

PUBLIC UTILITIES COMMISSION

IN RE: REQUEST BY NATIONAL GRID :
FOR CHANGE OF GAS DISTRIBUTION : Docket No. 3943
RATES :

**RESPONSE OF GEORGE WILEY CENTER TO THE
FIRST DATA REQUEST OF THE COMMISSION**

The Public Utility Commission's First Data Request to Intervenors and the Division asked that "[a]s 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."

The George Wiley Center (the Center) offers this response:

1. The Center disagrees with National Grid (NG) that the company is entitled to the requested increase in profits. As to the financial impact of this disagreement, the Center defers to the Division.
2. The Center disagrees with NG's request that the customer charge be increased from \$ 9 per month to \$16 per month. Customers cannot decrease this charge by conservation. The size of this charge is therefore of critical importance to those on limited incomes. A data request itemizing the financial impact of maintaining the customer charge at \$ 9 is pending.
3. The Center agrees with NG, the Attorney General and TEC-RI that a low-income discount should be instituted. The Division, Environment Northeast and the Conservation Law Foundation offer no opinion. Thus, no party has objected to the institution of such a discount. According to NG, a 10% discount would cost \$829,338.00.

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4. The Center disagrees with NG that the appropriate level of discount is 10% of customer and distribution charges. NG offers far better discounts to its Rhode Island electric customers (50%), as well as far better discounts to customers of NG's subsidiaries in other states. The Center seeks a discount commensurate with NG's Rhode Island electric discount of 50%. The financial impact would be five times greater than the proposed 10% discount.
5. The Center disagrees with the decoupling mechanism (RDM) as proposed. It lacks protection from rate increases for low-income customers, even though proponents acknowledge that that usage is going to decline for the foreseeable future, and that rates will go up with declining usage under the proposed RDM. NG's RDM also suffers from the deficiencies outlined in the *Pre-Filed Comments of George Wiley Center* at pp. 11-13 and the *Direct Testimony of John Farley* at pp. 18-35.

Respectfully submitted,
The George Wiley Center
By its attorney,



B. Jean Rosiello (#2886)
MacFadyen, Gescheidt & O'Brien
101 Dyer Street
Providence, RI 02903
401-751-5090

CERTIFICATE OF SERVICE

I certify that on August 29, 2008 I mailed two hard copies of this document, plus appendices, on Jeffrey H. Gladstone, Esq. and Robert K. Taylor, Esq., Partridge, Snow & Hahn LLP, 180 South Main Street, Providence, RI 02903 and I served one copy, plus appendices, by email to each of the parties on the service list.

