

July 24, 2007

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

Re: Docket 3804 - Affordable Energy Plan
Motion for Relief from Order

Dear Ms. Massaro:

This letter serves as a Motion for Relief from Commission Order No. 18973 (May 31, 2007) in accordance with Rule 1.28(b) of the Commission's Rules of Practice and Procedure. In Order No. 18973, the Commission approved National Grid's Affordable Energy Plan, which included the introduction of a discounted distribution rate for low-income gas customers, and required the Company to file a tariff revision consistent with the order. As described in the order and R.I.G.L. § 39-1-27.10, National Grid's discounted gas rate was to be funded through the affordable energy fund created by statute and implemented via the strategic plan of the Office of Energy Resources ("OER").

In a letter filed with the Commission on July 12, 2007, Mr. Dzykewicz, Commissioner of OER, explained that with the passage of the FY 2008 budget, the Rhode Island General Assembly eliminated funding for the affordable energy fund. Accordingly, such budget changes effectively made the OER strategic plan submitted to the Commission "null and void."

Since the foundation of the Company's plan relied on an appropriation from OER, and since there is no funding to implement the discounted distribution rate for low-income gas customers, the Company respectfully withdraws the low-income discounted gas rate from its Affordable Energy Plan and requests that it need not file any tariff revision.

Thank you for your attention to this filing. Please feel free to contact me if you have any questions concerning this matter at (401) 784-7667.

Very truly yours,



Laura S. Olton

cc: Docket 3804 Service List
Paul Roberti, Esq.
Steve Scialabba, Division

Certificate of Service

I certify that a copy of the cover letter and materials accompanying this certificate were mailed or hand-delivered to the individuals listed below.



Date: July 24, 2007

Joanne M. Scanlon
 National Grid

Docket 3804 – National Grid – Affordable Energy Plan Service List as of 1/10/07

Name/ Address	E-Mail Distribution	Telephone/ Facsimile
Laura Olton, Esq. National Grid 280 Melrose St. Providence, RI 02907	Laura.olton@us.ngrid.com	401-784-7667 401-784-4321
	Joanne.scanlon@us.ngrid.com	
Leo Wold, Esq. Dept. of Attorney General 150 South Main Street Providence, RI 02903	Lwold@riag.ri.gov	401-222-2424 401-222-3016
	Sscialabba@ripuc.state.ri.us	
	Jlanni@ripuc.state.ri.us	
	RDIMeglio@riag.ri.gov	
Andrew C. Dzykewicz RI Office of Energy Resources One Capitol Hill Providence RI 02908-5850	adzykewicz@gov.state.ri.us	401-222-7524 401-222-1260
Matt Guglielmetti RI Office of Energy Resources One Capitol Hill Providence RI 02908-5850	MatteoG@gw.doa.state.ri.us	401-222-3370 401-222-1260
Jean Rosiello, Esq. 340 Olney St. Providence, RI 02906	jeanrosiello@cox.net	401-751-5090 401-751-5096
Henry Shelton George Wiley Center. 32 East Ave. Pawtucket RI 02860		401-728-5555 401-725-1020
Original & 9 copies with: Luly Massaro, Commission Clerk RI Public Utilities Commission 89 Jefferson Boulevard Warwick, RI 02888	lmassaro@puc.state.ri.us	401-941-4500 401-941-1691
	sfrias@puc.state.ri.us	
	tmassaro@puc.state.ri.us	
	Anault@puc.state.ri.us	
John Farley, Executive Director The Energy Council of RI	jfarley316@hotmail.com	