 to 2009 reflects the deployment of the Gas Marketing Program (i.e. from \$5.574 million to \$9.222 million).

- (f) The amount of incremental growth capital attributable to the Gas Marketing Program (and contained in Line 4) is \$3.65 million beginning in 2009. This capital spending reflects the addition of 840 residential heating services; 50 non-heating services and 204 commercial services. These customer additions would be incremental to the baseline level and do not reflect the low-use conversions where a new service is not required.
- (g) The growth capital figures for the fiscal years 2009 and onward assume that the Gas Marketing Program will be in place producing a steady level of conversions (incremental to historical levels). The level amount of growth capital does not mean that no growth is anticipated. Rather, it means that the Gas Marketing Program will be in place producing a steady level of conversions each year.

Record Request No. 7

Request:

Please describe the elements of the “Company Unaccounted For” volumes. What is included in the reported total? Please provide 5 years of historical data.

Response:

Unaccounted for Gas for the past five years is recorded as follows:

2007-08	1.80%
2006-07	2.65%
2005-06	2.90%
2004-05	1.82%
2003-04	2.57%

These totals are calculated according to the D.O.T.-issued “Instructions for completing Form PHMSA F7100.1-1,” which defines “% Unaccounted For Gas” as follows:

$$[(\text{Purchased gas} + \text{produced gas}) - (\text{customer use} + \text{company use} + \text{appropriate adjustments})] / (\text{purchased gas} + \text{produced gas})$$

The allowable adjustments specified by the D.O.T. include:

“...such factors as variations in temperature, pressure, meter-reading cycles, or heat content; calculable losses from construction, purging, line breaks, etc., where specific data are available to allow reasonable calculation or estimate; or other similar factors.”

In the case of National Grid – Rhode Island, no adjustments were used in these calculations. Therefore, the “adjustments” = 0. In addition, Purchased gas + Produced gas would be represented by “Sendout” and Customer Use + Company Use would be represented by “Throughput.”

These are the volumes used for the calculations from 2004 – 2006:

<u>Year</u>	<u>Sendout</u>	-	<u>Throughput</u>	=	<u>UFG</u>	
2003-04	38,919,673	-	37,917,921	=	1,001,752	(2.57%)
2004-05	38,529,542	-	37,829,942	=	699,600	(1.82%)
2005-06	35,982,241	-	43,938,537	=	1,043,704	(2.90%)
2006-07	36,597,043	-	35,628,991	=	968,052	(2.65%)
2007-08	37,929,692	-	37,247,211	=	682,481	(1.80%)

Record Request No. 10

Request:

How does the Company work to reduce line losses and reduce Company Unaccounted For Gas? How is Unaccounted For Gas paid for? Does the Company monitor or measure improvement? If so, how?

Response:

In terms of reducing line losses, National Grid has a policy of replacing leak prone pipe, which would otherwise contribute to the loss of natural gas through leakage. For Rhode Island, in Fiscal Year 2008, the plan is to replace 14 miles of steel and cast-iron main, with approximately 9 miles completed through August 2008.

In addition, National Grid has a program in place to improve metering accuracy through the replacement and recertification of gas meters. This program is designed to comply with Company policies and procedures, as well as all local regulatory requirements.

Unaccounted for Gas is recovered in through the GCR as part of the Company Fuel Allowance. The Company's Tariff, RIPUC NEGC No. 101, Section 1, Schedule B defines Company Fuel Allowance as follows:

The quantity in Therms (as calculated on a percentage basis) by which the gross amount of gas received for Customer's account at the Point(s) of Receipt is reduced in kind in order to compensate the Company for gas loss and unaccounted for, Company use or similar quantity-based adjustments.

The tariff further defines such calculation at Section 6, Schedule C, Item 1.12.0:

...Such Company Fuel Allowance shall be calculated by the Company based upon an average of the Company's most recent (5) years experience, fuel loss and unaccounted for or similar quantity based adjustments.

Record Request No. 12

Request:

Please provide the System Integrity Report. Please provide your Priority Report.

Response:

Provided are:

- Attachment RR-COMM-12(a)
National Grid System Integrity Overview – Calendar Year 2007
(Covers all of National Grid-US by State)
(SI Overview 2007.ppt)
- Attachment RR-COMM-12(b)
Prioritized Main Replacement Work For RI – Fiscal Year 2009
(C&M WORKPLAN FY09 PROD.xls)

nationalgrid

Enterprise

Gas Distribution Systems

System Integrity Overview

Calendar Year 2007

Analysis Of D.O.T. Report Data Filed March 2008
Comparisons of 2007 Leak and System Inventory Data
by State and National Grid Legacy Companies
(Trend Analyses Will Be Provided In A Future Full System Integrity Report)

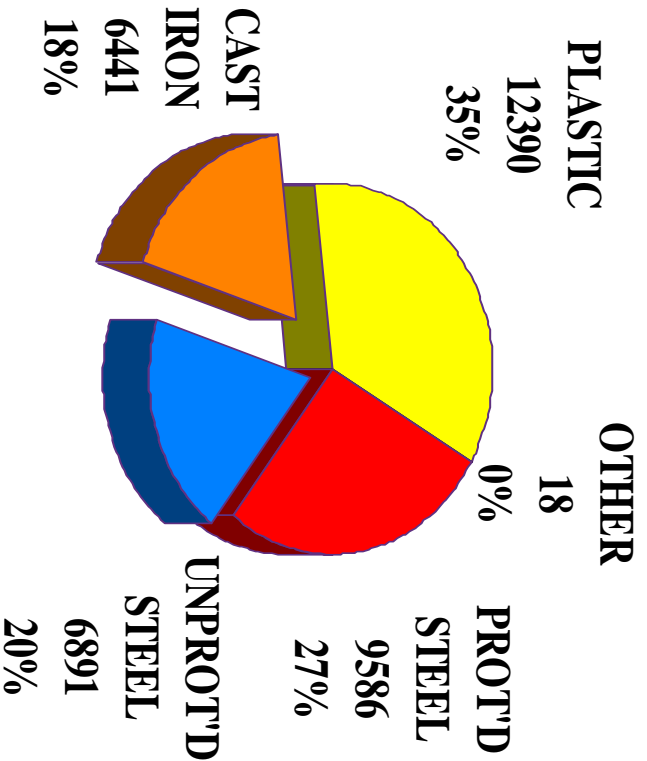
John DiStefano, Senior Engineer
System Integrity - Engineering Planning

2007 MAIN INVENTORY

U.S. COMPARATIVE SUMMARY

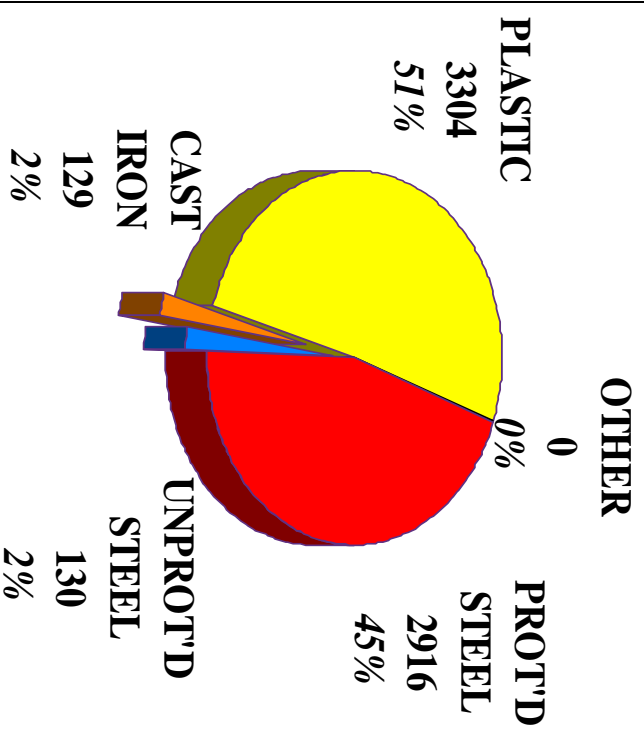
National Grid - US

35,326 MILES



2004 AGA Average

6,479 MILES

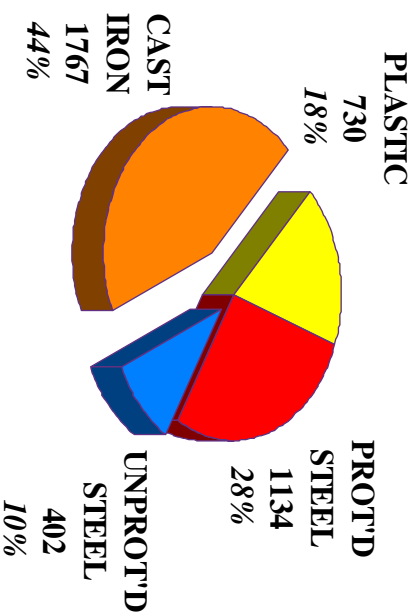


2007 MAIN INVENTORY

NEW YORK

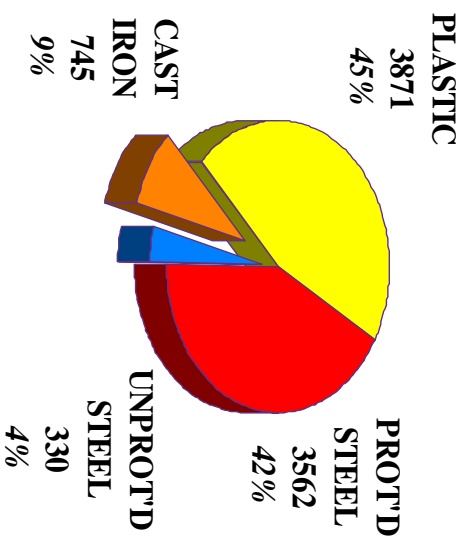
New York City

4,033 MILES



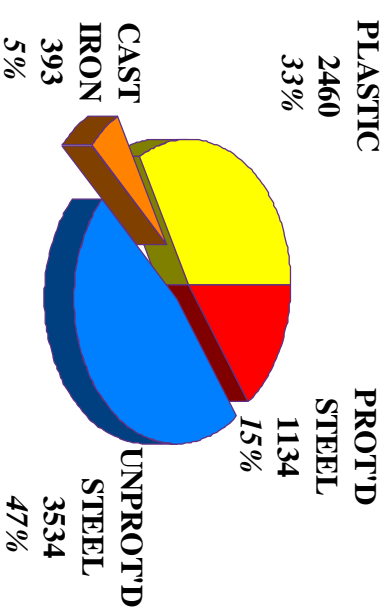
Upstate

8,508 MILES



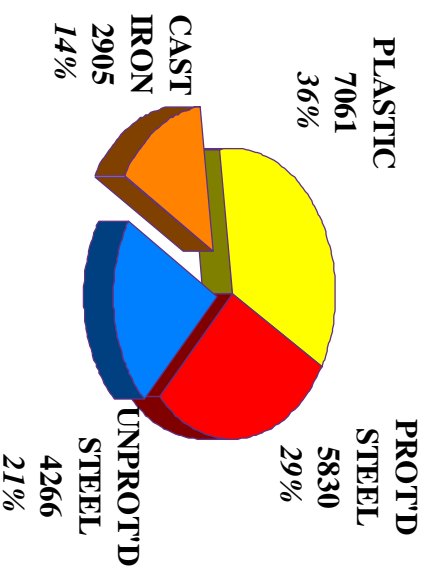
Long Island

7,521 MILES



All New York

20,062 MILES

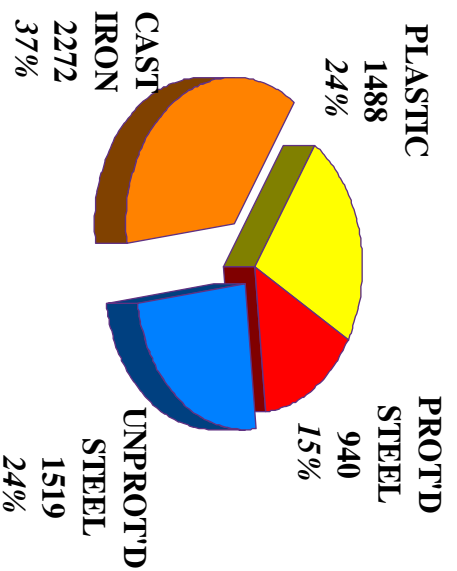


2007 MAIN INVENTORY

MASSACHUSETTS

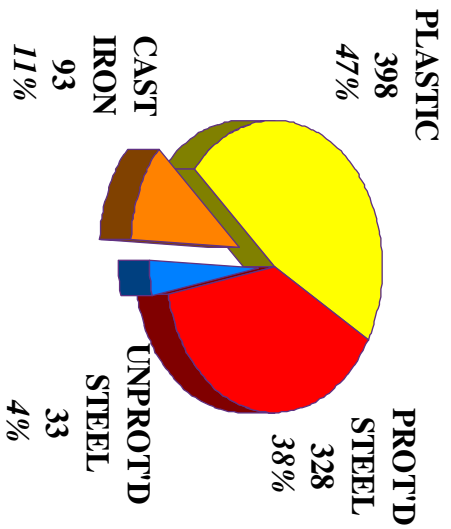
Boston

6,219 MILES



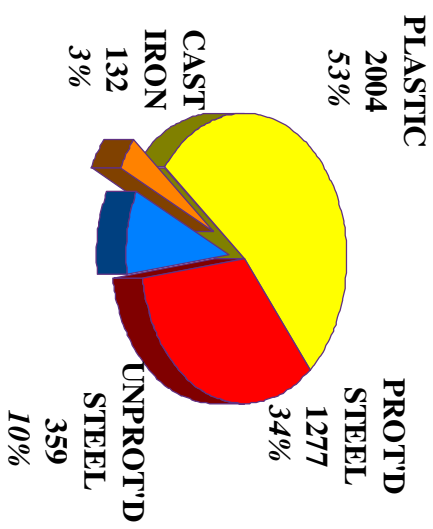
Essex

852 MILES



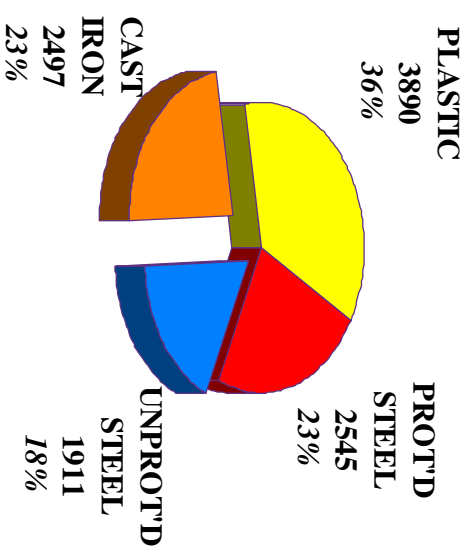
Colonial

3,772 MILES



All Massachusetts

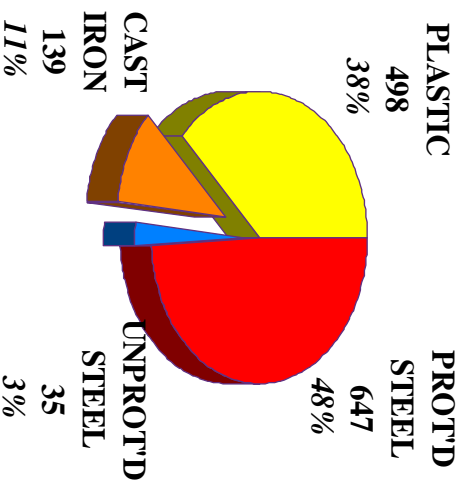
10,843 MILES



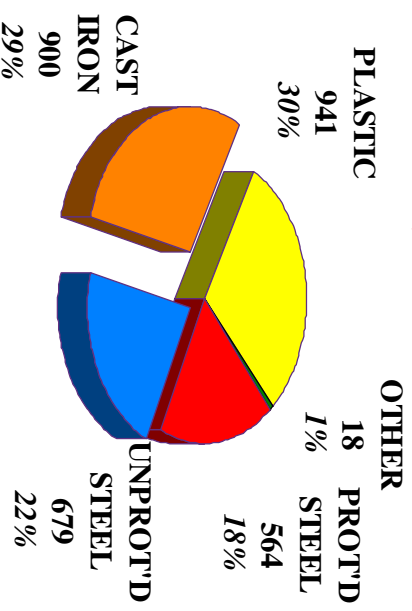
2007 MAIN INVENTORY

OTHER NEW ENGLAND

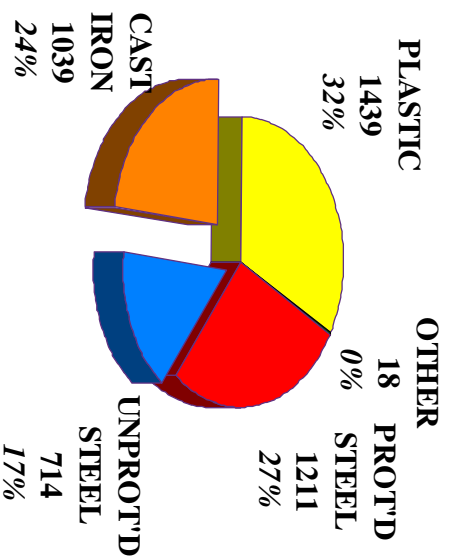
New Hampshire
1,319 MILES



Rhode Island
3,102 MILES



All Other NE
4,421 MILES

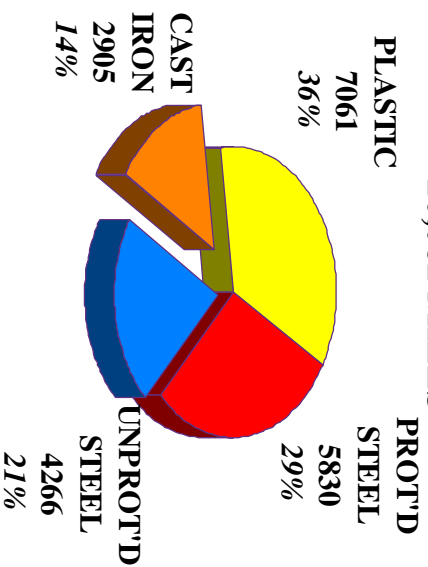


2007 MAIN INVENTORY

SUMMARY - All States

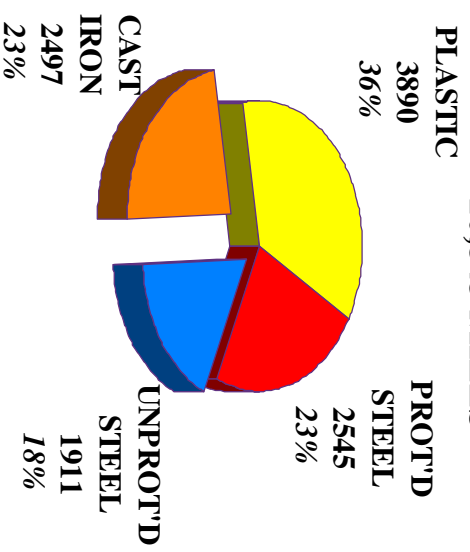
NY

20,062 MILES



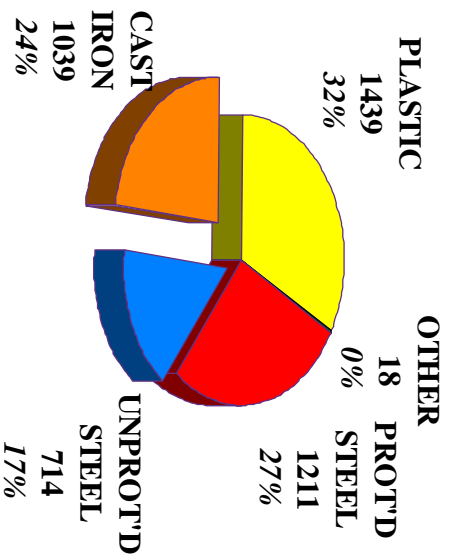
MA

10,843 MILES



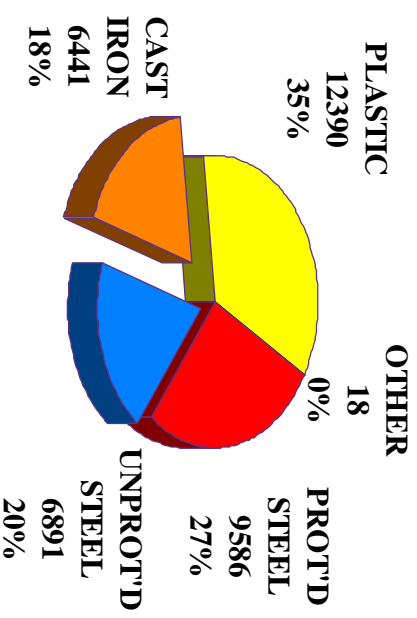
Other NE

4,421 MILES



ENTERPRISE

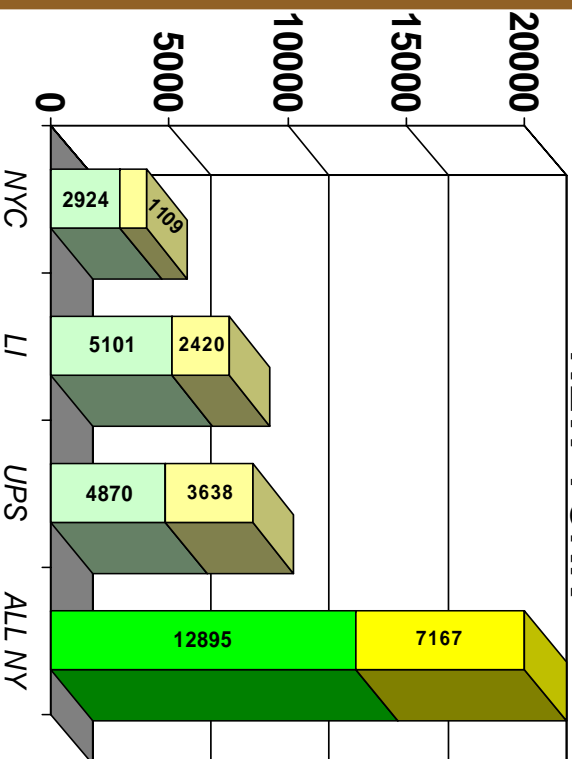
35,326 MILES



2007 MAIN INVENTORY

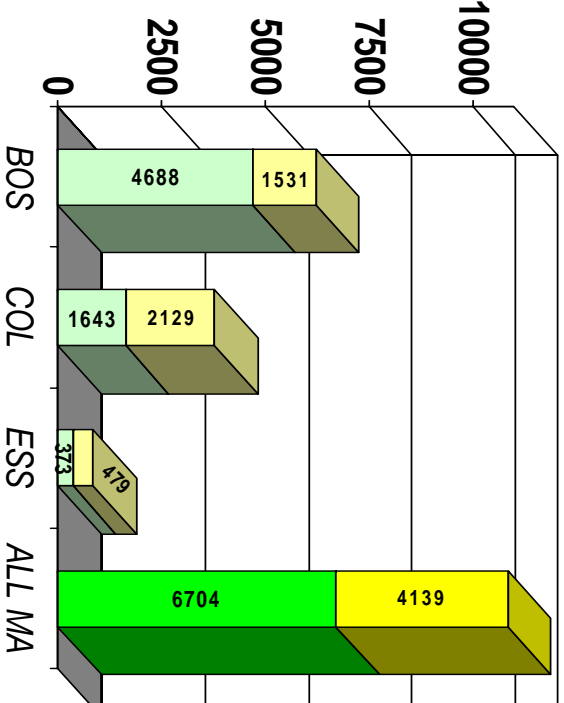
Main Age Analysis

NEW YORK



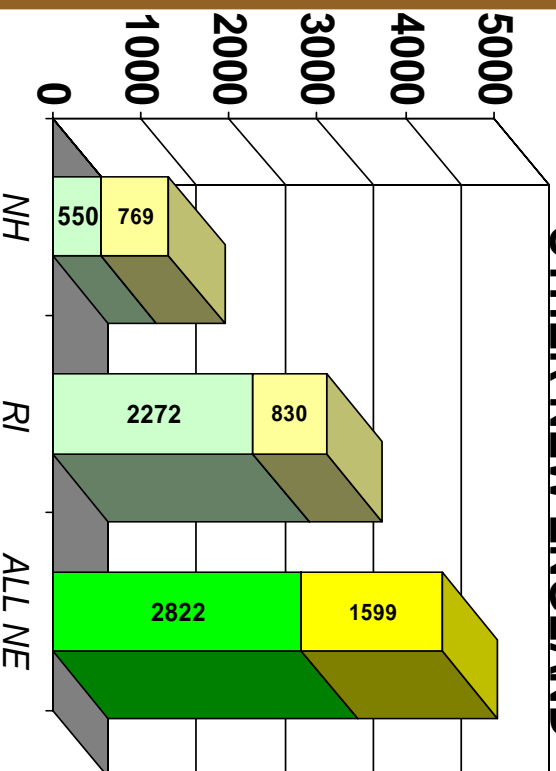
1980 & Newer
Pre-1980

MASSACHUSETTS



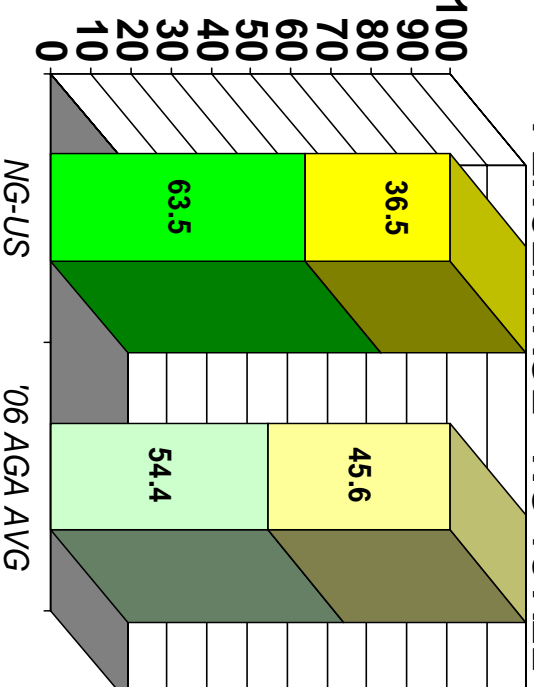
1980 & Newer
Pre-1980

OTHER NEW ENGLAND



1980 & Newer
Pre-1980

PERCENTAGE - NG vs ALL US

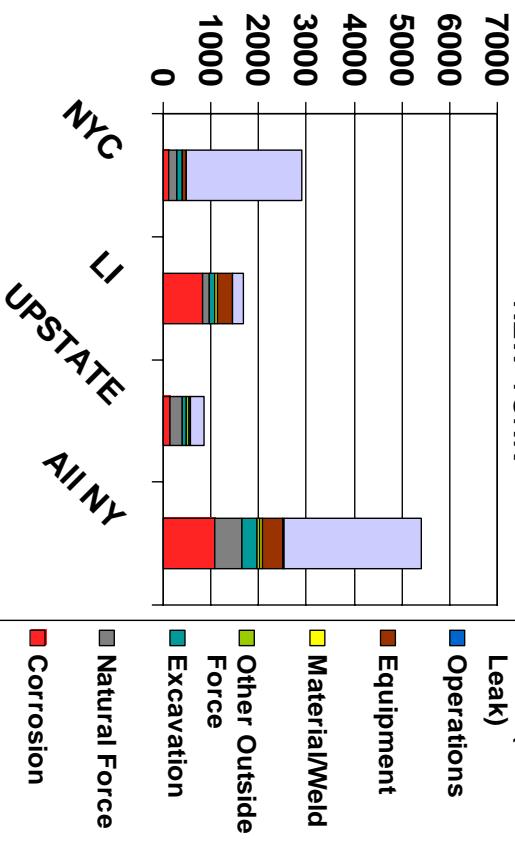


1980 & Newer
Pre-1980

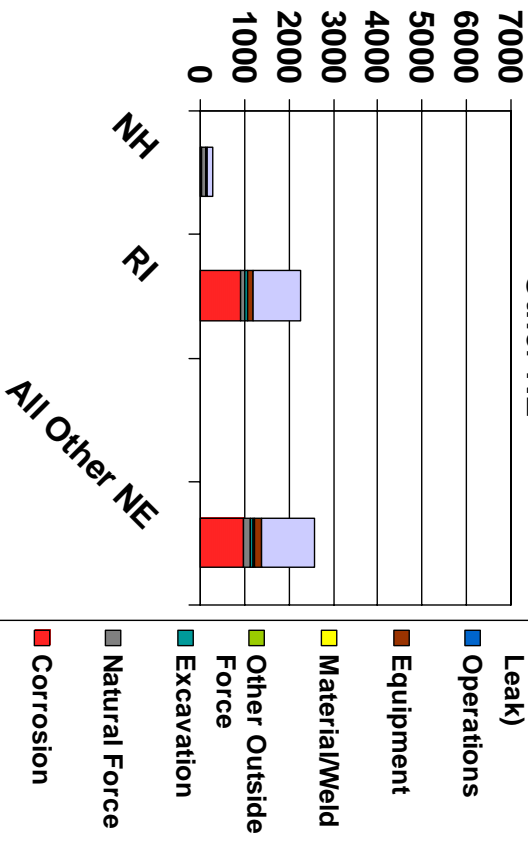
2007 MAIN LEAK REPAIRS

All Main Leak Repairs (including damages)

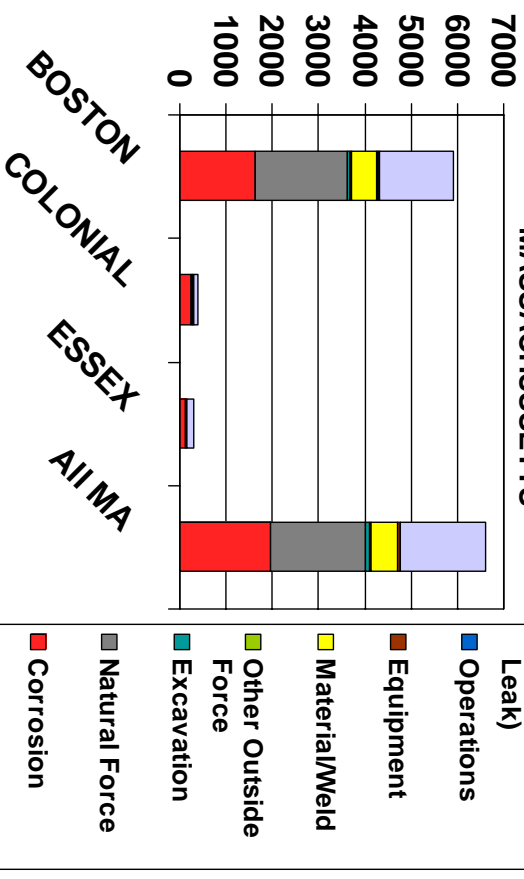
NEW YORK



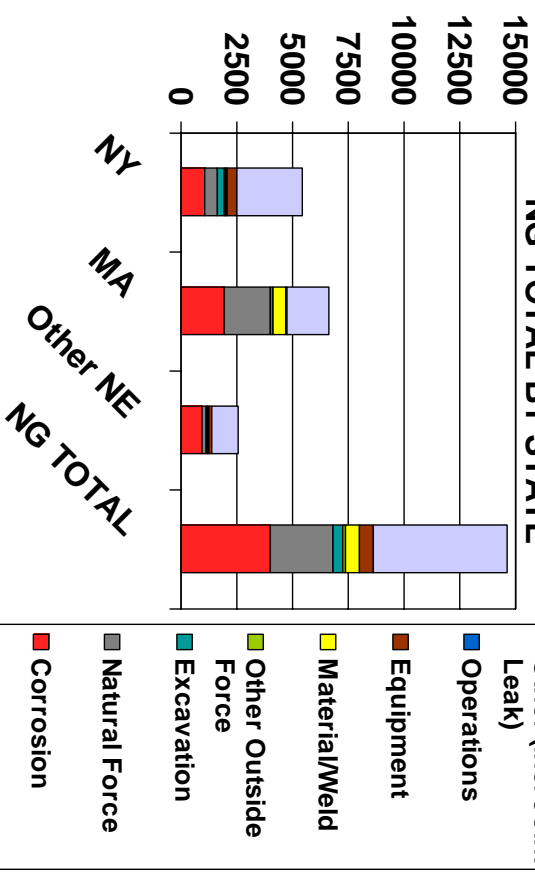
Other NE



MASSACHUSETTS



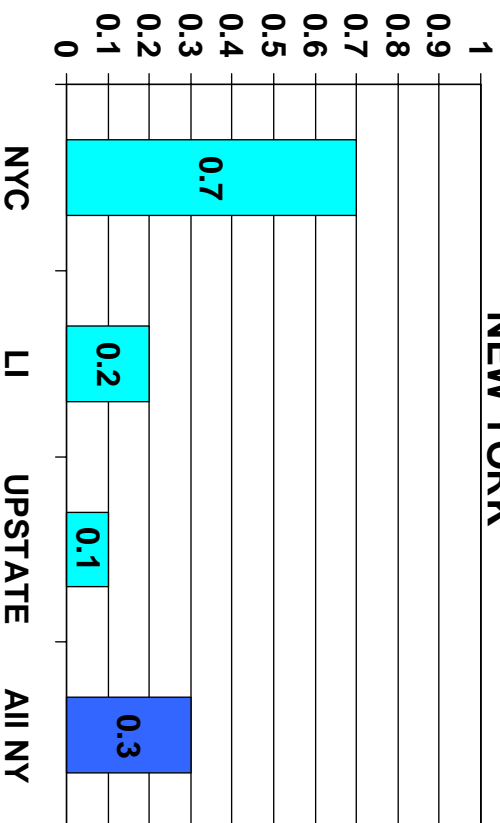
NG TOTAL BY STATE



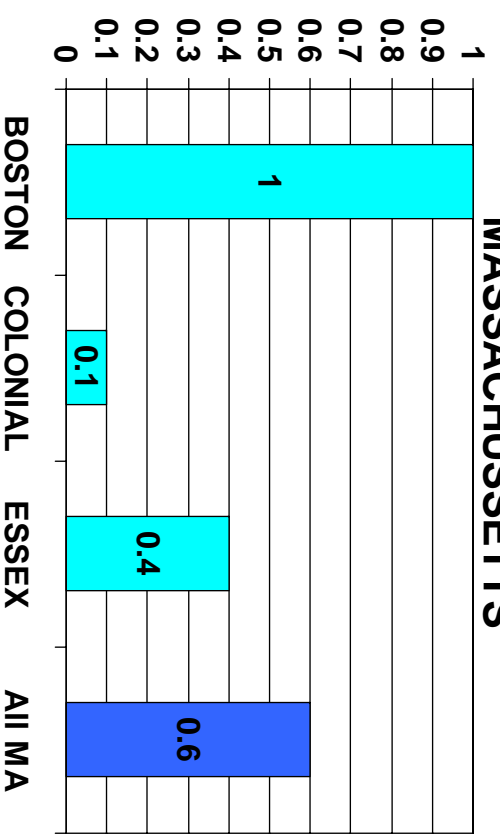
2007 MAIN LEAK "RATES"

Total Main Leak Repairs (incl. damages) / Mile of Total Main

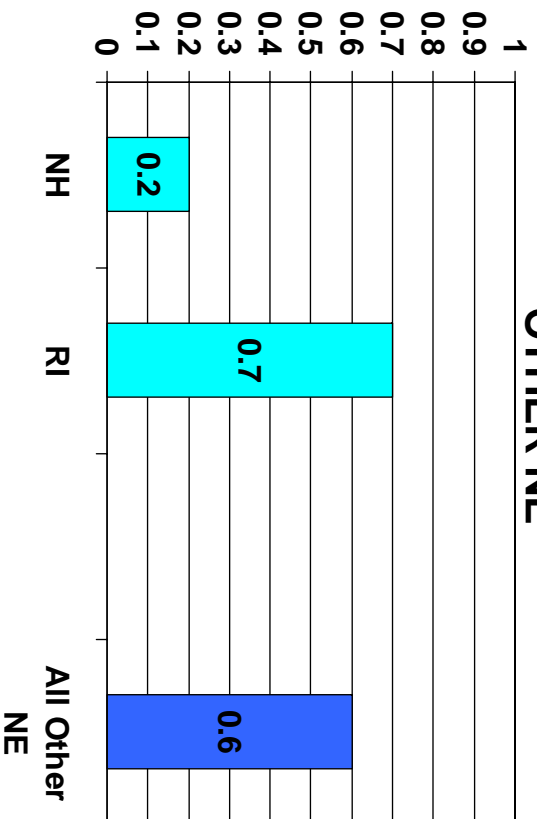
NEW YORK



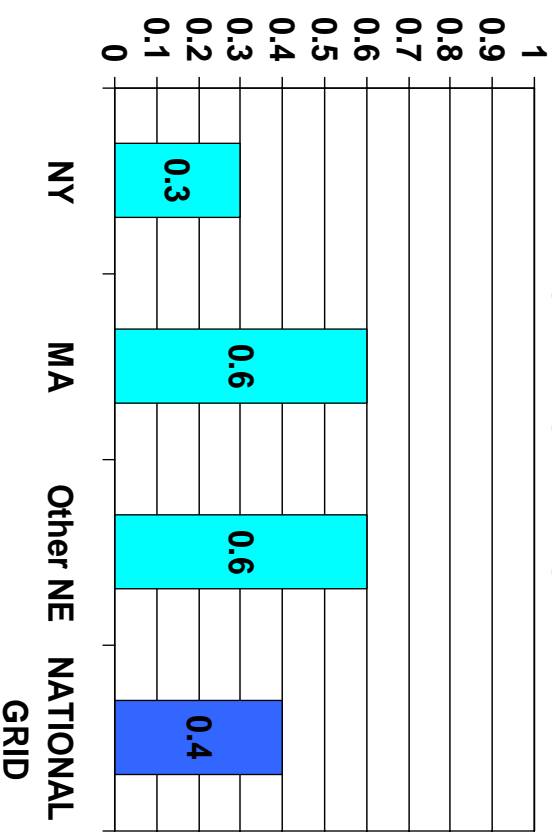
MASSACHUSETTS



OTHER NE



NATIONAL GRID TOTAL

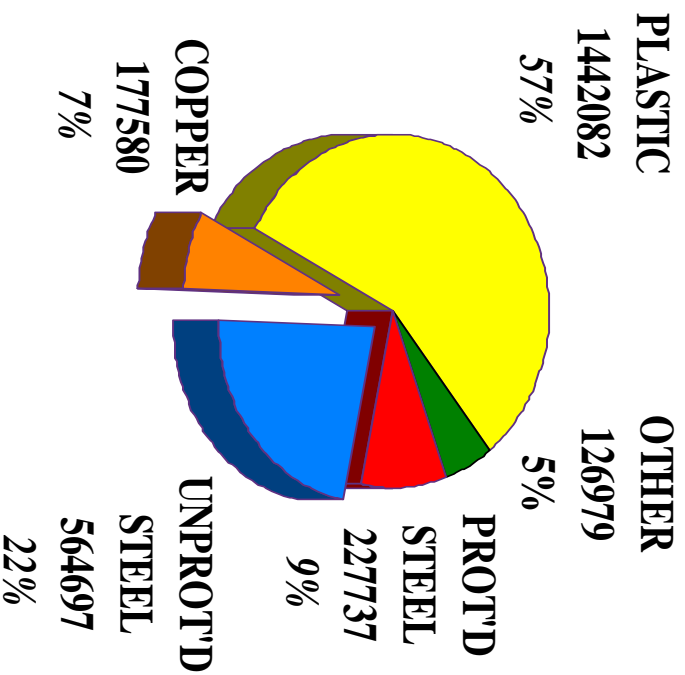


2007 SERVICE INVENTORY

U.S. COMPARATIVE SUMMARY

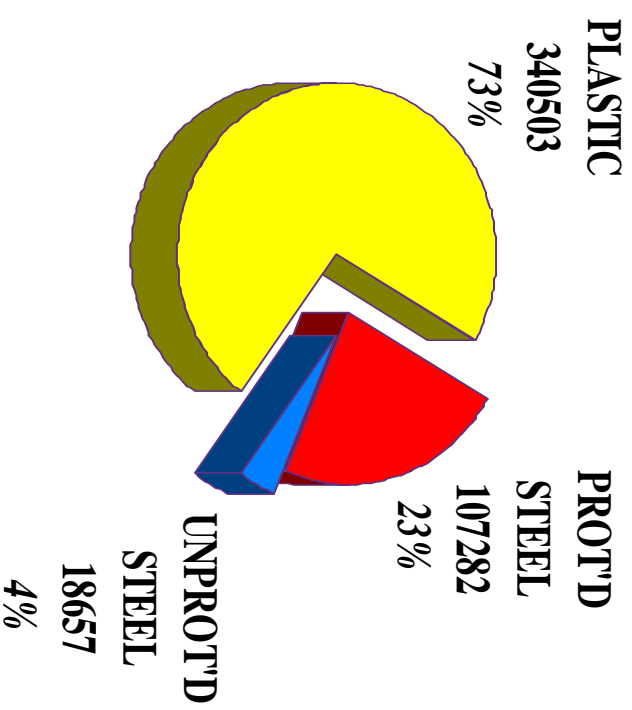
National Grid - US

2,539,075 SERVICES



2004 AGA Average

466,442 SERVICES

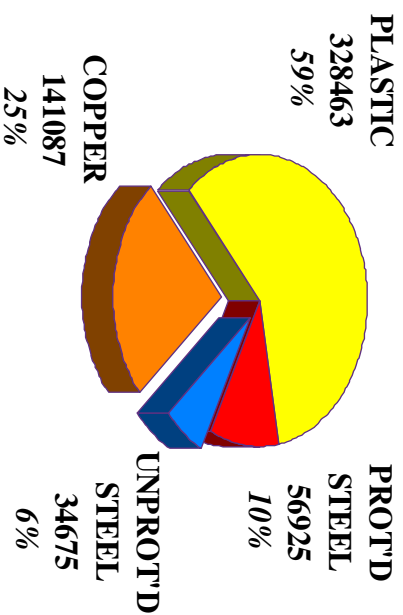


2007 SERVICE INVENTORY

NEW YORK

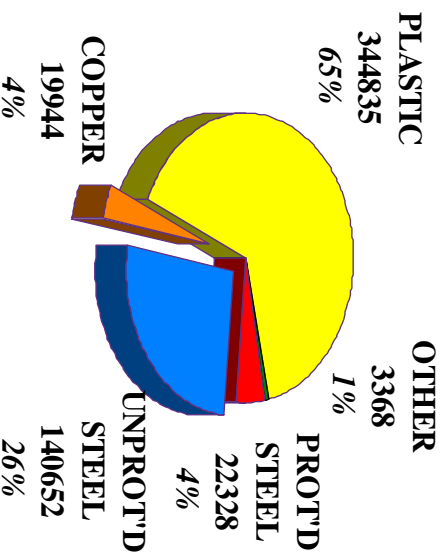
New York City

561,150 SERVICES



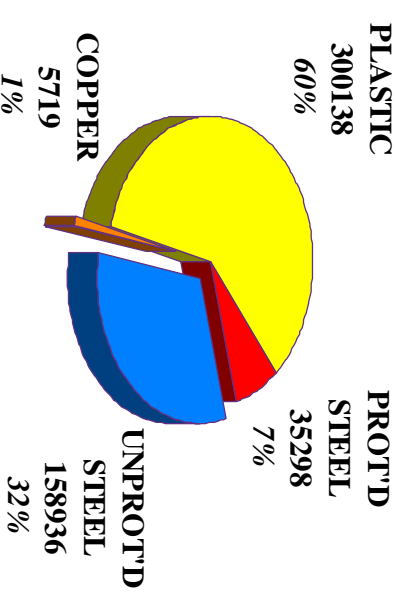
Upstate

531,127 SERVICES



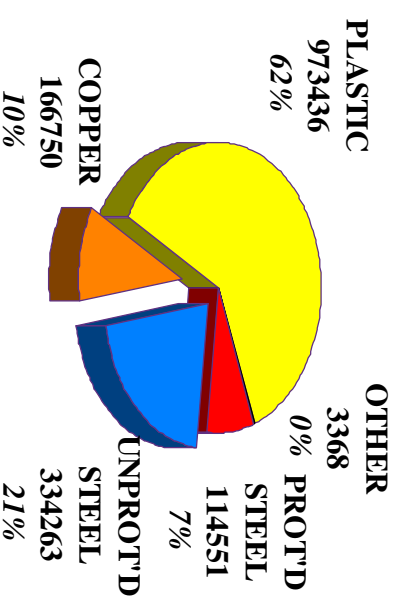
Long Island

500,091 SERVICES



All New York

1,592,368 SERVICES

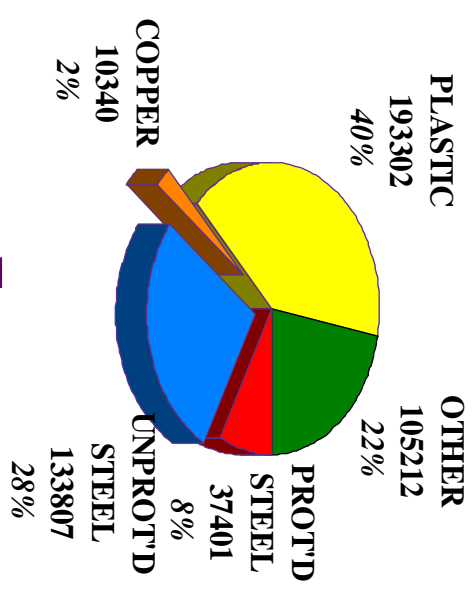


2007 SERVICE INVENTORY

MASSACHUSETTS

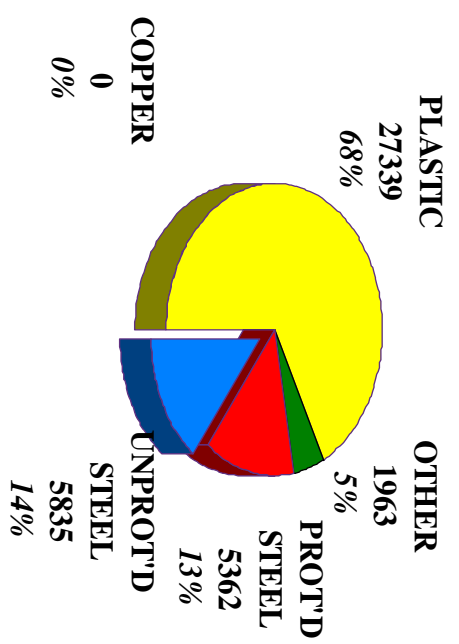
Boston

480,062 SERVICES



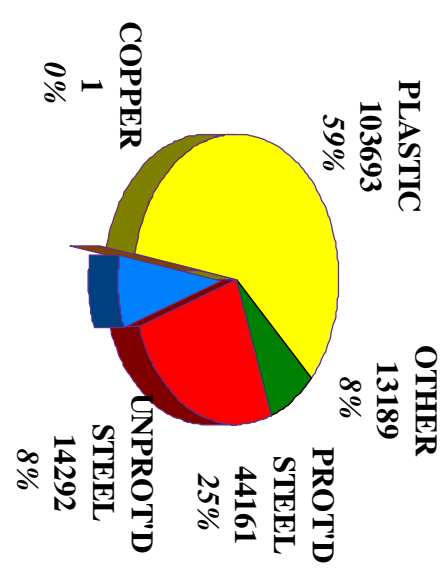
Essex

40,499 SERVICES



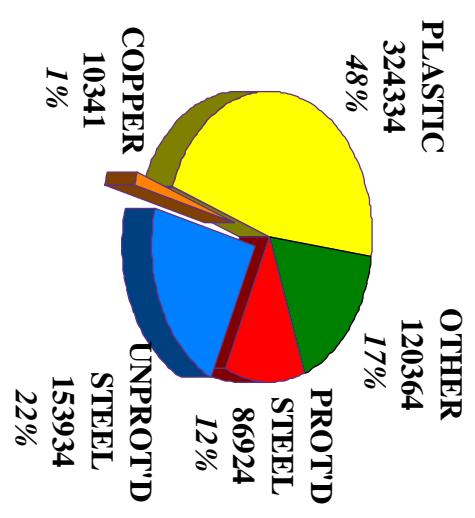
Colonial

175,336 SERVICES



All Massachusetts

695,897 SERVICES

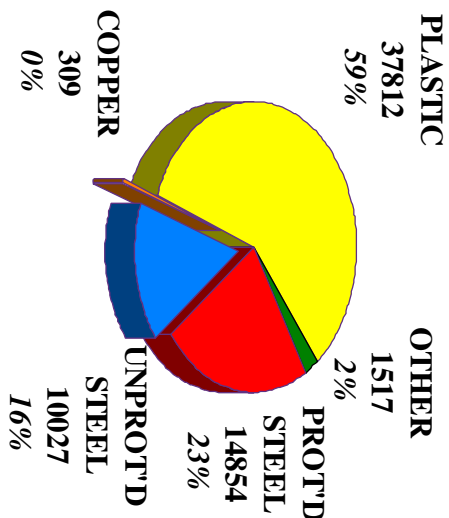


2007 SERVICE INVENTORY

OTHER NEW ENGLAND

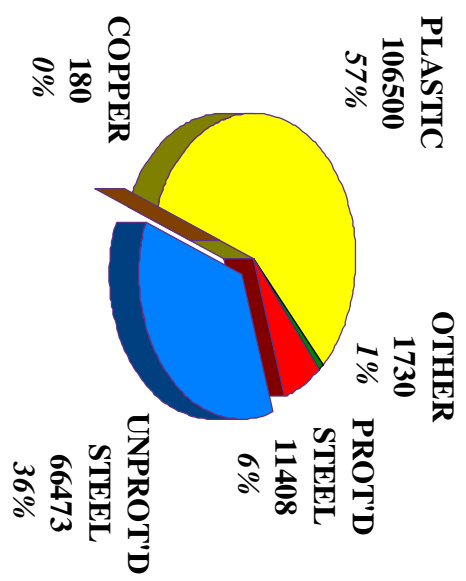
New Hampshire

64,519 SERVICES



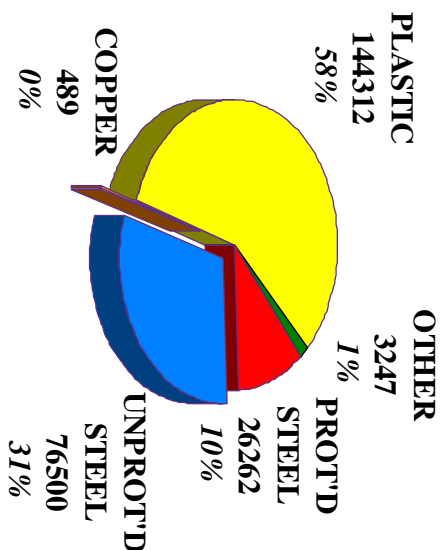
Rhode Island

186,291 SERVICES



All Other NE

250,810 SERVICES

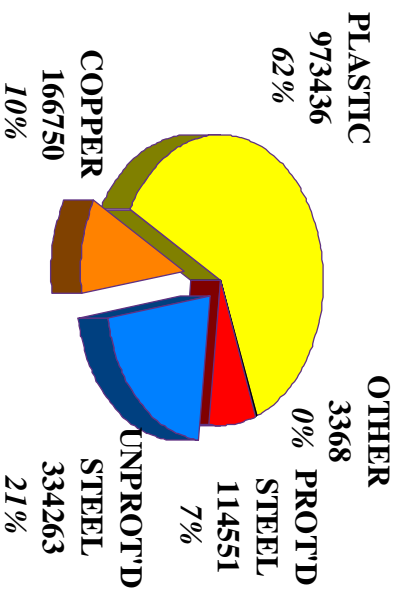


2007 SERVICE INVENTORY

SUMMARY - All States

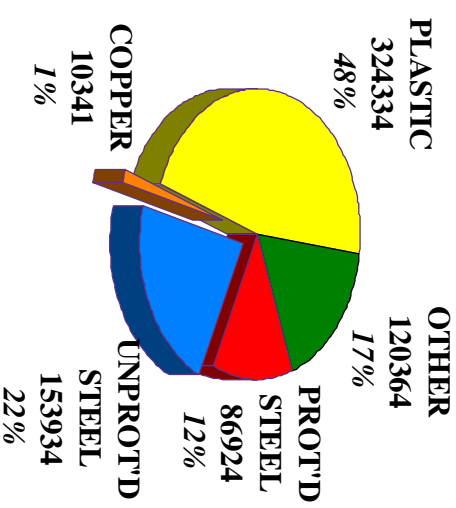
NY

1,592,368 SERVICES



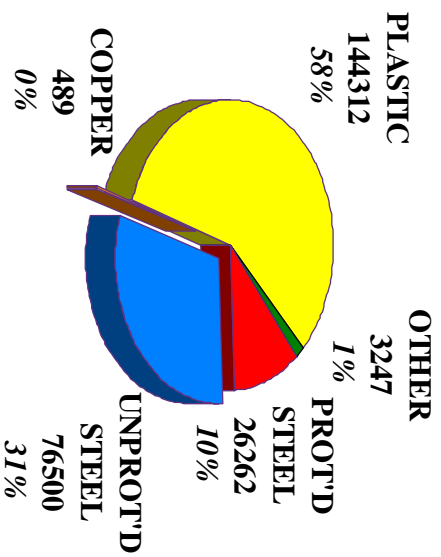
MA

695,897 SERVICES



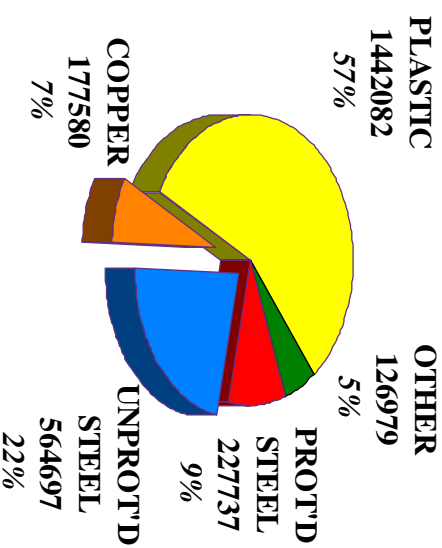
Other NE

250,810 SERVICES



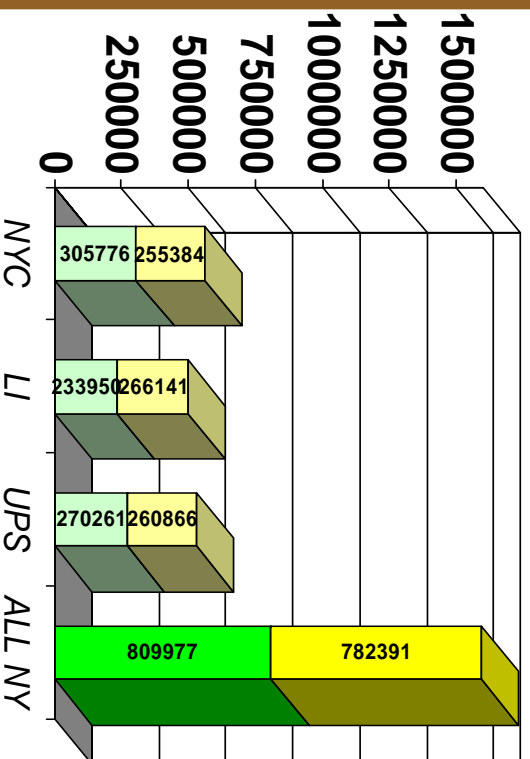
ENTERPRISE

2,539,075 SERVICES

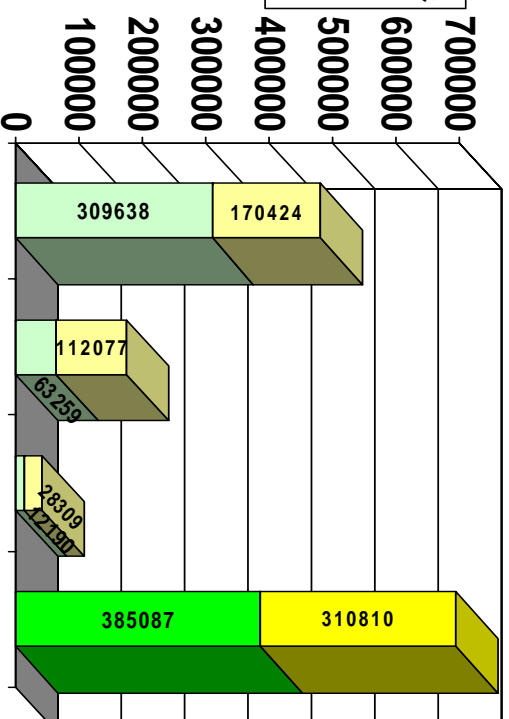


2007 SERVICE INVENTORY

Service Age Analysis NEW YORK

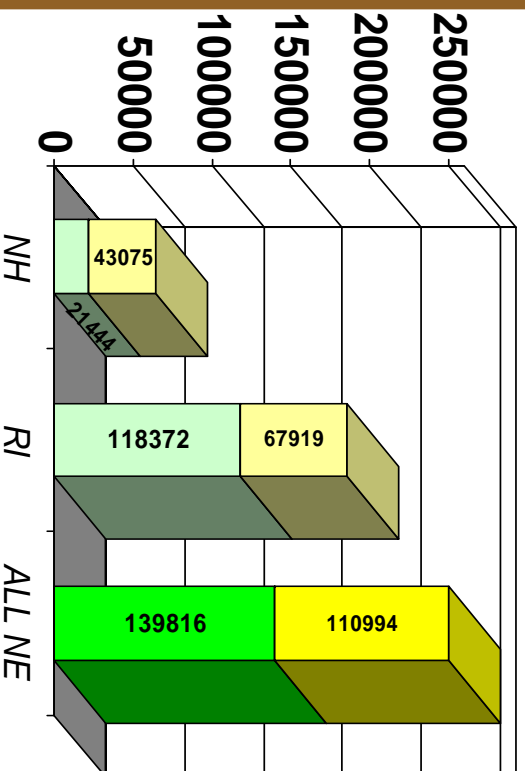


1980 & Newer
Pre-1980



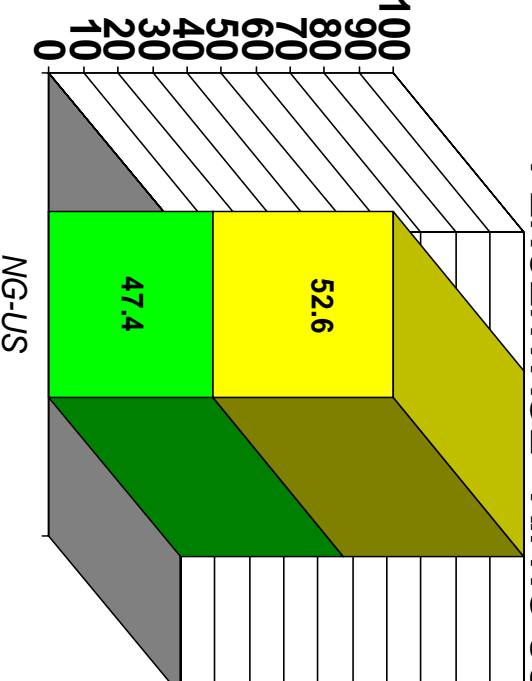
1980 & Newer
Pre-1980

OTHER NEW ENGLAND



1980 & Newer
Pre-1980

PERCENTAGE - All NG US

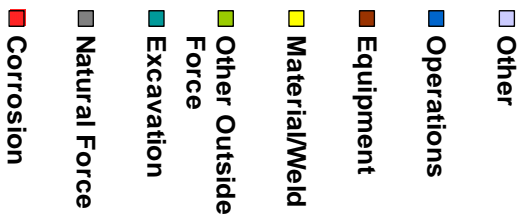
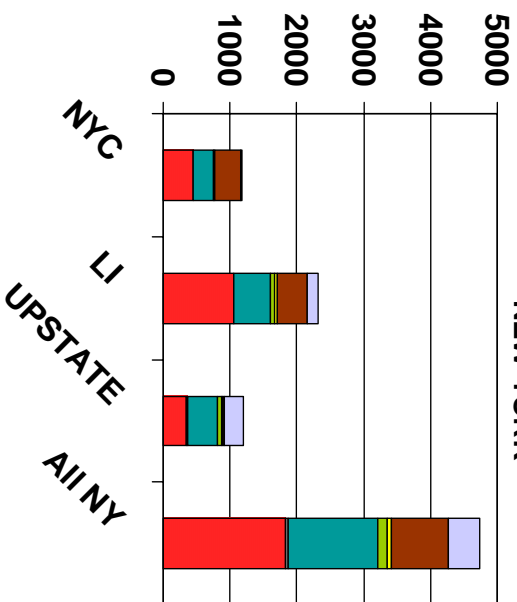


1980 & Newer
Pre-1980

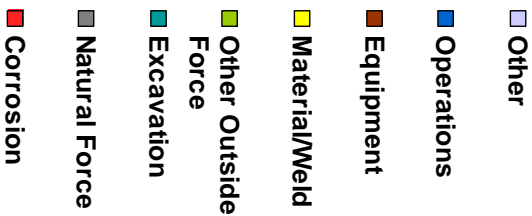
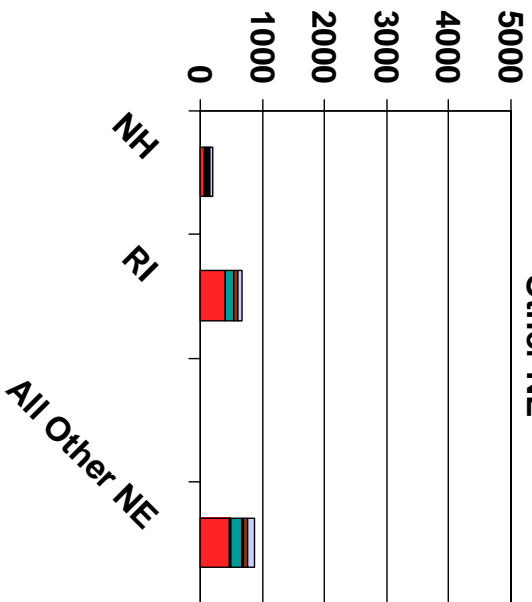
2007 SERVICE LEAK REPAIRS

All Service Leak Repairs (including damages)

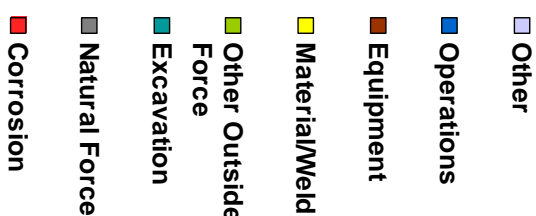
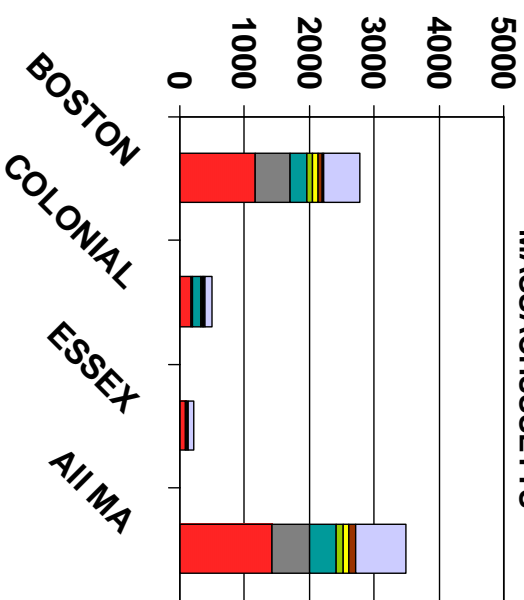
NEW YORK



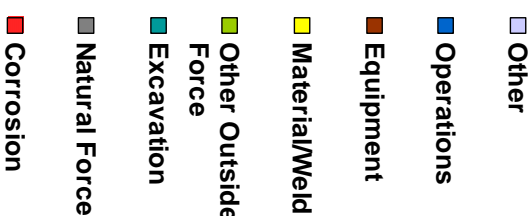
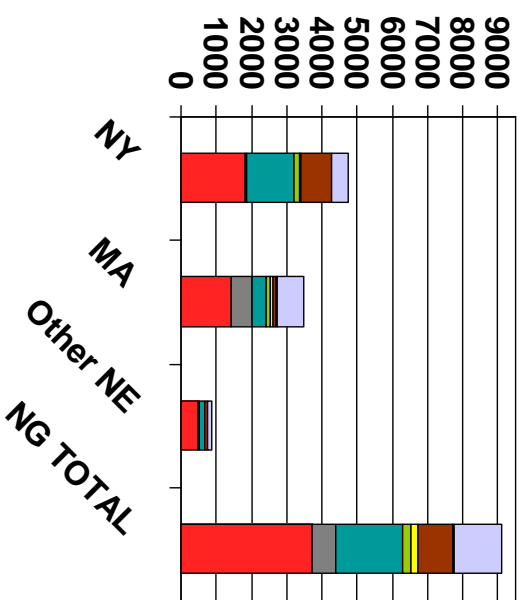
Other NE



MASSACHUSETTS



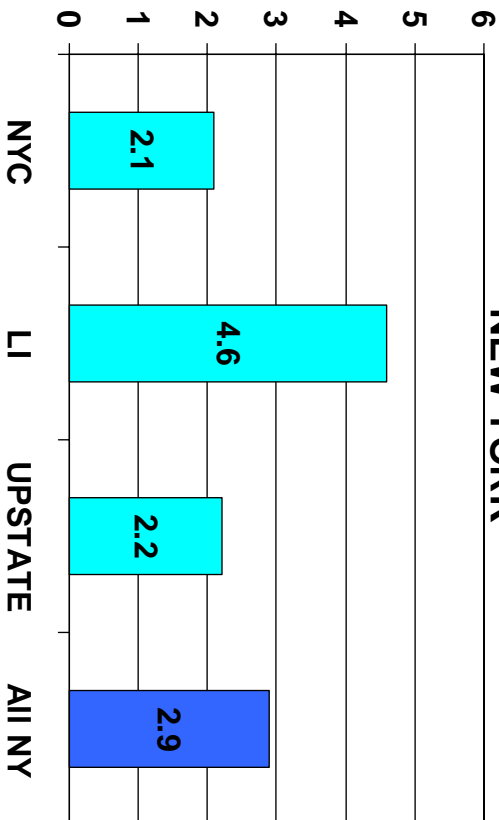
NG TOTAL BY STATE



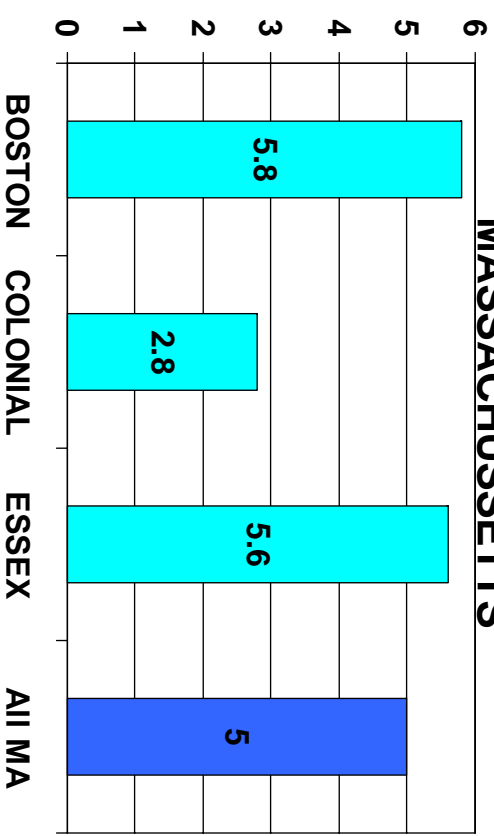
2007 SERVICE LEAK "RATES"

Total Service Leak Repairs (incl. damages) / 1,000 Total Services

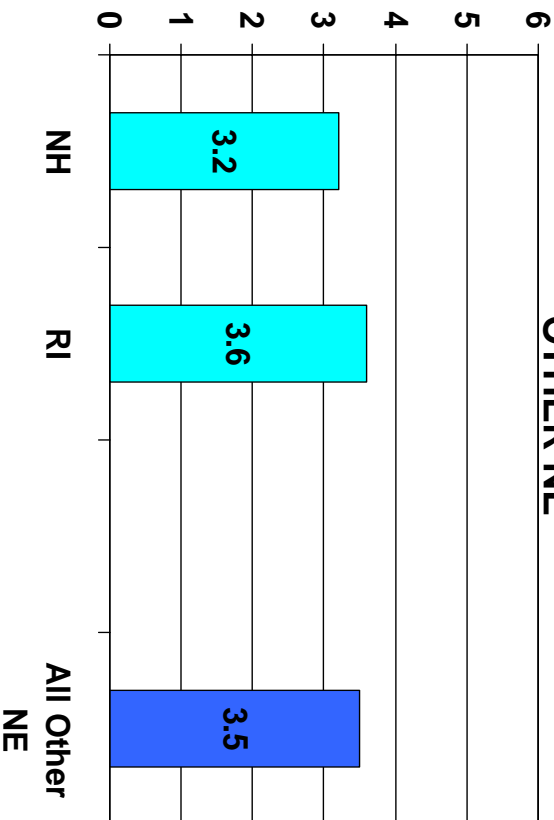
NEW YORK



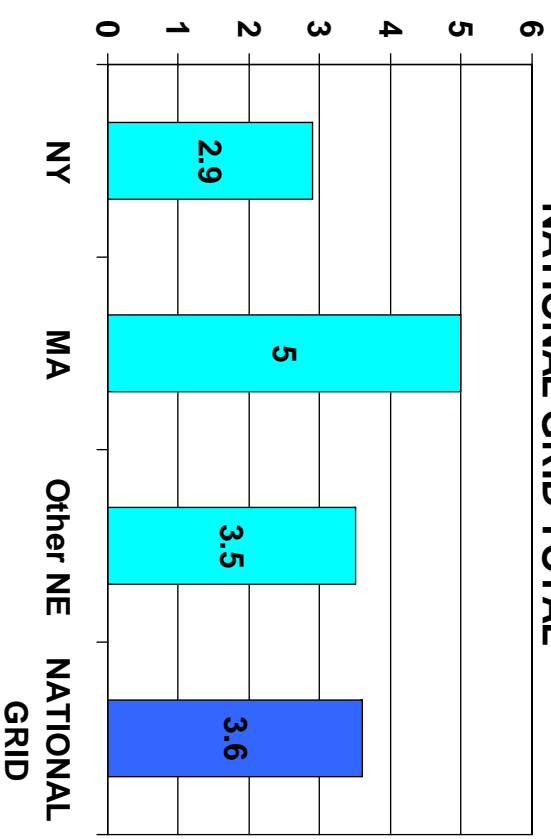
MASSACHUSETTS



OTHER NE



NATIONAL GRID TOTAL



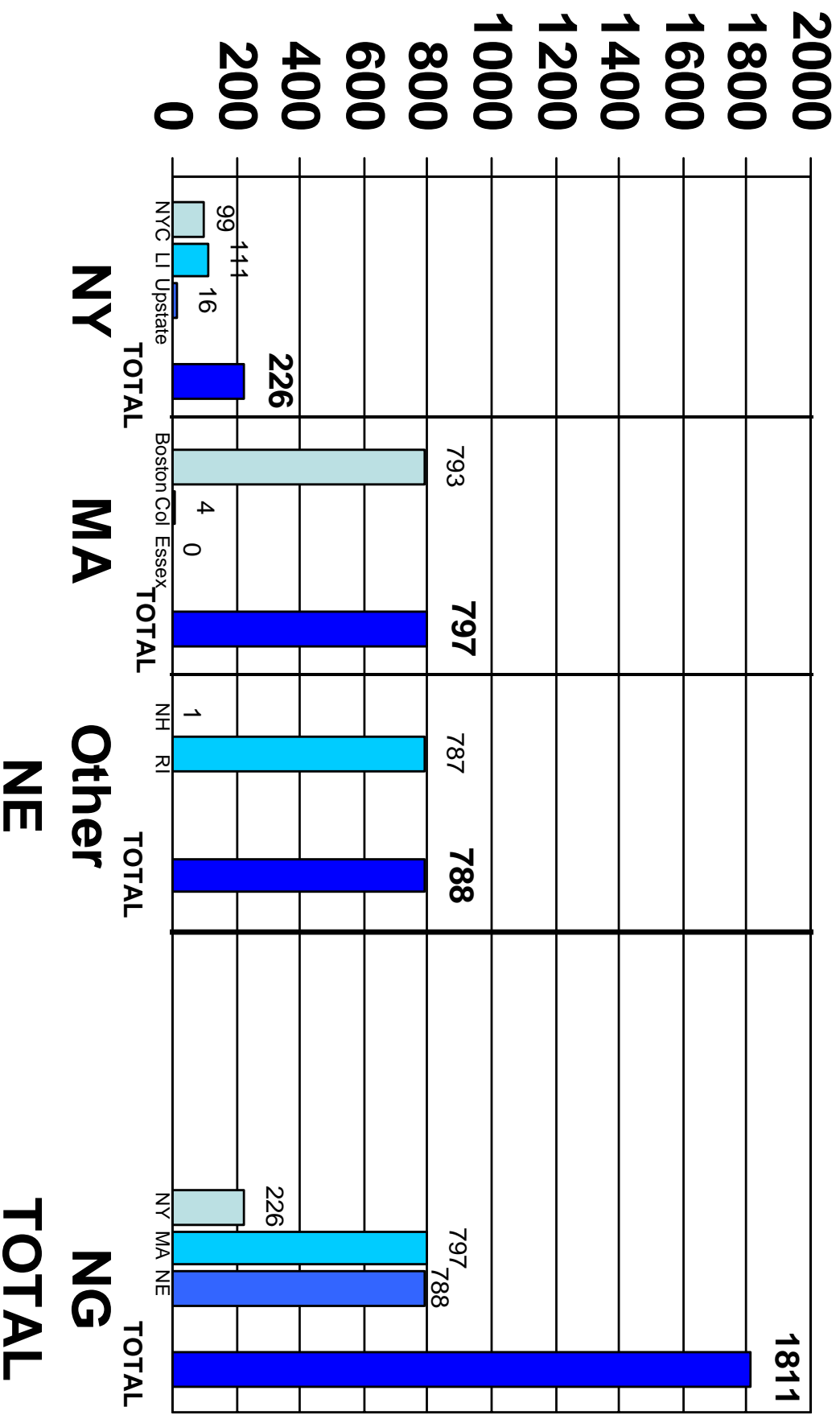
NATIONAL GRID-US DISTRIBUTION PIPE PROFILE BY STATE AND LEGACY COMPANY

		2007 D.O.T Report Pipe Inventories					
	Distribution Main (miles)	Total Services (#)	Service Density (Svcs/Mile Main)	Avg Svc Length (feet/service)	Service Pipe Length (miles)	TOTAL DISTRIB PIPE (miles)	
NYC	4,033	561,150	139	45	4,783	8,816	
LI	7,521	500,091	66	65	6,156	13,677	
Upstate	8,508	531,127	62	71.33	7,175	15,683	
NY State	20,062	1,592,368	79	60.06	18,114	38,176	
Boston	6,219	480,062	77	43.98	3,999	10,218	
Colonial	3,772	175,336	46	65.96	2,190	5,962	
Essex	852	40,499	48	78.58	603	1,455	
MA State	10,843	695,897	64	51.53	6,792	17,635	
NH	1,319	64,519	49	66.19	809	2,128	
RI	3,102	186,291	60	67.94	2,397	5,499	
Other NE	4,421	250,810	57	67.49	3,206	7,627	
NY State	20,062	1,592,368	79	60.06	18,114	38,176	
MA State	10,843	695,897	64	51.53	6,792	17,635	
Other NE	4,421	250,810	57	67.49	3,206	7,627	
NG - US	35,326	2,539,075	72	58.46	28,112	63,438	

NOTE: Colonial includes both "Cape Cod" and "Lowell"

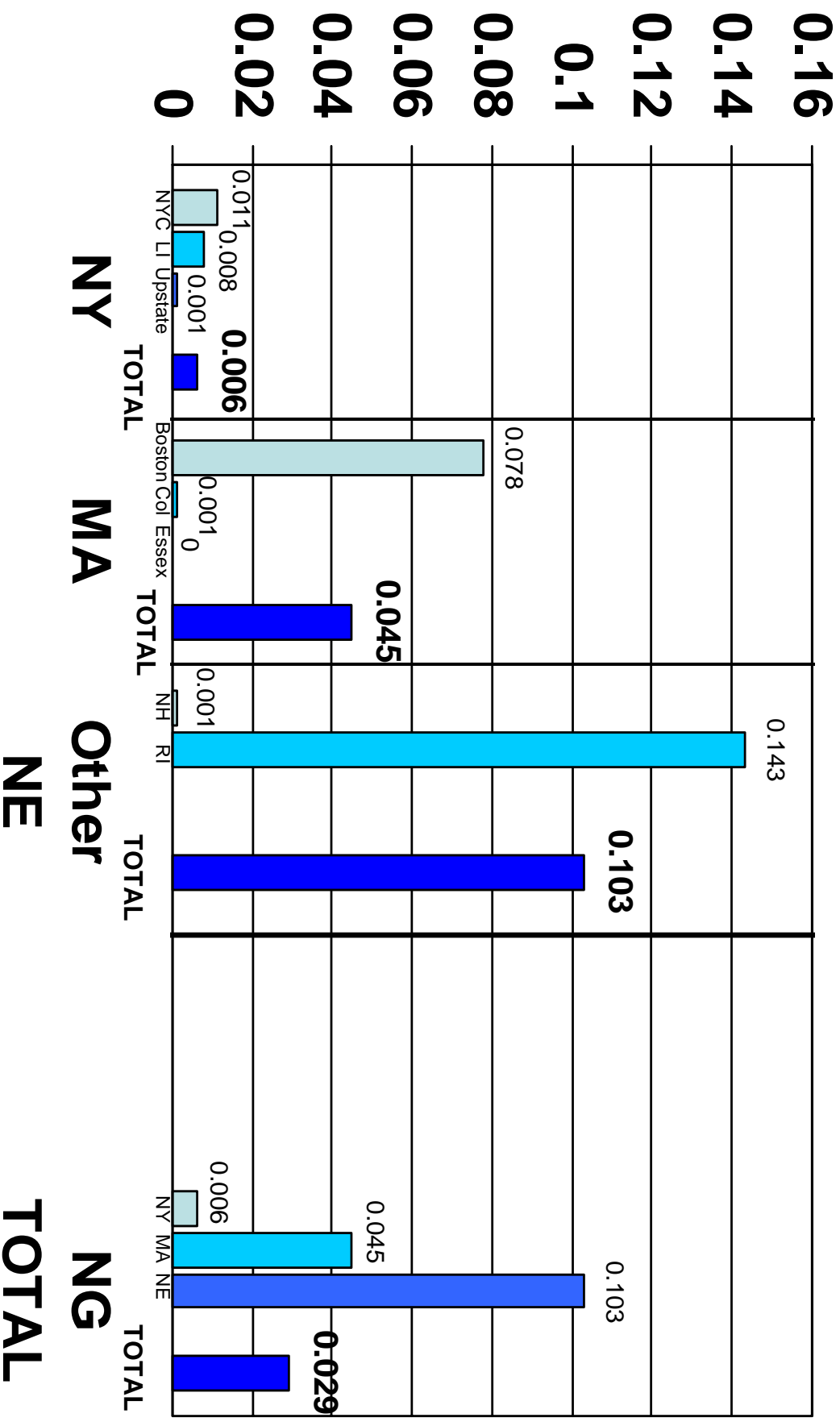
2007 Workable Leak BACKLOG

Total Workable Leaks Awaiting Repair as of 12/31/07



2007 Workable Leak BACKLOG "RATES"

Total Workable Backlog PER MILE of Total Distribution Pipe (Main & Svc)



Attachment RR-COMM-12(b)

		Arnold, John, Williams, Thayer and Dove Street	Replace approximately 5930' x 3" and 4" CI	System Integrity	Providence
		Charlefield	Replace approximately 3500' x 3" CI on	System	Providence
		Lockwood and Point Street	Abandon 2130' x 4" CI on Lockwood and Point Street. Replace approximately 2155' x 3" CI on Conduit Street. Replace 4560' x 4" CI and 6" CI on Providence, Emmett, Frank, and Oldham St.	System Integrity	Providence
		Wayland Avenue	Abandon 1750' x 4" CI LP main, transfer LP services to 35# main (17). Replace approximately 830' x 4" CI on Medway and E. Manning. Replace 110' x 6" CI on Wayland.	System Integrity	Providence
		Allendale Ave	Abandon 323' x 6" CI, transfer approximately 5 services to 35# main.	System Integrity	Johnston
		Oriole Avenue	MR/Butler Avenue to Peterson Street, Replace 495 of 3" and 4" CI	System Integrity	Providence
318	5	Legion Way	At Breeze Way	System Integrity	East Providence
1,405	34	John & Martin St	Bellevue to Spring: John to Prospect Hill, Replace 1414' x 4" CI, 33 services	System Integrity	Newport
785	4	Gordon Ave	From Oakland Beach to end of main inc. Tarleton Street.	System Integrity	Warwick
460	5	Merritt Rd	Pawtucket Ave. and #35 Merritt Rd.	System Integrity	East Providence
1,134	12	New Britain	Church Ave. to Torrington Dr.	System Integrity	Warwick
350	5	Canonicus St.	Shove St. east to end of main	System Integrity	Tiverton
534	8	Barton Ave.	Warwick Neck to Grand Ave. Permit received 3/8/07. Replace 534' x 2" BS, 8 services. Can go whenever.	System Integrity	Warwick
150	-	Narragansett Pkwy	Stoddard Pl. to 1130 Narragansett Pkwy, Replace 150 x 3" BS, 0 services	System Integrity	Warwick
1,840	37	Fales Ave., Lewis St.	Bay Rd. to Richards St.	System Integrity	Barrington
800	11	Highland Ave. @ Richmond Street	#10 to #42 Highland Ave.	System Integrity	Barrington
208	3	Reynolds Ave.	#67 Reynolds to # 79 Reynolds	System Integrity	Warwick
4,390	155	Gentian Ave., Funston Ave. Area	West of Admiral St., north of Isabella Ave. Includes work to Reg. Station R027. Being designed as LDT	System Integrity	Providence

Attachment RR-COMM-12(b)

		Lockwood and Point Street	Abandon 2130' x 4" CI on Lockwood and Point Street. Replace approximately 2155' x 3" CI on Conduit Street. Replace 4560' x 4' CI and 6" CI on Providence, Emmett, Frank, and Oldham St.	System Integrity	Providence
1,605	15	Vernon Ave., Livingston Place	Broadway to Fenner Ave.	System Integrity	Newport
410	5	Brookfield Dr., Louise Dr.	Wakefield St to end of main	System Integrity	West Warwick
604	6	Burns Street, Blossom Street	Relay 600' x 2" PE on Burns and Blossom.	System Integrity	West Warwick
215	9	Franklin St	From Spring St 200'. Abandon 450' total.	System Integrity	Newport

Record Request No. 14

Request:

Please provide any cost benefit analysis prepared by the Company quantifying the benefit of moving meters that are currently located inside customer premises to an outside location?

Response:

The decision to move high pressure meter and regulator installations from inside to outside of the customer premise was based on an internal assessment of the risk. No cost-benefit analysis was performed.

Record Request No. 21

Request:

Please provide a summary table showing total energy assistance funds provided to low income gas and electric service customers over the past three years.

Response:

	12-mos ended June 30, 2008	12-mos ended June 30, 2007	12-mos ended June 30, 2006
<u>Gas Service Customers</u>			
1 LIHEAP funds to offset residential customers' bills	\$5,641,771	\$7,678,324	\$6,880,797
2 Number of customers receiving LIHEAP grants	17,234	17,027	17,121
3 Good Neighbor Energy Fund	\$319,440	\$190,209	\$169,344
4 Total net write-offs (not tracked by rate class or protection status)	\$9,230,765	\$9,147,982	\$7,279,411
5 Energy Efficiency Program Funds to aid low income customers (program initiated July 2007)	\$983,643	\$0	\$0
6 Other Programs			
7 Supplemental LIHEAP match	\$1,636,461	\$1,578,679	\$2,521,308
8 Various Community Agencies	\$1,510,809	\$1,292,463	\$892,646
<u>Electric Service Customers</u>			
9 LIHEAP funds to offset residential customer bills	\$908,328	\$918,125	\$580,940
10 Number of customers receiving LIHEAP grants	2,857	2,416	1,808
11 Good Neighbor Energy Fund Money (calendar year 2007, 2006 and 2005)	\$13,977	\$189,235	\$96,094
12 Subsidy provided under discounted Low Income Rate A-60 (includes CTC funds)	\$5,500,000	\$6,300,000	\$5,200,000
13 CTC settlement funds	\$1,805,070	\$2,024,447	\$982,159
14 DSM funds to aid low income customers (calendar year 2007, 2006 and 2005)	\$2,993,594	\$1,922,500	\$1,924,900
15 Total net write-offs	\$12,100,000	\$11,000,000	\$7,800,000
16 Net write-offs for A-60 rate	\$2,000,000	\$1,800,000	\$1,400,000
17 Other Programs	\$0	\$0	\$0