

June 4, 2013

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 **Final Report**

Dear Ms. Massaro:

In accordance with the Soft-Off Settlement Agreement between National Grid and the Rhode Island Division of Public Utilities and Carriers, as approved by the Rhode Island Public Utilities Commission ("the Commission") on May 4, 2012, and the Company's May 23, 2012 correspondence to the Commission regarding an agreed upon reporting schedule, attached is the Company's final report regarding the Soft-Off Pilot.

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

Very truly yours,

Jennifer Brooks Hutchinson

cc: Docket Nos. 4251 and 4252 Service Lists Leo Wold, Esq. Jim Lanni

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

In Re: The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. No. NG-GAS No. 101 and R.I.P.U.C. No. 2072

Docket Nos. 4251 & 4252

FINAL REPORT OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A NATIONAL GRID REGARDING SOFT-OFF PILOT PROGRAM

I. Background

On April 20, 2012, National Grid¹ and the Rhode Island Division of Public Utilities and Carriers ("Division") (collectively the "Parties") entered into a Settlement Agreement ("Agreement") relating to the Company's "Soft-Off" billing termination policy. Pursuant to the Agreement, the Parties agreed to participate in a one-year pilot program ("Pilot") beginning on May 4, 2012 and ending on the one-year anniversary of said start date (the "Pilot Period") as a study period in which to collect data as part of the Company's Soft-Off program. The Company simultaneously filed an amended gas tariff, R.I.P.U.C. NG-GAS No. 101, and an amended electric tariff, R.I.P.U.C. No. 2072 (collectively, the "Tariffs"), to effectuate the Agreement. The Commission approved the Agreement and the Tariffs on May 4, 2012. Pursuant to the Agreement, the Company was required to file quarterly reports during the Pilot Period containing Soft-Off data collected for the respective quarterly period in accordance with the schedule established pursuant to the Company's May 23, 2012 correspondence, and to file a final report within 30 days following the end of the Pilot Period. The Company agreed to include in the final report a cost-benefit analysis, any joint modification proposals to the Soft-Off program, and a proposal by the Company of whether to continue the Soft-Off program based on the results of the Pilot.

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

II. Final Pilot Results

As shown in the quarterly reports filed through May 6, 2013, the Company was successful in significantly reducing and controlling the population and size of open Soft-Off meters. In the final quarterly report that the Company filed with the Commission and the Division on May 6, 2013, the Company reported 1,222 electric meters and 1,107 gas meters that had been in a Soft-Off status for over four (4) months and remained open at the time of the report. These remaining open Soft-Off meters represented 684,129 kWh of accumulated electric usage and 238,629 ccf of accumulated gas usage. The Company valued this remaining accumulated electric and gas usage using current residential rates, which resulted in a correlating cost of \$46,623 for electric and \$164,063 for gas. These balances of unbilled electric and gas consumption are below the established Pilot electric and gas penalty thresholds of \$100,000 and \$200,000, respectively.

The above final Pilot results were accomplished by a dedicated team consisting of Company employees within the Accounts Processing ("A/P"), Customer Metering Services ("CMS"), and Credit & Collections ("C&C") departments. This composite team, using continually available Soft-Off data from the Company's recently implemented CSS system, was able to monitor and act upon the open population of meters (otherwise referred to as "cases") throughout the Pilot Period. The A/P team managed open case review and prioritization of those cases. The CMS team accepted, worked, and reported back on those cases in the field. The C&C team provided process steps to follow in handling collection cases, including protected and multi-dwelling premises.

Continuous availability of a prioritized open case report was critical to the team as CMS was able to draw upon the list and fill available field resource time. The case report was also instrumental in allowing A/P to continuously detect any growth in backlog that caused them to escalate for potential field work re-scheduling or overtime planning. The team met at least bi-weekly to review and discuss the open case report including tagged cases of incomplete field attempts (unable to complete, or "UTC"). The reports also served to provide the team with immediate positive feedback on case closure.

III. Cost-Benefit Analysis

In evaluating the Soft-Off program's avoided costs and real costs, the Company was able to determine a partial operational cost-benefit assessment. Attachment 1 is a spreadsheet entitled "2013-06-04 Pilot Program Results." As shown in "Avoided ConnDisc Cost" of Attachment 1, the avoided cost of performing field disconnects, connects, and reads (with a matching disconnect and connect) during the Pilot Period was calculated to be \$2,812,038. In comparison, real costs of managing the Soft-Off program are shown in "Inactive W Use Cost" and "AP Cost" of Attachment 1 as \$214,514 and \$69,409, respectively, for a total real cost of \$283,922. The resulting cost-benefit ratio using all of these values is 9.9 or \$2,528,116.

The remaining factor that must be considered as part of the overall cost-benefit analysis is revenue loss due to unbilled electric and gas. The value of this lost revenue can be derived by evaluating the amount of electric and gas associated with Soft-Off meters (resulting from "Soft" disconnects) that are not completely eliminated in subsequent connects, shut-offs, and removals. The Company refers to these as unbilled service "gaps." A "gap" is the difference between an instance of a final meter reading and that same meter's subsequent re-activation, shut-off, or removal. Where that difference is not zero, the amount represents unbilled gas or electric. Gaps are recognized at the point in which an open case is closed by a re-activation, shut-off, or removal. Gap data changes over time as open cases continue to be closed and previously closed gaps are maintained in cases of back-billing for previously-unaccounted-for use. However, over time established gaps are less and less likely to change.

While the Company was not required to report on this factor, specifically, during the Pilot, the Company is providing this data in this final report as it believes that it is important to the overall viability of the Soft-Off program. Attachment 2 is a spreadsheet entitled "2013-06-04 Pilot Period RI Gas & Elec Gaps" and shows the current value of Pilot Period gas gaps to be \$844,843 and electric gaps to be \$435,902. Considering the net operational savings of the program at \$2,528,116, and the "cost" of lost gas and electric in gaps in the Pilot Period, the program still nets \$1,247,371 in favorable avoided costs as reflected in the Company's current cost of service. It is important to note that gaps would still exist even

in the absence of a Soft-Off program; however, they would be smaller and fewer. Notwithstanding that result, even if 75 percent of the gaps could be eliminated by ceasing the Soft-Off program, 100 percent of the savings would, in turn, be lost as well.

IV. Company Proposal

The team evaluating and working Soft-Off cases believes the keys to effectively managing the program are:

- 1. Establishing a team with ownership and responsibility
- 2. Continually monitoring and working the process
- 3. Prioritizing cases to assure focus on largest value
- Assure that Customer Service Representatives always attempt to connect new customers back to points of disconnect (eliminating "gaps")
- 5. Encouraging landlords to cooperate in the Leave on for Landlord program

The Company believes the gas and electric penalty thresholds established during the Pilot Period were and continue to be appropriate. The activity seen in electric Soft-Off case management during the Pilot was fairly normal. The activity seen in gas Soft-Off case management was somewhat higher than normal given better access to data from the recently implemented CSS system and closure of a number of significantly large cases. The Company believes the Pilot established that the Soft-Off program is economically viable with continuous case management and implementation of the key practices listed above. Accordingly, the Company proposes to continue the current Soft-Off program without modification or alteration.

Respectfully submitted,

The Narragansett Electric Company d/b/a National Grid

Jenfor Burgs Hallo

By its attorney,

Jennifer Brooks Hutchinson (RI Bar #6176)

Dated: June 4, 2013

Attachment 1 Docket Nos. 4251 and 4252 Final Report Page 1 of 7

Soft/Off, Soft/On PUC Report Criteria

Savings:

Avoided Conn Dis Cost associated with processing an order is defined as total number of auto/complete connect/disconnects processed during the month multiplied by the cost of the field visit had the order been processed via that method (matching connect/disconnect orders completed on same day are removed from the totals and calculated once at \$15 per visit).

Costs:

Cost is made up of two factors: AP cost of processing CIM wfm during the month and field visit cost for completing an inactive meter with use order during the month

1) Field Cost is identified as: Electric - Connect is \$15, Disconnect is \$15 (Inactive Meter With Use order would have the same cost as disconnect)

Gas - Connect is \$41, Disconnect is \$21 (Inactive Meter With Use order would have the same cost as disconnect)

UTC Inactive Meter With User Order cost is \$15 for elec and gas

Matching Connect/Disconnect on Same Day - \$15

To get the total number of Inactive with Use orders associated with auto complete each month, multiply the total number of all Inactive meter with use orders completed (as shown in Karen Morel's monthly report) by 97% (result of sampling done)

2) CIM Wfm Cost is identified as: Avg rep handle time is 4 minutes per wfm, cost is \$16.50 per hour, \$.275 per minute = \$1.10 per CIM Wfm To get the total number of CIM wfms associated with auto/complete each month, multiply the total number of all CIM wfms completed each month (from monthly Timeliness report) by 97% (result of sampling done)

Legend for Monthly Reports: Service Point Type 100 = gas Service Point Typ 200 = electric Order Type 01 = Connect Order Order Type 02 = Disconnect Order

Total Cost Savings is calculated by subtracting the Wfm Cost & the cost for field completion of an inactive with use order from the Avoided Connect/Disconnect Cost

Avoided ConnDisc Cost

Page 1 of 2

	Total Number of Gas (100) Auto Complete Connect-01 Orders	Gas (100) Auto Complete Disc-	Complete Conn-	Elec (200) Auto Complete Disc-	Matching Gas (100) Conn-01 Orders		(200) Conn-01		Monthly	Monthly pertinentGas Disconnect	Monthly pertinent Elec Connects (200)
May-2012										1,547	
Jun-2012	,	2,159	·	,				1,946			
Jul-2012		,	,	,			,	1,934			
Aug-2012	,			,				1,822		1,282	
Sep-2012	3,384	1,756	7,050	3,573	624	624	1,801	1,801	2,760	1,132	5,249
Oct-2012	2,668	1,292	5,058	2,359	432	432	1,148	1,148	2,236	860	3,910
Nov-2012	3,191	885	5,983	2,698	369	369	1,334	1,334	2,822	516	4,649
Dec-2012	2,499	733	5,078	2,565	336	336	1,302	1,302	2,163	397	3,776
Jan-2013	, -		, -	,				1,098	,		-,
Feb-2013	,		,	,				1,133	,	345	- ,
Mar-2013	,		5,171	,							, -
Apr-2013	2,517	844	5,696	2,824	332	332	1,371	1,371	2,185	512	4,325

6,080

6,080

18,276

18,276

28,479

10,014

52,683

36,844

Totals

34,559

16,094

70,959

Avoided ConnDisc Cost

Page 2 of 2

	Monthly pertinentElec Disconnects (200)	Avg Gas Conn Cost					Gas Conn	Total Monthly Gas Disc Cost	Total Monthly Elec Conn Cost	Elec Disc	Total avoidedGas Cost	Total avoided Elec Cost	Total avoided combined cost
May-2012	2,314	\$41.00	\$21.00	\$15.00	\$15.00	\$15.00	\$106,517	\$32,487	\$104,130	\$34,710	\$139,004	\$138,840	\$277,844
Jun-2012	1,938	\$41.00	\$21.00	\$15.00	\$15.00	\$15.00	\$123,163	\$29,211	\$107,490	\$29,070	\$152,374	\$136,560	\$288,934
Jul-2012	2,009	\$41.00	\$21.00	\$15.00	\$15.00	\$15.00	\$103,245	\$27,111	\$97,590	\$30,135	\$130,356	\$127,725	\$258,081
Aug-2012	1,955	\$41.00	\$21.00	\$15.00	\$15.00	\$15.00	\$118,901	\$26,922	\$103,545	\$29,325	\$145,823	\$132,870	\$278,693
Sep-2012	1,772	\$41.00	\$21.00	\$15.00	\$15.00	\$15.00	\$122,520	\$23,772	\$105,750	\$26,580	\$146,292	\$132,330	\$278,622
Oct-2012	1,211	\$41.00	\$21.00	\$15.00	\$15.00	\$15.00	\$98,156	\$18,060	\$75,870	\$18,165	\$116,216	\$94,035	\$210,251
Nov-2012	1,364	\$41.00	\$21.00	\$15.00	\$15.00	\$15.00	\$121,237	\$10,836	\$89,745	\$20,460	\$132,073	\$110,205	\$242,278
Dec-2012	1,263	\$41.00	\$21.00	\$15.00	\$15.00	\$15.00	\$93,723	\$8,337	\$76,170	\$18,945	\$102,060	\$95,115	\$197,175
Jan-2013	1,127	\$41.00	\$21.00	\$15.00	\$15.00	\$15.00	\$90,922	\$7,686	\$71,355	\$16,905	\$98,608	\$88,260	\$186,868
Feb-2013	1,029	\$41.00	\$21.00	\$15.00	\$15.00	\$15.00	\$90,306	\$7,245	\$69,735	\$15,435	\$97,551	\$85,170	\$182,721
Mar-2013	1,133	\$41.00	\$21.00	\$15.00	\$15.00	\$15.00	\$95,584	\$7,875	\$77,565	\$16,995	\$103,459	\$94,560	\$198,019
Apr-2013	1,453	\$41.00	\$21.00	\$15.00	\$15.00	\$15.00	\$94,565	\$10,752	\$85,440	\$21,795	\$105,317	\$107,235	\$212,552

Totals 18,568 \$1,258,839 \$210,294 \$1,064,385 \$278,520 \$1,469,133 \$1,342,905 \$2,812,038

Inactive W Use Cost

Page 1 of 2

Month	orders completed	elec (200)orders completed	associated with Auto Complete (90% of total)	Auto Complete (97% of total)	Total number electric orders UTC'd	(orders UTC'd	(97% of total)	Avg Gas Cost for processing inac w/use order
May-2012					196				\$21.00
Jun-2012					129	125		249	
Jul-2012		233				79		155	
Aug-2012		370		359	99	96		137	\$21.00
Sep-2012				696		166		172	\$21.00
Oct-2012				367	80	78			
Nov-2012				178		39			
Dec-2012	140			633	199	193			\$21.00
Jan-2013				300	116	113			
Feb-2013	98	220		213	61	59	157	152	\$21.00
Mar-2013	331	756			217				\$21.00
Apr-2013	273	601	246	583	169	164	385	373	\$21.00

Totals 1,978 4,814 2,255 4,670 1,362 1,321 4,168 4,043 \$21.00

Inactive W Use Cost

Page 2 of 2

Attachment 1 Docket Nos. 4251 and 4252 Final Report Page 5 of 7

Month	Avg Elec Cost for processing inac w/use order	Avg Elec/Gas cost for processing UTC'd inactive with user order	for processing gas inac w/use order	Total monthlycost for processing elec inac w/useorder	UTC'd inac w/use order	Total monthly cost for processing gas UTC'd inac w/use order	Total Monthly Cost for field completion of inactive with use meter orders
May-2012							\$16,663
Jun-2012	·						
Jul-2012	\$15.00	\$15.00	\$2,287	\$3,390	\$1,179		
Aug-2012	\$15.00	\$15.00	\$2,287	\$5,384	\$1,440	\$2,052	\$11,162
Sep-2012	\$15.00	\$15.00	\$3,780	\$10,447	\$2,488	\$2,575	\$19,290
Oct-2012	\$15.00	\$15.00	\$4,706	\$5,500	\$1,164	\$2,881	\$14,251
Nov-2012	\$15.00	\$15.00	\$11,424	\$2,663	\$582	\$22,727	\$37,396
Dec-2012	\$15.00	\$15.00	\$2,646	\$9,501	\$2,895	\$3,550	\$18,593
Jan-2013	\$15.00	\$15.00	\$3,497	\$4,496	\$1,688	\$5,791	\$15,471
Feb-2013	\$15.00	\$15.00	\$1,996	\$3,201			. ,
Mar-2013	\$15.00	\$15.00					
Apr-2013	\$15.00	\$15.00	\$5,160	\$8,745	\$2,459	\$5,602	\$21,965

10(a)3 \$10.00 \$10.00 \$41,040 \$70,044 \$22,000 \$04,000 \$214,014	Totals	\$15.00	\$15.00	\$47,346	\$70,044	\$22,669	\$64,806	\$214,514
--	--------	---------	---------	----------	----------	----------	----------	-----------

AP Cost

Month	Total number of CIM Wfms Processed	Auto Complete (97% of total wfms processed)	Avg Handle Time (minutes)		Cost per minute	Total Cost to process monthly wfms		Total AP Cost
May-2012	2,064	2,002		\$16.50	\$0.275	\$2,202		\$2,202
Jun-2012	2,741	2,659		\$16.50	\$0.275	\$2,925		\$2,925
Jul-2012	2,335	2,265		\$16.50	\$0.275	\$2,491		\$2,491
Aug-2012	1,734	1,682		\$16.50	\$0.275	\$1,850		\$1,850
Sep-2012	3,169	3,074	4	\$16.50	\$0.275	\$3,381	\$4,202	\$7,583
Oct-2012	3,838	3,723	4	\$16.50	\$0.275	\$4,095	\$4,202	\$8,297
Nov-2012	4,508	4,373	4	\$16.50	\$0.275	\$4,810	\$4,202	\$9,012
Dec-2012	1,250	1,213	4	\$16.50	\$0.275	\$1,334	\$4,202	\$5,535
Jan-2013	3,643	3,534	4	\$16.50	\$0.275	\$3,887	\$4,202	\$8,089
Feb-2013	4,935	4,787	4	\$16.50	\$0.275	\$5,266		
Mar-2013	1,974	1,915	4	\$16.50	\$0.275	\$2,106	\$4,202	\$6,308
Apr-2013	5,295	5,136	4	\$16.50	\$0.275	\$5,650		\$5,650
Totals	37,486	36,361	4	\$16.50	0.275	\$39,998	\$29,411	\$69,409



^{*2} FTE's working solely on Soft Off Report from September 2012 through March 2013.

Monthly Reconciliation

Month	connect/disconnect orders via auto/complete	inactive meter with use investigation order	wfm	Monthly savings/cost ratio	Avoided cost minus program costs
May-2012	\$277,844	\$16,663	\$2,202	14.7	\$258,979
Jun-2012	\$288,934	\$14,642	\$2,925	16.4	\$271,367
Jul-2012	\$258,081	\$9,184		22.1	\$246,406
Aug-2012	\$278,693	\$11,162			\$265,680
Sep-2012	\$278,622	\$19,290	\$7,583	10.4	\$251,749
Oct-2012	\$210,251	\$14,251	\$8,297	9.3	\$187,703
Nov-2012	\$242,278	\$37,396	\$9,012	5.2	\$195,871
Dec-2012	\$197,175	\$18,593	\$5,535	8.2	\$173,047
Jan-2013	\$186,868	\$15,471	\$8,089	7.9	\$163,308
Feb-2013	\$182,721	\$8,369	\$9,467	10.2	\$164,885
Mar-2013	\$198,019	\$27,528	\$6,308	5.9	\$164,183
Apr-2013	\$212,552	\$21,965	\$5,650	7.7	\$184,937

Pilot Total Savings \$2,812,038 \$214,514 \$69,409 9.9 \$2,528,116

Pilot Period RI Gaps

Attachment 2 Docket Nos. 4251 and 4252 Final Report Page 1 of 1

Rhode Island gaps during Pilot Period: May 2012 - April 2013

Gas

CompanyNo	ServiceType	Year	Month	NumGaps	Original	Current	Saved	LastUpdated	MonthName	Therm factor	Therms in gaps	Value per therm	Value
49	15	2012	5	602	177,309	106,536	-70,773	05/26/2013 0:00	May	1.030	109,732	\$0.66750	\$73,246
49	15	2012	6	821	197,974	119,392	-78,582	05/26/2013 0:00	Jun	1.030	122,974	\$0.66750	\$82,085
49	15	2012	7	727	111,712	79,094	-32,618	05/26/2013 0:00	Jul	1.030	81,467	\$0.66750	\$54,379
49	15	2012	8	884	130,338	84,417	-45,921	05/26/2013 0:00	Aug	1.030	86,950	\$0.66750	\$58,039
49	15	2012	9	902	129,891	75,383	-54,508	05/26/2013 0:00	Sep	1.030	77,644	\$0.66750	\$51,828
49	15	2012	10	1,035	162,973	118,798	-44,175	05/26/2013 0:00	Oct	1.030	122,362	\$0.66750	\$81,677
49	15	2012	11	1,163	210,545	115,688	-94,857	05/26/2013 0:00	Nov	1.030	119,159	\$0.66750	\$79,538
49	15	2012	12	807	204,455	98,219	-106,236	05/26/2013 0:00	Dec	1.030	101,166	\$0.66750	\$67,528
49	15	2013	1	770	230,149	133,883	-96,266	06/02/2013 0:00	Jan	1.030	137,899	\$0.66750	\$92,048
49	15	2013	2	587	145,983	82,658	-63,325	06/02/2013 0:00	Feb	1.030	85,138	\$0.66750	\$56,829
49	15	2013	3	605	164,016	132,946	-31,070	06/02/2013 0:00	Mar	1.030	136,934	\$0.66750	\$91,404
49	15	2013	4	531	111,150	81,804	-29,346	06/02/2013 0:00	Apr	1.030	84,258	\$0.66750	\$56,242
			•	•			•	•			•	•	\$844,843

Electric

CompanyNo	ServiceType	Year	Month	NumGaps	Original	Current	Saved	LastUpdated	MonthName		e per Vh Value
49	10	2012	5	1,122	619,829	509,657	-110,172	05/26/2013 0:00	May	\$0.0	06815 \$34,733
49	10	2012	6	1,385	563,929	458,522	-105,407	05/26/2013 0:00	Jun	\$0.0	06815 \$31,248
49	10	2012	7	1,261	495,572	425,096	-70,476	05/26/2013 0:00	Jul	\$0.0	\$28,970
49	10	2012	8	1,433	605,010	530,908	-74,102	05/26/2013 0:00	Aug	\$0.0	\$36,181
49	10	2012	9	1,363	664,395	596,764	-67,631	05/26/2013 0:00	Sep	\$0.0	\$40,669
49	10	2012	10	1,232	654,144	578,632	-75,512	05/26/2013 0:00	Oct	\$0.0	\$39,434
49	10	2012	11	1,177	532,130	485,377	-46,753	05/26/2013 0:00	Nov	\$0.0	\$33,078
49	10	2012	12	1,051	679,107	592,016	-87,091	05/26/2013 0:00	Dec	\$0.0	06815 \$40,346
49	10	2013	1	1,160	752,697	713,235	-39,462	06/02/2013 0:00	Jan	\$0.0	06815 \$48,607
49	10	2013	2	892	472,847	433,607	-39,240	06/02/2013 0:00	Feb	\$0.0	06815 \$29,550
49	10	2013	3	954	612,354	575,811	-36,543	06/02/2013 0:00	Mar	\$0.0	\$39,242
49	10	2013	4	952	542,283	496,589	-45,694	06/02/2013 0:00	Apr	\$0.0	\$33,843

\$435,902

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

<u>June 4, 2013</u> 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.	Thomas.teehan@us.ngrid.com	401-784-7667
National Grid		401-784-4321
280 Melrose St.	Joanne.scanlon@us.ngrid.com	
Providence, RI 02907		
Leo Wold, Esq.	LWold@riag.ri.gov	401-222-2424
Dept. of Attorney General	Sscialabba@ripuc.state.ri.us	401-222-3016
150 South Main St. Providence RI 02903	<u>Jlanni@ripuc.state.ri.us</u>	
	mcorey@riag.ri.gov	
	dmacrae@riag.ri.gov	
File an original & nine (9) copies w/:	Lmassaro@puc.state.ri.us	401-780-2107
Luly E. Massaro, Commission Clerk		401-941-1691
Public Utilities Commission	Plucarelli@puc.state.ri.us	
89 Jefferson Blvd.		
Warwick RI 02888	Sccamara@puc.state.ri.us	