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December 14, 2009

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

RE: Docket No. 4116 - National Grid Energy Efficiency Program Plan for 2009

Dear Ms. Massaro,

This letter conveys the support of the Energy Efficiency and Resource Management Council ("EERMC" or "The Council") for the National Grid 2010 Energy Efficiency Program filed with the Rhode Island Public Utilities Commission by National Grid on November 2, 2009.

The Council notes that the National Grid filing is a settlement document setting forth the proposed terms of the Electric Demand-Side Management Programs for 2010 entered into by The Narragansett Electric Company, d/b/a National Grid ("Company"), the Division of Public Utilities and Carriers, The Energy Council of Rhode Island, the Energy Consumers Alliance of New England d/b/a People's Power and Light, and Environment Northeast (together, the "Parties").

The Council is pleased that these participants in the Collaborative Subcommittee of the EERMC have worked together with National Grid and the Council's Consulting Team to develop an Energy Efficiency Program Plan for least cost procurement in 2010 that is consistent with R.I.G.L. 39-1-27.7 (the Least Cost Procurement provisions of the Comprehensive Energy Conservation, Efficiency, and Affordability Act of 2006), R.I.G.L. 39-2.1-2(b), and the Rhode Island Public Utilities Commission's "Standards for Energy Efficiency and Conservation Procurement" approved in Order 19344 in Docket 3931 on July 17, 2008.

This filing by National Grid of this second annual EE Program Plan represents a significant step toward accomplishing the State policy of "Least Cost Procurement" enunciated in the Comprehensive Energy Conservation, Efficiency and Affordability Act of 2006. National Grid is on target to meet its savings goals for efficiency program implementation in 2009 which represented a significant increase in effort and savings from the levels of 2008 program activity. The Goals and Budget for 2010 represent a comparable level of increase for 2010.

Thus, this Energy Efficiency Program Plan is consistent with the three-year Energy Efficiency Procurement Plan ("EE Procurement Plan") submitted by National Grid on September 2, 2008 with approval and support of the EERMC, the Office of Energy Resources, the Division of Public Utilities and Carriers, Environment Northeast, and TEC-RI and approved by the Public Utility Commission on April 17, 2009.

The efficiency programs for 2010 are projected to secure total annual MWh savings of 89,637 at a levelized cost per kWh saved of 4.1 cents, as opposed to a 9.2 cent cost for conventional electric supply. This increase in efficiency investment moves towards a level that is closer to acquiring all energy efficiency resources that are lower cost than supply, which represents Rhode Island's state energy policy. The proposed portfolio of programs is expected to have a benefit/cost ratio of 3.67, which means that approximately \$3.67 in benefits is expected to be created for each \$1 invested in the programs.

The EERMC encourages the PUC to approve the 2010 Energy Efficiency Program Plan, and pledges that it will continue to work with National Grid, the Collaborative Subcommittee, the Division, TEC-RI, People's Power and Light, and other parties to ensure that the three-year Energy Efficiency Procurement Plan and the underlying objectives of the 2006 Act are fully implemented.

Thank you for your consideration of this matter.

Respectfully Submitted,

The Rhode Island Energy Efficiency & Resources Management Council,

R. Daniel Prentiss

By its Attorney,