

April 5, 2011

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02889

**RE: Docket No. 4206 - National Grid's Revenue Decoupling Mechanism ("RDM")
Proposal for Gas and Electric**

Dear Ms. Massaro:

On behalf of National Grid¹ enclosed is a Motion to Transfer Backup Rates Testimony. The motion requests that so much of the testimony submitted by TEC-RI that relates to the issue of the continued use of backup rates be transferred to Commission Docket 4232, which the Commission recently established to review and consider the use of backup rates.

Thanks you for your attention to this transmission. If you have any questions please feel free to contact me at (401)784-7667.

Very truly yours,

A handwritten signature in blue ink, appearing to read "T. Teehan", is written over a horizontal line.

Thomas R. Teehan

cc: Docket 4206 Service List

¹ The Narragansett Electric Company d/b/a National Grid ("National Grid" or the Narragansett Electric Company").

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

National Grid's Revenue Decoupling
Mechanism Proposal

Docket No. 4206

National Grid's Motion to Transfer Backup Rates Testimony

Pursuant to Commission Rule 1.20(g), National Grid¹ moves that so much of the direct pre-filed testimony submitted by TEC-RI relative to the continued use of backup rates be transferred from this docket to Docket 4232, which the Commission recently established for the very purpose of reviewing the use of backup rates.²

The Commission recently opened a separate Docket 4232 (the "Backup Rates Docket"), which will allow the Commission to deal globally with the many policy issues relating to backup rates, including the basic purpose and benefits of backup rates and the potential benefits and effects of eliminating them, including how the lost revenues would be allocated among rate classes. Additionally, in the Backup Rates Docket, the Commission will also have the opportunity to take up the backup rate exemption that was established as part of the Second Amended Stipulation and Settlement in Docket 3617.

The Company does not in any way wish to eliminate or disrupt discussion of the arguments for and against the use of backup rates and expects that those issues will be

¹ The Narragansett Electric Company d/b/a National Grid ("National Grid" or the "Company").

² The Company brings this motion under Commission Rule 1.20 simply as a procedural mechanism to accomplish its request to transfer the backup rates testimony to that other docket. The testimony that is the subject of this motion is found on page 3, line 15 and on page 6, line 8 through page 17, line 3 of Mr. Ferguson's pre-filed testimony.

fully aired in the context of the Backup Rates Docket. Moving TEC-RI's backup rate testimony into another separate docket specifically designated to encompass the issues raised in that testimony would allow for the focused review of those issues and avoid further complicating or burdening the Commission's review of the proposed electric and gas Revenue Decoupling Mechanisms.

In light of the foregoing, the Company respectfully requests that so much of the pre-filed direct testimony of William H. Ferguson as relates to the termination of backup rates be removed from this docket and transferred to the Backup Rates Docket.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY**

By its attorney,



Thomas R. Teehan (RI #4698)
280 Melrose Street
Providence, RI 02907
(401) 784-7667

Dated: April 5, 2011

Certificate of Service

I hereby certify that a copy of the cover letter and / or any materials accompanying this certificate has been electronically transmitted, sent via U.S. mail or hand-delivered to the individuals listed below.



Joanne M. Scanlon

April 5, 2011
Date

**Docket No. 4206 - National Grid (NGrid) – Revenue Decoupling Mechanism Filing
Service List as of 12/7/10**

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