

June 16, 2014

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**Re: Docket 4503 - Proposed Rulemaking Consumer Protection Requirements For
Nonregulated Power Producers
National Grid Written Comments**

Dear Ms. Massaro:

Pursuant to the Rhode Island Public Utilities Commission's ("PUC") Notice issued in the above-referenced docket, National Grid¹ submits these post-public hearing comments for the PUC's consideration regarding the PUC's proposed amendments to the Consumer Protection Requirements For Nonregulated Power Producers ("NPP Requirements").

Section II.D of the NPP Requirements proposes to add a new paragraph 11 to require a statement in the NPP's contract with the consumer that there may be a market adjustment charged or credited to the customer by the electric distribution company on his or her utility bill. National Grid supports this addition to the disclosure requirements in NPP contracts with consumers. National Grid has also taken steps in recent months to clarify its messaging to customers regarding the Standard Offer Service Billing Adjustment (referred to in the amended NPP Requirements as the "market adjustment") that is applied to the customer's account as a result of the customer arranging their electric supply from a competitive supplier. This adjustment appears on the final bill that the customer receives from the Company for Standard Offer Service. The Company has also updated its website to better inform customers about the billing adjustment that appears on their bill. Therefore, the Company suggests the following modification to the proposed language in Section II.D(11):

A statement that there may be a market adjustment charged or credited to the customer by [name of electric distribution company] on his or her utility bill prior to the date when the switch to a competitive supplier becomes effective.

¹ The Narragansett Electric Company d/b/a National Grid ("National Grid" or the "Company")

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National Grid also agrees with the Division of Public Utilities and Carriers' ("Division") proposed modification of Section III.A of the NPP Requirements to delete reference to the Consumer Protection Division of the Department of Attorney General regarding breach of contract and billing disputes that the Division raised at the June 12, 2014 public hearing. The Company believes that this modification will clarify the process for referral of customer complaints regarding an NPP to the Division in a similar manner as other types of customer complaints.

The Company is also reviewing its electric tariff, R.I.P.U.C. No. 1191, Terms and Conditions for Nonregulated Power Producers, to determine whether any changes to the tariff or to other tariff provisions are necessary as a result of the PUC's implementation of the new NPP Requirements. If so, the Company will make the appropriate tariff filing with the PUC.

Thank you for your attention to this filing. Please feel free to contact me if you have any questions concerning this matter at (401) 784-7288.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jennifer Brooks Hutchinson", with a horizontal line extending to the right.

Jennifer Brooks Hutchinson

cc: Steve Scialabba, Division
John Bell, Division
Leo Wold, Esq.