



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

150 South Main Street • Providence, RI 02903
(401) 274-4400 - TDD (401) 453-0410

Peter F. Kilmartin, Attorney General

October 27, 2011

Ms. Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Blvd.
Providence, RI 023903

Re: Docket Nos. 4251 and 4252

Dear Ms. Massaro,

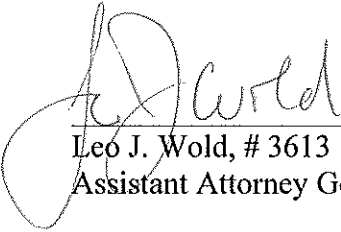
I write on behalf of the Division of Public Utilities and Carriers regarding the May 24, 2011 filings that the Narragansett Electric Company, d/b/a National Grid (the "Company") has made in connection with the above-entitled matters. In general the filings purport to formalize through tariff amendments existing policies that the Company informally implemented in 2010. After the Company made its proposed tariff revisions, the Division forwarded twenty-five data requests to the Company seeking particular information regarding the content of the filings. A copy of the Company's responses to the Division's discovery is attached hereto and may be marked as exhibit in each of the above-entitled matters.

The Division has reviewed the Company's filings as well as its responses to the Division's discovery. The Division is satisfied that the proposed revisions amending R.I.P.U.C. NG-GAS No. 1010 and R.I.P.U.C. No. 2072 reflect the "Soft-Off" policies that have been in place since 2010. The Division is also convinced that the proposed tariff amendments reasonably balance fairness to landlords whose properties are subject to "Soft-Off" terminations and ratepayers as a whole who must bear the incremental costs of "hard" terminations.

Based on the foregoing, the Division does not object to the Commission's approval of the proposed tariff advices that the Company has filed.

Respectfully submitted,

Division of Public Utilities and Carriers

A handwritten signature in cursive script, appearing to read "L. J. Wold", is written over a horizontal line. The signature is positioned to the left of the printed name and title.

Leo J. Wold, # 3613
Assistant Attorney General

cc: Service List

nationalgrid

Jennifer Brooks Hutchinson
Senior Counsel
Rhode Island

July 15, 2011

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket Nos. 4251 & 4252 – Soft-Off Policy
Responses to Division Data Requests (Set 1)

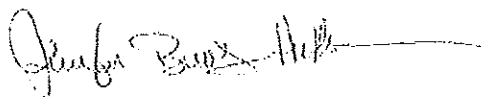
Dear Ms. Massaro:

Attached please find National Grid's responses to the Division's First Set of Data Requests in the above-captioned dockets.

Please be advised that the Company is submitting responses to Division 1-5, 1-10, 1-11, 1-12, 1-18, 1-19, 1-20, and 1-24. The Company will be providing the responses to the Division's remaining data requests shortly.

Thank you for your attention to this transmittal. If you have any questions regarding this filing, please feel free to contact me at 401-784-7288.

Very truly yours,



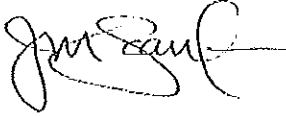
Jennifer Brooks Hutchinson

Enclosures

cc: Dockets 4251 & 4252 Service Lists
Leo Wold, Esq.
Steve Scialabba
James Lanni

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

July 15, 2011

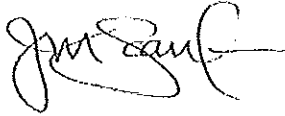
Date

Docket No. 4251 – National Grid Gas – Billing Termination ("Soff-Off")
Service List as of 6/24/11

| Name/Address | E-mail | Phone/FAX |
|---|--|------------------------------|
| Thomas R. Teehan, Esq. National Grid 280 Melrose St. Providence, RI 02907 | Thomas.teehan@us.ngrid.com | 401-784-7667 401-784-4321 |
| | Joanne.scanlon@us.ngrid.com | |
| Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence RI 02903 | LWold@riag.ri.gov | 401-222-2424 |
| | Sscialabba@ripuc.state.ri.us | 401-222-3016 |
| | Jlanni@ripuc.state.ri.us | |
| | mcorey@riag.ri.gov | |
| | dmacrae@riag.ri.gov | |
| File an original & nine (9) copies w/ Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888 | Lmassaro@puc.state.ri.us | 401-780-2107 401-941-1691 |
| | Plucarelli@puc.state.ri.us | |
| | Sccamara@puc.state.ri.us | |

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

July 15, 2011

Date

**Docket No. 4252 – National Grid Electric – Billing Termination ("Soff-Off")
Service List as of 6/24/11**

| Name/Address | E-mail | Phone/FAX |
|---|--|------------------|
| Thomas R. Teehan, Esq. National Grid 280 Melrose St. Providence, RI 02907 | Thomas.teehan@us.ngrid.com | 401-784-7667 |
| | Joanne.scanlon@us.ngrid.com | 401-784-4321 |
| Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence RI 02903 | LWold@riag.ri.gov | 401-222-2424 |
| | Sscialabba@ripuc.state.ri.us | 401-222-3016 |
| | Janni@ripuc.state.ri.us | |
| | mcorey@riag.ri.gov | |
| | dmacrae@riag.ri.gov | |
| File an original & 10 copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888 | Lmassaro@puc.state.ri.us | 401-780-2107 |
| | Nucci@puc.state.ri.us | 401-941-1691 |
| | Anault@puc.state.ri.us | |
| | ADalessandro@puc.state.ri.us | |

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests – Set 1
Issued June 24, 2011

Division 1-5

Request:

Provisions of the 2007 pilot program for electric soft closures and the 2009 gas soft closure implementation require that if unbilled electric or gas usage exceeded 200 kWh or 13 ccfs and the sent letters to the occupants did not result in the service being established in seven days, then the Company would contact the landlord. Can the Company explain why the seven-day period or some other time period in no response situations was excluded from the proposed tariff?

Response:

Given that the referenced 2007 pilot program would have taken place pre-merger, the Company could find no information or an individual with any recollection of a discussion at the 2007 or subsequent 2009 meetings concerning a seven-day period to contact the landlord. As such, a seven-day period was not included in the proposed tariffs. In any case, as stated in the Company's response to DIV 1-22, the Company does attempt to timely identify and contact the landlord when no response is received to an "occupant" letter that is sent to a premise.

Prepared by or under the supervision of: Jeffrey P. Martin

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests – Set 1
Issued June 24, 2011

Division 1-10

Request:

How will National Grid account for the unrecovered cost of gas consumed at a premise where there isn't any customer responsible for payment? Please explain why National Grid should not track and monitor the annual unbilled gas that is attributed to the proposed soft-off practice and secondly, report back annually to the Commission and Division on the results?

Response:

Please see the Company's response to Division 1-11. As noted in that response, a separate tracking of unrecovered gas costs is not necessary as a mechanism already exists to account for such gas.

Prepared by or under the supervision of: John F. Nestor, III

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests – Set 1
Issued June 24, 2011

Division 1-11

Request:

How does National Grid include the cost of the lost gas in its calculation of the purchased gas adjustment factor?

Response:

Unbilled or lost gas is included in the Company's Fuel Allowance, which is defined in the Terms and Conditions section of the Company's Tariff, RIPUC NG-GAS No. 101, Section 1, Schedule B as "The quantity in Therms (as calculated on a percentage basis) by which the gross amount of gas received for Customer's account at the Point(s) of Receipt is reduced in kind in order to compensate the Company for gas loss and unaccounted for, Company use or similar quantity-based adjustment. Section 6, Schedule C, Item 1.12.0 of the Tariff further describes the calculation of the Fuel Allowance factor as "based upon an average of the Company's most recent five (5) years experience, fuel loss and unaccounted for or similar quality based adjustments." The Fuel Allowance factor is calculated annually based on the difference between the total sendout and total throughput. Sendout is the quantity of gas that enters the system (citygate deliveries) or is locally produced (LNG). Total throughput is the gas going through customer meters based upon billing sales data. The yearly data is based on 12 months ending August 31st and the updated 5-year average is effective November 1st each year.

Prepared by or under the supervision of: John F. Nestor, III

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests – Set 1
Issued June 24, 2011

Division 1-12

Request:

Please explain whether National Grid will include the soft-off practice in the utility's Operation and Maintenance (O&M) Plan that is required by Office of Pipeline Safety (OPSO) to insure the gas can safely remain turned on in the absence of a customer?

Response:

National Grid had not considered including the Soft-Off practice in the utility's Operation and Maintenance (O&M) Plan since the Company views the soft off practice as a billing and collection practice rather than a safety practice.

Prepared by or under the supervision of: Danielle Morrissey

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests – Set 1
Issued June 24, 2011

Division 1-18

Request:

Has National Grid completed its transfer of all natural gas customers to its Customer Service System (CSS) billing program that is current being used just for electric customers? If not, when will the transfer be completed?

Response:

National Grid is currently working on the conversion of its Rhode Island gas accounts from its Advantage system to its CSS system. Expected completion is October 2011.

Prepared by or under the supervision of: Jeffrey P. Martin

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests – Set 1
Issued June 24, 2011

Division 1-19

Request:

How many residential gas and electric meters do not have ERTs? Why isn't language included in the proposed filing that addresses the treatment of service terminations when locations do not have ERTs?

Response:

There are approximately 1,900 gas meters that do not have ERTs and approximately 36,000 electric meters that do not have ERTs in Rhode Island. National Grid did not include language in the Soft-Off tariff filings that addresses the treatment of service terminations when locations do not have an ERT because a Soft-Off situation does not apply in these cases. Rather, accounts without ERTs are handled as any other termination of an account that does not meet the criteria for use of a Soft-Off by the Company. With respect to gas meters without ERTs, it is the Company's practice to physically lock those meters when a customer requests a termination of service. For electric meters without ERTs, the Company issues a final estimated read, unless there are outstanding billing issues or the account is commercial.

Prepared by or under the supervision of: Danielle Morrissey

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests -- Set 1
Issued June 24, 2011

Division 1-20

Request:

How will National Grid maintain the "signed" consent forms or written agreements from property owners/landlords in its computerized records and how long will they be maintained?

Response:

Beginning in January 2010, National Grid has scanned and uploaded signed Electric service Leave on for Landlord (LOFL) applications to the non-service account in CSS. The LOFL application then remains as a permanent contact on the account. Original copies of LOFL applications signed in 2008 and 2009 are filed in the Company's Accounts Processing (AP) Department located in Northborough, MA. Original copies of LOFL applications for 2000 to 2008, previously stored in the Company's archives, are being recalled and filed with existing applications in the Northborough AP Department. It is a landlord's responsibility to notify National Grid in writing if he/she desires certain premises removed from the LOFL program. When the written request is received the coding is removed and correspondence scanned to the corresponding non-service account.

Signed Gas LOFL applications for 2010-2011 are filed in the Northborough, MA AP Department. Applications for 2008 & 2009 are currently filed with Electric LOFL applications. Gas LOFL applications for 2004-2007, previously stored in archives are being recalled and filed with existing applications in Northborough.

Once National Grid has completed the conversion of Gas accounts to CSS, Gas LOFL applications will be scanned and uploaded to customer accounts using the same process that is currently used for Electric LOFL applications, and will become part of the permanent account record.

Prepared by or under the supervision of: Jeffrey P. Martin

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests -- Set 1
Issued June 24, 2011

Division 1-24

Request:

What efforts has National Grid made in establishing a current data base for landlords' names, addresses and other contact information in order to efficiently comply with the proposed soft-off provisions?

Response:

The Company currently stores landlord data within its CIS databases (CSS and Advantage). When Advantage is converted to CSS, this data will be transitioned accordingly.

Prepared by or under the supervision of: Jeffrey P. Martin

nationalgrid

Jennifer Brooks Hutchinson
Senior Counsel
Rhode Island

July 20, 2011

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket Nos. 4251 & 4252 – Soft-Off Policy
Responses to Remaining Division Data Requests (Set 1)

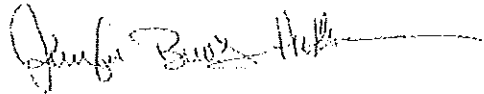
Dear Ms. Massaro:

Attached please find National Grid's¹ responses to the Division's First Set of Data Requests that remain in the above-captioned dockets.

In this transmittal, the Company is providing responses to Division 1-1 through 1-4, Division 1-6 through 1-9, Division 1-13 through 1-17, Division 1-21 through 1-23, and Division 1-25. This transmittal completes the Company's responses to the Division First Set of Data Requests in the above-captioned dockets.

Thank you for your attention to this transmittal. If you have any questions regarding this filing, please feel free to contact me at 401-784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Dockets 4251 & 4252 Service Lists
Leo Wold, Esq.
Steve Scialabba
James Lanni

¹ The Narragansett Electric Company d/b/a National Grid.

Division 1-1

Request:

In the Company's filed transmittal letter regarding "gas" soft-off terminations, a gas account must meet the eligibility criteria that the account cannot be more than \$300 in arrears, except if the customer is requesting new service at another premise.

- a. Please explain the Company's rationale for the provision that states if an account has an arrearage of less than \$300 then the service would be deemed eligible for a soft-off termination
- b. Why has the company chosen the amount of \$300 as the threshold level and how many cfs need to be consumed for the amount to be \$300?
- c. If the \$300 or less is not recovered, how will National Grid treat the financial loss from an accounting perspective?
- d. Why hasn't National Grid chosen to have similar eligibility criteria for electric like the gas threshold requirement of \$300?
- e. If National Grid were required to include a maximum electric consumption in dollars that would make a service account not eligible for a soft-off termination, what amount would be used and what would be the kWh consumption?

Response:

- a. In setting the threshold amount for consideration for a Soft-Off at a location, National Grid considered the risk for the arrearage to continue unpaid, the avoided cost of field visits and the convenience to a new customer at the premise. Based on these considerations, the Company believes that \$300 is an amount that balances these concerns by minimizing the risk of unpaid arrearages, while avoiding unnecessary field visits and improving customer satisfaction.
- b. Please see the Company's response to Division 1-1 (a). At current tariff rates and gas costs, \$300 dollars would equal approximately 322 ccf.

Division 1-1 (continued)

- c. An outstanding amount that exists on an account following its closure is treated by the Company through standard collection practices. There is no difference in treatment created by the Soft-Off.
- d. The Company has not imposed the \$300 arrears criteria for Electric Soft-Off terminations due to the differences in risk. The risk of Bad Debt as measured by write-offs as a percent of revenue is significantly lower for the Company's electric customers as compared to gas customers. For FY 2011, the write-offs as a percent of revenue were 1.79 percent for Electric accounts, and 3.95 percent for Gas accounts.
- e. The Company has established a maximum threshold of 250 kWh, i.e. if usage in arrears is under 250 kWh, the premises would be eligible for a Soft-Off termination (as long as the other criteria were met). For a customer receiving service on Regular Residential Rate A-16, the 250 kWh is equivalent to approximately \$36.63 in billed revenue based on rates currently in effect, including charges for delivery service, Standard Offer Service and Rhode Island Gross Earnings Tax.

Prepared by or under the supervision of: Danielle Morrissey and Jeffrey P. Martin

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests – Set 1
Issued June 24, 2011

Division 1-2

Request:

In the "electric" soft-off policy when the consumption exceeds 250 kwh at a location, the service will be terminated by the Company.

- a. Please explain why National Grid has not proposed a similar maximum consumption figure for the termination of gas accounts there would not be any undue delay or lengthy lapses on the Company's part in performing the shutoff?
- b. If National Grid were required to include a maximum gas consumption that would result in an immediate termination, what amount of ccfs would be used?

Response:

- a. Please see the Company's response to DIV 1-22.
- b. Please see the Company's response to DIV 1-22.

Prepared by or under the supervision of: Danielle Morrissey and Jeffrey P. Martin

Division 1-3

Request:

In both the electric and gas soft-off proposals if the consumption exceeds 100 kWh or 13 ccfs respectively, a notification letter is sent to the location indicating that the service will be physically disconnected if the account is not established. If no response, then the Company will make additional attempts to locate and contact the landlord/owner.

- a. The language "additional attempts" to locate and contact the landlord is vague and could be extremely time consuming. Explain why National Grid hasn't established a specific time period for attempting to contact the landlord or established a maximum number of landlord contact attempts?
- b. What prevents an excessive passing of time due to the additional attempt provision before service can be terminated due the Company's inability to contact the landlord or the landlord does not response?
- c. In lieu of the additional attempts that could be time consuming and backlogged, the proposed electric soft-off policy requires immediate termination after exceeding 250 kWh in consumption. Why shouldn't National Grid impose a similar requirement in the gas soft-off policy and that provision would prevent unnecessary delays due to unsuccessful contacts?
- d. Why shouldn't the Company establish a time period for no responses from occupants at the locations so there isn't any long delays before attempting to then contact the landlord?
- e. In its proposed gas soft-off policy, the Company states that once 13 ccfs are exceeded then an initial notification letter is sent to the location and if there is any response from the occupant or the Company is unable to gain access to the gas meter, then the Company will attempt to contact the landlord/owner. Is it the Company's intent to terminate the service when a location exceeds 13 ccfs and the occupant (or landlord) does not answer the notification letter and they do have access to the gas meter? Please explain the purpose of including the phrase "or if the Company cannot gain access" in this provision?

Division 1-3 (continued)

Response:

- a. Please see the Company's response to DIV 1-22.
- b. The process described in the Company's proposed gas tariff ensures that an excessive period of time does not pass due to additional attempts to contact customers while ensuring compliance with other legal and regulatory obligations. Please see the Company's response to DIV 1-22.
- c. Please see the Company's response to DIV 1-22.
- d. Please see the Company's response to DIV 1-22.
- e. The language states that (following the 13 ccf notice) "If no response is received or if the Company can not gain access, additional attempts will be made to locate and contact the landlord/owner." The intent is to proceed with attempts to contact a landlord/owner when either of these conditions exists. Meters with access issues may pose additional challenge to physical shut off, if necessary, making it prudent to begin the attempt to contact a landlord/owner sooner.

Prepared by or under the supervision of: Jeffrey P. Martin

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests – Set 1
Issued June 24, 2011

Division 1-4

Request:

In each and every month, there are numerous gas and electric services that are not physically terminated due the company's existing soft closure practice and such services remain on or active while the account is classified as inactive without an assigned Customer of Record. Please provide the number of gas and electric "inactive" accounts that existed each month as soft-off terminations for the 2010 year?

Response:

The tables below show the number of Rhode Island electric and gas meters in a Soft-Off status on the last day of each calendar month for 2010.

Electric meters in an "estimated off" status at month end

| <u>Month ending:</u> | <u># Meters</u> |
|----------------------|-----------------|
| January 2010 | 5,001 |
| February 2010 | 5,198 |
| March 2010 | 5,032 |
| April 2010 | 5,395 |
| May 2010 | 6,783 |
| June 2010 | 7,360 |
| July 2010 | 6,921 |
| August 2010 | 6,766 |
| September 2010 | 6,362 |
| October 2010 | 5,592 |
| November 2010 | 5,847 |
| December 2010 | 5,302 |

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests – Set 1
Issued June 24, 2011

Division I-4 (continued)

Gas meters in an "estimated off" status at month end

| <u>Month ending:</u> | <u># Meters</u> |
|----------------------|-----------------|
| January 2010 | 5,266 |
| February 2010 | 5,303 |
| March 2010 | 5,388 |
| April 2010 | 5,632 |
| May 2010 | 5,972 |
| June 2010 | 6,104 |
| July 2010 | 6,369 |
| August 2010 | 6,235 |
| September 2010 | 5,959 |
| October 2010 | 5,499 |
| November 2010 | 5,051 |
| December 2010 | 5,355 |

Prepared by or under the supervision of: Jeffrey P. Martin

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests – Set 1
Issued June 24, 2011

Division 1-6

Request:

Please provide the electric and gas consent forms and written agreement sample that will be sent to the landlord/owners who are interested in transferring utility services into their names upon final billing of the tenants?

Response:

Attached are the electric and gas forms for landlords to consent to the "Leave on for Landlord" program, identified as Attachment DIV 1-6-1 and Attachment DIV 1-6-2, respectively. It is expected that a single form will be possible following the conversion of gas customers to the CSS billing system.

Prepared by or under the supervision of: Jeffrey P. Martin

LANDLORD AUTHORIZATION

Location of Property or Properties: (Please use back to list more properties)

| | |
|---|--|
| <p>Please Print Current or Previous Tenant: _____</p> <p>Address: _____ Number Street Apartment/Unit City/Town</p> <p>Account or Meter Number: _____</p> | <p>Landlord's Last Name</p> <p>First Name</p> |
| <p>Please Print Current or Previous Tenant: _____</p> <p>Address: _____ Number Street Apartment/Unit City/Town</p> <p>Account or Meter Number: _____</p> | |
| <p>Please Print Current or Previous Tenant: _____</p> <p>Address: _____ Number Street Apartment/Unit City/Town</p> <p>Account or Meter Number: _____</p> | |
| <p>Please Print Current or Previous Tenant: _____</p> <p>Address: _____ Number Street Apartment/Unit City/Town</p> <p>Account or Meter Number: _____</p> | |

In order to prevent discontinuance of service I request that electric service be *placed in my name* when a tenant notifies the company that they will vacate the above location(s).
I understand this authorization will not prevent the termination of electric service due to billing issues with an existing or new tenant.

Billing Information:

Landlord Name: _____

Mailing Address: _____

Daytime Telephone Number: _____

Signature

Date

Return this form to:

National Grid
PO Box 960
Northborough, MA 01532-0960
Fax: 508.357.4730



**Application for Participation
 Automatic Landlord Program**

I, the undersigned, agree to participate in National Grid's Automatic Landlord Program.

- The account(s) at the address(s) specified herein and supplied by National Grid shall be held in my name and billed to me when the account is not being billed to a tenant.
- National Grid will automatically transfer service to my name when a shut-off request is received from a tenant, thereby allowing gas service to remain active.
- It is my responsibility to notify National Grid, in writing, of any changes to the addresses specified herein.
- It is my responsibility to notify National Grid, in writing, if I no longer wish to participate in the Automatic Landlord Program.
- It is the tenant's responsibility to call National Grid to have gas service transferred to the tenant's name.
- If a tenant's service is shut off for non-payment, service will not be transferred to my name unless I specifically give permission to National Grid to do so.

| | |
|--|------------------------|
| Name of Landlord (please print) | Mailing address |
| Driver's License No. & State | Phone Number |
| | Social Security Number |
| Service Addresses for Automatic Landlord (include unit or apartment number if applicable): | |
| <hr/> | |
| <hr/> | |
| <hr/> | |
| <hr/> | |
| If more space is needed, please continue on the back of this form. | |

Signature of Landlord

Date

Rev 09/28/07

Division 1-7

Request:

Please list the specific rate classifications of small commercial and industrial "gas" customers who are eligible for soft-off terminations?

- a. Why has National Grid excluded small commercial and industrial "electric" customers from being eligible for soft-off terminations?
- b. Does the exclusion means that small commercial and industrial "electric" customers will be terminated immediately when the service is requested to be discontinued?

Response:

Small commercial and industrial gas customers (rate 21) are eligible for Soft-Off terminations provided they meet specific account / meter requirements.

- a. Small commercial electric customers on rate C06 are eligible for Soft-Off.
- b. No. Since small commercial electric customers that meet account and meter requirements are eligible for Soft-Off, they are not always terminated immediately when service is requested to be discontinued.

Prepared by or under the supervision of: Jeffrey P. Martin

Division 1-8

Request:

National Grid conveyed to the Division when the "gas" soft-off policy was being initially implemented in 2009 that the Company was in the process of establishing a gas data-base report on the address locations that have been vacant for a three-month period or greater with the purpose of issuing field orders from the vacancy information to shut off the gas services.

- a. Please explain what has happen to that initiative and why the three-month vacancy issue is not addressed in the proposed filing?
- b. How has the Company included vacant properties in its leak survey requirements that are in soft-off situations?

Response:

- a. The Company has compiled a 90-day report showing by cycle those meters that are in a Soft-Off status for more than 90 days. In addition, these meters are also included in a daily exception report which is also compiled by cycle. These two reports allow the Company to track and take action on both the 13 ccf threshold and the age of the Soft-Off.
- b. Meters at vacant premises in a Soft-Off condition are included in existing leak survey programs and included in those programs' requirements.

Prepared by or under the supervision of: Jeffrey P. Martin

The Narragansett Electric Company
d/b/a National Grid
Docket Nos. 4251 and 4252
In re: Tariff Filings Proposing to Implement
A Billing Termination ("Soft-Off") Practice for
Gas and Electric Services
Responses to Division's Data Requests – Set 1
Issued June 24, 2011

Division 1-9

Request:

What is the Company's projected annual cost savings by implementing the soft-off policy for gas and electric services that comes about from the reduction in the number of times the Company is required to turn the service off and then on?

Response:

Based on current CMS work load forecasts and available resources, the Company estimates that without the Soft-Off process, it would require an additional 8.8 Gas CMS technicians at an aggregate cost of approximately \$1 million, and an additional 2.3 Electric CMS technicians at an aggregate cost of approximately \$256k.

Prepared by or under the supervision of: Danielle Morrissey

The Narragansett Electric Company
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Division 1-13

Request:

Please explain why the Company shouldn't include language in its proposal pertaining to back billing an occupant for usage during the soft-off period when the identity of the customer and the occupancy is verified?

Response:

The Company did not include specific language pertaining to back billing accounts in its Soft-Off tariffs because the Company's existing tariff currently addresses a situation where a customer benefits from service. Specifically, RIPUC NG-GAS No. 101, Section 1, Schedule A, Sub-part 3.0 states that, "[f]ailure to make application for service shall not relieve a party from the obligation to apply and/or pay for service previously used." In addition, back billing of accounts is addressed in the Division's *Rules and Regulations Prescribing Standards for Gas Utilities, Master Meter Systems and Jurisdictional Propane Systems* (See Pages 28-31). National Grid is required to comply with its tariff and the Division's rules and regulations regarding back billing for all of its accounts, including those in the Soft-Off program.

Prepared by or under the supervision of: Danielle Morrissey

Division 1-14

Request:

Title 49-CFR 192.727(d) states that "whenever service to a customer is discontinued, the Company must either (1) provide a locking device to prevent the unauthorized opening of the gas valve, (2) a mechanical device must be installed in the service line or meter assembly to prevent the flow of gas, or (3) the customer's gas piping must be physically disconnected from the gas supply.

- a. Can National Grid provide an explanation as to why the Company's proposed gas soft-off policy is not in violation of the Minimum Federal Safety Standards that requires the flow of gas to be terminated in a prescribed manner under CFR 192.727(d)?
- b. Are there any federal requirements for a gas distribution company that prohibit gas service being left active to a house or apartment for an indefinite period of time with no Customer of Record?

Response:

The Company objects to the question to the extent that it calls for a legal conclusion. Notwithstanding the aforesaid objection, the Company responds as follows:

- a. The Company's proposed gas Soft-Off policy is consistent with the requirements of 49 CFR 192.727(d). Under the Company's proposed policy, gas would remain on for a defined period of time to allow for the orderly transfer of gas service from an existing customer to a new customer without the expense and inconvenience of doing a physical shut-off followed by a second visit to turn the gas back on. If, however, a new customer of record is not established within a reasonable period of time the Company's Soft-Off policy has a procedure in place to physically discontinue service and make safe the premises in accordance with the requirements of the federal regulation.

In a letter of interpretation dated December 24, 2002 in response to an Atlanta Gas Light Company inquiry, the Office of Pipeline Safety (OPS) of the U.S. Department of Transportation acknowledged its awareness of the industry practice known as "soft closure" under which an operator continues to provide gas service to a property during the interval of time between termination of one customer's account and initiation of a second customer's account. That interpretation letter concludes by stating "...[T]he operators decision to use "soft closure" should be guided by considering whether a reasonable finder of fact would conclude that doing so was consistent with the operators obligation to remove from service

Division 1-14 (continued)

any pipeline segment that has become unsafe". The Company's proposed gas Soft-Off policy, which makes provision to either identify a customer of record or physically disconnect service where no customer of record exists within a reasonable time frame, meets that standard of review.

- b. The federal regulations do not state how soon an operator must discontinue service to a property when no subsequent customer has been identified for billing purposes. Section 192.703(b) contains a general requirement to replace, repair or remove from service any pipeline segment that has become unsafe. The Company's proposed Soft-Off policy is consistent with that requirement.

It is also worth noting that once the flow of gas is discontinued (i.e. locked) to the premise, the Rhode Island Rules and Regulations Prescribing Standards for Gas Utilities, Master Meter Systems and Jurisdictional Propane Systems (the "RI Rules & Regulations") recognizes such service as an "inactive" service, prior to being permanently abandoned. The RI Rules and Regulations and the Company's O&M procedures prescribe conditions under which these inactive services must be abandoned, with the maximum timeframe being 5 years.

Prepared by or under the supervision of:
Legal Department (as to Objection) and Danielle Morrissey

The Narragansett Electric Company
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Division 1-15

Request:

What are the Company's plans for the periodic promotion of information about the soft-off termination practice and its outreach efforts to obtain landlord authorizations?

Response:

At the time of request for account closure (final), the Company will explain to a qualifying customer the process of Soft-Off and the fact that the customer will receive an estimated final bill.

The Company will explain and offer the Leave on for Landlord program anytime a customer makes contact and indicates that they are a landlord / property owner. This can happen when a landlord / property owner applies for service following a tenant moving out. Having a premise covered by a Leave on for Landlord agreement prevents account closure (which could be a Soft-Off) and allows service responsibility to be automatically transferred into the landlord's name.

Prepared by or under the supervision of: Jeffrey P. Martin

Division 1-16

Request:

The Bell-Mayewski decision required "a time limit as well as a monthly ccf consumption limit" in the Company's filed "soft closure" policy. The time limit was required by the Division so that the electric or gas services would not be left on indefinitely and the Company would either terminated the services to the vacant units or there would be an acceptance by the landlord for payment responsibility. Where has National Grid included the "time limit" requirements in its gas and electric proposals?

Response:

National Grid included the "time limit" requirements in its gas and electric proposals as follows:

Gas:

Attachment 2, Tariff Advice Filing, Amend RIPUC NG-Gas No. 101, Page 3 of 3, Section 1 General Rules and Regulations, Schedule A, Sheet 5 Third Revision, Paragraph 3, states that, "[i]n cases where the account has not exceeded 13cf and, if after 90 days, the account is still in the "Soft-Off" status, the Company will send notification to the location indicating that the service may be physically terminated if an account is not established." (Emphasis added.)

Electric:

Attachment 2, Tariff Advice Filing, Amend RIPUC 2072, Page 8 of 8, Sheet 8 Cancelling RIPUC No 2040, Section 33, Paragraph 4 states, "[w]hen consumption at the location exceeds 250 kilowatt-hours, service to the location will be terminated. In cases where the account has not exceed 100 kilowatt-hours and if after 90 days, the account is still in the "soft off" status, the Company will send notification to the location indicating that the service may be physically terminated if an account is not established." (Emphasis added.)

Division 1-17

Request:

There is a regulation provision in Texas that allows the gas operator to continue active gas service to a location for a maximum of thirty (30) days subsequent to a customer requesting discontinuance and if another customer does not request new service, the existing service has to be physically disconnected. Why wouldn't National Grid propose such an uncomplicated policy like in Texas as compared to monitoring monthly usage, sending notification letters and attempting to contact the landlords/owners?

Response:

National Grid considered a variety of options for its Soft-Off program and designed a program that, in the Company's view, minimizes risk, eliminates unnecessary field visits, and improves customer satisfaction. The Company determined that an approach that uses numerous factors to determine when a "Soft-Off" termination is appropriate for an account, including location of meters, actual meter reading, read rate, customer payment risk, and cost of field visits, allows the Company to optimize the cost of the program and minimize unbilled gas use. See also the Company's response to Division 1-22.

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Division 1-21

Request:

How can the Commission and Division be assured that National Grid will comply with the provisions put forth in its proposal such as the eventual service terminations when the occupants or the landlords do not respond?

Response:

As stated in National Grid's May 24, 2011 filing letter, National Grid's proposal seeks to amend its *Terms and Conditions of Service* in its gas and electric tariffs in order to specifically provide for its existing Soft-Off policy, which had been informally established with the Consumer Section of the Division in 2010, in compliance with the Division's recent Order in Docket No. D-10-110. National Grid is required to comply with the terms of its tariff. By including the Soft-Off policy in the tariff, there exists sufficient regulatory oversight to ensure National Grid's compliance with the provisions of the Soft-Off policy.

Prepared by or under the supervision of: John F. Nestor, III

Division 1-22

Request:

The electric proposal has a provision that once 250 kwh is consumed, then the electric service will be terminated. The gas soft-off proposal does not have any such provision, why not?

Response:

As stated in the Company's proposed gas tariff, the Company's gas Soft-Off proposal does include both an amount (13 ccf) and time period (90 days) for when the termination process will begin. The Company's filing also recognizes that a number of factors must be taken into consideration before a gas service may be finally terminated at a specific location. These include, but are not limited to, landlord intervention, access to the property, whether any customer(s) at that location qualify for customer-protected status, the Commission's winter moratorium rules, if applicable, and other factors. A hard and fast standard that service will be terminated at a location when a specific volume of gas is consumed or time period is met would conflict with other potential legal and regulatory requirements, to which the Company may be subjected.

The Company's procedures for the termination process is as follows:

When consumption at the premise exceeds 13ccf, an "Occupant" letter is sent to the premise indicating service will be terminated if an account is not established. If there is no response, then attempts are made to locate the Landlord/property owner of the premise and contact them by phone. A "Landlord" letter is sent and either a new turn-on is processed (contact made) or a field order is generated to physically shut off the gas service at that location. If attempts to locate a Landlord/property owner are not successful, then a "PUC Certified Letter" will be sent via certified mail to the premise. If the premise is a multi-dwelling, an order will be generated to have the house "Posted" notifying the occupants that National Grid requires access to its facilities or the whole house may be subject to shut off in ten (10) days. For a multi-dwelling, if no response is received by the Company to the posting after ten (10) days, then the Company will consider the impact of a shut-off on all other customers at that location, including but not limited to, the weather, any moratorium on shut-offs, and any customer protections in place at that time, such as statutory infant or elderly protection. Consistent with this review, and the Commission's and the Division's rules and regulations governing termination of service, the Company will then issue an order to have service to the premise shut off at the street. In the case where a gas account has not exceeded 13 ccf, and if after 90 days the account is still in a Soft-Off status, the Company will follow the procedures for notification and shut-off outlined above.

Division 1-23

Request:

One of the soft-off provision state that if the Company obtains an oral or written acceptance then the landlord will be assigned as the Customer of Record. Why isn't the Company requiring a follow up written landlord authorization for its records since an acceptance of an oral concurrence from a landlord is considered hearsay?

Response:

Section 3 of the Company's Terms and Conditions tariff permits the Company to accept oral or written applications for residential service. The Company's Soft-Off provision regarding acceptance by the landlord as the customer of record is intended to facilitate the Company's internal billing and collection procedures after a termination request has been received, and is consistent with the Company's tariff for establishing residential service.

Furthermore, it is important to note that the setup of a "Leave on for Landlord" agreement requires a signed application form. The Company will, however, accept an oral request for a one-time transfer of service into the landlord's name for a given premise / meter. This one-time transfer does not establish a new "Leave on for Landlord" agreement in the Company's billing system.

Prepared by or under the supervision of: Jeffrey P. Martin

Division 1-25

Request:

What other National Grid jurisdictions have implemented either a gas or electric soft-off program or both? Please provide the criteria or requirements of the programs(s)?

Response:

National Grid has implemented a soft off programs for all its Companies with the exception of KeySpan Long Island. The programs for each Company are described below.

Upstate NY (Niagara Mohawk)

Eligibility

- Gas Soft Off Program – Residential & Small Commercial eligible
- Electric Soft Off Program – Residential & Small Commercial eligible

General Requirements

- Customer cannot be in arrears more than \$300.00
- Customer cannot have a disconnect notice
- Initial and final read is estimated based (must have 2 months prior actual reads)

Advanced Consumption Back Office Process

- Gas Accounts: A letter is generated to Occupant accounts with use of 10 CCF or greater
- Electric Accounts: A letter is generated to Occupant accounts with use of 100 KWH or greater
- Accounts Payable ("AP") will either find an occupant willing to take responsibility for the service or send out to physically turn off electric meter once use is 250 KWH or greater
- AP will either find an occupant willing to take responsibility for the service or send out to physically turn off gas meter 35 CCF or greater.

Division 1-25 (continued, p2)

Massachusetts Electric

Eligibility

- Residential & Small Commercial eligible

General Requirements

- Customer cannot be in arrears more than \$300.00
- Customer cannot have a disconnect notice
- Initial and final read is estimated based (must have 2 months prior actual reads)

Advanced Consumption Back Office Process

- Gas Accounts: A letter is generated to Occupant accounts use of with 10 CCF or greater
- Electric Accounts: A letter is generated to Occupant accounts with use of 100 KWH or greater
- AP will either find a customer willing to take responsibility for the service or issue a service order to physically turn off electric meters when use reaches 250 KWH or greater
- AP will either find a customer willing to take responsibility for the service or issue a service order to physically turn off gas meter when use reaches 35 CCF or greater

Massachusetts Gas (Boston/Colonial/Essex)

Eligibility

- Residential & certain small commercials accounts with Automated Meter Reading devices

General Requirements

- The meter must have an active AMR device
- Must be no pending physical ("hard") lock orders for the meter

Advanced Consumption Back Office Process

- Inactive accounts are flagged for review by AP when a regular cycle read determines there has been use of 13CCF or greater.
- AP will either find an occupant willing to take responsibility for the service or issue a service order to physically lock the meter.

Division 1-25 (continued, p3)

KeySpan NYC

Eligibility

- Residential & certain small commercial accounts with AMR

General Requirements

- The meter must have an active AMR device
- Must be no pending physical ("hard") lock orders for the meter

Advanced Consumption Back Office Process

- Inactive accounts are flagged for review by AP when a regular cycle read determines there has been use of 13CCF or greater
- AP will either find an occupant willing to take responsibility for the service or issue a service order to physically lock the meter.

KeySpan LI

There is no Soft On/Off Program

Prepared by or under the supervision of: Danielle Morrissey and Jeffrey P. Martin