

BEFORE THE
STATE OF RHODE ISLAND
AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

In Re: NATIONAL GRID GAS - :
APPLICATION TO IMPLEMENT : Docket No. 3943
NEW RATES :

**RESPONSE BY SILENTSHERPA ENERGY CONSULTING AND
PROFESSIONAL SERVICES, INC. TO NGRID'S REQUEST TO WITHDRAW
DECOUPLING FROM THE ABOVE-CAPTIONED DOCKET**

SilentSherpa Energy Consulting and Professional Services, Inc. ("SilentSherpa") submits the following comment in response to NGrid's request to withdraw the issue of decoupling from the above-captioned Docket.

COMMENT

This Commission should deny NGrid's request to withdraw its position on decoupling. From the perspective of a neutral party on this issue, SilentSherpa suggests that NGrid is withdrawing its position on decoupling simply to preserve the outcome of similar efforts in other states. If the Commission were to reject decoupling in this case, it would set precedent potentially used by other regulatory agencies. In addition, if NGrid is successful with the implementation of decoupling in other jurisdictions then that precedent would likely influence a future decision by the Commission.

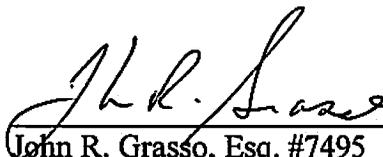
As a representative of many Rhode Island rate payers who directly fund the Company's, Commission's, and Division's involvement in this rate case, SilentSherpa respectfully requests the Commission rule on this issue as part of this rate case rather than allow NGrid to shelf it for another day. Otherwise, there has been a great deal of rate payer money wasted on financing what appears to be a test run by the Company; a seven-figure test run not to mention the hours of preparation by other parties who do not have the luxury of rate payer financing.

This Commission should not provide NGrid with a “blank check” with respect to its use of the regulatory system. Rather, this Commission should hold NGrid to the prudent use of funds NGrid is privileged to collect from residential, commercial, industrial, and low-income rate payers; funds that could otherwise be applied to any number of issues raised in this rate case including low-income assistance.

If the Company decides that pulling from the shelf at the eleventh hour such a substantial issue – which set in motion a huge effort by many interested parties – best serves its interest and the Commission allows it, then perhaps NGrid’s shareholders should pay the tab out of respect for its customers. Allowing this issue to survive to fight another day at the cost of the rate payer is neither fair nor honorable. It would be nothing less than an insult to the participant’s who in good faith committed to responding to this issue and to the rate payer’s who, at the end of the day, funded NGrid’s “crash test.”

For the foregoing reasons, SilentSherpa respectfully requests that the Commission deny NGrid’s eleventh-hour exit from the issue presented and compel it to continue along the same path it chose to move in when it set in motion such a major issue in this case.

Respectfully submitted,
SilentSherpa ECPS, Inc.
By its attorney,

A handwritten signature in cursive script, appearing to read "John R. Grasso". The signature is written in black ink and is positioned above a horizontal line.

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