

February 13, 2012

**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 Commission Data Requests (Set 1)**

Dear Ms. Massaro:

Attached are National Grid's<sup>1</sup> responses to the Commission's 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

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

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 Commission Data Requests – Set 1  
Issued February 3, 2012

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Commission 1-1

Request:

Please describe the efforts/methods that the Company will make/employ to notify a landlord/property owner during the ninety (90) day period if consumption exceeds the proposed amount or upon expiration of the ninety (90) day period. Please include how the Company will acquire the address of a landlord/property owner and assure receipt of notification.

Response:

Regarding the Company’s efforts/methods to notify a landlord/property owner during the ninety (90) day Soft-Off period, the Company will first attempt to contact the landlord/property owner by phone if a phone number is available. If no phone number is available or using one does not result in a useful contact, the Company will then send an "owner" letter to the premise or address on file. To acquire the address of a landlord/property owner, the Company will first use the landlord / property owner information contained in its customer system. If that information is not available from its customer system, the Company will attempt to obtain information from a LexisNexis database and/or the local “Online Tax Assessor Resource” (web application).

Prepared by or under the supervision of: Jeffrey Martin

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Commission 1-2

Request:

As the policy provides “[w]here a Residential customer or Small Commercial and Industrial customer has requested termination of service...the Company may utilize a ‘Soft-Off’ termination...”, please describe the situations anticipated by the Company where termination could effect the rights of other gas and/or electric customers or could be in violation of the Commission or Divisions rules and regulations.

Response:

The Company’s statement is designed to address those situations where the Company is unable to obtain access to the Soft-Off premise or building and the termination of the Soft-Off premise may only be accomplished by shutting-off the building at the curb. For example, such a situation arises in the case of a multi-unit dwelling where the Company is unable to gain access to the Soft-Off unit meter and shutting off at the street would result in terminating other customers in that building who have statutory protection (e.g. infant under two years), are protected under the Commission and Division’s billing and termination rules (e.g. winter moratorium protection) or are current on their bills. A similar situation also arises in a commercial context where a small business may be part of a multi-unit building and the Company is unable to gain access to the Soft-Off business unit.

Prepared by or under the supervision of:  
John F. Nestor, III. Jeanne A. Lloyd, Danielle Morrissey and Legal Department

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Commission 1-3

Request:

Please identify who would be responsible to pay the cost of turning the meter on and off absent the Soft-Off policy.

Response:

Absent the Soft-Off policy, the cost of turning the meter on and off is recovered from all customers through base rates. As shown on Attachment 5 of the Company’s May 24, 2011 Gas Tariff Advice filing and Attachment 5 of the Electric Tariff Advice filing, the underlying rationale for the Soft-Off policy is to save customers and the Company the costs to dispatch an order to turn a service off and then incur the additional cost to turn that service back on at a subsequent time. The Soft-Off policy recognizes that maintaining service at a location for limited usage and time, provides a financial benefit to the Company and customers (e.g. no need for a new tenant to wait for service to be turned on, avoidance of frozen pipes in the winter, and operational savings to be passed on to customers). Absent the Soft-Off Policy, the Company and customers would forfeit these benefits and savings and incur the inconvenience and full costs of any dispatches to turn a service off and on at a location.

Prepared by or under the supervision of:  
John F. Nestor, III, Jeanne A. Lloyd, Jennifer Feinstein

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Commission 1-4

Request:

Please explain why and how if property is vacated other customers could be affected by a termination of service.

Response:

Please see the Company’s response to Commission 1-2 for a discussion as to how other customers in a multi-tenant situation could be affected by a Soft-Off termination. In the case where a Soft-Off is being utilized in a vacated single-unit premise, such as a single family home, the rights of other customers are not impacted.

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John F. Nestor, III., Jeanne A. Lloyd, Danielle Morrissey

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Commission 1-5

Request:

Please explain why the Company has proposed an aggregate of 35ccf as opposed to the Division’s 33ccf aggregate for gas consumption.

Response:

A Soft-Off situation could exist at a premise where usage is less than 13ccf monthly consumption, the initial trigger for the Company to send an “owner” letter. Therefore, the 35 ccf aggregate consumption or the 90-day period, whichever occurs first, is roughly the equivalent of 12 ccf per month (e.g. 12 ccf x 3 = 36 ccf), after which the Company will begin the termination process and issue a shut-off order.

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

Commission 1-6

Request:

Please identify how many “multi-tenant situation[s] where there are other occupants who have paid their gas bills, or who qualify for ‘protected status’ or winter moratorium protection” exist. Additionally how will these customers be affected by a request for termination from another tenant that will vacate that other tenant’s premises.

Response:

Using information contained in the Company’s customer system, it is not possible to identify multi-tenant situations in which there are other occupants who have either paid their gas bills, or who qualify for protected status or winter moratorium protection. The reason for this lack of information is because the Company’s customer system cannot identify, with certainty, multi-unit locations. For example, a premise may appear in the Company’s customer system to be multi-unit based on the address (unit, floor) but that same premise may be designated as “single family.”

When requesting that a service be terminated, a shut-off order is issued to the field, at which point, the customer representative in the field will determine if the premise is a multi-unit property or single family, and, in the event of a multi-unit property, whether access to the individual meter for the shut-off location is possible. If access to the individual meter is not possible, then the Company would generally, such as in the case of a single family, shut-off service from the street, provided a street valve exists. However, with a multi-unit premise, shutting off service from a street valve will terminate service to the entire building, including occupants who may qualify for one of the protections listed above, and/or whose account is current. In these situations, the Company must follow the Commission’s and the Division’s rules and regulations for termination of service and other statutory requirements (i.e. infant protection laws) prior to shutting off service.

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Commission 1-7

Request:

How many Soft-Off Terminations has the Company performed per year for the last three years. Please specify either gas or electric. Of those Soft-off Terminations, how many have resulted in agreements with landlords/property owners and how many have resulted in an actual shut off. Please specify by gas or electric.

Response:

In the years 2009 - 2011, the Company has processed the following gas Soft-Off orders:

2009 - 13,328  
2010 – 15,988  
2011 – 15,340

Information related to electric Soft-Off orders processed in the three prior years is not readily available in the CSS system. The Company is making an effort to obtain this data for the prior three years and will supplement this response accordingly.

There are currently 18,549 landlord agreements for gas and electric in the customer system. The data needed to correlate each of the above Soft-Off terminations with either a landlord agreement or a physical termination is not readily available and requires an extensive examination of the Company’s historical data from both the gas and electric billing systems. The Company is making an effort to retrieve this data and will supplement its response accordingly.

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Commission 1-8

Request:

How many accounts are currently in Soft-Off status? Of those accounts how many have been in that status for more than 90 days? Please specify by gas or electric.

Response:

There are currently 6,758 gas meters in an open “Soft-Off” status. Of these, 5,263 have been in this status for over 90 days and include meters with less than 35 ccf.

There are currently 9,653 electric meters in the “Soft Off” status. Of these, 7,450 have been in this status for over 90 days and include meters with less than 250 kWh.

Prepared by or under the supervision of: Jeffrey Martin

## 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

February 13, 2012

Date

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

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone/FAX</b>
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Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence RI 02903	<a href="mailto:LWold@riag.ri.gov">LWold@riag.ri.gov</a>	401-222-2424 401-222-3016
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<b>File an original &amp; nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	<a href="mailto:Lmassaro@puc.state.ri.us">Lmassaro@puc.state.ri.us</a>	401-780-2107 401-941-1691
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## 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

February 13, 2012  
Date

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

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone/FAX</b>
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