

June 13, 2012

VIA ELECTRONIC AND FIRST CLASS MAIL

R. Daniel Prentiss, Esq. Energy Efficiency Resources Management Council One Turks Head Place, Suite 380 Providence, RI 02903

RE: Docket 4295 – The Narragansett Electric Company, d/b/a National Grid 2012 Energy Efficiency Program Plan Transfer of Funds Request

Dear Mr. Prentiss:

On behalf of National Grid¹ and pursuant to Section IV.C.2 of the Energy Efficiency Program Plan For 2012 Settlement of the Parties ("2012 Plan") approved in Docket 4295, the Company is requesting the Energy Efficiency and Resources Management Council's ("EERMC") approval of a transfer of gas funds between the Low Income Residential sector and the Commercial and Industrial ("C&I") sector. The Company requests that the EERMC vote on the approval at its meeting on June 14, 2012. The swift approval of a transfer will enable the Company to quickly commence retrofit projects for six Low Income Multifamily facilities.

Section IV.C.2 of the 2012 Plan states that "The Company can transfer funds from one sector to another sector with prior approval of the Division and the EERMC."

The Company is requesting to transfer \$300,000 from the gas Single Family Low Income Services program in the Low Income Residential sector to the gas Large Commercial Retrofit program in the C&I sector. The proposed transfers represent 16.3% of the Low Income Residential sector budget, as shown in table G-2 of the 2012 Plan. Consequently, the Company is seeking EERMC approval to make this funding transfer.

The Company requests to transfer these funds to serve low income families by retrofitting and weatherizing six multifamily facilities. National Grid's Low Income Single Family program is administered by the Office of Energy Resources ("OER") and delivered through a network of community action agencies. The Providence Community Action ("ProCAP") is the agency that serves the Providence area, which has the highest concentration of low income natural gas customers in the state. ProCAP has faced challenges auditing and weatherizing homes in recent months. Through collaboration with OER and ProCap, National Grid believes that the agency may not be able to serve its maximum potential of customers this year.

At the May 10, 2012 EERMC meeting, OER and National Grid discussed some of the challenges facing ProCAP. The EERMC prioritized serving low income customers, regardless

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

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of whether they live in a single or multifamily home. Therefore, National Grid has identified and screened gas weatherization projects at six master-metered multifamily facilities; because they are master-metered, they are served by the C&I Large Commercial Retrofit program. The weatherization projects will serve approximately 1,100 households and can be completed by the end of the year. However, the C&I Large Commercial Retrofit program does not have sufficient funds to serve all six of the facilities; therefore, the Company is requesting a transfer of funds in order to weatherize all of the facilities.

Section IV.C.3 of the 2012 Plan states that "The Company will not be permitted to adjust its goals or incentive target calculations for any transfers between sector budgets." Therefore, the savings goals for all gas sectors remain the same. The following table outlines the incentives budget and program goals as filed in the 2012 Plan and as proposed in this transfer request:

		2012 EE Plar	1	Proposed Transfer Revision				
	Annual			Annual				
	Gas		Total	Gas		Total	Budget	
	Savings	Incentive	Program	Savings	Incentive	Program	Percent	
	(MMBtu)	Budget	Budget	(MMBtu)	Budget	Budget	Change	
Low Income								
Residential Sector	7,697	\$ 1,710,000	\$ 1,843,500	7,697	\$1,410,000	\$ 1,543,500	-16.3%	
Commercial and								
Industrial Sector	120,312	\$ 3,573,900	\$ 5,502,200	120,312	\$3,873,900	\$ 5,802,200	5.5%	

While the sector budget and savings targets remain unchanged, and the proposed transfer has no impact on the savings goals or performance incentive target calculations, the Company has attached revised 2012 Electric Energy Efficiency Program Tables to illustrate how the transfer affects program budgets, goals, and participation within the C&I sector. These updated tables will be used to guide implementation efforts if the proposed request is approved. Cells that change as a consequence of the proposed transfer are highlighted in yellow.

Thank you for your attention in this request. The Company is simultaneously requesting the Division's approval of this request as required by Section IV.C.2 of the 2012 Plan. If you have any questions, please feel free to contact me at (401) 784-7288.

Very truly yours,

Jennifer Brooks Hutchinson

Enclosures

cc: Jon Hagopian, Esq.
Steve Scialabba, Division
Dave Stearns, Division

Charlie Hawkins, OER

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Table G-1 National Grid Gas DSM Funding Sources in 2012 by Sector \$(000)

Pro	jections	bv	Sector	
110	CCHOILS	NJ.Y	Sector	

	Frojections by Sector							
(1) Projected Budget (from G-2):		w Income esidential \$1,543.5		Non-Low Income Residential \$6,339.5		ommercial & Industrial \$5,802.2		Total \$13,685.2
Sources of Other Funding:								
(2) Actual Year-End 2011 Fund Balance and Interest:	\$	22.3	\$	155.9	\$	267.3	\$	445.5
(3) Low Income Weatherization in Base Rates:	\$	200.0					\$	200.0
(4) Total Other Funding:	\$	222.3	\$	155.9	\$	267.3	\$	645.5
(5) Customer Funding Required:							\$	13,039.7
(6) Forecasted Dth Sales:								
(7) Forecasted Dth Sales:		1,681,012		16,365,729		16,770,190		34,816,931
(8) Uncollectible Rate of 2.46%:		41,353		402,597		412,547		856,497
(9) Forecasted Dth Sales:		1,639,659		15,963,132		16,357,644		33,960,435
(10) Energy Efficiency Program Charge per Dth:							\$	0.384
(11) Currently Effective EE Program Charge							\$	0.411
(12) Adjustment to Reflect Fully Reconciling Fundi	ng Me	chanism					\$	(0.027)

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Table G-2 National Grid Gas Energy Efficiency Program Budget 2012

	Program		Rebates and	Sales, Technical			
	Planning and		Other Customer	Assistance and	Evaluation &	Shareholder	
Program	Administration	Marketing	Incentives	Training	Market Research	Incentive	Grand Total
NON LOW-INCOME RESIDENTIAL:		_					
ENERGY STAR® HVAC	\$21.9	\$153.0	\$2,629.8	\$171.3	\$0.0		\$2,975.9
Energy Wise	\$21.9	\$50.0	\$2,398.8	\$230.5	\$42.6		\$2,743.8
Residential Products Pilot	\$21.9	\$0.0	\$80.0	\$32.1	\$0.0		\$134.1
Comprehensive Marketing - Residential	\$0.0	\$130.0	\$0.0	\$0.0	\$0.0		\$130.0
EERMC - Residential	\$92.5	\$0.0	\$0.0	\$0.0	\$0.0		\$92.5
Subtotal - Non-Low Income Residential	\$158.2	\$333.0	\$5,108.5	\$433.9	\$42.6	\$263.3	\$6,339.5
LOW-INCOME RESIDENTIAL:							
Single Family Low Income Services	\$21.9	\$0.0	\$1,410.0	\$33.9	\$0.0		\$1,465.8
Subtotal - Low Income Residential	\$21.9	\$0.0	\$1,410.0	\$33.9	\$0.0	\$77.7	\$1,543.5
COMMERCIAL AND INDUSTRIAL:							
Large Commercial New Construction	\$85.9	\$103.0	\$1,583.7	\$236.0	\$126.4		\$2,135.0
Large Commercial Retrofit	\$156.6	\$134.1	\$2,251.1	\$458.8	\$146.4		\$3,146.9
Small Business Direct Install	\$9.2	\$18.9	\$39.1	\$43.4	\$0.0		\$110.6
EERMC - C&I	\$59.3	\$0.0	\$0.0	\$0.0	\$0.0		\$59.3
Comprehensive Marketing - C&I	\$0.0	\$121.0	\$0.0	\$0.0	\$0.0		\$121.0
Subtotal - Commercial & Industrial	\$310.9	\$377.0	\$3,873.9	\$738.2	\$272.8	\$229.4	\$5,802.2
Grand Total	\$491.0	\$710.0	\$10,392.4	\$1,206.0	\$315.4	\$570.4	\$13,685.2

Notes:
(1) The fund transfer of \$300k in incentives from Single Family Low Income Service to Large Commercial Retrofit is highlighted in yellow for Division and EERMC approval.

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Table G-3
Derivation of the 2012 Spending & Implementation Budgets

	Proposed 2012 Budget From G-2 (\$000)	EERMC Costs (\$000)	Shareholder Incentive (\$000)	Evaluation Costs (\$000)	Eligible Sector Spending Budget for Shareholder Incentive on G-9 (\$000) ¹	Implementation Expenses for Cost-Effectiveness on G-5 (\$000) ²
NON LOW-INCOME RESIDENTIAL:						
ENERGY STAR® HVAC	\$ 2,975.9			\$ -		\$ 2,975.9
EnergyWise	\$ 2,743.8			\$ 42.6		\$ 2,701.1
Residential Products Pilot	\$ 134.1			\$ -		\$ 134.1
Comprehensive Marketing - Residential	\$ 130.0			\$ -		\$ 130.0
EERMC - Residential	\$ 92.5	\$ 92.5		\$ -		\$ 92.5
Shareholder Incentive	\$ 263.3		\$ 263.3			\$ -
Subtotal - Non-Low Income Residential	\$ 6,339.5	\$ 92.5	\$ 263.3	\$ 42.6	\$ 5,983.8	\$ 6,033.6
LOW-INCOME RESIDENTIAL:						
Single Family Low Income Services	\$ 1,465.8			\$ -		\$ 1,465.8
Shareholder Incentive	\$ 77.7		\$ 77.7			\$ -
Subtotal - Low Income Residential	\$ 1,543.5	\$ -	\$ 77.7	\$ -	\$ 1,465.8	\$ 1,465.8
COMMERCIAL AND INDUSTRIAL:						
Large Commercial New Construction	\$ 2,135.0			\$ 126.4		\$ 2,008.6
Large Commercial Retrofit	\$ 3,146.9			\$ 146.4		\$ 3,000.5
Small Business Direct Install	\$ 110.6			\$ -		\$ 110.6
EERMC - C&I	\$ 59.3	\$ 59.3		\$ -		\$ 59.3
Comprehensive Marketing - C&I	\$ 121.0			\$ -		\$ 121.0
Shareholder Incentive	\$ 229.4		\$ 229.4			\$ -
Subtotal - Commercial & Industrial	\$ 5,802.2	\$ 59.3	\$ 229.4	\$ 272.8	\$ 5,513.5	\$ 5,300.0
Grand Total	\$ 13,685.2	\$ 151.8	\$ 570.4	\$ 315.4	\$ 12,963.1	\$ 12,799.4

Notes:

- (1) Eligbile Sector Spending Budget = Budget from G-2 minus EERMC Costs and Shareholder Incentive
- (2) Implementation Expenses = Budget from G-2 minus Evaluation Costs and Shareholder Incentive

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Table G-4

Proposed 2012 Budget Compared to Approved Compliance Filing Budget for 2012 (\$000)

	I	Proposed	J	uly 2011		
		Budget	A	pproved		
	201	2 from G-2	Gas Budget		Di	ifference
Non-Low Income Residential						
ENERGY STAR® HVAC	\$	2,975.9	\$	1,465.9	\$	1,510.0
EnergyWise	\$	2,701.1	\$	1,174.7	\$	1,526.4
Residential Products Pilot	\$	134.1	\$	49.4	\$	84.7
EERMC - Residential	\$	92.5	\$	82.0	\$	10.5
Comprehensive Marketing - Residential	\$	130.0	\$	80.2	\$	49.8
Subtotal - Non-Low Income Residential	\$	6,033.6	\$	2,852.2	\$	3,181.5
					\$	=
Low Income Residential					\$	=
Single Family Low Income Services	\$	1,465.8	\$	983.9	\$	481.9
Subtotal - Low Income Residential	\$	1,465.8	\$	983.9	\$	481.9
					\$	=
Commercial & Industrial					\$	-
Large Commercial New Construction	\$	2,008.6	\$	1,012.5	\$	996.1
Large Commercial Retrofit	\$	3,000.5	\$	1,142.0	\$	1,858.5
Small Business Direct Install	\$	110.6	\$	106.3	\$	4.3
EERMC - C&I	\$	59.3	\$	50.9	\$	8.4
Comprehensive Marketing - C&I	\$	121.0	\$	23.7	\$	97.3
Subtotal Commercial & Industrial	\$	5,300.0	\$	2,335.4	\$	2,964.6
					\$	-
Other Expense Items					\$	-
Company Incentive	\$	570.4	\$	274.5	\$	295.9
Evaluation	\$	315.4	\$	199.1	\$	116.3
Subtotal Other Items	\$	885.8	\$	473.6	\$	412.2
TOTAL BUDGET	\$	13,685.2	\$	6,645.1	\$	7,040.2

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Table G-5 Calculation of Program Year Cost-Effectiveness 2012 Values in \$000

	Rhode Island			Program				TRC
	Benefit/		Total	Implementation	Customer	Evaluation	Shareholder	\$/Lifetime
	Cost	E	Benefit	Expenses	Contribution	Cost	Incentive	MMBtu
Residential Programs								
Energy Star® HVAC	2.88	\$	18,936.9	\$ 2,975.9	\$ 3,589.7	\$ -	NA	\$ 4.82
EnergyWise	1.99	\$	6,898.8	\$ 2,701.1	\$ 718.4	\$ 42.6	NA	\$ 7.27
Residential Products Pilot		\$	-	\$ 134.1	\$ -	\$ -	NA	
Comprehensive Marketing		\$	-	\$ 130.0	\$ -	\$ -	NA	
EERMC Assessment-Residential		\$	-	\$ 92.5	\$ -	\$ -	NA	
SUBTOTAL	2.43	\$	25,835.7	\$ 6,033.6	\$ 4,308.1	\$ 42.6	263.29	\$ 5.65
Low Income Programs								
Single Family Low Income Services	1.93	\$	2,975.9	\$ 1,465.8	\$ -	\$ -	77.70	\$ 9.52
Large Commercial & Industrial								
Large Commercial Retrofit	1.79	\$	8,917.1	\$ 3,000.5	\$ 1,828.1	\$ 146.4	NA	\$ 5.24
Large Commercial New Construction	1.56	\$	5,803.6	\$ 2,008.6	\$ 1,579.2	\$ 126.4	NA	\$ 5.51
Small Business Direct Install	2.98	\$	348.3	\$ 110.6	\$ 6.2	\$ -	NA	
Comprehensive Marketing		\$	-	\$ 121.0	\$ -	\$ -	NA	
EERMC Assessment-C&I		\$	-	\$ 59.3	\$ -	\$ -	NA	
SUBTOTAL	1.64	\$	15,069.0	\$ 5,300.0	\$ 3,413.4	\$ 272.8	229.39	\$ 4.89
TOTAL	2.05	\$	43,880.6	\$ 12,799.4	\$ 7,721.5	\$ 315.4	570.38	\$ 5.72

Notes

(1) For the fund transfer between Single Family Low Income Services and Large Commercial Retrofit, the planned Total Benefits do not change because Annual MMBTu Savings Goals do not change, per Section IV.C.3 of the 2012 Plan.

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Table G-6 Summary of Benefits and Savings by Program 2012

		Benefits (\$000)		MMBTU Gas Saved		
	Total(1)	Natural Gas(2)	Non-Gas Benefit (3)	Annual	Lifetime(4)	
Commercial & Industrial						
Large Commercial New Construction	\$5,803.6	\$5,800.3	\$3.3	39,485	673,830	
Large Commercial Retrofit	\$8,917.1	\$8,149.4	\$767.7	75,814	948,796	
Small Business Direct Install	\$348.3	\$348.3	\$0.0	5,013	28,701	
EERMC - C&I	NA	NA	\$0.0	NA	NA	
SUBTOTAL	\$15,069.0	\$14,298.0	\$771.0	120,312	1,651,327	
Low Imcome Residential						
Single Family Low Income Services	\$2,975.9	\$1,361.9	\$1,614.1	7,697	153,932	
SUBTOTAL	\$2,975.9	\$1,361.9	\$1,614.1	7,697	153,932	
Non Low Income Residential						
EnergyWise EnergyWise	\$6,898.8	\$4,216.1	\$2,682.7	23,827	476,546	
Energy Star® HVAC	\$18,936.9	\$11,828.5	\$7,108.4	79,712	1,361,531	
Residential Products Pilot	\$0.0	\$0.0	\$0.0	-	-	
EERMC - Residential	NA	NA	\$0.0	NA	NA	
SUBTOTAL	\$25,835.7	\$16,044.6	\$9,791.1	103,540	1,838,077	
TOTAL	\$43,880.6	\$31,704.5	\$12,176.2	231,548	3,643,336	

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Table G-7 Comparison of Goals 2012

	2012					
	Proposed	1 2012	Approved	July 2011	Difference	
	Annual Energy		Annual Energy		Annual Energy	
	Savings		Savings		Savings	
	(MMBTU		(MMBTU		(MMBTU	
	Natural Gas)	Participants	Natural Gas)	Participants	Natural Gas)	Participants
Program						
Commercial & Industrial						
Large Commercial New Construction	39,485	624	18,031	176	21,454	448
Large Commercial Retrofit	75,814	2,369	35,445	558	40,369	1,811
Small Business Direct Install	5,013	103	2,302	48	2,711	55
EERMC - C&I						
SUBTOTAL	120,312	3,096	55,779	782	64,533	2,314
Low Income Residential						
Single Family Low Income Services	7,697		3,848	215	3,848	
SUBTOTAL	7,697	355	3,848	215	3,848	140
Non-Low Income Residential						
Energy Wise	23,827	2,000	9,334	1,126	14,493	874
Energy Star® HVAC	79,712	12,211	33,243	4,100	46,470	8,111
Residential Products Pilot		300		NA	300	NA
EERMC - Residential		<u>'</u>		-		
SUBTOTAL	103,540	14,511	42,577	5,226	60,963	9,285
TOTAL	231,548	17,962	102,203	6,223	129,344	11,739

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Table G-8 Avoided Costs 2012

Used in Benefit-Cost Model

		RESIDENTIAL					
	Non	Hot					
	Heating	Water	Heating	All			
Year		annual					
2011	5.97	5.97	7.74	7.46			
2012	6.49	6.49	8.21	7.94			
2013	6.70	6.70	8.42	8.15			
2014	6.98	6.98	8.81	8.51			
2015	7.56	7.56	9.28	9.01			
2016	7.59	7.59	9.30	9.04			
2017	7.57	7.57	9.29	9.02			
2018	7.59	7.59	9.32	9.05			
2019	7.64	7.64	9.37	9.10			
2020	7.73	7.73	9.47	9.20			
2021	7.83	7.83	9.58	9.30			
2022	7.96	7.96	9.75	9.46			
2023	8.25	8.25	10.03	9.74			
2024	8.44	8.44	10.20	9.92			
2025	8.51	8.51	10.29	10.00			
2026	8.64	8.64	10.42	10.14			
2027	8.77	8.77	10.56	10.27			
2028	8.90	8.90	10.69	10.40			
2029	9.03	9.03	10.83	10.54			
2030	9.16	9.16	10.97	10.67			
2031	9.30	9.30	11.11	10.81			
2032	9.43	9.43	11.25	10.95			
2033	9.57	9.57	11.40	11.10			
2034	9.71	9.71	11.55	11.24			
2035	9.86	9.86	11.69	11.39			
2036	10.00	10.00	11.85	11.54			
2037	10.15	10.15	12.00	11.69			
2038	10.30	10.30	12.15	11.84			
2039	10.45	10.45	12.31	11.99			
2040	10.61	10.61	12.47	12.15			
2041	10.77	10.77	12.63	12.31			

COMMERCIAL & INDUSTRIAL						
Non						
Heating	Heating All					
annual						
5.91	7.17	6.79				
6.43	7.64	7.27				
6.64	7.86	7.49				
6.92	8.24	7.84				
7.50	8.71	8.34				
7.53	8.74	8.37				
7.51	8.72	8.35				
7.53	8.75	8.38				
7.58	8.80	8.43				
7.67	8.90	8.53				
7.77	9.01	8.63				
7.90	9.18	8.80				
8.19	9.46	9.07				
8.38	9.63	9.25				
8.45	9.72	9.33				
8.58	9.85	9.47				
8.71	9.99	9.60				
8.84	10.13	9.74				
8.97	10.26	9.87				
9.10	10.40	10.01				
9.24	10.55	10.15				
9.37	10.69	10.29				
9.51	10.84	10.44				
9.66	10.99	10.58				
9.80	11.14	10.73				
9.95	11.29	10.88				
10.09	11.44	11.03				
10.24	11.60	11.19				
10.40	11.76	11.35				
10.55	11.92	11.50				
10.71	12.08	11.67				

ALL
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From 2011 Avoided Cost Study Page D3

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Table G-9 Target Shareholder Incentive 2012

Incentive Rate: 4.40%

	(1)	(2)	(3)	(4)	(5)
	Eligible				
	Spending	Target	Annual	Threshold	Target Incentive
	Budget	Incentive	Savings Goal	Savings	Per Annual
Sector	\$(000)	\$(000)	(MMBTU)	(MMBTU)	MMBTU
Low Income Residential	\$1,466	\$77.7	7,697	4,618	\$10.095
Non-Low Income Residential	\$5,984	\$263.3	103,540	62,124	\$2.543
Commercial & Industrial	\$5,514	\$229.4	120,312	72,187	\$1.907
Total	\$ 12,963	\$570.4	231,548	138,929	\$2.463

Notes:

- (1) Sector budget excluding the EERMC Assessment and Shareholder Incentives. See Table G-3.
- (2) Equal to the incentive rate (4.40%) x Column (1).
- (3) See Table G-7
- (4) 60% of Column (3). No incentive is earned on annual MMBTU savings in the sector unless the Company achieves at least this threshold level of performance.
- (5) Column (2)*1000/Column (3)