

July 15, 2011

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket Nos. 4251 & 4252 – Soft-Off Policy
Responses to Division Data Requests (Set 1)**

Dear Ms. Massaro:

Attached please find National Grid's responses to the Division's First Set of Data Requests in the above-captioned dockets.

Please be advised that the Company is submitting responses to Division 1-5, 1-10, 1-11, 1-12, 1-18, 1-19, 1-20, and 1-24. The Company will be providing the responses to the Division's remaining data requests shortly.

Thank you for your attention to this transmittal. If you have any questions regarding this filing, please feel free to contact me at 401-784-7288.

Very truly yours,




Jennifer Brooks Hutchinson

Enclosures

cc: Dockets 4251 & 4252 Service Lists
Leo Wold, Esq.
Steve Scialabba
James Lanni

Certificate of Service

I hereby certify that a copy of the cover letter and / or any materials accompanying this certificate has been electronically transmitted, sent via U.S. mail or hand-delivered to the individuals listed below.



Joanne M. Scanlon

July 15, 2011

Date

**Docket No. 4251 – National Grid Gas – Billing Termination ("Soff-Off")
Service List as of 6/24/11**

Name/Address	E-mail	Phone/FAX
Thomas R. Teehan, Esq. National Grid 280 Melrose St. Providence, RI 02907	Thomas.teehan@us.ngrid.com	401-784-7667 401-784-4321
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Certificate of Service

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Joanne M. Scanlon

July 15, 2011

Date

**Docket No. 4252 – National Grid Electric – Billing Termination ("Soff-Off")
Service List as of 6/24/11**

Name/Address	E-mail	Phone/FAX
Thomas R. Teehan, Esq. National Grid 280 Melrose St. Providence, RI 02907	Thomas.teehan@us.ngrid.com	401-784-7667 401-784-4321
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File an original & 10 copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	Lmassaro@puc.state.ri.us	401-780-2107 401-941-1691
	Nucci@puc.state.ri.us	
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Division 1-5

Request:

Provisions of the 2007 pilot program for electric soft closures and the 2009 gas soft closure implementation require that if unbilled electric or gas usage exceeded 200 kWh or 13 ccf and the sent letters to the occupants did not result in the service being established in seven days, then the Company would contact the landlord. Can the Company explain why the seven-day period or some other time period in no response situations was excluded from the proposed tariff?

Response:

Given that the referenced 2007 pilot program would have taken place pre-merger, the Company could find no information or an individual with any recollection of a discussion at the 2007 or subsequent 2009 meetings concerning a seven-day period to contact the landlord. As such, a seven-day period was not included in the proposed tariffs. In any case, as stated in the Company’s response to DIV 1-22, the Company does attempt to timely identify and contact the landlord when no response is received to an “occupant” letter that is sent to a premise.

Prepared by or under the supervision of: Jeffrey P. Martin

Division 1-10

Request:

How will National Grid account for the unrecovered cost of gas consumed at a premise where there isn’t any customer responsible for payment? Please explain why National Grid should not track and monitor the annual unbilled gas that is attributed to the proposed soft-off practice and secondly, report back annually to the Commission and Division on the results?

Response:

Please see the Company’s response to Division 1-11. As noted in that response, a separate tracking of unrecovered gas costs is not necessary as a mechanism already exists to account for such gas.

Prepared by or under the supervision of: John F. Nestor, III

Division 1-11

Request:

How does National Grid include the cost of the lost gas in its calculation of the purchased gas adjustment factor?

Response:

Unbilled or lost gas is included in the Company’s Fuel Allowance, which is defined in the Terms and Conditions section of the Company’s Tariff, RIPUC NG-GAS No. 101, Section 1, Schedule B as “The quantity in Therms (as calculated on a percentage basis) by which the gross amount of gas received for Customer’s account at the Point(s) of Receipt is reduced in kind in order to compensate the Company for gas loss and unaccounted for, Company use or similar quantity-based adjustment. Section 6, Schedule C, Item 1.12.0 of the Tariff further describes the calculation of the Fuel Allowance factor as “based upon an average of the Company’s most recent five (5) years experience, fuel loss and unaccounted for or similar quality based adjustments.” The Fuel Allowance factor is calculated annually based on the difference between the total sendout and total throughput. Sendout is the quantity of gas that enters the system (citygate deliveries) or is locally produced (LNG). Total throughput is the gas going through customer meters based upon billing sales data. The yearly data is based on 12 months ending August 31st and the updated 5-year average is effective November 1st each year.

Prepared by or under the supervision of: John F. Nestor, III

Division 1-12

Request:

Please explain whether National Grid will include the soft-off practice in the utility’s Operation and Maintenance (O&M) Plan that is required by Office of Pipeline Safety (OPSO) to insure the gas can safely remain turned on in the absence of a customer?

Response:

National Grid had not considered including the Soft-Off practice in the utility’s Operation and Maintenance (O&M) Plan since the Company views the soft off practice as a billing and collection practice rather than a safety practice.

Prepared by or under the supervision of: Danielle Morrissey

Division 1-18

Request:

Has National Grid completed its transfer of all natural gas customers to its Customer Service System (CSS) billing program that is current being used just for electric customers? If not, when will the transfer be completed?

Response:

National Grid is currently working on the conversion of its Rhode Island gas accounts from its Advantage system to its CSS system. Expected completion is October 2011.

Prepared by or under the supervision of: Jeffrey P. Martin

Division 1-19

Request:

How many residential gas and electric meters do not have ERTs? Why isn’t language included in the proposed filing that addresses the treatment of service terminations when locations do not have ERTs?

Response:

There are approximately 1,900 gas meters that do not have ERTs and approximately 36,000 electric meters that do not have ERTs in Rhode Island. National Grid did not include language in the Soft-Off tariff filings that addresses the treatment of service terminations when locations do not have an ERT because a Soft-Off situation does not apply in these cases. Rather, accounts without ERTs are handled as any other termination of an account that does not meet the criteria for use of a Soft-Off by the Company. With respect to gas meters without ERTs, it is the Company’s practice to physically lock those meters when a customer requests a termination of service. For electric meters without ERTs, the Company issues a final estimated read, unless there are outstanding billing issues or the account is commercial.

Prepared by or under the supervision of: Danielle Morrissey

Division 1-20

Request:

How will National Grid maintain the “signed” consent forms or written agreements from property owners/landlords in its computerized records and how long will they be maintained?

Response:

Beginning in January 2010, National Grid has scanned and uploaded signed Electric service Leave on for Landlord (LOFL) applications to the non-service account in CSS. The LOFL application then remains as a permanent contact on the account. Original copies of LOFL applications signed in 2008 and 2009 are filed in the Company’s Accounts Processing (AP) Department located in Northborough, MA. Original copies of LOFL applications for 2000 to 2008, previously stored in the Company’s archives, are being recalled and filed with existing applications in the Northborough AP Department. It is a landlord’s responsibility to notify National Grid in writing if he/she desires certain premises removed from the LOFL program. When the written request is received the coding is removed and correspondence scanned to the corresponding non-service account.

Signed Gas LOFL applications for 2010-2011 are filed in the Northborough, MA AP Department. Applications for 2008 & 2009 are currently filed with Electric LOFL applications. Gas LOFL applications for 2004-2007, previously stored in archives are being recalled and filed with existing applications in Northborough.

Once National Grid has completed the conversion of Gas accounts to CSS, Gas LOFL applications will be scanned and uploaded to customer accounts using the same process that is currently used for Electric LOFL applications, and will become part of the permanent account record.

Prepared by or under the supervision of: Jeffrey P. Martin

Division 1-24

Request:

What efforts has National Grid made in establishing a current data base for landlords’ names, addresses and other contact information in order to efficiently comply with the proposed soft-off provisions?

Response:

The Company currently stores landlord data within its CIS databases (CSS and Advantage). When Advantage is converted to CSS, this data will be transitioned accordingly.

Prepared by or under the supervision of: Jeffrey P. Martin