

HinckleyAllenSnyderLLP
ATTORNEYS AT LAW

50 Kennedy Plaza, Suite 1500
Providence, RI 02903-2319
TEL: 401.274.2000
FAX: 401.277.9600
www.haslaw.com

Gerald J. Petros
gpetros@haslaw.com
Direct Dial: 401-457-5212

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2008 JUL 30 AM 10:45

PUBLIC UTILITIES COMMISSION

July 29, 2008

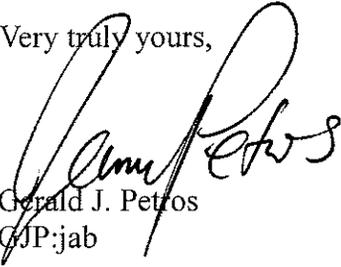
Luly E. Massaro, Commission Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. 3969

Dear Luly:

I am writing on behalf of Narragansett Electric Company d/b/a National Grid to inform the Commission that we have no objection to Constellation Energy Commodities Group's motion to intervene.

Very truly yours,


Gerald J. Petros
GJP:jab

cc: Service List

914513v1 (95000/9501000)

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July 29, 2008

Via Electronic and First Class Mail

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

RECEIVED
2008 JUL 30 AM 10:46
PUBLIC UTILITIES COMMISSION

**Re: Petition and Request of the Narragansett Electric Company
d/b/a National Grid
Docket No. 3969**

Dear Luly:

I enclose an original and nine copies of Narragansett Electric Company d/b/a National Grid's First Data Request to Constellation Energy Commodities Group.

Very truly yours,


Gerald J. Petros
GJP:el

Enclosure

cc: Service List

914147v1 (57972/129329)

STATE OF RHOD ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

Petition and Request of the Narragansett
Electric Company d/b/a National Grid

Docket No. 3969

**NARRAGANSETT ELECTRIC COMPANY d/b/a NATIONAL GRID'S FIRST DATA
REQUEST TO CONSTELLATIONAL ENERGY COMMODITIES GROUP**

Narragansett Electric Company d/b/a National Grid ("Narragansett Electric") hereby requests that Constellation Energy Commodities Group ("Constellation"), respond to the following requests for information and documents:

1. Please describe in reasonable detail how Constellation has procured all power supply, including all market products required under ISO rules for load serving entities (the "Power Supply"), for purposes of serving standard offer load in Rhode Island from 1998 until the present (the "Relevant Period"). Please also explain how Constellation manages that supply for purposes of serving standard offer load in Rhode Island.

2. Please identify all power supply contracts that Constellation has with any party in the New England ISO region from which Constellation has purchased all or a portion of the Power Supply to serve standard offer load in Rhode Island for the last thirty months. In identifying the contracts, please identify the party, the term, the market products purchased by month, quantities purchased by month, and pricing by month.

3. Please identify any financial instruments or agreements entered into by Constellation for the purposes of hedging or managing all or a portion of costs for providing the Power Supply to serve standard offer load in Rhode Island. In identifying the contracts, please

identify the party, the term, the nature of the financial arrangement, total payments made or received by month, and pricing.

4. How has Constellation tracked the actual costs and revenues associated with serving standard offer load in Rhode Island separately from its other power supply business. Please provide copies of internal financial analyses and memos reflecting such tracking. Please also state for each year during the Relevant Period the costs and revenues arising out of providing wholesale standard offer supply in Rhode Island. Please itemize the costs by component. To the extent any costs are a result of allocating a portion of costs to Rhode Island, please identify such allocated portion and the method of allocation.

5. Has Constellation made any projections of costs and revenues of its wholesale power supply contracts serving standard offer load in Rhode Island separately from its other power supply business? If so, please provide copies of any analyses performed during the Relevant Period, showing any monthly, quarterly, and annual projections.

6. Does Constellation support the approval of the FAF Tariff by the Commission, as proposed by Narragansett Electric in this docket? Whatever the answer, please fully explain the basis for the answer and provide all supporting documentation.

7. When is the first time that Constellation notified Narragansett Electric that Constellation claimed entitlement to an additional payment for a Fuel Adjustment Factor for the period commencing on January 1, 2005. Please set forth the details re this notice, including the date, form, and substance of the notice. If the notice was written please provide a copy and any proof of delivery.

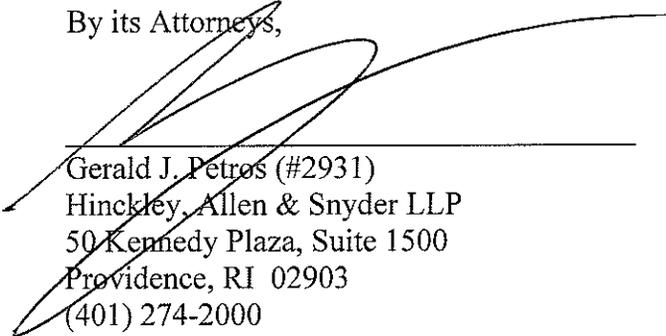
8. When did Constellation learn that TransCanada claimed an entitlement to an additional payment from Narragansett Electric for a Fuel Adjustment Factor for power supply to

serve the standard offer load in Rhode Island? When did Constellation first assert a similar claim and why did it do so at that particular time? Please explain completely and specifically the basis for all answers and provide supporting documentation.

9. For the period from January 2005 through March 2008, is it Constellation's position that it is owed any payments in addition to those already made by Narragansett Electric for standard offer service provided to Narragansett Electric's customers in Rhode Island? If yes, please state the basis and method for calculating any such additional payments and explain fully why Constellation did not invoice Narragansett Electric for any such additional payments during that time period. Please also explain why Constellation chose not to notify Narragansett Electric prior to April of 2008 that Constellation claimed an entitlement to such additional payments for the period from January 2005 through April of 2008.

NARRAGANESTT ELECTRIC
COMPANY d/b/a NATIONAL GRID

By its Attorneys,



Gerald J. Petros (#2931)
Hinckley, Allen & Snyder LLP
50 Kennedy Plaza, Suite 1500
Providence, RI 02903
(401) 274-2000
(401) 277-9600 (fax)

Dated: July 29, 2008

CERTIFICATION

I hereby certify that I mailed a copy of the within Data Request to counsel of record, as set forth below, on the 29th day of July, 2008.

Name/Address	E-mail Distribution	Phone/FAX
Thomas R. Teehan, Esq. National Grid. 280 Melrose St. Providence, RI 02907	Thomas.teehan@us.ngrid.com	401-784-7667
	Joanne.scanlon@us.ngrid.com	401-784-4321
	Ronald.gerwatowski@us.ngrid.com	
Gerald Petros, Esq. Hinckley, Allen & Snyder 50 Kennedy Plaza, Suite 1500 Providence RI 02903	gpetros@haslaw.com	401-274-2000
Paul Roberti, Esq. (for Division) Dept. of Attorney General 150 South Main St. Providence, RI 02903	Proberti@riag.ri.gov	401-222-2424
	Steve.scialabba@ripuc.state.ri.us	401-222-3016
	Mtobin@riag.ri.gov	
	Kzelano@riag.ri.gov	
Original & nine (9) copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02889	Lmassaro@puc.state.ri.us	401-780-2107
	Plucarelli@puc.state.ri.us	401-941-1691
	Anault@puc.state.ri.us	
Kenneth W. Irvin, Esq. McDermott, Will & Emery LLP 600 13th Street, NW Washington, DC 20005	kirvin@mwe.com	202-756-8116 202-756-8087
Charles Henderson, Esq. Stacey Nakasian, Esq. Duffy Sweeney & Scott, Ltd. One Turks Head Plaza, Suite 1200 Providence, RI 02903	chenderson@duffysweeney.com snakasian@duffysweeney.com	401-455-0700

Cynthia Fomes