

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
DIVISION OF PUBLIC UTILITIES AND CARRIERS

IN RE: JOINT PETITION FOR PURCHASE :  
AND SALE OF ASSETS BY THE : Docket # D-06-13  
NARRAGANSETT ELECTRIC CO. :  
AND THE SOUTHERN UNION CO. :

**MOTION OF THE GEORGE WILEY CENTER TO  
COMPEL ANSWERS TO DATA REQUESTS NO. 1-3,  
1-4, 1-5, 1-6, 1-7, 1-8, 1-10**

The George Wiley Center respectfully moves to compel National Grid (NG) to answer Data Requests No. 1-3 to 1-8 and 1-10 (copies of questions and answers attached) on the following grounds:

DR 1-3, 1-7, 1-8: These requests concern the impact the proposed merger will have on low-income customers who get behind on their gas and / or electric bills and therefore face termination.

Now, with separate gas and electric companies, customers cannot lose both utilities based on an arrearage in bills for just one or the other. If the merger will mean that an arrearage on an electric bill can result in termination of gas service, or vice versa, then the merger is not in the best interests of ratepayers in general, or of low-income rate payers in particular.

NG refuses to address any termination issues, stating that it plans to file a comprehensive rate plan in six months. These responses miss the point of these proceedings. The law requires that the Division decide whether the merger is “consistent with the public interest.” G.L. § 39-3-25. The impact of the merger on termination policies is very much part of the public’s interest. The law does not authorize the Division to ignore this public-interest issue on the ground that it

might come up in other proceedings conducted for other purposes down the road. To the contrary, the law mandates that the Division assess the public's interest in the merger now, and that it make whatever orders it deems appropriate to address the public's interest. *Id.*

DR 1-4, 1-5, 1-6, 1-10: These requests address rate questions, which NG asks the Division not to consider at all on the ground that NG will be filing a comprehensive rate plan in six months.

Rates are central to the public interest. For low-income customers, they can be all-consuming. The Division cannot assess the public's interest in the merger absent information concerning its impact on rates. The law requires the Division to assess the public interest, not to defer that assessment to later rate hearings.

Because NG will be the only game in town if the merger is approved, NG's policies on the issues addressed in these data requests (discounts, low-income programs, arrearage payments, ROE) are critical to the public interest.

For all of these reasons, the George Wiley Center asks that NG be required to answer Data Requests 1-3 to 1-8 and 1-10 more fully.

Respectfully submitted,  
The George Wiley Center  
By its attorney,

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### CERTIFICATE OF SERVICE

I certify that on the 31<sup>st</sup> day of May, 2006, I caused a copy of this document to be emailed to each of the following:

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