



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

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Peter F. Kilmartin, Attorney General

October 3, 2013

Luly Massaro, Clerk
Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02889

Re: The Narragansett Electric Co., d/b/a National Grid Tariff Advice Filing to Amend RIPUC NG-GAS No. 101, Docket No. 4405

Dear Ms. Massaro,

At open meeting on September 24, 2013, the Commission postponed a decision on the proposed filing of The Narragansett Electric Company ("National Grid" or the "Company") while the Commission reviews all outstanding discovery. Pending completion of the Commission's review, the Division of Public Utilities and Carriers ("Division") writes to re-emphasize a number of salient points which counsel in favor of the adoption of the proposed tariff advice. By virtue of the Company's filed tariff, a customer who accepts gas distribution service from National Grid is legally required to provide access to the Company's meter:

Properly authorized representatives of the Company shall have the right to access the customer's premises at all reasonable times and intervals for the purpose of reading, installing, examining, repairing, replacing or removing the company's meters . . . The Customer shall be responsible for providing accessibility to the above metering and equipment belonging to the Company.

RIPUC NG-Gas No. 101 Section 1, Schedule A, Sheet 10.

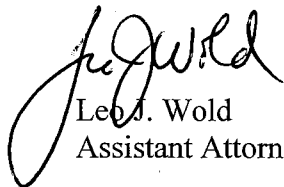
Under the proposed tariff advice, only those customers who are in breach of this explicit tariff obligation will have the cost of a curb stop assessed to their account. The proposed language provides: "...where a customer fails to grant the Company access to its gas meter in order to terminate service to that customer for non-payment of bills and the Company installs a street or curb valve in order to terminate service, the Company will assign the full cost of install the street or curb valve to that customer's account."

Assigning the financial burden of curb stop installation as reflected in this manner makes eminent sense and is in accord with law and regulatory policy. Without a curb valve installation requirement in place, the cost of installation can be exceeded by the cost of the unpaid gas used by the recalcitrant customer in as short a period as a half-year. Ensuring that these customers are shut off in a timely manner avoids potentially limitless growth in uncollectibles from these customers and the needless waste of gas.

Just as importantly, the proposed tariff is consistent with the regulatory principle of cost causation that the Commission has long recognized. In Re: Complaint of Scott Pollard Regarding Line Extension Rates, Docket 3643, Order No. 18101 (2004) (specific customers should be charged for a line extension based on the policy of allocating identifiable costs to the cost causer). See also In Re: Tariff Filing Made by Interstate Navigation Company on April 8, 1983, Docket No. 1704, Order No. 11114 (commercial customers should pay higher freight rates since the cost of freight service has increased disproportionately since last cost of service study). Under this principle, the general body of ratepayers should not be required to pay for the cost of gas service or curb stop installation, when a specific and identifiable customer does not live up to his or her noticed tariff obligations as a customer of the Company.

Based on the foregoing and for the reasons previously advanced, the Division, once again, urges the Commission approve the Company's proposed tariff advice filing as filed.

Very truly yours,



Leo J. Wold
Assistant Attorney General

cc: Service List