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July 15, 2005

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, MA 02110

RE: D.T.E. 04-116- Investigation by the Department of Telecommunications and Energy On Its Own Motion Regarding the Service Quality Guidelines Established in Service Quality Standards for Electric Distribution Companies and Local Gas Distribution Companies, D.T.E. 99-84 (2001)

Dear Secretary Cottrell:

Please find attached the responses of New England Gas Company (the "Company") to the Department of Telecommunications and Energy's: (1) Second Set of Information Requests to All Participants; and (2) Second Set of Information Requests to the Gas Companies in the above-referenced proceeding. Please contact me or Kevin Penders at the Company if you have any questions regarding the responses.

Very truly yours,

John K. Habib

Enclosure
cc: Service List
Jody Stiefel
Kevin Penders
Peter Czekanski
Joseph Rogers

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

SECOND SET OF INFORMATION REQUESTS OF
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
ALL PARTICIPANTS
D.T.E. 04-116

RESPONSES OF NEW ENGLAND GAS COMPANY

Dated: July 15
Persons Responsible: Peter Czekanski

Information Request DTE-A 2-1

Would it be appropriate in the future for companies to enter into settlements or other agreements which would permit parties to deviate from the established SQ Guidelines?

Response

It would be appropriate to allow companies to enter into settlement agreements that would permit parties to deviate from SQ Guidelines because, consistent with the Department's current service quality policies, service quality should continue to be measured by companies against their individual historical performance, rather than against the performance of other companies doing business in the state. Distribution companies serve different territories and require different levels of investment, technology and resources to provide high levels of service quality to their customers. Moreover, several of the distribution companies serving customers in Massachusetts, including New England Gas Company, are multi-jurisdictional, with affiliates serving customers in other states. Moreover, as long as the Department can determine that a proposed SQ Plan would accurately and comprehensively track a utility's performance on a consistent basis over time, would allow performance trends to be deduced, and allow the Department to detect when service quality is declining, then the SQ Plan would achieve the Department's policy objectives, regardless of whether it deviates from a generic set of SQ Guidelines.

Accordingly, allowing distribution companies to negotiate company-specific service quality guidelines with the Department and interested parties will allow the Department to enforce its service quality policies with jurisdictional distribution companies, while allowing the companies to advocate for specific provisions that will allow them to maintain and enhance their service quality in an efficient manner.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

SECOND SET OF INFORMATION REQUESTS OF
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
GAS COMPANIES
D.T.E. 04-116

RESPONSES OF NEW ENGLAND GAS COMPANY

Dated: July 15
Respondent: Michael Sullivan

Information Request DTE-GAS 2-1

Is it feasible to shorten the one-hour odor call response time in the SQ Guidelines? Explain.

Response

For many Massachusetts LDCs, it would likely not be feasible to be subject to a shorter odor call response time. Responding to calls is affected by population density, traffic, weather and other factors. Accordingly, LDCs will likely have to significantly change their allocation of resources to meet a tighter standard. Moreover, the premise behind tightening the standard is unclear. If it is based on an assumption that shortening the one-hour odor call response time in future SQ Guidelines will result in increased performance, the assumption is misguided. For example, as it relates to New England Gas Company, the Company's Fall River Service Area responded to 99.9 percent of odor calls with 60 minutes and the North Attleboro Service Area responded to 100 percent. This is because the Company places the highest priority in responding to odor calls and also, because the Company's service territory is small enough to allow for particularly rapid responses to such calls. Other companies also place a very high priority on responding to odor calls and do so with great success, although they may face more significant challenges in reaching a particular location. Accordingly, there is no basis for the conclusion that shortening the odor call response time will lead to any increase in SQ performance for this category.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

SECOND SET OF INFORMATION REQUESTS OF
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
GAS COMPANIES
D.T.E. 04-116

RESPONSES OF NEW ENGLAND GAS COMPANY

Dated: July 15
Respondent: Michael Sullivan

Information Request DTE-GAS 2-2

Is it feasible to raise the threshold for the percentage of odor calls responded to in less than an hour? Explain.

Response

Please see the Company's response to DTE-GAS-2-1.