STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

Rhode Island Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick RI 02888 (401) 941-4500

November 26, 2014

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

Re: Docket 4527/4528 - National Grid - 2015 Energy Efficiency and System Reliability Procurement Plans

Dear Ms. Massaro:

The Division of Public Utilities and Carriers (the Division) submits the within comments, with regard to the 2015 Energy Efficiency and System Reliability Procurement Plans that National Grid (the Company) filed with the Rhode Island Public Utilities Commission (Commission) on October 31, 2014.

The Division supports the 2015 electric and gas savings and the program charges to achieve the savings. We expect that the program charges will result in significant net cost reductions for Rhode Island electricity and gas customers.

Further, we find the electric and gas bill impacts for the average customer to be reasonable. We understand that the gas bill impacts are a work in progress and look forward to further development of gas bill impacts models similar to the electric bill impacts models. We hope that these models can be further developed and refined over the course of this upcoming calendar year and filed with the next annual plan.

The Division acknowledges the Company's efforts to develop and implement strategies to address winter price spikes in this plan year. We look forward to updates on the impact of the winter price spike strategies on customer participation and spending. We are interested in participating in discussions on programmatic adjustments to meet customer needs over the

course of this upcoming program year and request that the Company inform the Collaborative of any adjustments early enough to enable the members to discuss them and provide input.

We also support the Company's effort in allocating funding to weatherize oil heated homes. We remain interested in the work of the Delivered Fuels Working Group to find a funding source that can provide consistent funding over time to meet the needs of oil heating customers.

If you should have any questions please feel free to contact me.

Very truly yours,

Jon G. Hagopian Senior Counsel State of Rhode Island Division of Public Utilities & Carriers

cc: Thomas F. Ahern, Administrator Steve Scialabba, Chief Accountant