



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

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March 31, 2014

VIA REGULAR MAIL AND ELECTRONIC MAIL:

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

RE: National Grid - Docket 4442 - Customer-Owned Street & Area Lighting Tariff Filing

Dear Ms. Massaro:

On behalf of the Office of Energy Resources, enclosed is an original and ten (10) copies of the attached letter from Commissioner Gold regarding Docket #4442.

Sincerely,

Daniel W. Majcher, Esq.

DWM/njr

Enclosure

- c. Cynthia Wilson-Frias
Docket 4442 Service List

Rhode Island Office of Energy Resources
One Capitol Hill 4th Floor
Providence, RI 02908
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STATE OF RHODE ISLAND
**OFFICE OF
ENERGY RESOURCES**
Commissioner Marion S. Gold, Ph.D.

Dear Ms. Massaro:

The Rhode Island Office of Energy Resources ("OER") commends National Grid, the Washington County Regional Planning Council ("Council") and the Rhode Island League of Cities and Towns ("League") (hereinafter together, the "Parties") for working in good faith to resolve some of the disputed matters surrounding the implementation of the Municipal Street Light Investment Act. The collaboration of the Parties has resulted in a number of adjustments to the terms of the tariff and agreement documents.

The OER participated in the multiple phone calls and face-to-face meetings between the Parties during the negotiations, and we believe that the Parties attempted to resolve as many issues as possible in good faith. Ultimately, the Parties were unable to resolve all of the disputes and have filed their respective positions on the remaining issues with the Rhode Island Public Utilities Commission ("Commission").

The OER understands and agrees that the intent of the Act was to support municipal efforts to reduce costs for both the maintenance and the energy usage associated with street lighting services. In order to increase efficiency, municipalities could potentially convert to energy efficient lighting and/or install metered control devices within their respective jurisdictions. The OER believes that the League and the Council have offered a reasonable compromise to National Grid regarding the streetlight tariff and implementation plan. The proposal of the Council and League incorporates both energy efficient lighting and metered controls in a phased-in approach, with a limited number of municipalities participating in the first year of the new program.

The OER concurs that such a phased-in approach will allow National Grid to evaluate and make adjustments to the program before offering a full roll-out to all of the municipalities. Therefore, a phased-in approach represents a prudent plan for implementation. Therefore, the OER respectfully requests that the Commission consider the proposal put forth by the Council and the League to implement a phased-in street lighting tariff program which includes the ability to convert to energy efficient lighting and metered controlled devices. The OER is committed to working with the Parties and National Grid to implement this new program.

Sincerely,

A handwritten signature in blue ink, appearing to read "Marion Gold". The signature is stylized and somewhat abstract, with large loops and flourishes. It is positioned above the printed name and title.

Marion Gold

Commissioner