



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DIVISION OF PUBLIC UTILITIES AND CARRIERS

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August 31, 2016

Ms. Luly Massaro, Clerk
Rhode Island Public utilities Commission
89 Jefferson Boulevard
Warwick, R.I. 02888

Re: Docket Nos. 4251 & 4252 – Soft-Off Program

Dear Ms. Massaro:

I write on behalf of the Division of Public Utilities and Carriers (the “Division”) regarding the effectiveness and continuation of the Soft-Off Program that has been placed into effect in 2010 by Narragansett Electric Company, d/b/a National Grid (the “Company”). The Division asked the Public Utilities Commission (the “Commission”) for an extension of time to explore soft-off related issues to improve the program and report back to the Commission with its findings.

After several meetings with the Company, National Grid did recognize the importance of the Division’s interest in having the utility have the ability to access premises with inside gas meters without restriction, for safety purposes. The attached agreement between National Grid and the Division consists of pro-active measures in securing gas meter access along with other various soft-off related issues ranging from financial to performance reporting.

The Division appreciates the Commission’s patience and attention in this matter, and allowing time for the Division and the Company to have further discussions. If you have any questions regarding the proposed agreement, please feel free to contact us.

Respectfully submitted,

James E. Lanni

Associate Public Utilities Administrator
for Operations and Consumer Affairs

cc: Steven Scialabba
Leo Wold, Esq

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Docket Nos. 4251 & 4252 - Soft-Off Agreement

1. National Grid¹ will work with the Division to review and propose legislation to provide for a replevin process² in Rhode Island, similar to what is available in the Company's other jurisdictions (i.e. Massachusetts and New York).
2. National Grid has agreed to submit to the Division the following reports:
 - A one-time updated cost-benefit analysis in form and substance similar to that which the Company included in its June 4, 2013 final report that it filed with the Rhode Island Public Utilities Commission (PUC) following the conclusion of the one-year Soft-Off Pilot.³
 - A one-time updated Soft-Off performance report in form and substance similar to and utilizing the same criteria as that which is contained in the quarterly reports that the Company filed with the PUC during the one-year Soft-Off Pilot, retroactive to the date of the final report (June 4, 2013).
 - On an annual basis, a performance report in form and substance similar to and utilizing the same criteria as that which is contained in the quarterly reports that the Company filed with the PUC during the one-year Soft-Off Pilot. The Company will submit said annual report within 30 days following December 31 of each calendar year.
3. National Grid will continue to attempt to identify higher risk properties (i.e., single unit/family residential and commercial buildings with inside meters and a long history of access issues) for which a hard shut off may be appropriate. In so doing, the Company will continue to review the feasibility and costs associated with performing a hard shut off at such properties, including the incremental costs of additional field personnel. In addition, the Company and the Division will look at expanding the Company's curb valve program through the Gas Infrastructure, Safety and Reliability Plan for locations where inside meters and a history of access issues are present.
4. The Company will review its procedures to (i) ensure that when a tenant requests electric service in the tenant's name, the Company's customer service representatives

¹ The Narragansett Electric Company d/b/a National Grid (referred to herein as National Grid or the Company).

² A replevin process would allow National Grid, upon issuance of a warrant and accompanied by a sheriff or other authorized law enforcement personnel, to enter a premises and access a gas meter to perform leak surveys and for other gas safety-related purposes where access had been previously denied.

³ See June 4, 2013 Final Report, Docket Nos. 4251, 4252, at 3.

are also inquiring regarding the gas service, and (ii) provide that if a tenant does not accept gas service in its name, the gas service will be disconnected.

5. The Company and the Division are continuing to review the Leave On For Landlord program⁴.

⁴ The Leave on for Landlord (LOFL) program is a service that the Company offers to owners, landlords, and rental agencies to provide the opportunity to have the gas and/or electric service activated in their own name when a tenant requests that services be disconnected, alleviating the need for the Company to go out to the premises and physically lock the service.