nationalgrid

Laura S. Olton
General Counsel
Rhode Island

October 10, 2006

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

RE: Docket 3760 - Annual Distribution Adjustment Charge and Earnings Sharing Mechanism
Responses to Division Data Requests – Set 2

Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's responses to the second set of the Division Data Requests issued on September 25, 2006, in the above-captioned proceeding. This set includes responses to Division Data Requests 2-1 through 2-6.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (401) 784-7667.

Very truly yours,

Laura S. Olton

Laura S. Olton

Enclosures

cc: Docket 3760 Service List

280 Melrose Street, Providence, RI 02907
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Division Data Request 2-1

Request:

Please provide all workpapers, including electronic spreadsheets with all formulas intact, upon which New England Gas has relied to develop each page of Attachments PCC-1 through PCC-9.

Response:

Electronic spreadsheets relied on for Attachments PCC-1 through PCC-9 were sent via e-mail to Mr. Oliver on September 8th.

Prepared by or under the supervision of:
Peter Czekanski

Division Data Request 2-2

Request:

Regarding Attachment PCC-2 filed August 1, 2006 and PCC-2 filed September 1, 2006, please:

a. Document and explain the basis for all changes in the underlying data and assumptions between the two versions of this Attachment;
b. Document and explain why the Withdrawal Commodity cost for November 2005 is noticeably less than that for any other month listed.

Response:

a. Attachment PCC-2 filed August 1, 2006 was based on a gas cost sendout model projection that used a June 8th NYMEX strip. The Attachment PCC 2 filed September 1st was based on the Company's Docket No. 3766 September 1st Gas Cost Recovery (GCR) filing, Schedule GLB-2 page 18. The LNG commodity related costs were based on a new gas cost projection study with updated inventory data and updated dispatch projections.
b. The LNG withdrawal commodity cost for November is based on boiloff and upon review of the gas supply model inputs, the Company has identified that there was an error in entering the boiloff volume. The boiloff volumes should be increased 5,243 dth, which results in an additional $48,369 of commodity costs for November. Multiplying that by the System Balancing Factor results in an additional $9,862, which divided by the projected firm throughput would not change the proposed System Pressure factor.

Prepared by or under the supervision of:
Peter Czekanski

Division Data Request 2-3

Request:

Regarding the Direct Testimony of Peter C. Czekanski at page 6-7, please provide detailed support for the Company's actual DSM costs by month for the 12-months period ended June 30, 2006, as well as detail supporting the Company's estimates of the DSM costs it expects to incur for the 12-month period ending June 30, 2007. Please include in the response to this request amounts expended by DSM program and by rate class, the number of participating customers by rate class, and the purpose of each expenditure. Also, please document all projects for which commitments of DSM funds were committed prior to June 30, 2006 but not expend by that date.

Response:

Please see Attachment PCC-3 for details of the Company's actual DSM costs by month for the 12-months period ended June 30, 2006. The rebate disbursements in December, January and February were for the State of RI's natural gas fueling station at Pontiac Ave, in Cranston, the Amgen cogeneration project and the Butler Hospital microturbine and chiller projects respectively.

Projects for which commitments of DSM funds were made prior to June 30, 2006 but not expended by that date are the following:

- Charles Place Apartments (Extra Large High Load account)
  - Microturbines
  - Rebate $102,483
  - Rebate was issued August, 2006
- Taco, Inc (Extra Large High Load account)
  - Microturbines
  - Rebate $172,784
  - An Award and Acceptance letter was issued. Awaiting project implementation and final review.
- State Airport (Large High Load account)
  - Compressed Natural Gas Station and Natural Gas vehicles
  - Rebate $45,000
  - The State has made revisions to the original project. These revisions are currently under review to determine if any adjustment is required to the current level of rebate.

Prepared by or under the supervision of:
Peter Czekanski

Response DIV 2-03 continued:

Additional DSM projects currently under review or where customers have expressed interest in the Company's DSM program and the Company would expect to commit funds include the following:

- Bryant College (Extra Large High Load account)
  - Absorption Chiller
  - Rebate $25,000
- South County Hospital (Extra Large High Load account)
  - Absorption Chiller
  - Rebate estimate $45,000
- Kent Farms (Large High Load account)
  - Microturbines
  - Rebate estimate $40,000
- Providence College (Extra Large High Load account)
  - Absorption Chiller
  - Rebate estimate $45,000
- Residential Conversion Rebates
  - 20 oil to gas conversions
  - 5 electric to gas conversions
  - Rebate estimate $2,500

Prepared by or under the supervision of:
Peter Czekanski

Division Data Request 2-4

Request:

Regarding the Direct Testimony of Peter C. Czekanski at page 8, lines 6-10, please provide documentation of the Company's actual LIHEAP and low income weatherization program expenditures by month for the 12-months ended June 30, 2006, and for the referenced $17,400 carry over amount from FY 2006.

Response:

Please see the attached.

Prepared by or under the supervision of:
Peter Czekanski

LIHEAP and Low Income Weatherization Account Activity

Month	Description	Debits	Credits	Ending Balance
	Starting Balance			$ (773,341)
Jul-05	Annual Funding - Monthly accrual		$ 56,848	$ (830,189)
	Disbursements	$ 562		$ (829,627)
	Reverse disbursements		$ 274	$ (829,901)
Aug-05	Annual Funding - Monthly accrual		$ 49,713	$ (879,614)
	Reclass	$ 97,834		$ (781,780)
	Reclass - Weatherization	$ 200,000		$ (581,780)
	Disbursements	$ 376		$ (581,404)
	Reverse disbursements		$ 601	$ (582,005)
Sep-05	Annual Funding - Monthly accrual		$ 55,345	$ (637,350)
	Disbursements	$ 325		$ (637,025)
	Reverse disbursements		$ 275	$ (637,300)
	Reverse disbursements-Prior Years		$ 148,773	$ (786,074)
Oct-05	Annual Funding - Monthly accrual		$ 73,177	$ (859,251)
	Annual Funding		$ 1,785,000	$ (2,644,251)
	Entries - DSM		$ 613,305	$ (3,257,556)
	Weatheriztion + accrual reverses	$ 718,957		$ (2,538,599)
	Disbursements	$ 152		$ (2,538,447)
	Reverse disbursements		$ 97	$ (2,538,544)
Nov-05	Disbursements	$ 176		$ (2,538,368)
	Reverse disbursements		$ 176	$ (2,538,544)
Dec-05	Disbursements	$ 16,628		$ (2,521,916)
Jan-06	Disbursements	$ 1,835,391		$ (686,525)
	Reverse disbursements		$ 966	$ (687,491)
Feb-06	LIHEAP disbursements	$ 193,232		$ (494,259)
	Reverse disbursements		$ 875	$ (495,134)
Mar-06	LIHEAP disbursements	$ 300,522		$ (194,612)
	Reverse disbursements		$ 420	$ (195,032)
Apr-06	LIHEAP disbursements	$ 178,129		$ (16,903)
	reverse disbursement		$ 588	$ (17,492)
May-06	LIHEAP disbursements	$ 657		$ (16,835)
	reverse disbursement		$ 569	$ (17,404)
Jun-06	No activity		$ -	$ (17,404)

Response: DIV 2-05 continued:

Division Data Request 2-5

Request:

Regarding the Direct Testimony of Peter C. Czekanski at page 9, lines 1-14, Attachment PCC-4, page 3 of 3 and the Company's August 1, 2006 Annual Environmental Report, please:

a. Provide detailed documentation by project of each amount expended during the twelve months ended June 30, 2006 for projects 907, 307, 700, 171 and 782;
b. For project 171, Contaminated Regulators, please detail the expenditures incurred during the twelve months ended June 30, 2006:
    i. For removal of mercury seal regulators (MSRs),
    ii. For independent real-time vapor screening, and
    iii. For follow-up analytical testing at an independent laboratory
c. Identify each location for which independent laboratory testing indicated the presence of mercury after MSR removal;
d. Document and explain in detail why the Company was able to replace nearly 9,000 MSRs prior to June 30, 2005 at a cost of $1,255,930 but required $284,643 to remove and replace 59 MSR during the 12 months ended June 30, 2006;
e. Identify and document the portion of the costs of removal of MSRs removed during the 12 months ended June 30, 2006 that is offset by costs of removal included in the Company's depreciation reserve for mercury regulators;
f. Identify the year of initial installation for each of the 59 MSRs removed during the 12 months ended June 30, 2006; and
g. Specify the remaining number of mercury regulators that need to be removed and replaced. If an exact number is not known, please provide the Company's best estimate of the remaining number of MSR to be removed and replaced. Also, provide the Company's expected time schedule for completing all MSR removal and replacement activities.

Response:

a. A summary of all invoices paid for projects 907, 307, 700, 171 and 782 are attached.
b. The Company records all expenditures for the mercury regulators project 171 in a single account and therefore, detailed information is not available. Expenses incurred are those associated with the Company labor for the removal of the regulator and those for services provided by Clean Harbors.

Prepared by or under the supervision of:
Peter Czekanski

Response: DIV 2-05 continued:

Under the Company procedures for the removal and handling of mercury regulators (a copy is attached), a Clean Harbors technician is required to be on-site to perform real-time vapor screening prior to, during, and after the removal. The Clean Harbors technician will transport the removed regulator to their Braintree, MA facility for recycling and they will also leave an air monitoring dosimeter "badge" at the site. Clean Harbors will retrieve the badge at least 24 hours later and send it to an independent laboratory to confirm real-time vapor screening results. A summary of all relevant Clean Harbors invoices and Company labor costs are provided in response to DIV 2-05a above.

c. There were no locations for which independent laboratory testing indicated the presence of mercury exceeding permissible concentrations after MSR removal.
d. The reason that the expenditures for the 12 months ended June 30, 2006 were high relative to the sum of the previous years is that the current expenditures included one customer site remediation. The two invoices from SET Environmental totaling $131,241 and the Occuhealth invoice for $2,627 (see the attached account summary details for project 171) were related to this site remediation.
e. The Company does not have a separate depreciation reserve for mercury regulators. Any cost of removal built into the last depreciation study would not include the cost the Company currently incurs under its existing policies.
f. The Company does not have the year of initial installation for the 59 MSRs removed during the 12 months ended June 30, 2006.
g. The Company does not have a precise count of the number of mercury regulators remaining in the system. The Company is using leak-survey and service tech personnel to identify the presence of mercury regulators in customer buildings. Based on our past experience and rate of identifying the existence of mercury regulators, all mercury regulators should be removed from service on or before FY09.

Prepared by or under the supervision of:
Peter Czekanski

Description of Expenditure	Voucher / CK Date	Voucher / CK #	Cost Incurred	Catagory	Account	Notes
Vanasse Hangen Brustlin	7/7/2005	406175	944.07	REM	10800003 4Z0907860REM	#29313
RI General Treasurer	7/28/2005	406864	313.03	REM	10800003 4Z0907860REM	# 4/3/05 - 6/25/05
	7/31/2005		(944.07)		10800003 4Z0907860REM	Rev AP Accrual
Narragansett Bay Commission	8/30/2005	407626	362.25	REM	10800003 4Z0907860REM	# 85417
Vanasse Hargen Brustlen	9/30/2005		1,388.76	REM	10800003 4Z0907860REM	Accrual
Vanasse Hargen Brustlen	10/31/2005		4,100.72	REM	10800003 4Z0907860REM	Accrual
Vanasse Hargen Brustlen	10/31/2005		1,388.76	REM	10800003 4Z0907860REM	Prof Serv Inv 0033278
Vanasse Hargen Brustlen	10/31/2005		(1,388.76)	REM	10800003 4Z0907860REM	Rev AP Accrual
Vanasse Hargen Brustlen	11/30/2005		3,651.30	REM	10800003 4Z0907860REM	Accrual
Vanasse Hargen Brustlen	11/30/2005		4,100.72	REM	10800003 4Z0907860REM	Inv #0035540
Vanasse Hargen Brustlen	11/30/2005		(4,100.72)	REM	10800003 4Z0907860REM	Rev AP Accrual
Vanasse Hargen Brustlen	12/3/2005	410557	3,651.30	REM	10800003 4Z0907860REM	Inv # 0037092
	12/31/2005		5,031.23	REM	10800003 4Z0907860REM	AP Accrual JE #23310
	12/31/2005		(3,651.30)	REM	10800003 4Z0907860REM	Rev AP Accrual
	12/31/2005		(944.07)	REM	10800003 4Z0907860REM	Reclass to Expense
Vanasse Hangen Brustlin	1/31/2006	411934	3,362.84	REM	10800003 4Z0907860REM	Inv # 38893
	1/31/2006		(3,362.84)	CHAR	1080003 4Z0907860REM	AP Accrual Rev #24044
Vanasse Hangen Brustlin	2/7/2006	412670	1,684.40	REM	10800003 4Z0907860REM	Inv #0039877
Narragansett Bay Comm	2/7/2006	412631	362.25	REM	1080003 4Z0907860REM	Inv # 85417
	2/28/2006		(1,668.39)	REM	1080003 4Z0907860REM	Rev Accrual # 24715
Vanasse Hangen Brustlin	3/9/2006	413568	1,405.77	REM	10800003 4Z0907860REM	Inv # 0040608
Vanasse Hangen Brustlin	4/11/2006	414718	19,707.11	REM	10800003 4Z0907860REM	Inv # 0042784 3/10/06
Vanasse Hangen Brustlin	5/9/2006	415709	1,753.45	REM	10800003 4Z0907860REM	Inv # 44506 5/8
Vanasse Hangen Brustlin	5/23/2006	416103	900.17	REM	10800003 4Z0907860REM	Inv # 0045028
Narragansett Bay Comm	5/23/2006	416066	362.25	REM	10800003 4Z0907860REM	Inv # 85417 5/06 4/23/06
Vanasse Hangen Brustlin	5/31/2006	Reversed	1,548.46	REM	10800003 4Z0907860REM	Inv # 0045030 4/23
Vanasse Hangen Brustlin	5/31/2006	Reversed	(1,548.46)	REM	1080003 4Z0907860REM	Inv # 0045030 Reversed
Total			$ 38,410.23			

Description of Expenditure	Voucher / CK Date	Voucher / CK #	Cost Incurred	Catagory	Account	Notes
Clean Harbors	7/28/2005	406781	750.35	PCB	10800003/4Z0307860PCB	RI0573989
Bk One (D Tomka) Thielsch Eng	8/11/2005	407178	792.00	PCB	10800003/4Z0307860PCB	401.072120050176
ESS Laboratory	8/23/2005	407441	88.00	PCB	10800003/4Z0307860PCB	# 0503261
Clean Harbors	8/31/2005		554.16	PCB	10800003/4Z0307860PCB	401-JD-41 Accrual
Clean Harbors	8/31/2005		(1,084.22)	PCB	10800003/4Z0307860PCB	401-JD-41 Accrual
Clean Harbors	8/31/2005		7,901.06	PCB	10800003/4Z0307860PCB	401-JD-41 Accrual
Clean Harbors	9/6/2005	407756	554.16	PCB	10800003/4Z0307860PCB	#RI0586034
Clean Harbors	9/6/2005	407756	(1,084.22)	PCB	10800003/4Z0307860PCB	#RI0580058R
Clean Harbors	9/6/2005	407756	7,901.06	PCB	10800003/4Z0307860PCB	#RI0580058R
Clean Harbors	9/22/2005	408197	4,114.13	PCB	10800003/4Z0307860PCB	#RI0504162R
Clean Harbors	9/23/2005	408292	1,458.70	PCB	10800003/4Z0307860PCB	#RI0501890R
	9/30/2005		(554.16)	PCB	10800003/4Z0307860PCB	Reverse Accrual 401-JD-41
	9/30/2005		(7,901.06)	PCB	10800003/4Z0307860PCB	Reverse Accrual 401-JD-41
	9/30/2005		336.37	PCB	10800003/4Z0307860PCB	Reclass
	9/30/2005		1,084.22	PCB	10800003/4Z0307860PCB	Reverse Accrual 401-JD-41
Clean Harbors	12/30/2005	410805	5,868.44	PCB	10800003/4Z0307860PCB	Inv # RI0539597R
	12/31/2005		19,942.13	PCB	10800003/4Z0307860PCB	AP Accrual
	12/31/2005		3,472.13	PCB	10800003/4Z0307860PCB	AP Accrual
J P Morgan NA Kevin England	1/12/2006	411814	264.00	PCB	10800003/4Z0307860PCB	Procurement Cards
J P Morgan NA Kevin England	1/12/2006	411814	968.00	PCB	10800003/4Z0307860PCB	Procurement Cards
	1/31/2006		(3,472.13)	PCB	10800003/4Z0307860PCB	AP Accrual Rev #23298
	1/31/2006		(3,472.13)	PCB	10800003/4Z0307860PCB	AP Accrual Rev (12/05)#24044
Clean Harbors Envir Serv	1/31/2006	412410	696.51	PCB	10800003/4Z0307860PCB	Inv # 0573316
J P Morgan NA Kevin England	1/12/2006	411814	1,019.00	PCB	10800003/4Z0307860PCB	Procurement Cards
Clean Harbors Envir Serv	1/31/2006	411841	3,472.13	PCB	10800003/4Z0307860PCB	Inv # R10553368
Kevin England - Thielsch Eng	2/13/2006	412763	176.00	PCB	10800003/4Z0307860PCB	Bankcard
Kevin England - Thielsch Eng	2/13/2006	412763	352.00	PCB	10800003/4Z0307860PCB	Bankcard
	2/28/2006		(6,000.00)	PCB	10800003/4Z0307860PCB	Feb 06 Add'l II Re Acc for Dec
Clean Harbors Envir Serv	3/14/2006	413601	9,245.26	PCB	10800003/4Z0307860PCB	Inv # R10570172
Kevin England - Thielsch Eng	3/14/2006	413766	440.00	PCB	10800003/4Z0307860PCB	Procurement Cards
Clean Harbors Envir Serv	3/23/2006	413926	1,458.13	PCB	10800003/4Z0307860PCB	Inv # 0696846
Clean Harbors Envir Serv	3/23/2006	413926	900.34	PCB	10800003/4Z0307860PCB	Inv # RI0601281
Clean Harbors Envir Serv	3/23/2006	413926	567.93	PCB	10800003/4Z0307860PCB	Inv # RI0696846
Clean Harbors Envir Serv	3/23/2006	413926	576.45	PCB	10800003/4Z0307860PCB	Inv # RI0696846
Accrual	3/31/2006		1,495.48	PCB	10800003/4Z0307860PCB	JD-41 AccrAP
Rev Accrual	3/31/2006		(10,470.00)	PCB	10800003/4Z0307860PCB	Rev Dec 05 e-mail acc
Clean Harbors Envir Serv	4/4/2006	414203	1,495.48	PCB	10800003/4Z0307860PCB	Inv #R10604668

Description of Expenditure	Voucher / CK Date	Voucher / CK #	Cost Incurred	Catagory	Account	Notes
Clean Harbors Envir Serv	4/27/2006	415200	2,615.74	PCB	10800003/4Z0307860PCB	Inv #R10622159
Clean Harbors Envir Serv	4/27/2006	415250	473.06	PCB	10800003/4Z0307860PCB	Inv #RI0620788
Clean Harbors Envir Serv	4/27/2006	415250	487.06	PCB	10800003/4Z0307860PCB	Inv #RI0620786
Rev Accrual	4/30/2006		(1,495.48)	PCB	10800003/4Z0307860PCB	Reverse Accrual
Clean Harbors Envir Serv	5/9/2006	415584	715.03	PCB	10800003/4Z0307860PCB	Inv # RI0623728 5/6/06
Kevin England - Thielsch Eng	5/23/2006	416060	176.00	PCB	10800003/4Z0307860PCB	Pcard
Kevin England - Thielsch Eng	5/23/2006	416060	264.00	PCB	10800003/4Z0307860PCB	Pcard
Clean Harbors Envir Serv	5/27/2006	415250	(487.06)	PCB	10800003/4Z0307860PCB	Inv # RI0620786
Clean Harbors Envir Serv	5/27/2006	415250	487.06	PCB	10800003/4Z0307860PCB	Inv # RI0620786 4/25/06
Clean Harbors Envir Serv	5/30/2006	Reversed	(466.20)	PCB	10800003/4Z0307860PCB	Inv # RI0638240
Clean Harbors Envir Serv	5/30/2006	Reversed	466.20	PCB	10800003/4Z0307860PCB	Inv # RI0638240 Reverse
Clean Harbors Envir Serv	5/31/2006		466.20	PCB	10800003/4Z0307860PCB	Accrual
JP Morgan	6/30/2006		352.00	PCB	10800003/4Z0307860PCB	Pcard Accrual
Clean Harbors Envir Serv	6/30/2006		(466.20)	PCB	10800003/4Z0307860PCB	Rev Accrual
Clean Harbors Envir Serv	6/30/2006	416374	466.20	PCB	10800003/4Z0307860PCB	Inv # RI0638240
Clean Harbors Envir Serv	6/30/2006	417021	808.08	PCB	10800003/4Z0307860PCB	Inv # RI0652094
Clean Harbors Envir Serv	6/30/2006	417021	481.74	PCB	10800003/4Z0307860PCB	Inv # RI0652093
Total			49,249.13			

Description of Expenditure	Voucher / CK Date	Voucher / CK #	Cost Incurred	Catagory	Account	Notes
Narragansett Bay Comm	8/30/2005	407626	724.50	Cortwt	10800003 4Z0700860CORTWT	# 94466
Narragansett Bay Comm	11/22/2005	410106	362.25	Cortwt	1080003 4Z0700860CORTWT	Inv 85417
Narragansett Bay Comm	11/23/2005	410213	724.50	Cortwt	1080003 4Z0700860CORTWT	Inv 94466
Narragansett Bay Comm	2/7/2006	412631	724.50	Cortwt	10800003 4Z0700860CORTWT	Inv #94466
Derek Tomka - Home Depot	2/13/2006	412763	180.20	Cortwt	10800003 4Z0700860CORTWT	Bankcard
Kevin England - Thielsch Eng	3/14/2006	413766	838.00	Cortwt	10800003 4Z0700860CORTWT	Pcard JP Morgan Chase Bank
Kevin England-Thielsch	4/13/2006		2,926.00	Cortwt	1080003 4Z0700860CORTWT	P Card
Kevin England-Thielsch	4/13/2006		3,216.00	Cortwt	1080003 4Z0700860CORTWT	P Card
Kevin England - Thielsch Eng	5/23/2006	416060	809.00	Cortwt	10800003 4Z0700860CORTWT	Pcard JP Morgan Chase Bank
Narragansett Bay Comm	5/23/2006	416066	724.50	Cortwt	10800003 4Z0700860CORTWT	Narragansett Bay Comm
ESS Lab May Entry	6/1/2006	416245	200.00	Cortwt	10800003 4Z0700860CORTWT	Inv # 0603427 5/5/06
ESS Lab May Entry	6/1/2006	416245	789.00	Cortwt	10800003 4Z0700860CORTWT	Inv # 0604086 5/5/06
ESS Lab	6/6/2006	416461	789.00	Cortwt	10800003 4Z0700860CORTWT	Work Order #0605057
ESS Lab	6/19/2006	416835	200.00	Cortwt	10800003 4Z0700860CORTWT	Work Order #0605489
ESS Lab	6/19/2006	416835	608.00	Cortwt	10800003 4Z0700860CORTWT	Work Order #0605217
ESS Lab	6/19/2006	416835	618.00	Cortwt	10800003 4Z0700860CORTWT	Work Order #0605174
ESS Lab	6/27/2006	417033	119.00	Cortwt	10800003 4Z0700860CORTWT	Work Order #0605490
ESS Lab	6/27/2006	417033	597.00	Cortwt	10800003 4Z0700860CORTWT	Work Order #0605403
ESS Lab	6/27/2006	417033	672.00	Cortwt	10800003 4Z0700860CORTWT	Work Order #0605404
ESS Lab	6/30/2006	417033	3,186.00	Cortwt	1080003 4Z0700860CORTWT	Work Order # 0605491
ESS Lab	6/30/2006		789.00	Cortwt	10800003 4Z0700860CORTWT	Accrual
Vanasse Hangen Brustlin	6/30/2006		384.29	Cortwt	10800003 4Z0700860CORTWT	Accrual
Total			$ 20,180.74			

Description of Expenditure	Voucher/Ck Date	Voucher / CK #	Cost Incurred	Catagory	Account	Notes
Clean Harbors	8/25/2005	407534	18,745.33	RC	10800003/4Z0171860RC	RI 0566148
Clean Harbors	8/25/2005	407534	4,132.77	RC	10800003/4Z0171860RC	RI 0592443
SET Environmental	8/30/2005	407661	65,200.00	RC	10800003/4Z0171860RC	#97677
Clean Harbors	8/31/2005		3,985.35	RC	10800003/4Z0171860RC	Accrual
Clean Harbors	8/31/2005		4,708.19	RC	10800003/4Z0171860RC	Accrual
Clean Harbors	8/31/2005		6,141.66	RC	10800003/4Z0171860RC	Accrual
Clean Harbors	8/31/2005		11,097.17	RC	10800003/4Z0171860RC	Accrual
Occuhealth Inc	8/31/2005	407729	2,626.70	RC	10800003/4Z0171860RC	Check dated 9/1/05 #12162
	8/31/2005		66,041.00	RC	10800003/4Z0171860RC	Accrual
Clean Harbors	9/6/2005	407756	25,932.37	RC	10800003/4Z0171860RC	C10588877,RI0586546-0255R-4598
Clean Harbors	9/22/2005	408197	23,733.58	RC	10800003/4Z0171860RC	#RI0504982R, RI0510706
SET Environmental	9/30/2005		66,041.00	RC	10800003/4Z0171860RC	#20781 Accrual
	9/30/2005		(25,932.37)	RC	10800003/4Z0171860RC	Reverse Accrual 401-JD-41
	9/30/2005		(66,041.00)	RC	10800003/4Z0171860RC	Reverse Accrual JE20781
SET Environmental	10/6/2005	408805	66,041.00	RC	10800003/4Z0171860RC	Inv #00097919
Clean Harbors	10/31/2005		6,899.24	RC	10800003/4Z0171860RC	Accrual
	10/31/2005		(66,041.00)	RC	10800003/4Z0171860RC	Reverse Accrual JE20781
	11/30/2005		(6,899.24)	RC	10800003/4Z0171860RC	
Clean Harbors	12/30/2005	410805	13,468.23	RC	10800003/4Z0171860RC	Inv # RI0556382
	12/31/2005		11,352.29	RC	10800003/4Z0171860RC	Reclass to Environmental
	12/31/2005		25,401.47	RC	10800003/4Z0171860RC	AP Accrual
	12/31/2005		11,933.47	RC	10800003/4Z0171860RC	Accrual
	12/31/2005		(15.74)	RC	10800003/4Z0171860RC	Reclass to Expense
Clean Harbors Envir Serv	1/16/2006	411841	11,933.47	RC	10800003/4Z0171860RC	Inv # RI0539339
Clean Harbors Envir Serv	1/26/2006	412319	$ 4,622.78	RC	10800003/4Z0171860RC	Inv # RI0573319
	1/31/2006		(11,933.47)	RC	10800003/4Z0171860RC	AP Acccrual Reversal #24044
	1/31/2006		(11,933.47)	RC	10800003/4Z0171860RC	AP Acccrual Reversal #23298
	2/28/2006		(13,468.00)	RC	10800003/4Z0171860RC	Feb 06 Add'l II Re Acc for Dec
Clean Harbors Envir Serv	3/9/2006	413513	4,984.02	RC	10800003/4Z0171860RC	Inv # RI0603543
Clean Harbors Envir Serv	3/23/2006	413926	6,080.40	RC	10800003/4Z0171860RC	Inv # RI0688219
Clean Harbors Envir Serv	5/31/2006		6,137.47	RC	10800003/4Z0171860RC	Accrual
Clean Harbors Envir Serv	6/30/2006	416374	6,137.47	RC	10800003/4Z0171860RC	Inv # RI0641740
Clean Harbors Envir Serv	6/30/2006	416930	4,289.26	RC	10800003/4Z0171860RC	Inv # RI0652085
Clean Harbors Envir Serv	6/30/2006		(6,137.47)	RC	10800003/4Z0171860RC	Rev Accrual
Clean Harbors			6,899.24	RC	10800003/4Z0171860RC	Inv # RI0523464
Sub Total			$ 276,163.17			

Description of Expenditure	Voucher/Ck Date	Voucher / CK #	Cost Incurred	Catagory	Account	Notes
Company Labor	7/31/2005		593.22	LA	10800003/4Z0171860LA	
Company Labor	8/31/2005		854.15	LA	10800003/4Z0171860LA	
Company Labor	9/30/2005		605.30	LA	10800003/4Z0171860LA	
Company Labor	10/31/2005		1,057.86	LA	10800003/4Z0171860LA	
Company Labor	11/30/2005		1,334.58	LA	10800003/4Z0171860LA	
Company Labor	12/31/2005		573.42	LA	10800003/4Z0171860LA	
Company Labor	1/31/2006		$ 969.05	LA	10800003/4Z0171860LA	
Company Labor	2/28/2006		520.77	LA	10800003/4Z0171860LA	
Company Labor			-	LA	10800003/4Z0171860LA	
Company Labor	4/30/2006		979.36	LA	10800003/4Z0171860LA	
Company Labor	5/31/2006		743.72	LA	10800003/4Z0171860LA	
Company Labor	6/30/2006		248.69	LA	10800003/4Z0171860LA	
Labor Exp			$ 8,480.12			
Total			$ 284,643.29			

Description of Expenditure	Voucher / CK Date	Voucher / CK #	Cost Incurred	Catagory	Account	Notes
	7/31/2005		(2,698.00)	SI	10800003 4Z0782860SI	Reclass
Vanasse Hagen Brustlin	7/28/2005	406891	3,406.26	SI	10800003 4Z0782860SI	
Vanasse Hagen Brustlin	8/10/2005	406891	(3,406.26)	SI	10800003 4Z0782860SI	Reversal
Vanasse Hagen Brustlin	8/16/2005	407339	520.61	SI	10800003 4Z0782860SI	# 0032233
Vanasse Hagen Brustlin	8/16/2005	407339	3,394.26	SI	10800003 4Z0782860SI	# 0031710
Vanasse Hagen Brustlin	9/30/2005		196.33	SI	10800003 4Z0782860SI	Accrual
Vanasse Hagen Brustlin	10/6/2005	408788	196.33	SI	10800003 4Z0782860SI	Prof Serv Inv #0033283
Vanasse Hagen Brustlin	10/31/2005		3,224.57	SI	10800003 4Z0782860SI	Accrual
	10/31/2005		(196.33)	SI	10800003 4Z0782860SI	Reverse Accrual
Vanasse Hagen Brustlin	11/30/2005		1,624.39	SI	10800003 4Z0782860SI	Accrual
	11/30/2005		(3,224.57)	SI	10800003 4Z0782860SI	Reverse Accrual
Vanasse Hagen Brustlin	12/3/2005	410704	1,624.39	SI	10800003 4Z0782860SI	Inv # 0037163
Adler Pollock & Sheehan	12/31/2005	411190	437.50	LEGL	10800003 4Z0782860LEGL	Inv # 317172
	12/31/2005		571.26	SI	10800003 4Z0782860SI	AP Accrual
	12/31/2005		(1,624.39)	SI	10800003 4Z0782860SI	Reverse Accrual
Vanasse Hangan Brustlin	1/16/2006	411934	419.25	SI	10800003 4Z0782860SI	Inv. # 38898
	1/31/2006		(419.25)	SI	10800003 4Z0782860SI	AP Accrual Rev #24044
Adler Polloch & Sheehan	2/14/2006	412766	262.50	SI	10800003 4Z0782860LEGL	Inv # 318004
	2/28/2006		388.00	SI	10800003 4Z0782860SI	Accrual from Corp 3/27/06
Vanasse Hangan Brustlin	3/9/2006	413568	370.05	SI	10800003 4Z0782860SI	Inv # 0040612
Adler Polloch & Sheehan	3/30/2006	414083	375.00	SI	10800003 4Z0782860LEGL	Inv # 320587
Rev Accrual	3/31/2006		(152.01)	SI	10800003 4Z0782860SI	Rev Dec 05 e-mail acc
Clean Harbors Env Services	4/11/2006	414635	6,065.58	SI	10800003 4Z0782860SI	Inv RI0600003 3/10/06
Vanasse Hangan Brustlin	4/11/2006	414718	3,916.98	SI	10800003 4Z0782860SI	Inv 0043122 3/10/06
Vanasse Hangan Brustlin	4/11/2006	414718	2,084.54	SI	10800003 4Z0782860SI	Inv 0043123 3/10/06
Adler Polloch & Sheehan	4/13/2006	414736	187.50	LEGL	10800003 4Z0782860LEGL	Inv # 319624
Vanasse Hangan Brustlin	5/9/2006	415709	2,022.28	SI	10800003 4Z0782860SI	Inv 44520 5/8
Vanasse Hangan Brustlin	5/23/2006	416103	1,620.01	SI	10800003 4Z0782860SI	Inv 0045035 4/25
Vanasse Hangan Brustlin	5/31/2006		(3,353.66)	SI	10800003 4Z0782860SI	Inv # 44524 5/8/06 Reverse
Vanasse Hangan Brustlin	5/31/2006	Reversed	3,353.66	SI	10800003 4Z0782860SI	Inv 44524 5/8 Reversed
Adler Polloch & Sheehan	6/30/2006	416804	187.50	LEGL	10800003 4Z0782860LEGL	Inv # 322897 6/17/06
Adler Polloch & Sheehan	6/30/2006	416804	2,531.25	LEGL	10800003 4Z0782860LEGL	Inv # 321891 6/17/06
Vanasse Hangan Brustlin	6/30/2006	417091	12,937.26	SI	10800003 4Z0782860SI	Inv # 0046953 6/23/06
	6/30/2006		(388.00)	LEGL	10800003 4Z0782860LEGL	Rev Accrual
Vanasse Hagen Brustlin			3,224.57	SI	10800003 4Z0782860SI	Inv 0035544
TOTAL			$ 39,679.36			

SUBJECT	REFERENCE
Removal and Handling of Mercury Regulators	**EP No. 1 – Waste Management**

PURPOSE: This guidance document provides guidance on the removal and handling of mercury regulators.

SCOPE: All operations of National Grid and its contractors which involve the removal and handling of mercury regulators must comply with this guidance document.

RESPONSIBILITIES: It is the responsibility of all company personnel and contractors to conduct their work activities in a manner that is protective of the environment.

PROCEDURE: This procedure controls the removal and handling of mercury-containing regulators.

Note: If it is not known that the regulator contains mercury, it shall be treated as a mercury-containing regulator until proven otherwise.

Responsibilities

Only trained persons are qualified to carry out the tasks outlined in this procedure. It is the responsibility of the Customer Service Supervisor to assign qualified personnel and helper to this task due to safety and environmental concerns.

Materials/Supplies needed:

A. Nitrile Gloves
B. 6 Gallon Bucket (marked MS REGULATORS)
C. 73 Quart Bin
D. Plastic bags (4-mil) / Zip ties
E. Floor Mat/Mercury Pad
F. Caps, Plugs and Seals
G. Chemical Splash Goggles
H. CAUTION Tag L-38

1. 0 Area Preparation

A. Air quality technician, Clean Harbors, must approve work area for entry of company employees before work begins.
B. If dirt/mud has collected on the soles of your work boots, don chemically resistant overshoe at entrance to building.
C. Put on nitrile gloves.
D. Put on approved safety goggles.
E. Line bin with two plastic bags, one inside the other.
F. Spread out floor mat and place lined bin on mat in position to catch anything that may drop from work area. If site conditions are such that the mat and lined bin cannot be properly placed (including services already cut off by C&M).
G. Shut off curb valve (if available).
H. Shut off gas supply to regulator.
I. Purge regulator, meter and house line.

2. 0 Vent Line Removal

Note: If C&M is going to or has already cut off service, refer to 6.A.

A. Tap vent line with wrench to dislodge mercury.
Note: After tapping, some mercury may still be lodged in ventline.
B. Position the 3rd plastic bag around the regulator and vent line to capture any mercury from the vent line.
C. Disconnect vent line with extreme care to prevent dropping any mercury that may be trapped in the vent line. Inspect with a flashlight then disassemble entire vent line. Remove entire vent line (if site conditions prohibit removal of the entire vent line, as a minimum, disassemble vent back to and including nearest vertical elbow and vertical length of pipe.) Plug/cap pipe with sealant (pipe dope), remove nipple from regulator, and plug/cap regulator with sealant, up to 2 ft. of the outside vent line.
D. Plug or cap all ends of disassembled vent piping with sealant.
E. Place vent line in 3rd plastic bag.

3.0 Regulator Removal Alternatives

Note: Regulators may be removed using either of the two methods shown, if neither alternative is feasible, contact the customer service field supervisor responsible for mercury regulators.

A. Union Method (Preferred Method)

1. Break union connection.
2. Remove union nipple.
3. Plug outlet side of regulator with sealant (pipe dope).
4. Spin off regulator (use extreme care to prevent regulator from tipping when it comes off pipe threads).
5. Plug regulator inlet with sealant (pipe dope).
6. Place regulator in bin.

B. Cut Out Method (Second Choice)

1. Cut outlet with four-wheel cutter.
2. Remove outlet nipple and plug outlet side of regulator.
3. Secure regulator
4. Cut inlet with four-wheel cutter.
5. Remove inlet nipple and plug inlet side of regulator.
6. Place regulator in lined bin

4.0 C&M Cut Off prior to Service Arrival

A. C&M notifies customer service dispatcher that a mercury regulator must be removed.
Note: If the service must immediately be reinstated outside of normal business hours, C&M will make <u>all reasonable efforts</u> to fix the situation SAFELY without disturbing the regulator, including possibly relocating the service and securing the sealed regulator assembly in place so that the regulator removal can be scheduled during normal business hours. (The appointment should be scheduled with the customer while on scene. C&M notifies the MSR Supervisor or Environmental Manager immediately of the time scheduled with the customer for the removal).

B. C&M secures meter/regulator set with strap iron or other appropriate means to protect the set from movement that could disturb mercury in the regulator.

C. C&M plugs all openings to the secured meter/regulator set.
Note: Service personnel perform the rest of procedure.

5.0 Contaminant Removal

A. Ensure all mercury empacked items are at least double bagged.
B. Place all plastic bagged materials in labeled bucket.
C. Bucket and label will be provided by Clean Harbors technician

D. Clean Harbors technician will continue to monitor the area and will notify personnel on-site when the area has reached "clearance" levels
E. If necessary, Clean Harbors will use a small exhaust blower and flexible ducting to ventilate the area for a short period of time to reach clearance levels
F. Secure cover on bucket.
G. The labeled bucket with the regulator will be transported by Clean Harbors as Universal Waste and will be recycled at their Braintree, MA facility or other facility. The Bill of Lading for the transportation of the Universal Waste will be signed by the crew supervisor.
H. Place removed vent piping, bin, and blanket in truck for transportation back to the shop.
Note: Make sure all materials (except sealed vent pipe) are in proper, closed and secure containers.
I. Install new regulator.
J. Install vent line.
K. Place CAUTION tag on vent line.
L. Turn on curb valve (If turned off).
M. Turn on service valve.
N. Check for natural gas leaks.
O. Air quality technician to check blanket and tools with mercury vapor meter (Lumex) for mercury contamination.
P. Return tools to truck.
Q. Clean Harbors technician will place air monitoring "badge" at the site and will retrieve the badge to verify safe mercury levels at least 24 hours later. In some cases if may be necessary to request help from Customer Field service to retrieve this badge. If the badge is retrieved it is taken down from the location where it was hung and placed in a zip-lock bag and given to the Environmental Department to be sent to the analytical lag. The bag must be labeled with the address from where the regulator removal took place. **Note: If at any time the blanket and/or tools come in contact with mercury, they are to be bagged and treated as mercury containing material.**

6.0 Spills

A. All spills shall be immediately reported to dispatch.
B. Dispatchers shall immediately report incident using the Emergency Response Chart.
C. All spills shall be handled by the on-site air quality contractor, who may call (after discussion with the Environmental Compliance Department) additional Clean Harbors emergency response personnel. The Clean Harbors technician has authority to call these additional resources directly from the scene.

D. All indoor work will stop immediately in the presence of spilled mercury and will remain suspended until the on-site air quality technician approves continuation of work. Technician must leave the area.

7.0 Training

A. All training should be coordinated in conjunction with Safety & Environmental Depts.

8.0 Records

A. Training Records.

B. Clean Harbors will send the Environmental Department a package containing the record of monitoring, copy of the completed Bill of Lading and results of the air monitoring "badge" which was left on-site and retrieved later by Cleans Harbors.

9.0 Related Documents

A. Material Safety Data Sheet (Mercury, CAS#7439-97-6)

B. Material Safety Data Sheet (Hg Absorb in mercury spill kit)

C. Material Safety Data Sheet (HgX)

D. Procedure

E. Instructional Aid

F. Competency

G. Instructor Guide

Division Data Request 2-6

Request:

Please provide all workpapers supporting the Company's forecasts of (a) Firm Throughput and (b) Firm Transportation Throughput for the 12-months ended October 31, 2007.

Response:

Please see the attached copy of the Company's response to Division Data Request 1-1 in the Gas Cost Recovery Docket No. 3766.

Prepared by or under the supervision of:
Peter Czekanski

Division Data Request 1-1

Request:

Re: Schedule PCC-1, page 12. The electronic workpapers provided show all the forecasted monthly sales and FT-2 Transportation volumes as hard inputs. Please:

a. Provide all supporting workpapers for the development of monthly and annual forecasted sales for each rate class.
b. Identify losses, additions or changes in rate classification for Large and Extra Large C&I customers and all documentation relied upon to support forecasted changes in sales and transportation volumes for those classes.

Response:

a. Workpapers supporting the development of monthly and annual forecasted sales for each rate class, except the extra large, are contained in two excel files. The first file, "Forecast 2007-2008", includes a worksheet used to develop the forecasted customer count based on the general trend of month-to-month changes over the same month in each of the last three years. For example, between October and November in each of the past three years, there has been an average increase of 2,124 residential heating customers and hence, the forecast for November 2006 reflects an increase of 2,124 customers over the October customer count. For the medium, large low load and large high load categories, the sales and transportation data in each rate class was combined for purposes of developing the customer count forecast and then split into the sales / transportation subcategories based on the most recent mix of sales and transportation service. The forecasted sales volumes are calculated by multiplying the monthly forecasted customer count by the monthly average normalized use per customer. The development of the monthly average normalized use per customer is provided on the worksheets associated with the second excel file, "RI History for GCR". The second file shows the adjusting of actual historic consumption data for the effects of weather based on a ten-year normal of 5,463 degree days (5,492 in 2004 to account for the leap year). The normalized average use per customer is based on the average use per customer per month in the same month of the last two years.

   Electronic copies of both excel files have been provided to Mr. Oliver via e-mail.

Prepared by or under the supervision of:
Peter Czekanski

Response to DIV 1-1 continued:

b. Losses, additions and changes in the Large rate classification were not specifically identified by customer. The forecast for the Large rate classification was developed as described in the response to DIV 1-1a above. Specific losses, additions and changes were identified for Extra Large C&I customers on a customer-by-customer basis by the key accounts representatives assigned to the accounts. A copy of the spreadsheet with the supporting details and documentation was provided to Mr. Oliver via e-mail.

Prepared by or under the supervision of:
Peter Czekanski