

REBUTTAL TESTIMONY

OF

SEAN P. MONGAN

Table of Contents

I. Introduction.....	1
II. Purpose of Testimony	2
III. Intervenor Representations Concerning Marketing Program	3
IV. Overview of VPI Program.....	23

1 **I. INTRODUCTION**

2 **Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A. My name is Sean P. Mongan. My business address is One Metrotech
4 Center, Brooklyn, NY.

5 **Q. WHAT IS YOUR POSITION WITH THE COMPANY AND YOUR**
6 **CURRENT AREAS OF RESPONSIBILITY FOR NATIONAL GRID?**

7 A. I am Director of Operations and Process Support for the Energy Solutions
8 Service Group for National Grid USA (“National Grid”). In this position, I
9 have responsibility for planning, supervising and evaluating the marketing and
10 sales initiatives conducted for the National Grid’s gas-distribution companies,
11 including the former operations of KeySpan Energy Delivery in New York,
12 Massachusetts and New Hampshire.

13 **Q. HAVE YOU PREVIOUSLY FILED TESTIMONY IN THIS**
14 **PROCEEDING?**

15 A. Yes. On April 1, 2008, the Company submitted a request for base-rate relief to
16 the Rhode Island Public Utilities Commission (the “Commission”). As part of
17 that filing, I submitted pre-filed direct testimony to describe the Company’s
18 proposal to establish a Gas Marketing Program in Rhode Island to encourage
19 migration to natural gas service from other fuel sources so that the fixed costs

1 of the distribution system would be spread across a larger customer base over
2 time.

3 **II. PURPOSE OF TESTIMONY**

4 **Q. WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

5 A. On July 25, 2008, Mr. Bruce R. Oliver submitted testimony on behalf of the
6 Rhode Island Division of Public Utilities and Carriers (the “Division”)
7 regarding a number of issues covered in my pre-filed testimony. The Division
8 recommends against the approval of the proposed Gas Marketing Program, but
9 states that the Commission should include in rates an amount equal to the
10 “planned spending” of Rhode Island oil dealers, which the Division states is
11 \$148,000 (Division at 27). My rebuttal testimony addresses the Division’s
12 claims and demonstrates to the Commission that, in fact, the Gas Marketing
13 Program is both necessary and appropriate to encourage cost-effective,
14 increased system utilization through conversions of new and existing low-use
15 customers to gas service. However, my silence on any issues should not be
16 construed as agreement with any particular recommendation.

17

18

1 **Q. ARE THERE ANY ATTACHMENTS ACCOMPANYING YOUR**
2 **TESTIMONY?**

3 A. Yes. Attached to my testimony are the following attachments:

4 Attachment NG-SPM Rebuttal - 1 See Sean P. Mongan Pre-Filed
5 Direct Testimony, April 1, 2008

6 Attachment NG-SPM-Rebuttal - 2 Chart presenting the monthly
7 retail delivered prices and forecast
8 for No. 2 Heating Oil and Natural
9 Gas over the historical period
10 2004 through 2008 and the future
11 period 2008-09

12 Attachment NG-SPM-Rebuttal - 3 Examples of Rhode Island
13 spending by the National Oilheat
14 Research Alliance

15 **III. INTERVENOR REPRESENTATIONS CONCERNING MARKETING**

16 **Q. WHAT ARE THE SPECIFIC CLAIMS MADE BY THE DIVISION**
17 **THAT WILL BE ADDRESSED IN YOUR REBUTTAL TESTIMONY?**

18 A. The following claims are made in the Division's direct testimony: (1) that the
19 proposed Gas Marketing Program is not needed at this time because of the
20 price differential between heating oil and natural gas as of the writing of the
21 Division's testimony (Division at 20-21); (2) that there is information vital to
22 the program that the Company "does not know" about the market it intends to
23 pursue (Division at 21-25); (3) that the proposed program costs are not

1 reasonable (Division at 27-28); and (4) that aspects of the proposed program
2 are “anti-competitive” (Division at 28-30). As demonstrated below, the
3 Division’s claims are not based on accurate assumptions or conclusions
4 regarding the Company’s proposed Gas Marketing Program, especially in light
5 of the fact that the Division recommends that the growth that is projected to
6 result from the program should be included in rates. In that regard, my
7 testimony below discusses the fact that the projected growth cannot properly
8 be included in rates (to reduce costs borne by all customers), unless the costs to
9 achieve that growth are also included.

10 **Q. WHAT IS YOUR RESPONSE TO THE CLAIM THAT THE GAS**
11 **MARKETING PROGRAM IS NOT NEEDED BECAUSE OF THE**
12 **PRICE DIFFERENTIAL BETWEEN NATURAL GAS AND OIL?**

13 A. The claim that the Gas Marketing Program is not needed because of the
14 existing differential between the cost of heating oil and the cost of natural gas
15 misses the reality of customer economics and behavior, and therefore,
16 misunderstands the fundamental purpose and effect of the program.
17 Fundamentally, the program is aimed at providing education to the customer
18 who is considering a conversion to natural gas and assisting that customer in
19 overcoming the barriers that *actually do exist* and have the effect of
20 discouraging such conversions. Thus, the need for (and value of) the Gas

1 Marketing Program must be evaluated from the customer perspective, rather
2 than a wholesale commodity market perspective, which is the perspective that
3 Mr. Oliver has taken.

4 Mr. Oliver presents Schedule BRO-3 in support of his claim, which he states
5 “provides an illustration of the growth in the differential between natural gas
6 and heating oil prices in recent years (Division at 20). Based on this schedule,
7 Mr. Oliver concludes that “with energy costs strongly favoring natural gas, the
8 advantage of natural gas versus heating oil should not require a heavy
9 marketing effort” (Division at 21). However, there are several problems with
10 Schedule BRO-3.

11 First, Schedule BRO-3 purports to represent the price differential between
12 heating oil and natural gas; but does not actually depict the oil to natural gas
13 relationship from a heating customer’s perspective. Specifically, Schedule
14 BRO-3 implies that retail customers are facing a massive differential between
15 natural gas and heating oil, which has grown from less than \$1.00 per MMBtu
16 in the 2003-04 heating season to roughly \$16.00 per MMBtu in the 2008-09
17 heating season. However, customers who are making a conversion decision
18 generally do so by comparing costs in “per gallon” terms, because they are
19 more familiar with this concept than with the idea of consumption occurring in

1 MMBtus. In addition, Schedule BRO-3 plots the difference between
2 *wholesale commodity* prices for heating oil and natural gas, and therefore, does
3 not represent the difference in the customer's *delivered per-unit cost*, which is
4 the metric that customers will be evaluating.

5 In fact, if measured in terms of dollars per gallons of heating oil, the delivered
6 cost of natural gas during the past heating season (November 2007 through
7 April 2008) averaged \$2.28 per gallon, as compared to \$3.57 per gallon for
8 heating oil. This means that from the customer's perspective, the average
9 differential in the 2007-08 heating season between natural gas and heating oil,
10 totaled *\$1.29 per gallon* of heating oil, rather than a figure approaching \$6.00
11 per unit, as suggested in Schedule BRO-3. The differential in wholesale
12 commodity prices is not the same as the differential in the delivered per-unit
13 cost, and therefore, the price differential for wholesale oil or natural gas
14 commodity is not useful for the purpose of understanding the economic
15 decision confronting any given customer who is considering an oil-to-gas
16 conversion. The price differential in the wholesale commodity cost is also not
17 useful in the absence of information regarding factors such as the customer's
18 usage level and non-economic objectives, since a relatively significant price
19 differential may not be bothersome to a customer with minimal heating
20 consumption, a customer who is concerned about environmental impact or a

1 customer that is interested in converting to natural gas as a matter of personal
2 preference or necessity. All of these factors are considerations that the
3 Company addresses through the Gas Marketing Program.

4 **Q. ARE THERE ANY OTHER PROBLEMS WITH SCHEDULE BRO-3?**

5 A. Yes. A second significant problem with Schedule BRO-3 is that it does not
6 accurately portray the differential that is projected for the 2008-09 heating
7 season (depicted in the right-most column of Schedule BRO-3). Specifically,
8 the column entitled “Nov 08 – Mar 09,” is confusing because, again, the
9 figures are based on wholesale commodity prices, and also these figures appear
10 to be taken from a posting of NYMEX commodity futures on July 21, 2008,
11 which simply represents a single snapshot in time in the commodity market
12 and is not actually indicative of the retail pricing differential that market
13 analysts are forecasting for the heating oil and natural gas markets.
14 Attachment NG-SPM Rebuttal - 2 (provided herewith) is a chart presenting the
15 monthly retail delivered prices and forecast for No. 2 Heating Oil and Natural
16 Gas over the historical period 2004 through 2008 and the future period 2008-
17 09. This chart is based on data from the U.S. Department of Energy and shows
18 that the *delivered price differential* is actually expected to level out and
19 potentially decline through 2009. Thus, the idea that there will be a \$16.00 per
20 unit price differential between oil and natural gas in the 2008-09 heating

1 season for customers considering a gas conversion is not an appropriate
2 perspective.

3 **Q. WHAT IS THE SPECIFIC INFORMATION THAT THE COMPANY**
4 **HAS REGARDING PROSPECTS FOR THE OIL-TO-GAS COST**
5 **DIFFERENTIAL CITED BY MR. OLIVER?**

6 A. The most recent information published by the U.S. Department of Energy
7 (“USDOE”) is that the cost differential between oil and gas is not rising and
8 may even be falling, as suggested above. In any case, the USDOE does not
9 project a precipitous increase as suggested by Mr. Oliver in Schedule BRO-3.
10 Moreover, the July-to-August drop reported by the Rhode Island Office of
11 Energy Resources is consistent with the DOE data, which is available at
12 <http://www.energy.ri.gov/news/energyprices/oilprices.php>. Therefore, there is
13 no basis to conclude that the current price differential will be maintained or
14 increased over the short and longer term. In fact, it may occur, but the point is
15 that the differential will *always* be subject to fluctuation and the Company’s
16 program is designed to build sustainable growth regardless of temporary price
17 fluctuations.

1 **Q. ARE THERE OTHER PROBLEMS WITH THE DIVISION’S CLAIMS**
2 **REGARDING THE NEED FOR THE GAS MARKETING PROGRAM?**

3 A. Yes. As the Company discussed in response to Data Request COMM 1-23, the
4 Company’s programs are not structured around temporary variances in fuel
5 pricing. Although some customers may be induced to convert to gas service
6 because of a relatively larger differential existing at any given time, there are
7 other customers who will not because of the overall upfront cost of a gas
8 conversion, a lack of knowledge about the safety and reliability of natural gas
9 service or because of other considerations involved in converting their existing
10 heating system.

11 An important factor in considering the impact of the existing price differential
12 between heating oil and natural gas is that the Company’s projections of
13 customer additions resulting from the program *far exceeds* the number of
14 conversions that have occurred to date in 2008. For example, in the first
15 quarter of 2008, the Company completed 628 residential conversions (which is
16 a greater number of conversions than experienced in the past for the same
17 period). However, the Company is projecting a total of 1,950 *incremental*
18 residential conversions in 2008 and has included this assumption in the billing
19 determinants for the base-rate application. The Gas Marketing Program is
20 aimed at attracting customers to the system who would not otherwise be

1 converting to natural gas heating service. Thus, the Company's proposed base
2 rates anticipate that approximately 1,650 new customers per year will be added
3 in addition to the 300 baseline customer additions included in the test-year cost
4 of service (see, Attachment NG-SPM Rebuttal - 1 from my Direct Testimony).
5 Consequently, even with the price differential cited by Mr. Oliver spurring a
6 level of gas conversions, there remain a considerable number of heating
7 conversions that must be achieved through year-end 2008 in order to fulfill the
8 level anticipated in the proposed rates, *whether or not the price differential*
9 *persists*, which current indications are that it is not.

10 Another important consideration is that the Company commenced the
11 education process with Rhode Island customers in May 2008 with
12 communications accomplished primarily through direct mail, but also through
13 on-line communications and other media. As a result, it is impossible to
14 attribute the conversions completed to date exclusively to the price differential.
15 Many customers seeking to convert are contacting the Company as a result of
16 direct mailers and other communications made in anticipation of the
17 commencement of the Gas Marketing Program. This education, in the context
18 of the prevailing price differential, will result in an up-tick in conversions, and
19 therefore, there is no basis for the conclusion that the Gas Marketing Program
20 is not needed because of the price differential.

1 **Q. ARE THERE ANY OTHER FACTORS THAT ARE OVERLOOKED BY**
2 **THE DIVISION WITH REGARD TO THE NEED FOR THE**
3 **PROGRAM?**

4 A. Yes. The core objective of the Gas Marketing Program is to establish a long-
5 term structure that will provide customers a fair and accurate basis of
6 understanding of their fuel-source alternatives and to provide them choices
7 when presented with the need to replace their heating and hot water systems.
8 While the cost differential between oil and gas is currently motivating some
9 customers to commence the conversion process, many other customers have
10 shown a need for additional information and support to become gas customers.
11 In that regard, the Division’s claim that the cost differential between heating
12 oil and natural gas will suffice to promote the level of sustained, annual growth
13 that the Company is asking the Commission to build into rates does not take
14 into account a basic reality for customers.

15 The reality is that, even if the conversion from heating oil to natural gas makes
16 *perfect* economic sense in terms of the pay-off of the initial investment over
17 time through energy-cost savings, substantial barriers exist that may keep that
18 customer from completing the conversion. These barriers include a lack of
19 knowledge about the safety and reliability of natural gas, the environmental
20 benefits of its use and the need to sort out the steps involved in the process. As

1 the Company has stated previously, the most significant barrier is that a
2 conversion requires a substantial upfront capital investment by the customer,
3 which, even if making perfect sense over the long run, is prohibitive in the
4 short run.

5 When a customer is faced with the need to replace or upgrade an existing oil
6 furnace, the cost of converting to natural gas *will* involve costs that would not
7 be incurred were the customer simply to upgrade the oil heating equipment.
8 These costs are above and beyond the replacement of the heating unit and
9 include such costs as the installation of a new gas service connection and gas
10 piping, as well as oil tank removal and chimney re-lining. Data provided by
11 the Company in discovery shows that this incremental cost is typically in the
12 range of \$2,000 to \$2,500, which is an amount that the customer would pay *in*
13 *addition to the cost of the new furnace and its installation* (Data Request DIV
14 8-7). Since the customer would not incur these costs in simply upgrading the
15 old oil equipment with more efficient oil equipment, this payment in addition
16 to the cost of the equipment and its installation presents a very real and
17 significant barrier to gas conversion, even if the payback over time is *certain*
18 as a result of the cost differential between heating oil and natural gas. Thus,
19 the cost differential in the wholesale market alone will not suffice to motivate

1 the large number of customer conversions that the Company anticipates would
2 occur through full implementation of the program.

3 In order to accomplish a sustained and productive level of conversions, it is
4 necessary for the Company to create a program structured to maintain
5 *continuous* communication efforts and to facilitate conversions among those
6 customers who find the process or cost to be prohibitive, regardless of
7 temporary cost differentials between natural gas and oil. The Company's
8 proposed Gas Marketing Program is vital in achieving long-term customer
9 growth to expand the customer base and abate the ever-increasing cost of
10 maintaining the system because it makes the choice of gas more affordable and
11 feasible for customers.

12 **Q. IS THERE INFORMATION VITAL TO THE PROGRAM OR ITS**
13 **SUCCESS THAT THE COMPANY “DOES NOT KNOW” ABOUT THE**
14 **MARKETS IT INTENDS TO PURSUE?**

15 A. No. This claim is not accurate and does not take into account the program
16 structure and operation. There are several elements of this claim that my
17 testimony will address in turn:

18 First, the Division cites the Company's reliance on a “five-year old study”
19 prepared by “Keyspan, not National Grid” and concludes that the Company's

1 lack of “more current information . . . make it difficult to embrace the
2 program” (Division at 22). Notably, the Division does not dispute, analyze,
3 discuss or take issue with the substantive content of the study, its conclusions
4 or its applicability to the customer base in Rhode Island. In fact, the
5 conclusions have provided important and accurate guidance in implementing
6 the gas-marketing programs approved in other jurisdictions, including
7 Massachusetts. The Company knows this because it has conducted gas-
8 marketing programs in New England, New York and Long Island for many
9 years and has seen that the conclusions arising from this study bear out in
10 practice; there is no basis to assume that customers in Rhode Island will be
11 different. Because the Company’s experience indicates that the conclusions of
12 this study are accurate and indicative in shaping a gas-marketing program, it is
13 reliable in terms of mapping out a strategy for Rhode Island. It should also be
14 noted that the Company completed this comprehensive study within the
15 context of approved gas-marketing programs in New York, Long Island and
16 New England, and anticipates doing the same in Rhode Island should the
17 Commission decide to approve the program here.

18 Second, the Division claims that the Company should collect or maintain data
19 on the costs charged by independent contractors to complete heating
20 replacements at the request of residential or small commercial customers.

1 However, the Division offers no explanation as to the reasons that *not*
2 collecting this information undermines the need for or effectiveness of the
3 program. In fact, the Company does not collect or maintain this data because
4 the pricing offered by independent contractors to customers is competitively
5 sensitive information that is not available in the public domain. Moreover, the
6 proper role for the Company is (1) to provide full, fair and accurate
7 information to customers regarding the conversion process, the attributes of
8 natural gas as a fuel choice and (2) to facilitate the conversion process by
9 addressing the barriers that exist, which is the central objective of the Gas
10 Marketing Program. The customer must make his or her own assessment as to
11 the private financial details, the choice of heating contractor and the price of
12 those services. The Company cannot and should not be involved in this aspect
13 of the conversion and the fact that the Company is not involved in the
14 economic assessment in no way undermines the integrity of the program. For
15 the record, the Company believes that the total cost of an oil-to-gas conversion
16 averages \$3,000 to \$5,000 per residential customer depending on the choice of
17 equipment and installation contractor, with a substantial portion of that cost
18 attributable to the incremental costs required to convert from oil to natural gas.

19 Third, the Division claims that the Company does not track or have access to
20 data to (1) existing heating arrangements of low-use natural gas customers, or

1 (2) the hot water or heating equipment systems types of low-use natural gas
2 customers (Division at 22-23). Again, the Division offers no explanation as to
3 the reasons that *not* collecting or obtaining access to this information
4 undermines the need for or effectiveness of the program. In fact, the Gas
5 Marketing Program is aimed at converting customers to natural gas service
6 *from any type of alternative fuel source* and the only relevance that information
7 related to the existing system may have for the conversion process is in terms
8 of the customer's total cost of conversion. The Gas Marketing Program is
9 designed to provide education to customers regarding conversion details in
10 order to generate inquiries to the Company regarding gas conversions and to
11 facilitate the conversion process in the event that the customer decides to go
12 ahead with the conversion. The Gas Marketing Program is not designed to
13 target customers with specific economics underlying the conversion process.
14 Therefore, the data on the type of heating or hot-water heating systems
15 currently existing at a low-use premise is *completely unnecessary* for the
16 Company to know in order to generate an inquiry from the customer regarding
17 conversion possibilities.

18 Fourth, the Division claims that the Company does not evaluate the specific
19 economics of any particular heating source versus another heating source from
20 the customer's perspective, nor does the Company collect data to assess a

1 customer's reasonably economic potential to expand gas use (Division at 23).
2 Again, the Division offers no explanation as to the reasons that *not* collecting
3 or obtaining access to this information undermines the need for or
4 effectiveness of the program. In addition, even if the Company collected
5 information on the general economics of converting from a particular heating
6 source to natural gas, there is no basis to assume that the economics for a
7 *particular* customer will either indicate or preclude a gas conversion. The
8 economics of conversion for a particular customer must be considered on a
9 case-by-case basis *by the customer* who will be paying for the conversion. The
10 Company's job is to generate customer inquiries so that information can be
11 shared regarding natural gas service, the conversion process and the ways in
12 which the Company can assist the customer in converting to gas service, which
13 is the purpose and operation of the Gas Marketing Program. All other
14 economic considerations appropriately belong to the customer and should not
15 involve the Company since the customer must make a free and independent
16 decision based on available information.

1 **Q. DO YOU AGREE WITH THE DIVISION’S CLAIM THAT THERE IS A**
2 **PROBLEM WITH THE GAS MARKETING PROGRAM BECAUSE**
3 **INFORMATION IS NOT GATHERED ON THE TYPE OF HEATING**
4 **SYSTEMS USED IN MULTI-UNIT DWELLINGS?**

5 A. Absolutely not. In the context of the Gas Marketing Program, the Company
6 identifies prospective conversion customers through the identification of
7 *structures* that are connected to, or located on, the system on a non-heating
8 basis. This means that multi-unit buildings are counted as a single prospect for
9 purposes of the program and the Company’s conversion efforts are targeted at
10 the owner or landlord of the structure. The Company is not including low-use
11 customer accounts within a multi-unit dwelling as multiple prospects for the
12 Gas Marketing Program, as suggested by the Division. As discussed above,
13 the Gas Marketing Program is not designed to target customers with specific
14 economics underlying the conversion process and the Company needs only to
15 know that the prospective structure is connected to the system and is low-use.
16 Again, the Gas Marketing Program provides information to customer on the
17 attributes of natural gas service and conversion details in order to generate
18 customer inquiries, which allow the Company then to assess the customer’s
19 particular situation. Therefore, the data on the type of heating or hot-water
20 heating systems currently existing at a low-use structure is *completely*
21 *unnecessary* for the Company to know in order to generate an inquiry from the

1 customer regarding conversion possibilities.

2 **Q. DO YOU AGREE THAT THE PROGRAM COSTS ARE EITHER**
3 **UNNECESSARY TO EXPAND THE CUSTOMER BASE OR ARE**
4 **OTHERWISE UNREASONABLE, AS CLAIMED BY THE DIVISION?**

5 A. No, I do not agree with either proposition to any extent. In this proceeding, the
6 Company has proposed a program to the Commission to benefit firm-service
7 customers, whose interests are directly served by the Gas Marketing Program,
8 which is a fact apparently recognized by Mr. Oliver since he recommends that
9 the Commission incorporate the load growth that the Company is projecting to
10 result from the Gas Marketing Program into rates, without allowing the costs
11 that are necessary to achieve that growth (Division at 32).

12 Second, the Division reaches the conclusion that the program is not needed
13 based on the idea that the disparity in wholesale commodity prices between
14 heating-oil prices and natural gas is so great (and will remain so) that no
15 proactive efforts are needed by the Company. For the reasons discussed
16 above, this claim is inaccurate and does not address the heart of the issue,
17 which is that there are real and substantial barriers to conversion from the
18 customer's perspective, not the least of which is a substantial upfront capital
19 payment that may make conversion impossible even with long-term payback

1 economics that are highly favorable. In that regard, price differentials in the
2 wholesale commodity markets are only one piece of the puzzle.

3 In terms of the “reasonableness” of the program costs, the Division concedes
4 that the Company ought to be allowed to recover “an amount equal to the
5 planned spending of the RI oil dealers,” concluding that the total planned
6 spending for the RI oil dealers is \$148,000 based on the Company’s response
7 to Data Request DIV 8-11. The Division contrasts the Company’s proposed
8 program spending of \$1.377 million to the heating oil dealers’ “efforts to fund
9 a . . . customer education program,” in the amount of \$148,000, and implies
10 that these two figures are comparable numbers. However, this is not the case.

11 **Q. DOES THE FIGURE OF \$148,000 REPRESENT THE TOTAL**
12 **SPENDING IN RHODE ISLAND FOR OUTREACH ACTIVITIES BY**
13 **HEATING OIL DEALERS?**

14 A. No it does not. In the Company’s response to Data Request DIV 8-11, the
15 Company discussed the fact that the oil-heating industry is planning several
16 *multi-faceted* outreach campaigns, with the \$148,000 in advertising funds
17 representing only *one* known request by the OilHeat Institute of Rhode Island
18 to the National OilHeat Research Alliance (“NORA”) in 2008. The fact is that
19 information regarding the total spending in Rhode Island for oilheat outreach

1 and customer education is not available in the public domain, and therefore
2 there is no basis for tying the Company's proposed budget to the oilheat
3 spending on a single line item. In addition, the Company provided examples
4 of the "broad-based advertising and promotional" activities undertaken by the
5 oil-heat industry, including newsletters published by the OilHeat Institute of
6 Rhode Island ("OIR") describing the approach and plans. The cost of all of
7 this activity would not be included in the \$148,000. In addition, the Company
8 explained that the \$148,000 request covers only media expense, because
9 NORA bears the national common costs of advertising agency fees. Therefore,
10 there is no basis to conclude that the \$148,000 is the total amount of spending
11 in a year by the Rhode Island oil heat industry. Attachment NG-SPM
12 Rebuttal - 3 provides examples of "media buys" by NORA for the State of
13 Rhode Island and this example, which was obtained by the Company from
14 communication industry resources, represents the spending on *one* type of
15 media over just a few months. Therefore, the fact is that the actual spending
16 by NORA and OIR far exceeds the \$148,000 referenced by the Division.

17 **Q. SHOULD THE COMPANY'S PROGRAM COST BE TIED TO THE**
18 **AMOUNT OF PUBLICLY AVAILABLE SPENDING BY THE OIL**
19 **HEAT INDUSTRY?**

20 A. No. The Company has proposed a budget that is crafted to achieve the

1 objectives of the Gas Marketing Program and that is designed to result in the
2 load growth that is incorporated into the Company's proposed base rates in this
3 proceeding. The costs are based directly on the Company's experience in other
4 New England states. Moreover, the Company has demonstrated in this
5 proceeding that the costs are more than covered by the new growth that will
6 result, with the benefit being returned to firm service customers through rates.
7 Notably, the Division offers no analysis or dispute with the budgeted amounts,
8 except that the total amount is more than the documented amount of spending
9 by the oilheat dealers. The perspective should not be to just collect money
10 from firm customers to equal spending by oilheat dealers, but to assemble a
11 budget that is designed, based on experience, to be sufficient to achieve the
12 program objectives and produce the results that are quantified and included in
13 rates in this proceeding.

14 **Q. WILL THE COMPANY'S PROGRAM HAVE ANTI-COMPETITIVE**
15 **RESULTS AS CLAIMED BY THE DIVISION.**

16 A. No, it will not. In fact, this is a claim that has been levied in all of the
17 Company's jurisdictions by oilheat dealers as a way of opposing the program.
18 As described below, the VPI Program is a lead-generation and allocation
19 system that has proven to be of great value to local plumbing and heating
20 contractors in other jurisdictions. In those jurisdictions, the Company's

1 affiliate participates on an equal playing field with other plumbing and heating
2 contractors without any anti-competitive effect or favorable treatment because
3 the system is well structured to fairly and evenly distribute leads.

4 **IV. OVERVIEW OF VPI PROGRAM**

5 **Q. WOULD YOU JUST BRIEFLY REVIEW WHAT THE VPI PROGRAM**
6 **IS?**

7 A. Yes. The Company intends to provide installation support services through the
8 Value Plus Installer Program (“VPI”) to customers who have not yet identified
9 a plumbing and heating contractor to assist in their installation or conversion.
10 The VPI Program is an innovative program that is designed to provide
11 assistance to residential customers electing to convert to gas service and to
12 create a high level of customer satisfaction with the gas-conversion process.
13 The VPI Program involves a contractor-referral system that facilitates the
14 Company’s handling of sales leads routinely received from customers
15 requesting on-main gas conversions or low-use upgrades. The program
16 achieves this objective by creating a link between the Company and qualified
17 plumbing and heating contractors in the communities that the Company serves.
18 For example, potential customers who are contemplating converting to gas
19 service generally will contact the Companies to discuss the safety of natural

1 gas, facility installation, pricing alternatives and a number of other issues
2 related to the potential conversion. In such instances, the company sales
3 representative will work with the customer to analyze the customer's particular
4 circumstances and determine the feasibility of converting to gas service. In
5 other cases, a customer may contact the Company regarding the replacement of
6 existing hot water or heating equipment. In either case, customers frequently
7 ask the Company to refer a qualified contractor to perform the services
8 necessary to accomplish the customer's objectives. Referring a qualified and
9 experienced contractor to the customer results in a high level of customer
10 satisfaction and convenience and facilitates the Company's efforts to increase
11 system utilization in a cost-effective manner through low-use upgrades and on-
12 main conversions.

13 If the customer does not already have an installation contractor, the Company
14 will offer to schedule an appointment with a participating VPI contractor.
15 National Grid schedules customer appointments with participating contractors
16 on a rotating basis. All qualified contractors able to do gas installations in a
17 geographic location will be invited and encouraged to participate in the VPI
18 program. Only contractors who have submitted proof of insurance will be
19 eligible for participation in the program.

1 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

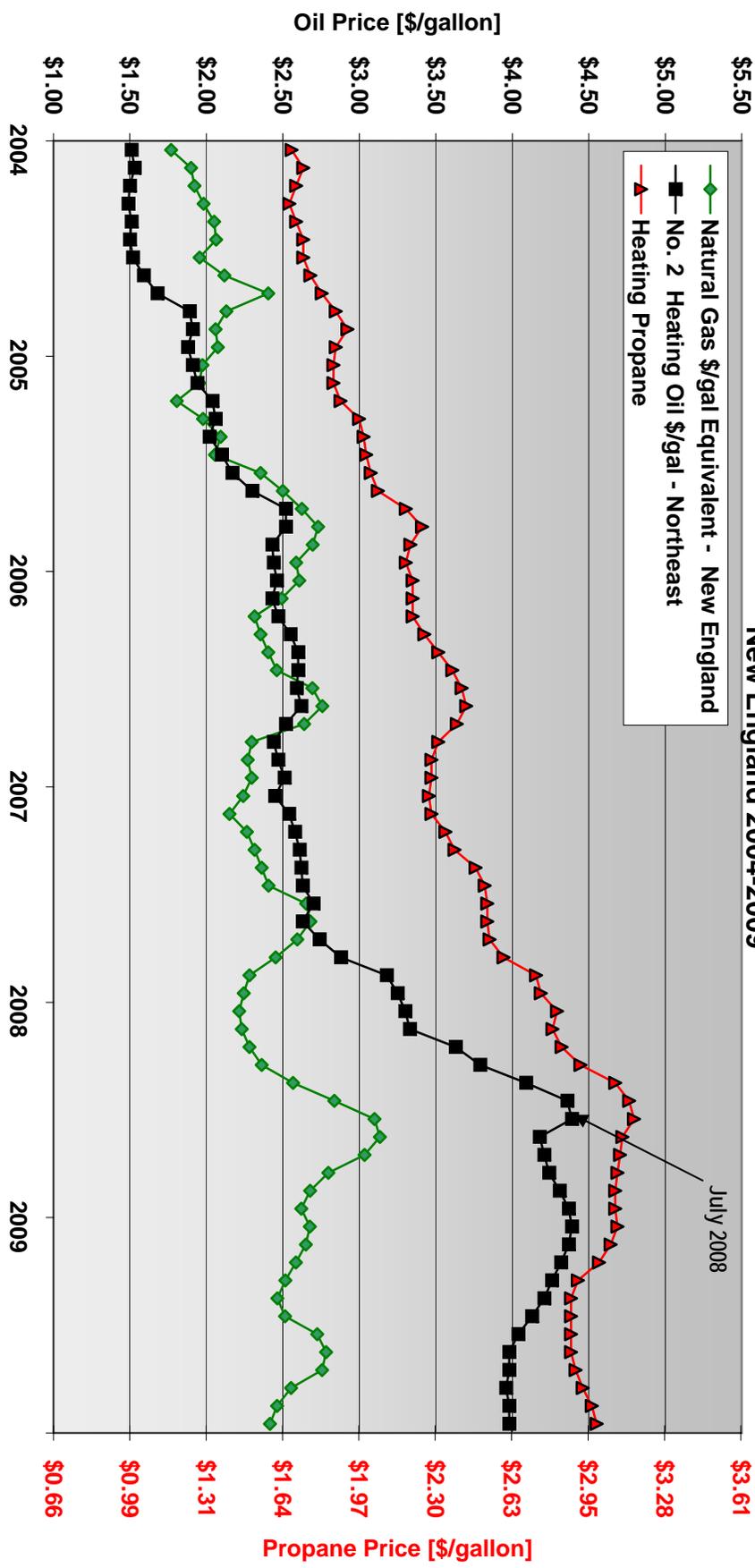
2 **A. Yes.**

Attachments

Attachment NG-SPM Rebuttal – 1	See Sean P. Mongan Pre-Filed Direct Testimony, April 1, 2008
Attachment NG-SPM-Rebuttal – 2	Chart presenting the monthly retail delivered prices and forecast for No. 2 Heating Oil and Natural Gas over the historical period 2004 through 2008 and the future period 2008-09
Attachment NG-SPM-Rebuttal – 3	Examples of Rhode Island Spending for NORA

Price Comparison of Natural Gas to No. 2 Heating Oil and Heating Propane (in price per gallons)
Residential Sector / Retail Delivered Pricing
Monthly Prices and Forecast
New England 2004-2009

Updated as of July 2008



Historical Pricing and Forecast 2004 through 2009
 Source: U.S. Dept. of Energy Pricing Forecast, www.eia.doe.gov/steo
 Natural gas price per MCF is converted to equivalent oil gallon price. $MCF(1,000,000 \text{ btus})/gallon = (138,500 \text{ btu's}) = \text{conversion factor } 7.22$
 Natural gas price per MCF is converted to equivalent propane gallon price. $MCF(1,000,000 \text{ btus})/gallon = (91,000 \text{ btu's}) = \text{conversion factor}$

Attachment NG-SPM-3
National Oilheat Research Alliance Brands: 2008

Report Type: Media Mix
 Report Completed: 06/19/2008 09:21:37 AM EST
 Reported Time Period: 1/1/2007-6/8/2008

TIME PERIOD	MARKET	PROPERTY	PARENT	BRAND	TOTAL DOLS (000)	SPOT TV DOLS (000)	US INTERNET DOLS (000)
YEAR 2008	PROVIDENCE	TURNTOTO10.COM	NATIONAL OILHEAT RESEARCH ALLIANCE	NORA OIL HEAT RSRCH ALNC	\$2.1		\$2.1
YEAR 2008	PROVIDENCE	WJAR	NATIONAL OILHEAT RESEARCH ALLIANCE	NATIONAL OILHEAT/ALNC	\$29.4	\$29.4	
YEAR 2008	PROVIDENCE TOTAL				\$31.5	\$29.4	\$2.1
YEAR 2008	* TOTAL US	BOBVILA.COM	NATIONAL OILHEAT RESEARCH ALLIANCE	NATIONAL OILHEAT/ALNC	\$6.9		\$6.9
YEAR 2008	* TOTAL US	HEALTHLINE.COM	NATIONAL OILHEAT RESEARCH ALLIANCE	NATIONAL OILHEAT/ALNC	\$0.5		\$0.5
YEAR 2008	* TOTAL US	KEEPKIDSHHEALTHY.COM	NATIONAL OILHEAT RESEARCH ALLIANCE	NATIONAL OILHEAT/ALNC	\$0.0		\$0.0
YEAR 2008	* TOTAL US	MARTHASTEWART.COM	NATIONAL OILHEAT RESEARCH ALLIANCE	NATIONAL OILHEAT/ALNC	\$0.6		\$0.6
YEAR 2008	* TOTAL US TOTAL				\$8.1		\$8.1
YEAR 2008 TOTAL					\$39.5	\$29.4	\$10.1

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 Data for certain markets may not be available for all time periods. See Methodology for market availability.

National Oilheat Research Alliance -- Television Schedule

DATE	TIME PERIOD	MARKET	PROPERTY	BRAND	PARENT	TV CREATIVE	LEN	DAYPART	PROGRAM	DOLS
2-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Fringe 2	NEWS	\$313
2-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Prime Access 2	ACCESS HOLLYWOOD	\$313
2-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Overnight	LATE NGT/CONAN O'BRIEN	\$110
3-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Morning 1	NEWS	\$188
3-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Morning 1	NEWS	\$313
3-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Afternoon Daytime 1	NEWS	\$125
5-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Prime	OFFICE-NBC	\$1,488
5-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Saturday Afternoon	SHELL HOUSTON OPEN/THIRD	\$251
5-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Prime	LAW&ORDER: CRIMINAL MINDS	\$435
6-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Overnight	CHAPPELLE'S SHOW	\$47
6-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Sunday Morning	TIM MCCARTHER SHOW	\$110
6-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Sunday Early Fringe 2	NEWS	\$332
7-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Prime	MONK-NBC	\$896
7-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Morning 2	TODAY SHOW	\$313
7-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Afternoon Daytime 2	MARATHA	\$125
7-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Overnight	LATE NGT/CONAN O'BRIEN	\$110
8-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Morning 1	NEWS	\$313
8-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Morning Daytime 1	TODAY SHOW III	\$313
8-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Morning Daytime 2	ORPHAN WINFREY SHOW	\$313
8-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Fringe 2	NEWS	\$313
8-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Fringe 2	NEWS	\$501
9-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Late News	TONIGHT SHOW-NBC	\$257
11-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Afternoon Daytime 2	DAYS OF OUR LIVES	\$125
12-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Late Fringe	TONIGHT SHOW-NBC	\$282
12-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Afternoon Daytime 2	ACCESS HOLLYWOOD WKND	\$229
12-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Saturday Prime Access	NEWS	\$501
12-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Saturday Prime Access	NATIONAL HEADS-UP POKER	\$113
13-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Weekend Late News	LAW & ORDER: SPECIAL VIC	\$1,315
13-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Weekend Late News	LAW & ORDER: SPECIAL VIC	\$301
13-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Prime	REGIS AND KELLY	\$801
28-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Morning Daytime 2	NEWS	\$1,203
29-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Morning 1	LATE NGT/CONAN O'BRIEN	\$105
29-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Fringe 2	MARATHA	\$192
29-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Prime	ACCESS HOLLYWOOD	\$480
29-Apr-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Afternoon Daytime 2	MOST OUTRAGEOUS TV MOMENT	\$1,056
3-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6335836	30	Prime	JANE & THE DRAGON-NBC	\$168
3-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6335836	30	Sunday Morning	TIM MCCARTHER SHOW	\$168
4-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6335836	30	Weekend Late Fringe	NEWS	\$883
4-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Weekend Late Fringe	NEWS	\$192
5-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6335836	30	Early Fringe 1	MARATHA	\$480
5-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6335836	30	Afternoon Daytime 2	ORPHAN WINFREY SHOW	\$2,085
6-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Prime	DEAL OR NO DEAL-NBC	\$480
6-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6335836	30	Early Morning 2	TODAY SHOW	\$394
6-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6335836	30	Afternoon Daytime 2	MARATHA	\$192
8-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Morning 2	ACCESS HOLLYWOOD	\$480
8-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Prime Access 2	TONIGHT SHOW-NBC	\$394
8-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Late Fringe	LATE NGT/CONAN O'BRIEN	\$168
9-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Overnight	REGIS AND KELLY	\$480
10-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6335836	30	Morning Daytime 2	SATURDAY NIGHT LIVE-NBC	\$480
11-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Weekend Late Fringe	TIM MCCARTHER SHOW	\$168
17-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Prime	MEDIUM-NBC	\$667
17-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Prime	MEDIUM-NBC	\$667
18-May-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Prime	MEDIUM-NBC	\$667
2-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Prime	OFFICE-NBC	\$2,016
2-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Morning 1	NEWS	\$288
2-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Morning 1	NEWS	\$288
2-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Morning Daytime 1	REGIS AND KELLY	\$480
2-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Morning Daytime 2	ORPHAN WINFREY SHOW	\$480
3-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Fringe 1	MARATHA	\$192
3-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Afternoon Daytime 2	MARATHA	\$480
4-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Early Fringe 2	NEWS	\$480
5-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Afternoon Daytime 1	NEWS	\$192
6-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Afternoon Daytime 2	MARATHA	\$192
7-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Overnight	LATE NGT/CONAN O'BRIEN	\$168
8-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Saturday Early Fringe 2	NEWS	\$432
8-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Weekend Late News	NEWS	\$883
8-Jun-08	YEAR 2008	PROVIDENCE	WIAR	NATIONAL OILHEAT/AIUNC	NATIONAL OILHEAT RESEARCH ALLIANCE	No Title Assigned - #6259409	30	Overnight	LAW & ORDER: SVU VCTM	\$77
GRAND TOTAL										\$29,399