

August 22, 2008

VIA OVERNIGHT AND ELECTRONIC MAIL

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

Re: Docket No. 3943 -- National Grid Request for Change of Gas Distribution Rates
Response of Rhode Island Hospital to Commission's First Data Request to Intervenors

Dear Ms. Massaro:

Enclosed please find one original and nine (9) copies of Rhode Island Hospital's ("RIH") response to the Public Utilities Commission's first data request directed to all intervenors. Please note that RIH's response provides an overview of its positions with respect to the issues under consideration in this docket.

Should you have any questions concerning this matter, please contact Andrew Kaplan at 617.330.7115.

Very truly yours,
RHODE ISLAND HOSPITAL

By its attorneys,



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and

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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

In Re: National Grid)
Gas Distribution)

Docket No. 3943

RHODE ISLAND HOSPITAL'S RESPONSE TO FIRST COMMISSION DATA REQUEST
DIRECTED TO ALL INTERVENORS

Request:

As an addendum to the Division's and Intervenors' surrebuttal testimony, please include a list of each item where the party disagrees with the positions of the Company or other parties to the docket. Include the financial impact of each item in dispute.

Response:

Because Rhode Island Hospital ("RIH") has not submitted surrebuttal testimony in this docket, the Commission's data request does not appear to directly apply to RIH. However, RIH respectfully responds to this data request by outlining its positions related to rate design and non-firm (*i.e.*, interruptible) services.

As National Grid's largest customer, RIH requires a rate structure that ensures the flexibility to negotiate gas prices as a means of reducing its energy costs, and disagrees with those positions taken by parties advocating cost-of-service based rates or fixed rates for non-firm service customers (*i.e.*, The Energy Consortium of Rhode Island and the Division, respectfully). While a fixed-rate structure might prove beneficial under today's energy market conditions, commodity prices are highly volatile and it is unreasonable for the Commission to establish a rate structure based upon today's unprecedented gas and oil prices.

Therefore, RIH will, among other things, seek the Commission's approval of a rate option that allows large commercial and industrial customers the flexibility to negotiate with National Grid for gas transportation prices based upon current commodity prices. At a time when health care costs have increased significantly, RIH, a not-for-profit acute care hospital, which also provides medically necessary services to uninsured or under-insured patients at no charge or at reduced charge, must be provided the opportunity to reduce significantly its energy costs.

RIH is in the process of reviewing the voluminous documentation in this proceeding and reserves its right to cross-examine witnesses and submit briefs concerning all issues in this docket. RIH appreciates the opportunity to participate in the Commission's review of these important matters.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served electronically the foregoing document upon each person designated on the official service list compiled by the Commission's Clerk in this proceeding.

Dated in Boston, MA this 22nd day of August 2008.

A handwritten signature in black ink, appearing to read 'RGC', is written over a horizontal line.

Robert G. Clifford

Paralegal

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**National Grid (NGrid) – Request for Change in Gas Distribution Rates
Docket No. 3943 - Service List as of 8/19/08**

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