

electrical company assessed to the Towns. Id. citing Providence Advance Club Leaflets, 1891 (attached to Carrigg 2 as Exhibit A). The Towns were paying over \$4,000 in inflation-adjusted funds per light annually for the company to recover its capital and operating costs of streetlighting. Id. To this day, all of the capital and operations and maintenance costs of streetlights are built in to the facilities charge in the S-14 rate tariff. Id. The Towns pay the costs of street lighting with funds raised through property taxes, and have done so since the genesis of electric street lighting in our state. Id. The tenor National Grid has taken in the development of this tariff and its negotiation suggests a take it or leave it attitude toward these sales. While the Towns do submit to the transaction contemplated by the Act, National Grid has no basis to dictate the terms of this transaction to the Towns as “Buyers.” One of many examples of inequitable bargaining is National Grid’s presumption of entitlement to indemnification for the Town’s ongoing ownership and operation of the streetlights.

National Grid’s response to data requests state that it incurs approximately \$1.5 million in annual costs to administer the municipal streetlights and takes in over \$8 million in annual net revenue. Response to Data Requests 1-3 and Exhibit 1-7(c). The Towns conducted their own, conservative assessment of the savings Towns could possibly accrue by taking over ownership and operation of the streetlights and reached a similar number. Carrigg 2 at pages 3-4. It is unclear how National Grid, a regulated “public utility,” got such profitable rates approved; but they have clearly persisted for many years. Carrigg 2, pages 2, 5, Exh. A. Given the history of profits National Grid extracted from streetlights, the Towns have every reason to suspect that the Company, which is principally responsible to its shareholders, would oppose and discourage implementation of the Act.

Many positions National Grid takes in the adoption and negotiation of this tariff indicate its uninterested and unaccommodating position. National Grid has steadfastly refused to address issues related to pole attachments despite the Act’s mandate that the new tariff “provid[e] for the use by

such municipality of the space on any pole, lamp post, or other mounting surface previously used by the electric distribution company for the mounting of the lighting equipment.” R.I.G.L. § 39-29-3(1).

The ninety-three pages of sale and licensing agreements are unnecessarily repetitive, cumbersome and ominous, presenting burdensome costs and political hurdles to purchase approval. National Grid’s position that it must approve the simple installation of new luminaires (the most commonly performed maintenance of streetlights) at totally disproportionate cost to the Towns, even if the change out will not add any weight to the poles or strain to the distribution system, supports the conclusion that National Grid and its labor force do not support Town autonomy in the operation of its streetlights or care about the cost effectiveness of program implementation. Carrigg 2, page 6.¹ National Grid refuses to comply with the Act’s requirement that it assign its existing easements and approvals, claiming it requires too much effort and cost to them and (consequently) that the towns should incur the greater burden of renegotiating such agreements. R.I.G.L. § 39-29-3(d) (“allow the municipality to assume the rights and obligations of the electric distribution company with respect to such space [on any pole, lamp post or other mounting service previously used by the electric distribution company] for the unexpired term of any lease, easement, or other agreement under which the electric distribution company used such space”). The Company claims that its computer billing system is not sophisticated enough to accommodate a little flexibility in Town implementation of basic efficiency controls (hours of operation and energy reduction) and the technological opportunity of metering streetlights, despite supportive implementation by other utilities in other jurisdictions. The Towns sincerely hope that National Grid will support the Town’s implementation of the Act but it has not demonstrated such support to date.

¹ National Grid’s union opposed passage of the Act.

WHEREFORE, the Towns respectfully request the Rhode Island Public Utility Commission's help in seeking an equitable and accommodating tariff and transaction documents that will encourage Towns to implement this program and thereby serve the purposes of the Act.

Respectfully submitted,

THE RHODE ISLAND LEAGUE OF CITIES
AND TOWNS & THE WASHINGTON
COUNTY REGIONAL PLANNING COUNCIL

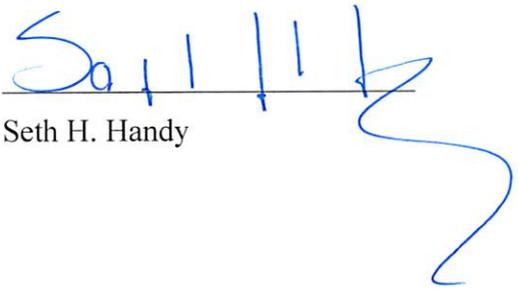
By their attorney,



Seth H. Handy (#5554)
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CERTIFICATE OF SERVICE

I hereby certify that on November 26, 2013, I mailed this pleading and 9 photocopies to the RI PUC and sent a true copy of the document by electronic mail to the parties, the Office of Energy Resources, National Grid, The Division of Public Utilities and Carriers Advocacy Section, the Rhode Island Office of the Attorney General and the Energy Efficiency Resources Management Council.



Seth H. Handy

State of Rhode Island Public Utilities Commission

**Review of the Customer-owned Street & Area Lighting Proposal in compliance with the RI
Municipal Streetlight Investment Act, R.I.G.L. § 39-29-1, et. seq.**

Docket No. 4442

Surrebuttal Testimony of

Daniel T. Carrigg

November 26, 2013

I. Introduction and Qualifications

1 **Q. Have you reviewed the rebuttal testimony of Jeanne Lloyd and John Walter?**

2 A. Yes, I have.

3 **Q. On page 1 and 2 of Mr. Walter’s testimony he states “the Company has no intention of**
4 **either preventing or dissuading any city or town from purchasing the Company’s**
5 **streetlighting assets as permitted by the Municipal Streetlight Investment Act, R.I.G.L. §**
6 **39-29-1, et. seq. (the “Act”).” Are these really the Company’s streetlighting assets?**

7 A. Not really, no.

8 **Q. Why not?**

9 A. I have researched the history of municipal streetlights in the Rhode Island archives and it
10 appears to be clear that while the streetlights have always been under the custody of private
11 electrical distribution companies, the Towns always paid those companies for the installation and
12 operation of the streetlights. The Narragansett Electric Lighting Company was founded in 1888.
13 By 1891, there was already a documented movement among the business community through the
14 Providence Advance Club to move toward municipal ownership of streetlights due to high costs
15 assessed to cities and towns [see Exhibit A, attached]. From the very beginning of electric street
16 lighting in Rhode Island, cities and towns were paying over \$4,000 in inflation adjusted funds per
17 light annually for the company to recover both operating and capital costs of lighting. And so it
18 is today, as all capital costs of streetlights and operations and maintenance costs are built in to the
19 facilities charge that currently exists as part of the S-14 rate tariff. In short, municipalities in
20 Rhode Island pay the entire capital and operations and maintenance costs of street lighting with
21 funds raised through property taxes, and have done so since the very genesis of electric street
22 lighting in our state.

1 **Q. If the Towns have always paid for the streetlights, why would the Act require the Towns**
2 **to pay the utility to exercise control over the streetlights?**

3 A. The streetlights currently exist as assets on the company's books. Even though municipalities
4 are the only paying customer for these lights and pay the entirety of the cost, it is possible that
5 this cost is paid over time and that some existing streetlight capital assets have not yet been paid
6 for by municipalities. But given the fact that the total estimated sales price of all municipal street
7 lighting assets is \$7.5 million (Commission 1-7, page 1) and the expected annual lost revenue
8 resultant from the sale of all municipal assets is \$8.2 million (Commission 1-7(c), page 1), it
9 seems highly likely that municipalities have paid the entire cost of existing physical street lighting
10 plant several times over. After all, by the Company's own estimation, one year of lost revenue
11 exceeds the entire net book value of municipal streetlighting assets.

12 **Q. Have you reviewed National Grid's responses to the Public Utility Commission's data**
13 **requests?**

14 A. Yes, I have.

15 **Q. What do those responses tell you about National Grid's cost of operating the streetlights**
16 **and its revenue from operating the streetlights?**

17 A. The response to Commission 1-3 indicates an annual operating cost of between \$1.5 million
18 and \$2 million in 2010, 2011 and 2012. National Grid's response to Commission 1-7 provides
19 exhibit 1-7(e) indicating total lost revenue to the Company of \$8,155,205 based on subtracting the
20 total kWh charge of just over \$2 million from total rate charges of \$10,205,550. These responses
21 indicate that National Grid generated approximately \$8.2 million in net revenues from its
22 operation of municipal streetlights.

23 **Q. Before seeing these responses, did you help the Towns estimate the savings that they**
24 **could reasonably anticipate upon purchasing the streetlights?**

1 A. Yes, I did.

2 **Q. How did you calculate that?**

3 A. I obtained billing data from several municipalities. I then counted the number of luminaires by
4 wattage and light source type. Given existing information in the tariff rate agreement for 2012,
5 when the study was done, I calculated the costs associated with facilities charges, distribution
6 charges, and supply charges. These three figures added together comprise the total bill to
7 municipalities. Supply and distribution charges could be assumed to remain regardless of who
8 owned the street lighting system, but facilities charges could be eliminated with municipal
9 ownership. Given the experience in Massachusetts, the fact that a new distribution charge related
10 to the Company's lighting service revenue requirement (National Grid's Tariff Advice Filing
11 Schedule JAL-3) was apparent. Given the data at hand, I estimated that the company would stand
12 to lose approximately \$8.5 million in revenue should each municipality purchase its streetlights.
13 This figure is very close to the \$8.2 million figure the Company provides in its response to
14 Commission 1-7(c). Also apparent was the fact that the purchase of existing street lighting plant
15 would cost municipalities money. I then took the total book value of the company's street
16 lighting plant in FY 2010, and used National Grid's 2009 Foster and Associates depreciation
17 study to estimate the total cost of purchasing street lighting plant. The result was a \$7.3 million
18 figure that is very close to the \$7.5 million figure that the Company provided in page 1 of its
19 response to Commission 1-7.

20 **Q. Based on this independent calculation, what did you conclude about anticipated savings**
21 **to the Towns?**

22 A. After examining independent maintenance contracts from other jurisdictions, I concluded that
23 municipalities could safely assume a minimum savings of 15% on their streetlighting costs by
24 simply purchasing their systems and arranging for maintenance independently from the Company.

1 **Q. Was your calculation of anticipated Town savings consistent with National Grid's**
2 **estimation of lost revenue?**

3 A. Yes.

4 **Q. Does this effectively mean that the Towns have actually paid National Grid much more**
5 **than the cost of purchasing, installing and operating these streetlights?**

6 A. Yes, it appears to.

7 **Q. Do you understand what became of these annual revenues to the Company?**

8 A. No.

9 **Q. Do you understand how a regulated public utility was able to realize such great annual**
10 **revenues from its operation of municipal streetlights?**

11 A. No, I do not. I surmise that the Towns should have been more active in these rate cases and
12 that the regulatory authorities did not see or respond to the discrepancy between costs incurred by
13 the public utility and revenues generated from the Towns.

14 **Q. Does Mr. Walter's Rebuttal Testimony adequately address the concern about the cost of**
15 **National Grid's proposed Lighting Services Charges?**

16 A. No. The proposed fees add up to over \$20 million for a \$7.5 million streetlight system and, as
17 proposed, will be far too burdensome for the Towns to bear without any alleged safety value.
18 The proposal that the Towns incur \$260 in fees for National Grid's supervision every time they
19 install a fuse, or propose what National Grid defines as a material change, including changing out
20 a luminaire even if it adds no weight to the pole or strain to the distribution system is just not cost
21 effective or manageable.

22 **Q. Does this conclude your testimony?**

23 A. Yes

ADVANCE CLUB LEAFLETS.
No. 1.

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ASTOR, LENOX AND
TILDEN FOUNDATIONS.

SIGNIFICANT COMPARISONS
OF THE
COST OF LIGHT

FURNISHED UNDER MUNICIPAL OWNERSHIP WITH
THAT BY PRIVATE CORPORATIONS.

BY

SYLVESTER BAXTER.



ADVANCE CLUB,
PROVIDENCE, R. I.

PROVIDENCE, R. I.:

E. A. JOHNSON & Co., BOOK AND JOB PRINTERS.

1891.

P.B.

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K

BOSTON, July 23, 1891.

EXECUTIVE COMMITTEE OF THE ADVANCE CLUB,
PROVIDENCE, R. I.:

GENTLEMEN: — In response to your request for information on the subject of municipal lighting, I would state that the results given in the appendix to my pamphlet on Berlin, written something over two years ago, were drawn from the most trustworthy sources attainable. Since then, however, during the agitation which has led to the passage of the Municipal Lighting Act by our Legislature at its recent session, the subject has been gone into more thoroughly, and later and fuller results have been obtained. In the presentation of these results, some of which I hope to lay before you, care was taken by those having in charge the conduct of the case in behalf of the proposed legislation to make no exaggerated claims, but to present a simple statement of the facts, with due allowance for interest on investment, depreciation, etc., wherever possible.

As to the general question of the far greater economy and advantage of public ownership of lighting plants, as well as other monopolies of municipal service, there can be no serious denial. The fact has been proven over and over again, by examples too numerous to mention, both in this country and in Great Britain and Germany. In Great Britain, for instance, about two hundred municipalities now manufacture their own gas, and cities like Birmingham and Manchester reap a profit therefrom of two hundred thousand to two hundred and fifty thousand dollars a year, besides the advantage of extremely cheap gas, and free lighting for public pur-

poses. For an account of the movements that led to municipalization of these services in Great Britain, with the corruption and extortion proceeding from private control, permit me to refer you to a valuable work called "A History of Private Bill Legislation," by Frederick Clifford. The superior management and enterprise under public control is shown by the fact that the great discoveries and economies from the utilization of residuals, as in that wonderful chapter in the history of modern chemistry relating to the creation and development of the manifold aniline products, were made and commercially carried out in municipal gas-works of England.

The following fact, also, should be borne in mind in weighing the evidence adduced in discussions of this kind: While those who advocate public ownership are actuated solely by public spirit, those opposed are for the greater part guided by the purely selfish motives of powerful corporate interests seeking to perpetuate their power. The evidence brought forward by the latter is therefore naturally colored and manipulated to suit their purpose, and whatever they cite in order to make it appear that public ownership is contrary to public interest, proceeds from no regard whatever for public interest, but for their own, which is that of making an essentially public service an instrument for obtaining all the private profit that can possibly be derived therefrom.

The latter would have it appear, that by some curious hocus pocus a private corporation can somehow essentially render a public service with much greater economy than is possible under public ownership and management, notwithstanding the necessity of earning the greatest possible profit on capital, very frequently made largely fictitious by watered stock. Against these large earnings required

in the case of private ownership is to be set the low rate of interest at which municipalities can obtain money for public improvements; and against the capitalization, which remains permanent in the former case, ever requiring the earning of a large sum in the shape of dividends, is to be placed the gradual wiping out of the capitalization by means of the accumulation of a sinking fund, under the policy almost universally prevailing for municipal improvements of the kind; thus steadily reducing the fixed charges and finally leaving only the operating expenses to be met from the earnings, and therefore enabling the rate for service to be made correspondingly low.

The articles opposed to municipal management recently printed in your city, to which you have called my attention, are evidently inspired by the motives alluded to above. Inquiry of those conversant with the facts shows that the assertions relating to Chicago and Lewiston, for instance, must have been based upon the statements made at our Legislative hearings on the question of municipal lighting last spring by the president of an electric lighting company in a northern New England State; statements which were shown at the time by strong testimony submitted in rebuttal to be wholly untrustworthy.

Now that the victory for municipal lighting has been gained in Massachusetts legislation, it is significant that powerful interests engaged in the manufacture of electric lighting apparatus, which had brought their great resources to bear in opposition to the proposed law, acting in unison with their customers, the lighting corporations, are now circulating arguments made at those hearings in behalf of public plants, in order to induce cities and towns to adopt the principle and so secure a wider market — a truly enlightened change of policy!

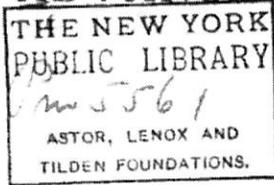
It is to be expected, however, that the same old mis-

statements alluded to above will be heard wherever the battle remains to be fought — as it is now on in your state — growing fainter and fainter in the distance, like the drum-beats of a discomfited and retreating, but still resisting army.

I will now cite some of the instances of public ownership of lighting plants which have come to hand. The latest is that from the Ohio capital. A little over a year ago, Columbus established its own plant of sixty eight arc lamps at a cost of ten thousand dollars, running it in connection with the city water-works and in the same building. For the year ending June 1, 1891, the running expenses were \$2,469.27, or \$35.72½ a light. The plant was run on what is known as “the Philadelphia schedule,” or “full moon;” that is, running all night with the exception of moonlight nights. It was run on dark and rainy nights in addition. In 1889, the electric lighting was done by contract with the Citizens Electric Lighting Company, at a cost of \$73.33 a lamp for forty-eight lights running on the same schedule, making on the face a saving of \$2,527.40, to say nothing of the extra light obtained on dark and rainy nights. In 1890, the same company, running on a “midnight moon schedule,” supplied forty-eight lamps at \$52.12½ a light, amounting to \$2,402, which was almost as much as it cost the city for sixty-eight lamps running all night except when it was moonlight.

It is probable, however, that the figures presented for the city plant make no allowance for interest on cost and for depreciation. In making these allowances, it is customary to reckon interest at six per cent., but here in the East, at all events, considering the favorable rates at which municipalities obtain money, four per cent. would be ample. However, for the sake of a liberal margin, six

ADVANCE CLUB LEAFLETS.



No. 2.

HOW SHOULD THE CITY OF PROVIDENCE 1876. BE LIGHTED?

IS IT GOOD BUSINESS POLICY FOR THE CITY
OF PROVIDENCE TO MAKE LONG TIME
MONOPOLISTIC CONTRACTS WITH
PRIVATE CORPORATIONS?

FACTS FOR THE CONSIDERATION OF THE CITIZENS
OF PROVIDENCE.



ADVANCE CLUB,
PROVIDENCE, R. I.

PROVIDENCE:
E. A. JOHNSON & CO., PRINTERS.
1891.

plant, and 5 per cent for depreciation, there would be a total cost of \$3,569.27 or \$52.41 per light, or a saving of \$20.92 upon each lamp.

THE CASE OF BANGOR, MAINE.

Bangor runs its electric light plant in connection with its water works. The plant (including reserve steam power) thus cost \$3,500. "Bangor has 150 arc lights of 2,000 candle-power which burn all night, and every night in the year. The cost per light per year, exclusive of interest on investment and depreciation, is \$34.05. Add to this 4 per cent interest upon the investment and 5 per cent for depreciation of plant, and the cost per lamp per year will be \$54.05. Add again \$15.00 on each thousand for taxes which the city would receive if the plant was owned by a private company, and the cost would be \$57.55 per lamp per year."

The city of Providence pays \$160.60 per lamp per year for 650 lamps, or yearly \$67,753.13 more than Bangor would pay for an equal number of lights at the rate of \$57.55 per lamp.

ELECTRIC LIGHTING BY PRIVATE CORPORATIONS.

The following comparisons made with annual cost of \$160.60 per lamp, which the city of Providence is at present paying, is worthy of careful attention.

The following table presents the cost per year of arc electric lights in those cities supplied by *contract* with *private companies*, the candle power being the same (2,000) in each case, unless specified:

Name of Place.	State.	No. of Lights.	Cost per Light per year.	Hours Lighted.
San Francisco,	Cal.	113	\$200.75	All night.
Helena,	Mont.	^{1500 candle power.} 60	198.00	Phila. schedule.
Boston,	Mass.	105	180.00	All night.
Portland,	Ore.	^{1200 candle power.} 65	180.00	Phila. schedule.
Omaha,	Neb.	118	175.00	All night.
Denver,	Colo.	221	174.00	"
Fall River,	Mass.	125	171.00	"
Stockton,	Cal.	122	165.00	"
Salem,	Mass.	191	164.25	"
Providence,	R. I.	650	160.60	"
Troy,	N. Y.	271	158.00	"
Kalamazoo,	Mich.	130	157.00	Phila. schedule.
Salt Lake,	Utah,	200	150.00	"
Minneapolis,	Minn.	475	150.00	"
Dayton,	Ohio,	200	150.00	All night.
Lincoln,	Neb.	60	150.00	"
Reading,	Pa.	156	146.25	"
Richmond,	Va.	133	146.00	"
Lowell,	Mass.	180	146.00	"
Lynn,	"	150	146.00	"
Worcester,	"	282	146.00	"
New Bedford,	"	94	146.00	Moonlight.
Newark,	N. J.	418	146.00	All Night.
Wilkesbarre,	Pa.	48	144.54	"
Albany,	N. Y.	568	144.17	"
Alliance,	Ohio.	8	144.00	"
Syracuse,	N. Y.	306	144.00	"
Waterbury,	Conn.	100	142.35	"
Des Moines,	Ia.	32	141.00	Phila. schedule.
Binghamton,	N. Y.	99	140.00	All night.
Saginaw,	Mich.	221	140.00	"
Cleveland,	Ohio,	200	139.12	"
Utica,	N. Y.	367	137.75	"
Springfield,	Ill.	130	137.00	Phila. schedule.
Somerville,	Mass.	70	135.00	1 A. M.
Ogden,	Utah,	25	133.36	Midnight.
New Orleans,	La.	1,010	130.00	All night.
St. Paul,	Minn.	50	127.75	Midnight.
Duluth,	"	200	127.75	All night.

Name of Place.	State.	No. of Lights.	Cost per Light per year.	Hours Lighted.
Fond du Lac,	Wis.	36	72.00	Phila. schedule.
Dubuque,	Ia.	150	70.00	"
Massilon,	Ohio,	180	70.00	All night.
Norwalk,	Conn.	82	70.00	Midnight.
Terra Haute,	Ind.	249	70.00	Phila. schedule.
Racine,	Wis.	100	70.00	All night.
Zanesville,	Ohio,	140	70.00	Phila. schedule.
Flint,	Mich.	56	67.00	Moonlight 1 a.m.
Louisville,	Ky.	156	66.00	All night.
Keokuk,	Ia.	125	60.00	Phila. schedule.
Yonkers,	N. Y.	45	60.00	All night.
Lafayette,	Ind.	214	50.60	Phila. schedule.
Cortland,	N. Y.	50	50.00	Midnight.
Ottumwa,	Ia.	70	44.00	All night.

PUBLIC ELECTRIC LIGHTING.

The following table shows the cost of arc lights (2,000 candle-power) in those cities which *own their electric lighting plants*:

Name of Place.	State.	No. of Lights.	Cost per Light per year.	Hours Lighted.
Easton,	Pa.	64	\$100.00	Phila. schedule.
Topeka,	Kan.	184	73.68	"
Moline,	Ill.	100	69.00	"
Aurora,	Ill.	118	67.99	"
Chicago,	Ill.	292	65.00	All night.
Grand Ledge,	Mich.	32	62.00	Midnight.
Bloomington,	Ill.	220	60.00	Phila. schedule.
Decatur,	Ill.	52	60.00	All night.
St. Joseph,	Mo.	260	54.00	Phila. schedule.
Hannibal,	Mo.	96	52.00	"
Lewiston,	Me.	100	51.10	"
Bay City,	Mich.	139	49.00	"
Huntington,	Ind.	50	48.64	All night.
Madison,	Ind.	85	48.00	"
Little Rock,	Ark.	110	47.50	Phila. schedule.
Bangor,	Me.	150	47.00	All night.
Galveston,	Tex.	175	44.90	Phila. schedule.
Ottawa,	Ill.	100	44.55	All night.

Name of Place.	State.	No. of Lights.	Cost per Light per year.	Hours Lighted.
Lewiston,	Me.	96	42.00	All night.
Martinsville,	Ind.	30	40.00	"
Dunkirk,	N. Y.	55	36.50	"
Paris,	Ill.	60	36.00	Phila. schedule.
Painesville,	Ohio,	80	35.00	"
Ypsilanti,	Mich.	80	23.61	Midnight.

THE CASE OF PROVIDENCE.

An examination of the above tables will show a remarkable difference in the average cost of electric lighting in the cities where the service is performed by private contract, from the cost where the cities manage and own an electric plant. The average cost to the above cities, having all night 2,000 candle-power service, under private corporation contract is \$121.84½. (Lights on other schedules average about \$20 less per year.) As Providence pays \$160.60 per year under contract with private corporation *electric lighting costs this city \$38.75½ per light per year more than the average* paid to private companies in other cities for like service, or *Providence pays* for its 650 electric lights \$25,180.75 per year *more than it would pay at the average cost to other cities.*

The *highest cost* to any city owning and managing its own electric light plant is \$100 per light per year. The *average cost* to cities where the lighting is under municipal control and where the lamps are 2,000 candle-power and burn all night (exclusive of cities where water power is used, as Bangor, Lewiston, etc.,) is \$48.08½ per light per year. Providence pays \$160.60 for this service, or \$112.51½ per year for each light over what it would cost at the average rate. Thus *Providence would save* on its 650 lights, at the average cost under municipal management, \$73,134.75 per year.

As these tables are from official sources, the simple and only conclusion to be drawn is that cities can themselves supply their own electric lighting much more cheaply and advantageously than they can obtain it from private parties, and that *Providence* is *paying* a *rate* much *above* even the *average* cost at which cities obtain electric light from *private corporations*, and is *paying* annually more than \$73,000.00 above the cost at the average *municipal rate*.

NO LONG CONTRACTS.

Should a city for any reason decide to make a contract with a private company for its electrical lighting, experience has shown the wisdom of making this contract short. Over two-thirds of the contracts thus made by cities in the United States, are for periods of less than five years. Of the remaining third, with very few exceptions, the contracts are for five year periods. The contracts for longer periods are entered into for the most part under conditions allowing the city to purchase the electric light plant if at any time it seem advisable.

THE CITIZENS OF PROVIDENCE HAVE A RIGHT TO DEMAND

Public lighting at a low cost by plants under *municipal ownership and management*, or *at a low cost* by *private corporations* under *short time contracts*.

Providence can be lighted far more cheaply than at present. *Providence should* be lighted at the *lowest possible cost* consistent with good service.

NOTE.—Thanks are due the officials of various cities who have so kindly furnished the committee information upon municipal lighting.