

September 30, 2010

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4200 - The Narragansett Electric Company d/b/a National Grid
Filing to Amend Terms and Conditions for Distribution Service
Responses to Division Data Requests (Set 1)**

Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's¹ responses to the Division's First Set of Data Requests issued on September 15, 2010, in the above-captioned proceeding.

Thank you for your attention to this transmittal. If you have any questions, please feel free to contact me at (781) 907-2121.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Leo Wold, Esq.
Steve Scialabba, Division

¹ The Narragansett Electric Company d/b/a National Grid.

Division Data Request 1-1

Request:

If the tariff change is authorized, is there a possibility that a customer who opts to have an electrician perform the reconnection would incur additional expense in the cost of labor and/or material charged by the electrician?

Response:

While the Company does not expect the electrician to charge the customer an additional fee for making the permanent connection because the connectors are supplied by the Company free of charge, the Company has no way of knowing whether participating electricians will charge customers any additional fees for work involved in making the permanent connection. NG Connects is a voluntary program and if the customer and/or electrician would prefer to have the Company make the permanent connections, the Company will do so at no cost to the customer or the electrician.

Division Data Request 1-2

Request:

What is currently the average wait time between a customer or electrician request for reconnection of an upgraded service and actual reconnection by the Company?

Response:

When an electrician requests a disconnect/reconnect appointment, the Company's goal is to schedule these appointments within five (5) business days on average. The Company's crew will then cut the service on the day and time of the appointment. The crew will return to re-energize the service on the same day the Company receives municipal inspection approval.

If the electrician does not request a disconnect/reconnect appointment but instead upgrades the service and installs temporary connectors, the Company's goal is to install the permanent connections within 5 business days after receiving the municipal inspection approval.

Division Data Request 1-3

Request:

According to the letter accompanying the Company's filing, "Currently, NG Connects is limited to residential services..."

Is this restriction set forth in the tariff language?

If so, please cite the location of such language in the tariff.

If not, please explain any reason for omitting such language.

Response:

The proposed tariff does not limit NG Connects to residential services. The term "Customer" is defined in the first paragraph of the tariff as "all persons, partnerships, corporations or others . . . who obtain local distribution service from The Narragansett Electric Company" While the Company believes that the proposed tariff would permit the Company to offer NG Connects to commercial customers in the future, at this time, the Company has opted to implement the program for residential services only. The reason for this limitation is that each non-residential service would need to be reviewed by a designer for load and other considerations, which is currently beyond the scope of NG Connects. The residential limitation is set forth in the current eligibility criteria for the program as described on the Company's website at www.nationalgridus.com/connects and in Section 4.2.6 of the Specifications for Electrical Installation booklet that was provided with the Company's initial filing. The proposed tariff also refers customers to the Company's website for a qualifying service.

Division Data Request 1-4

Request:

Page 2 of the letter accompanying the filing contains the language: “NG Connects simplifies the process by allowing a licensed electrician hired by a customer to make the permanent connection provided the following conditions are met:” The Company then goes on to add 6 “bullet points” to list the conditions. Are these conditions expressed any place other than in the filing letter, e.g. the tariff or the handbook?

Response:

Yes. These conditions are part of the eligibility criteria for participation in the program and are described on the Company’s website at www.nationalgridus.com/connects and in the mailers that the Company sent to electricians. In addition, Section 4.2.6 of the Specifications for Electrical Installation booklet that was provided with the Company’s initial filing contains a similar list of conditions.

Division Data Request 1-5

Request:

According to the filing, “The Company may decide, in the future, to expand the program to cover non-residential services. In such event, the Company will update its Electrical Installations booklet and notify the Commission accordingly.” If the Company does decide at some future date to expand the program to non-residential services, will the Company submit a filing with the Commission for authorization to make such a change?

Response:

The proposed tariff does not exclude non-residential services from NG Connects and refers a customer to the Company’s website for a list of the requirements in order for a service to qualify for NG Connects. Thus, if the Company decided to expand the program to cover non-residential services in the future, the Company does not believe that it would be required under the tariff to submit a separate filing with the Commission to authorize such change (absent other changes to the tariff language). However, in such event, the Company would update its website and Electrical Installations booklet accordingly, and would notify the Commission of such updates. At this time, the Company has no plans to expand the program to non-residential services.

Division Data Request 1-6

Request:

During normal maintenance or troubleshooting of an overhead service, is a licensed electrician allowed to check, remove and reconnect (if needed) the service connection at the weather head currently?

Response:

No. Unless the electrician contacts the Company for a service upgrade, the electrician is not permitted to cut or reconnect the service. Such work is outside the scope of NG Connects. If there is an issue with the overhead service, the Company's crew will repair or replace the overhead services and/or connectors.

Division Data Request 1-7

Request:

Currently, a municipal electrical inspector/building official inspects a service and contacts NGrid with approval for reconnection. How is the company notified now, and how does the company envision the inspection/approval process to work in the future regarding the private electrician?

Response:

There is no change to the current municipal electrical inspection process as a result of the implementation of NG Connects. Upon receipt of the inspection notification and approval from the municipal electrical inspector, a Company Meter Service employee will visually inspect the connection and seal the meter. Below is the relevant section from the Specification for Electrical Installations 2010 booklet, which explains the Company's general inspection protocol.

1.9 INSPECTION, WIRING ADEQUACY, AND ENFORCEMENT

The Company requires the Customer to furnish satisfactory evidence of the safe condition of its wiring before any service is connected. This will be in the form of an electrical inspection approval certificate from the authority having jurisdiction (AHJ) or an inspection agency approved by the AHJ and the Company. Inspections shall confirm compliance with the National Electrical Code, any applicable municipal codes, and any specific utility service rules that are in addition to the aforementioned codes. The Company and its accepted inspection organizations have the authority for enforcement of these rules. To re-energize a service that has been disconnected for an unsafe condition by any AHJ mandate or by the Company, the Customer must provide an electrical inspection certificate from an approved inspection agency to the Company prior to reconnection.

The Company requires certificates of inspection:

On all new services and

To re-energize any existing service that has been de-energized by any disconnect method (cutting service lateral conductors at pole or weatherhead, meter removal, etc.) for any of the reasons or durations listed below:

1. an emergency,
2. theft of service,
3. duration exceeding twelve months,
4. following 36 months of service inactivity, and
5. when premises wiring (system) is replaced, altered or extended.

Division Data Request 1-8

Request:

What is National Grid's projected labor savings on an annual basis for each of the next five years from the proposed National Grid Connects program? Are there other types of prospective savings such as materials, fuel, etc. and if so, what are they for the upcoming five years?

Response:

The Company will improve the efficiency and flexibility of its work force by eliminating the need for multiple appointments and, therefore, visits to the same premise, which also benefits customers. For every service upgrade that qualifies as a NG Connects service, a single trip will be made by a Meter Service worker that will include verifying the condition of the entire service entrance, visually inspecting the final connections, and inspecting and sealing the meter. Customers will also benefit because it allows licensed electrician participating in the NG Connects Program to bypass the scheduling of an appointment with the Company to disconnect and reconnect the permanent connection allowing more control over the timing of the work. This will shorten the length of time the electrician will be at the customer's home and the length of the outage the customer experiences.

Projected annual labor savings and other prospective savings over the next five (5) years are difficult to quantify in terms of dollars and cents because the program is strictly voluntary and in its first year of implementation. The Company does not know how many electricians will sign up for the program on an annual basis or the number of services that will qualify for the program.

Division Data Request 1-9

Request:

Has National Grid's employees' union expressed any concern with the proposed program and if so, what are the issues of union concern?

Response:

NG Connects was part of the last negotiation session between the Company and the employees' union representing overhead line workers, UWUA/BUW Local 310. An agreement was reached between UWUA/BUW Local 310 and the Company that allowed the implementation of NG Connects.

Division Data Request 1-10

Request:

Did National Grid seek concurrence from the IBEW Local 99 (independent electricians) regarding the proposed program? If so, were any recommendations suggested by the IBEW?

Response:

No. Customer Order Fulfillment along with the Energy Solutions Delivery group met with independent electricians to discuss many topics, including NG Connects. Since participation in NG Connects is voluntary, the Company did not seek concurrence from these electricians regarding the program.

Division Data Request 1-11

Request:

What National Grid jurisdictional areas in the northeast have already implemented the proposed connect program?

Response:

NG Connects has been implemented in Rhode Island, Massachusetts, New Hampshire, and New York. The Company has made tariff filings in Massachusetts, New Hampshire, and New York similar to the tariff filing submitted in Rhode Island. On July 15, 2010, the New York Public Service Commission approved the tariff filing submitted by National Grid. A copy of the Commission's order is attached as Attachment DIV 1-11-1. On September 15, 2010, the New Hampshire Public Utilities Commission Staff submitted a letter to the Commissioners recommending approval of the NG Connects tariff provision in New Hampshire, finding that it "will streamline the connection process and provide flexibility, control and choice for customers." A copy of the Staff's letter is attached as Attachment DIV 1-11-2. The Massachusetts filing is currently pending with the Department of Public Utilities.

Filed Session of July 15, 2010
S.P.O. 10-E-0191SP
Approved as Recommended
and so Ordered

Jaclyn A. Brillling

Digitally Signed by Secretary
New York Public Service Commission

JACLYN A. BRILLING
Secretary

Issued and Effective July 15, 2010

STATE OF NEW YORK
DEPARTMENT OF PUBLIC SERVICE

June 22, 2010

TO: THE COMMISSION

FROM: OFFICE OF ELECTRIC, GAS AND WATER—Electric Rates & Tariffs

SUBJECT: CASE 10-E-0191 – Tariff filing of Niagara Mohawk Power Corporation
d/b/a National Grid to Revise Rule 21 – Service Laterals Below 15,000
Volts to Implement the National Grid Connects Program.

SUMMARY OF

RECOMMENDATION: Staff recommends that the filing be allowed to become
effective.

Summary

On April 22 and June 21, 2010, Niagara Mohawk Power Corporation d/b/a National Grid (National Grid or the company) filed tariff revisions to Rule 21 – Service Laterals Below 15,000 Volts to implement the National Grid Connects Program. The Connects Program is a new program being implemented for residential customers to allow a licensed electrician who is registered with the company to make the permanent overhead connection between the company's overhead service lateral and the customer's entrance conductor. Staff recommends that the filing be allowed to become effective.

Tariff Filing

Currently, the company's tariff provisions prohibit an electrician hired by a customer to make the permanent overhead connection between the company's overhead service lateral and the customer's entrance conductor. The electrician must coordinate with the company for the company to make the permanent connection. Under its filing, the company proposes to establish a Connects Program to simplify the overhead connection process by allowing a licensed electrician hired by a customer to make the permanent connection provided the following conditions are met:

- the work must involve an existing overhead residential service;
- the residential overhead service must be single phase, three wire and 200 amps or less;
- there must be no change in the company's service point of attachment;
- the service wire must be available and in good condition;
- the electrician must be licensed and in good standing with the authority having jurisdiction and must sign up with the company to participate in the Connects Program; and
- the electrician must use connectors that will be supplied by National Grid at no cost.

The company will furnish on request detailed information on the method and manner of making a service connection. Such detailed information includes the company's Specification of Electrical Installations booklet which describes the Connects Program.

The tariff provisions state that the company gives no warranty to the customer, express or implied, as to the knowledge, training, reliability, honesty, fitness or performance of any electrician registered with the company for his purpose, and the

company shall not be liable for any damages or injuries caused by any electrician who may be used for such purpose.

To participate in the Connects Program, licensed electricians will need to sign up with the company. Qualifications for participating in the program will be listed on the company's website and in the mailer information packets. Licensing of electricians is determined by the authority having jurisdiction in the applicable municipality. For residential customers whose electricians have not signed up for the Connects Program, the company will continue to make the permanent connection.

Discussion

National Grid states that the Connects Program benefits residential customers in several ways. The Connects Program will allow the customer's licensed electrician more control over the timing of the work; the electrician will no longer have to schedule an appointment with the company to install the permanent connection which will shorten the length of time the electrician will be at the customer's home and the length of outage the customer experiences; and the Connects Program should expedite the customer's service since the electrician will be able to complete the work in one setting.

The company also states that the licensed electrician is exposed to no additional electric risk when making the permanent connection, as the voltage at the connection point is the same as at other locations on the customer's service equipment. Staff finds the company's tariff revisions to be reasonable and recommends that the filing be approved.

Public Notice

Pursuant to the State Administrative Procedure Act, a Notice of Proposed Rulemaking was published in the State Register on May 12, 2010. No comments have been received.

Niagara Mohawk requests waiver of publication notice of these changes because the company will inform licensed electricians of the qualifications necessary to participate in the Connects Program via its website and mailer information packets. In addition, the Connects Program will be described in the company's Specifications for Electrical Installations booklet. Staff agrees with the company's reasoning for the waiver of publication notice and therefore recommends that it be granted.

Recommendation

It is recommended that:

1. Niagara Mohawk Power Corporation d/a/a National Grid's filing dated April 22, 2010, as listed in the Appendix, be allowed to become effective; and

2. special permission be granted waiving the requirement of Section 66(12)(b) of the Public Service Law as to newspaper publication of the changes proposed by the amendments.

Respectfully submitted,

MICHAEL M. TWERGO
Utility Supervisor

ROSANNE E. MAIELLO
Utility Analyst 3

Reviewed by:

JANE CICERANI
Assistant Counsel
Office of General Counsel

BRUCE E. ALCH
Chief, Electric Rates & Tariffs
Office of Electric, Gas and Water

Approved by:

RAJ ADDEPALLI
Deputy Director, Electric
Office of Electric, Gas and Water

CASE 10-E-0191

APPENDIX

FILING BY: NIAGARA MOHAWK POWER CORPORATION
D/B/A NATIONAL GRID

Amendment to Schedule P.S.C. No. 220 - Electricity

First Revised Leaf No. 108

Issued: April 22, 2010 Effective: August 1, 2010

Second Revised Leaf No. 108

Issued: June 21, 2010 Effective: August 1, 2010

NEWSPAPER PUBLICATION: Waived

SAPA – 10-E-0191SP1 – STATE REGISTER – June 26, 2010

SPECIAL PERMISSION APPLICATION: 10-E-0191SP1

STATE OF NEW HAMPSHIRE

Inter-Department Communication

DATE: September 15, 2010

AT (OFFICE): NHPUC

FROM:

Al-Azad Iqbal

Analyst, Electric Division

SUBJECT: DE 10-174 Revisions to Terms and Conditions for Point of Connection of Company's Service

TO:

Commissioners

Debra A. Howland, Executive Director

Granite State Electric Company d/b/a National Grid ("National Grid" or the "Company") submitted a petition to the New Hampshire Public Utilities Commission ("Commission") pursuant to Puc 1605.01 to approve a revision to the terms and conditions of the Company's tariff N.H.P.U.C. No 17 regarding customer connections. Paragraph 18 of the terms and conditions of the Company's tariff provide that customers must wire to the point designated by the Company, at which point the Company will connect its service. This tariff provision does not specify the manner in which the Company makes this connection.

The Company seeks to amend this tariff language to clarify that connections can be made by National Grid or by the use of licensed electricians participating in the National Grid Connects Program ("NG Connects") as follows:

18. POINT OF CONNECTION OF COMPANY'S SERVICE

The Company shall furnish on request detailed information on the method and manner of making service connections. Such detailed information may include a copy of the Company's Specifications for Electrical Installation booklet, as may be amended from time to time, a description of the service available, connections necessary between the Company's facilities and customer's premises, location and access of service connection facilities and metering equipment, and Customer and Company responsibilities for installation of facilities.

The Customer shall wire to the point designated by the Company, at which point the Company will connect its service. For a service meeting Company requirements (which requirements are set forth on the Company's website at www.nationalgridus.com/connects), the Company may also permit this connection to be made by a licensed electrician in good standing with the authority having jurisdiction, as required by applicable law, and who is registered with the Company, provided, however, that the Company gives no warranty to the

customer, express or implied, as to the knowledge, training, reliability, honesty, fitness, or performance of any electrician registered with the Company for this purpose, and the company shall not be liable for any damages or injuries caused by any electrician who may be used for such purpose.

Staff reviewed the proposal and concluded that it is reasonable and will have minimal to no impact to the customers. Staff believes that it will streamline the connection process and provide flexibility, control, and choice for the customers. Based on this conclusion, Staff recommends that the commission approves the changes proposed by the Company.

Division Data Request 1-12

Request:

National Grid's Connects program is limited to 200-amp or less residential service; 400-amp service is becoming more common due to larger houses and additions. Is the service limitation due to the allowance of apprentices and journeymen to perform the work in addition to licensed electricians?

Response:

No. The 200-amp service size limitation is due to the size of the existing overhead service conductors (i.e., pole to house). Currently, most existing service wires are capable of carrying 200-amps or less without the need for the Company to send a line crew or designer to a customer's residence to determine load capability. A 400-amp residential service would require the service conductor to be changed /upgraded. This would require the designer to create a work request and the Company's crew to perform the removal and installation of a new service conductor. This type of work is beyond the scope of NG Connects, which is to simplify and expedite the process for making the permanent service connection for the customer.

Division Data Request 1-13

Request:

Why is the residential 200-amp upgrade limited when National Grid is contemplating the possibility of expanding the program in the future to non-residential services?

Response:

Currently, the program is limited to a residential 200-amp upgrade as described on the Company's website and in its Electrical Installations booklet. Please also refer to the Company's response to Data Request 1-12. At this time, the Company has no immediate plans to expand the program to non-residential services. Please refer to the Company's response to Data Request 1-3.