

June 10, 2011

#### VIA ELECTRONIC MAIL

Mr. Nick Ucci Principal Policy Associate Energy Facility Siting Board 89 Jefferson Boulevard Warwick, RI 02888

**Re:** Docket No. SB-2003-01

(E-183 Transmission Line Relocation Project - A/C I-195 Relocation) Responses to Attorney General's First Set of Data Requests (2011)

Dear Mr. Ucci:

Enclosed please find seven (7) copies of National Grid's<sup>1</sup> responses to the Attorney General's First Set of Data Requests (2011) issued in the above-captioned proceeding.

I am also enclosing my appearance of counsel in this proceeding.

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

Very truly yours,

Aufor Bine High

Jennifer Brooks Hutchinson

**Enclosures** 

Cc: Service List (via electronic mail)

<sup>1</sup> The Narragansett Electric Company d/b/a National Grid

In re: The Narragansett Electric Company : d/b/a National Grid :

(E-183 115kV Transmission Line : Docket No. SB-2003-01

Relocation Project – A/C I-195 Relocation):

#### APPEARANCE OF COUNSEL

In the above-entitled proceeding, I hereby appear for and on behalf of The Narragansett Electric Company d/b/a National Grid.

Jennifer Brooks Hutchinson (RI # 6176)

Runger Burger High-

National Grid

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Date: June 10, 2011

In re: The Narragansett Electric Company:

(E-183 115kV Transmission Line : Docket No. SB-2003-01

Relocation Project – A/C I-195 Relocation):

National Grid's Responses to the Attorney General's First Set of Data Requests (2011)

June 10, 2011

<sup>&</sup>lt;sup>1</sup> The Narragansett Electric Company d/b/a National Grid (hereinafter referred to as "National Grid" or the "Company").

In re: The Narragansett Electric Company:

(E-183 115kV Transmission Line : Docket No. SB-2003-01

Relocation Project – A/C I-195 Relocation):

## <u>National Grid's Responses</u> to the Attorney General's First Set of Data Requests (2011)

#### <u>REQUEST NO. 1-1 (2011)</u>:

Regarding the \$5.8 million identified by National Grid as the Cities of Providence and East Providence's share of refunds from rate settlements in RIPUC Dockets 2930/3617, please provide information and documentation indicating:

- a. Where the funds were deposited;
- b. When the funds were deposited;
- c. Into what type of account were the funds deposited;
- d. Whether that account has accrued interest;
- e. The balance of said funds and account;
- f. How the account is carried on National Grid's books.

#### RESPONSE:

- a. The funds were captured as part of National Grid's working capital and deposited in the general cash account.
- b. The funds were deposited as collected.
- c. The funds were deposited in the general cash account.
- d. The balance has not accrued interest.
- e. As noted above the funds were not deposited in a separate account, but commingled with National Grid's cash balance.
- f. The balance is reflected as a \$5,792,393 regulatory liability on the books of the Company.

(Response prepared by or under the supervision of Donald Albers)

In re: The Narragansett Electric Company:

(E-183 115kV Transmission Line : Docket No. SB-2003-01

Relocation Project – A/C I-195 Relocation):

National Grid's Responses to the Attorney General's First Set of Data Requests (2011)

#### REQUEST NO. 1-2 (2011):

Please state whether National Grid would consider a fast track delivery method for this project as suggested by the City of East Providence so the project could be sent out to bid on a design/build basis which would compress the time frame and provide a guaranteed maximum price with financial incentives for completing the project prior to establish milestones?

## **RESPONSE**:

National Grid does not believe that a fast track delivery method is realistic for this project. First, there are a number of uncertainties that make a comprehensive EPC-type contract impractical. These include uncertainty regarding the acquisition of the Revens parking lot as a cable landing site, the need to acquire other property rights for the underground cable and transition station, and permitting issues before both State and Federal agencies. There are also significant risks involved with the project including the uncertainty associated with four horizontal directional drill (HDD) crossings of the Providence and Seekonk Rivers, uncertainty as to under-river obstructions, and restricted work space. Any attempt to cap the price and expedite construction would shift all of these risks to the contractor and ultimately increase the cost of the project.

(Response prepared by or under the supervision of David M. Campilii)

In re: The Narragansett Electric Company:

(E-183 115kV Transmission Line : Docket No. SB-2003-01

Relocation Project – A/C I-195 Relocation):

<u>National Grid's Responses</u> to the Attorney General's First Set of Data Requests (2011)

## REQUEST NO. 1-3 (2011):

Please provide a construction grade estimate for the proposed E-183 realignment project.

#### RESPONSE:

In order to develop a construction grade estimate, it is necessary to do additional detailed engineering. National Grid will need to perform geotechnical borings, undertake additional research on the location of underground utilities, perform marine survey work for the river crossings, further develop the environmental and permitting requirements of the project, and develop constructability analyses in conjunction with the City of Providence and Rhode Island Department of Transportation. This work will require the expenditure of additional internal (National Grid) and external (contractor and/or consultant) funds.

National Grid has previously explained to the parties that it is unable to expend additional funds on the underground project until the means to recover such funds is confirmed and the acquisition of property rights is resolved.

(Response prepared by or under the supervision of David M. Campilii)

In re: The Narragansett Electric Company:

(E-183 115kV Transmission Line : Docket No. SB-2003-01

Relocation Project – A/C I-195 Relocation):

<u>National Grid's Responses</u> to the Attorney General's First Set of Data Requests (2011)

## REQUEST NO. 1-4 (2011):

Other than slippage, does National Grid anticipate the same construction project schedule prepared in 2009 attached hereto as Exhibit "A", if not, provide a copy of any revised project schedule?

#### RESPONSE:

In general, National Grid would expect the project to proceed in a similar manner to the project schedule originally attached to National Grid's response to Commission Data Request 3-1 in R.I.P.U.C. Docket No. 4065 if slippage is reflected. There are various factors other than slippage that could affect the viability of the schedule. For example, the Company has made assumptions on the duration of the licensing and permitting effort. Permitting efforts by their nature are uncertain and could delay the project. Further, there are some construction activities that are impractical to perform in the winter, either because of temperature dependence of the work or because of formal (City and RIDOT) winter construction moratoria. Depending on when the project is commenced and when licensing and permitting is completed, the timing of any winter moratorium on construction could alter the project schedule. Finally, horizontal drill installations inherently carry construction risks and can cause unforeseen schedule delays.

(Response prepared by or under the supervision of David M. Campilii)

# **CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the within Responses to the Attorney General's First Set of Data Requests (2011) were sent by email to the following individuals on the 10th day of June, 2011.

Joanne M. Scanlon National Grid

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