

August 18, 2009

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4065 – National Grid Request for Change of Electric Distribution Rates
 Response to Data Requests**

Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's¹ responses to data requests issued by the Division and the Commission in the above-referenced proceeding. Attached is a listing of the data requests issued to date and designating the responses included in this filing in bold.

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

Very truly yours,



Thomas R. Teehan

Enclosures

cc: Docket 4065 Service List

¹ The Narragansett Electric Company d/b/a National Grid ("Company").

| The Narragansett Electric Company d/b/a National Grid | | | | | |
|---|--------|------------|------------------|--------------|--|
| Docket 4065 | | | | | |
| Discovery Log | | | | | |
| As of: August 18, 2009 | | | | | |
| [C-denotes confidentiality is being sought] | | | | | |
| Data Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| COMM 1-1 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-1-3, 1-1-4, 1-1-5, 1-1-7, 1-1-8, 1-1-9 BULK |
| COMM 1-2 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-2 A-D |
| COMM 1-3 | Filed | 6/26/2009 | Dinkel | | Attachments COMM 1-3 A-B BULK |
| COMM 1-4 | Filed | 6/26/2009 | O'Brien | | |
| COMM 1-5 | Filed | 7/22/2009 | O'Brien/Dinkel | | Attachments COMM 1-5 (1-3) |
| COMM 1-6 | Filed | 6/26/2009 | Dinkel | C-attachment | Attachments COMM 1-6-1 & 1-6-2 BULK |
| COMM 1-7 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-7 |
| COMM 1-8 | Filed | 6/26/2009 | Dinkel | | Attachments COMM 1-8 (A-D) BULK |
| COMM 1-9 | Filed | 6/26/2009 | Dinkel | C-attachment | Attachments COMM 1-9 (1-11) BULK |
| COMM 1-10 | Filed | 6/26/2009 | Dinkel | | Attachment COMM 1-10 (hard copy only) BULK |
| COMM 1-11 | Filed | 6/26/2009 | O'Brien | | |
| COMM 1-12 | Filed | 7/1/2009 | Dinkel/Morrissey | | Attachments COMM 1-12 (1-2) |
| COMM 1-13 | Filed | 6/26/2009 | Dinkel | | Attachment COMM 1-13 |
| COMM 1-14 | Filed | 6/26/2009 | Dinkel | | Attachment COMM 1-14 |
| COMM 1-15 | Filed | 6/26/2009 | Dinkel | | Attachment COMM 1-15 |
| COMM 1-16 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-16 (1-12) |
| COMM 1-17 | Filed | 7/6/2009 | Pettigrew | | |
| COMM 1-18 | Filed | 7/14/2009 | Pettigrew | | Attachments COMM 1-18-1, 1-18-2, 1-18-3, 1-18-4(a) - (d) Bulk |
| COMM 1-19 | Filed | 8/11/2009 | O'Brien | | Attachment COMM 1-19 |
| COMM 1-20 | Filed | 6/26/2009 | O'Brien | | |
| COMM 1-21 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-21 (1-4) |
| COMM 1-22 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-22 (1-2) |
| COMM 1-23 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-23 (1-2) |
| COMM 1-24 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-24 |
| COMM 1-25 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-25 (1-14) BULK |
| COMM 1-25 (supp.) | Filed | 8/11/2009 | O'Brien | | Attachments COMM 1-25 (1-3) |
| COMM 1-26 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-26 |
| COMM 1-27 | Filed | 8/18/2009 | O'Brien | | Attachments COMM 1-27 (1-3) BULK |
| COMM 1-28 | Filed | 7/6/2009 | O'Brien | | Attachment COMM 1-28 |
| COMM 1-29 | Filed | 6/26/2009 | O'Brien | | |
| COMM 1-30 | Filed | 6/26/2009 | O'Brien | | |
| COMM 1-31 | Filed | 6/26/2009 | King | | |
| COMM 1-32 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-32 |
| COMM 1-33 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-33 (1-3) BULK |
| COMM 1-34 | Filed | 6/26/2009 | Dowd | | Attachments COMM 1-34 (1-2) BULK |
| COMM 1-35 | Filed | 6/26/2009 | Dowd | | Attachment COMM 1-35 BULK |
| COMM 1-36 | Filed | 6/26/2009 | Dowd | | Attachment DIV 2-1 (electronic only) |
| COMM 1-37 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-37 |
| COMM 1-38 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-38 |
| COMM 1-39 | Filed | 8/18/2009 | O'Brien | | Attachment COMM 1-39 |
| COMM 1-40 | Filed | 6/26/2009 | Dowd | | Attachment COMM 1-40 |
| COMM 1-41 | Filed | 6/26/2009 | Dowd | | Attachment COMM 1-41 |
| COMM 1-42 | Filed | 6/26/2009 | Dowd | | Attachment COMM 1-42 |
| COMM 1-43 | Filed | 6/26/2009 | Dowd | | Attachment COMM 1-43 |
| COMM 1-44 | Filed | 6/26/2009 | Dowd | | Attachment COMM 1-44 |

| The Narragansett Electric Company d/b/a National Grid | | | | | |
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| [C-denotes confidentiality is being sought] | | | | | |
| | | | | | |
| Data Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| COMM 1-45 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-45 |
| COMM 1-46 | Filed | 6/26/2009 | Dowd | | |
| COMM 1-47 | Filed | 6/26/2009 | Dowd | | Attachments COMM 1-47 (1-3) BULK |
| COMM 1-48 (Part 1) | Filed | 7/1/2009 | Dowd | | Attachment COMM 1-48 |
| COMM 1-48 (Parts 2-5) | Filed | 6/26/2009 | O'Brien | | |
| COMM 1-49 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-49 (1-5) |
| COMM 1-50 | Filed | 6/26/2009 | Dowd | | Attachments COMM 1-50 (1-38) BULK |
| COMM 1-51 | Filed | 6/26/2009 | Dowd | | |
| COMM 1-52 | Filed | 6/26/2009 | Dowd | | Attachment COMM 1-52 |
| COMM 1-53 | Filed | 6/26/2009 | Dowd | | Attachment COMM 1-53 |
| COMM 1-54 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-54 (1-2) |
| COMM 1-55 | Filed | 7/14/2009 | O'Brien | | Attachment COMM 1-55 |
| COMM 1-56 | Filed | 6/26/2009 | O'Brien | | |
| COMM 1-57 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-57 |
| COMM 1-58 | Filed | 6/26/2009 | O'Brien | | Attachment DIV 3-11 (PDF and working excel) |
| COMM 1-59 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-59 |
| COMM 1-60 | Filed | 7/1/2009 | O'Brien | | Attachment COMM 1-60 (A-B) |
| COMM 1-61 | Filed | 6/26/2009 | Dowd | | |
| COMM 1-62 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-62 (1-2) |
| COMM 1-63 | Filed | 8/11/2009 | O'Brien | | Attachments COMM 1-63 (A-F) A-C EXCEL FILES D & E BULK (hard copy only) |
| COMM 1-64 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-64 |
| COMM 1-65 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-65 |
| COMM 1-66 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-66 (1-2) |
| COMM 1-67 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-67 (1-3) |
| COMM 1-68 | Filed | 6/26/2009 | Wynter | | Attachment COMM 1-68 |
| COMM 1-69 | Filed | 6/26/2009 | Wynter | | Attachment COMM 1-69 |
| COMM 1-70 | Filed | 6/26/2009 | Wynter | | |
| COMM 1-71 | Filed | 6/26/2009 | O'Brien | | Attachments DIV 4-1 (1-2) BULK |
| COMM 1-72 | Pending | | | | |
| COMM 1-73 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-73 (1-2) |
| COMM 1-74 | Filed | 7/6/2009 | O'Brien | | |
| COMM 1-75 | Filed | 6/26/2009 | O'Brien | | |
| COMM 1-76 | Filed | 7/1/2009 | O'Brien | | Attachment COMM 1-76 |
| COMM 1-77 | Pending | | | | |
| COMM 1-78 | Filed | 7/14/2009 | O'Brien | C-attachment | |
| COMM 1-79 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-79 |
| COMM 1-80 | Filed | 8/3/2009 | O'Brien | | |
| COMM 1-81 | Filed | 8/3/2009 | O'Brien | | |
| COMM 1-82 | Filed | 7/1/2009 | O'Brien | | |
| COMM 1-83 | Filed | 6/26/2009 | O'Brien | | Attachments COMM 1-83 |
| COMM 1-84 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-84 |
| COMM 1-85 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-85 |
| COMM 1-86 | Filed | 6/26/2009 | O'Brien | | |
| COMM 1-87 | Filed | 6/26/2009 | O'Brien | | |
| COMM 1-88 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-88 |
| COMM 1-89 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-89 |
| COMM 1-90 | Filed | 7/6/2009 | O'Brien | | Attachments COMM 1-90 (1-2) BULK |
| COMM 1-91 | Filed | 6/26/2009 | O'Brien | | Attachment DIV 4-21 (1-2) BULK |
| COMM 1-92 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-92 |
| COMM 1-93 | Filed | 6/26/2009 | O'Brien | | |
| COMM 1-94 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-94 |
| COMM 1-95 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-95 |
| COMM 1-96 | Filed | 6/26/2009 | King | | Attachment COMM 1-96 |
| COMM 1-97 | Filed | 6/26/2009 | O'Brien | | |

| The Narragansett Electric Company d/b/a National Grid | | | | | |
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| Data Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| COMM 1-98 | Filed | 7/1/2009 | Dowd | | |
| COMM 1-99 | Filed | 6/26/2009 | Gorman | | Attachment COMM 1-99 |
| COMM 1-100 | Filed | 7/1/2009 | Gorman | | |
| COMM 1-101 | Filed | 7/1/2009 | Gorman | | |
| COMM 1-102 | Filed | 6/26/2009 | Gorman | | Attachment COMM 1-102 |
| COMM 1-103 | Filed | 6/26/2009 | Wynter | | |
| COMM 1-104 | Filed | 6/26/2009 | Wynter | | |
| COMM 1-105 | Filed | 6/26/2009 | O'Brien | | |
| COMM 1-106 | Pending | | | | |
| COMM 1-107 | Filed | 6/26/2009 | O'Brien | | Attachment COMM 1-107 |
| COMM 1-108 | Filed | 6/26/2009 | Wynter | | Attachment COMM 1-108 |
| COMM 1-109 | Filed | 6/26/2009 | Dowd/Pettigrew | | Attachment COMM 1-109 |
| COMM 2-1 | Filed | 8/18/2009 | Pettigrew | | |
| COMM 2-2 | Filed | 8/18/2009 | Pettigrew | | |
| COMM 2-3 | Filed Herewith | 8/18/2009 | Pettigrew | | |
| COMM 2-4 | Filed | 8/14/2009 | Stout | | |
| COMM 2-5 | Filed | 8/18/2009 | O'Brien | | |
| COMM 2-6 | Filed | 8/18/2009 | Tierney | | |
| COMM 2-7 | Filed | 8/18/2009 | Tierney | | |
| COMM 2-8 | Filed | 8/18/2009 | Tierney | | |
| COMM 2-9 | Filed | 8/18/2009 | Tierney | | |
| COMM 2-10 | Filed | 8/14/2009 | Stout | | |
| COMM 2-11 | Pending | | | | |
| COMM 2-12 | Filed | 8/18/2009 | Tierney | | |
| COMM 2-13 | Filed | 8/18/2009 | Tierney | | |
| COMM 2-14 | Filed | 8/14/2009 | Morrissey | | Attachment COMM 2-14 |
| COMM 2-15 | Filed | 8/14/2009 | Morrissey | | Attachments COMM 2-15 (1-2) |
| COMM 2-16 | Filed | 8/18/2009 | Morrissey/Stout | | |
| COMM 2-17 | Filed | 8/18/2009 | O'Brien | C-attachment | Attachment COMM 2-17 |
| COMM 2-18 | Pending | | | | |
| COMM 2-19 | Pending | | | | |
| COMM 2-20 | Pending | | | | |
| COMM 2-21 | Pending | | | | |
| COMM 2-22 | Pending | | | | |
| COMM 2-23 | Pending | | | | |
| COMM 2-24 | Filed | 8/18/2009 | O'Brien | | Attachment COMM 2-24 |
| COMM 2-25 | Pending | | | | |
| COMM 2-26 | Filed | 8/18/2009 | O'Brien | | |
| COMM 2-27 | Pending | | | | |
| COMM 2-28 | Filed | 8/14/2009 | Wynter | | |
| COMM 2-29 | Filed | 8/14/2009 | Wynter | | |
| COMM 2-30 | Filed | 8/14/2009 | O'Brien | | |
| COMM 2-31 | Filed | 8/14/2009 | O'Brien | | |
| COMM 2-32 | Filed | 8/18/2009 | O'Brien | | |
| COMM 2-33 | Filed | 8/18/2009 | O'Brien | | |
| COMM 2-34 | Filed | 8/14/2009 | Gorman | | |
| COMM 2-35 | Filed | 8/14/2009 | Gorman | | |
| COMM 2-36 | Pending | | | | |
| COMM 2-37 | Filed | 8/14/2009 | Wynter | | |
| COMM 2-38 | Filed | 8/14/2009 | Wynter | | |
| COMM 2-39 | Pending | | | | |
| COMM 2-40 | Pending | | | | |
| COMM 2-41 | Pending | | | | |
| COMM 2-42 | Filed | 8/18/2009 | O'Brien | | Attachment COMM 2-42 |
| COMM 2-43 | Pending | | | | |
| COMM 2-44 | Filed | 8/14/2009 | Gorman | | |
| COMM 2-45 | Filed | 8/14/2009 | Wynter | | |
| COMM 2-46 | Filed | 8/14/2009 | Wynter | | |
| COMM 2-47 | Filed | 8/14/2009 | Wynter | | |
| COMM 2-48 | Filed | 8/14/2009 | Wynter | | |
| COMM 2-49 | Filed | 8/14/2009 | Wynter | | Attachment COMM 2-49 |
| COMM 2-50 | Filed | 8/14/2009 | Wynter | | |

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| [C-denotes confidentiality is being sought] | | | | | |
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| Data Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| COMM 2-51 | Filed | 8/14/2009 | Wynter | | Attachment COMM 2-51 |
| COMM 2-52 | Filed | 8/14/2009 | Wynter | | |
| COMM 2-53 | Filed | 8/14/2009 | Wynter | | |
| COMM 2-54 | Filed | 8/14/2009 | Wynter | | Attachment COMM 2-54 (1-2) |
| COMM 2-55 | Pending | | | | |
| COMM 2-56 | Filed | 8/14/2009 | Wynter | | Attachment COMM 2-56 (1-2) |
| COMM 2-57 | Filed | 8/14/2009 | Gorman | | |
| COMM 2-58 | Filed | 8/14/2009 | Gorman | | |
| | | | | | |
| COMM 3-1 | Pending | | | | |
| COMM 3-2 | Pending | | | | |
| COMM 3-3 | Pending | | | | |
| COMM 3-4 | Pending | | | | |
| COMM 3-5 | Pending | | | | |
| COMM 3-6 | Pending | | | | |
| | | | | | |

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| [C-denotes confidentiality is being sought] | | | | | |
| Information Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| DIV-1-1 | Filed | 6/26/2009 | O'Brien | | Attachment DIV 1-1 |
| DIV-1-2 | Filed | 7/1/2009 | O'Brien | | Attachment DIV 1-2 |
| DIV-1-3 | Filed | 7/1/2009 | O'Brien | | Attachment DIV 1-3 |
| DIV-1-4 | Filed | 6/26/2009 | O'Brien | | |
| DIV-1-5 | Filed | 6/26/2009 | O'Brien | | |
| DIV-1-6 | Filed | 7/1/2009 | O'Brien | | |
| DIV-1-7 | Filed | 7/1/2009 | O'Brien | | |
| DIV-1-8 | Filed | 7/1/2009 | O'Brien | | |
| DIV-1-9 | Filed | 6/26/2009 | O'Brien | | Attachment DIV 1-9 |
| DIV-1-10 | Filed | 6/26/2009 | O'Brien | | |
| DIV-1-11 | Filed | 6/26/2009 | Dowd | | Attachment DIV 1-11 |
| DIV-1-12 | Filed | 6/26/2009 | O'Brien | | Attachment DIV 1-12 |
| DIV-1-13 | Filed | 6/26/2009 | Dowd | | Attachment DIV 1-13 |
| DIV-1-14 | Filed | 6/26/2009 | Dowd | | |
| DIV-1-15 | Filed | 6/26/2009 | O'Brien | | |
| DIV-1-16 | Filed | 6/26/2009 | O'Brien | | |
| DIV-1-17 | Filed | 6/26/2009 | O'Brien | | Attachment DIV 1-17 |
| DIV-1-18 | Filed | 6/26/2009 | O'Brien | | |
| DIV-1-19 | Filed | 6/26/2009 | O'Brien | | |
| DIV-1-20 | Filed | 6/26/2009 | Dowd | | Attachment DIV 1-20 |
| DIV-1-21 | Filed | 7/1/2009 | O'Brien | | |
| DIV-1-22 | Filed | 7/1/2009 | O'Brien | | |
| DIV-1-23 | Filed | 7/1/2009 | O'Brien | | |
| DIV-1-24 | Filed | 7/1/2009 | O'Brien | | |
| DIV-1-25 | Filed | 7/14/2009 | O'Brien | | |
| DIV-1-26 | Filed | 6/26/2009 | O'Brien | | Attachment DIV 1-26 |
| DIV-1-27 | Filed | 6/26/2009 | O'Brien | | |
| DIV-1-28 | Filed | 6/26/2009 | O'Brien | | |
| DIV-1-29 | Filed | 7/14/2009 | O'Brien | | Attachment DIV 1-29 |
| DIV-1-30 | Filed | 7/1/2009 | O'Brien | | |
| DIV-1-31 | Filed | 6/26/2009 | O'Brien | | Attachment DIV 1-31 |
| DIV-1-32 | Filed | 6/26/2009 | O'Brien | | Attachment DIV 1-32 |
| DIV-1-33 | Filed | 6/26/2009 | O'Brien | | Attachment DIV 1-33 |
| DIV-1-34 | Filed | 6/26/2009 | O'Brien | | |
| | | | | | |
| DIV-2-1 | Filed | 7/1/2009 | Gorman | C-attachment | Attachment DIV 2-1 (electronic only) |
| DIV-2-2 | Filed | 6/26/2009 | Gorman | | |
| DIV-2-3 | Filed | 6/26/2009 | Gorman | | |
| DIV-2-4 | Filed | 6/26/2009 | Gorman | | Attachment DIV 2-4 |
| DIV-2-5 | Filed | 6/26/2009 | Gorman | | |
| DIV-2-6 | Filed | 6/26/2009 | Gorman | | |
| DIV-2-7 | Filed | 6/26/2009 | Gorman | | |
| DIV-2-8 | Filed | 6/26/2009 | Gorman | | |
| DIV-2-9 | Filed | 6/26/2009 | Gorman | | |
| DIV-2-10 | Filed | 6/26/2009 | Gorman | | Attachment DIV 2-10 |
| DIV-2-11 | Filed | 6/26/2009 | Gorman | | |
| DIV-2-12 | Filed | 6/26/2009 | Gorman | | |
| | | | | | |
| DIV-3-1 | Filed | 7/6/2009 | O'Brien | | |
| DIV-3-2 | Filed | 8/18/2009 | O'Brien | | Attachments DIV 3-2 (1-4) |
| DIV-3-3 | Filed | 7/6/2009 | O'Brien | | Attachment DIV 3-3 |
| DIV-3-4 | Filed Herewith | 8/18/2009 | O'Brien | | Attachment DIV 3-4 |
| DIV-3-5 | Filed | 7/6/2009 | O'Brien | | |
| DIV-3-6 | Filed Herewith | 8/18/2009 | O'Brien | | Attachment DIV 3-6 |
| DIV-3-7 | Filed | 8/3/2009 | O'Brien | | Attachment DIV 3-7 |
| DIV-3-8 (Supp.) | Filed | 8/3/2009 | Morrissey | | Attachment DIV 3-8 (Supp.) |
| DIV-3-9 (Supp.) | Filed | 8/3/2009 | Morrissey | | Attachment DIV 3-9 (Supp.) |
| DIV-3-10 | Filed | 7/6/2009 | Morrissey | | Attachment DIV 3-10 |
| DIV-3-11 | Filed | 7/6/2009 | Morrissey | | Attachment DIV 3-11 (PDF and working excel) |
| DIV-3-12 | Filed | 7/6/2009 | O'Brien/Morrissey | | Attachment DIV 3-12 |
| DIV-3-13 | Filed | 7/6/2009 | O'Brien/Morrissey | | |
| DIV-3-14 | Filed | 7/6/2009 | O'Brien/Morrissey | | Attachment DIV 3-14 |
| DIV-3-15 | Filed | 7/6/2009 | Morrissey | | Attachment DIV 3-15 |
| DIV-3-16 | Filed | 7/6/2009 | Pettigrew | | |
| DIV-3-17 | Filed | 7/6/2009 | Pettigrew | | |
| DIV-3-18 | Filed | 7/6/2009 | Pettigrew | | |
| DIV-3-19 | Pending | | | | |
| DIV-3-20 | Filed Herewith | 8/18/2009 | Pettigrew | | Attachment DIV 3-20 |
| DIV-3-21 | Filed | 7/6/2009 | Pettigrew | | |

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| Information Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| DIV-3-22 | Filed | 8/18/2009 | O'Brien/Dowd | | |
| | Filed | | | | Attachments DIV 4-1 (1-2) BULK |
| DIV-4-1 | | 7/6/2009 | Moul | | |
| DIV-4-2 | Filed | 7/6/2009 | Dinkel | | |
| DIV-4-3 | Filed | 7/6/2009 | Dinkel | | |
| DIV-4-4 | Filed | 7/6/2009 | Dinkel | | |
| DIV-4-5 | Filed | 7/6/2009 | O'Brien | | |
| DIV-4-6 | Filed | 7/6/2009 | Moul | | |
| DIV-4-7 | Filed | 7/6/2009 | Dinkel | | Attachment DIV 4-7 |
| DIV-4-8 | Filed | 7/6/2009 | Dinkel | | Attachments DIV 4-8 (1-3) |
| DIV-4-9 | Filed | 7/6/2009 | Dinkel | | Attachment DIV 4-9 |
| DIV-4-10 | Filed | 7/6/2009 | Dinkel | | |
| DIV-4-11 | Filed | 7/14/2009 | O'Brien | | Attachment DIV 4-11 |
| DIV-4-12 | Filed | 7/6/2009 | Dinkel | | |
| DIV-4-13 | Filed | 7/6/2009 | Moul | | |
| DIV-4-14 | Filed | 7/6/2009 | Moul | | |
| DIV-4-15 | Filed | 7/6/2009 | Moul | | Attachment DIV 4-15 |
| DIV-4-16 | Filed | 7/6/2009 | Moul | | Attachment DIV 4-16 (1-2) |
| DIV-4-17 | Filed | 7/6/2009 | Moul | | |
| DIV-4-18 | Filed | 7/6/2009 | Moul | | |
| DIV-4-19 | Filed | 7/6/2009 | Moul | | Attachment DIV 4-19 |
| DIV-4-20 | Filed | 7/6/2009 | Moul | | Attachment DIV 4-20 |
| | Filed | | | | Attachment DIV 4-21 (1-2) BULK |
| DIV-4-21 | | 7/6/2009 | O'Brien | | |
| DIV-4-22 | Filed | 7/6/2009 | Moul | | Attachment DIV 4-22 (1-2) |
| DIV-4-23 | Filed | 7/6/2009 | Dinkel | | Attachment DIV 4-23 |
| DIV-4-24 | Filed | 7/6/2009 | Moul | | |
| DIV-4-25 | Filed | 7/6/2009 | Moul | | |
| DIV-4-26 | Filed | 7/6/2009 | Moul | | |
| DIV-4-27 | Filed | 7/6/2009 | Moul | | Attachment DIV 4-27 |
| | | | | | |
| DIV-5-A | Filed | 7/22/2009 | Wynter | C-attachments | Attachments DIV 5-A (1-3) |
| DIV-5-B | Filed | 7/22/2009 | Wynter | | Attachment DIV 5-B |
| DIV-5-C | Filed | 7/22/2009 | Wynter | | Attachment DIV 5-C |
| | | | | | |
| DIV-6-1 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-2 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-3 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-4 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-5 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-6 | Filed | 7/14/2009 | Tierney | | Attachment DIV 6-6 BULK |
| DIV-6-7 | Pending | | | | |
| DIV-6-8 | Pending | | | | |
| DIV-6-9 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-10 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-11 | Filed | 7/14/2009 | Tierney | | |
| | | | | | |
| DIV-6-12 | Filed | 7/14/2009 | Tierney | | Attachments DIV 6-12 (a) and (d) |
| DIV-6-13 (a) - (d) | Filed | 7/22/2009 | Tierney | | Attachment DIV 6-13 |
| DIV-6-13 (e) | Pending | | | | |
| | | | | | |
| DIV-6-14 | Filed | 7/14/2009 | Tierney | | Attachment DIV 6-14 (hard copy only) |
| DIV-6-15 (a) | Pending | | | | |
| DIV-6-15 (b) and (c) | Filed | 7/22/2009 | Tierney | | |
| DIV-6-16 | Pending | | | | |
| DIV-6-17 | Filed | 7/14/2009 | Tierney | | Attachment DIV 6-17 |
| DIV-6-18 | Filed | 7/14/2009 | Tierney | | Attachment DIV 6-18 |
| DIV-6-19 (a) - (d) and (f) | Filed | 7/22/2009 | Tierney | | Attachments DIV 6-19 and DIV 6-19-F (1-2) |
| DIV-6-19 (e) | Pending | | | | |
| DIV-6-20 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-21 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-22 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-23 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-24 | Filed | 7/22/2009 | Tierney | | Attachment DIV 6-24 |
| DIV-6-25 | Filed | 7/22/2009 | Stout | | Attachment DIV 6-25 (1-2) |
| DIV-6-26 | Filed | 7/14/2009 | Tierney | | |
| | | | | | |
| DIV-6-27 | Filed | 7/14/2009 | Tierney | | Attachment DIV 6-27 (working excel included) |
| DIV-6-28 | Filed | 7/14/2009 | Tierney | | |

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| [C-denotes confidentiality is being sought] | | | | | |
| | | | | | |
| Information Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| DIV-6-29 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-30 | Filed | 7/22/2009 | Tierney | | |
| DIV-6-31 (a) - (d) and (f) | Filed | 7/22/2009 | Tierney | | |
| DIV-6-31 (e) | Filed | 8/18/2009 | Tierney | | |
| DIV-6-32 | Filed | 8/18/2009 | O'Brien | | Attachment DIV 6-32 |
| DIV-6-33 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-34 | Filed | 7/22/2009 | Tierney | | Attachment DIV 6-34 (1-2) |
| DIV-6-35 | Filed | 7/14/2009 | Tierney | | Attachment DIV 6-35 (c) and (d) |
| DIV-6-36 | Filed | 7/14/2009 | Gorman | | |
| DIV-6-37 | Filed | 7/14/2009 | Gorman | | Attachment DIV 6-37(a) |
| DIV-6-38 | Filed | 7/14/2009 | Tierney | | |
| DIV-6-39 | Pending | | | | |
| | | | | | |
| DIV-7-1 | Filed | 8/3/2009 | King | | |
| DIV-7-2 | Filed | 7/22/2009 | King/Pettigrew | | |
| DIV-7-3 | Filed | 7/22/2009 | King | | |
| DIV-7-4 | Filed | 7/22/2009 | Wynter | | |
| DIV-7-5 | Filed | 7/22/2009 | King | | |
| DIV-7-6 | Filed | 7/22/2009 | Wynter/Stout | | Attachment DIV 7-6 |
| DIV-7-7 | Filed | 7/22/2009 | Fields | | Attachment DIV 7-7 (a) (hard copy only) and (b) |
| DIV-7-8 | Filed | 8/18/2009 | Dowd | | |
| DIV-7-9 | Filed | 7/22/2009 | Pettigrew | | |
| DIV-7-10 | Filed | 7/22/2009 | King | | |
| DIV-7-11 | Filed | 7/22/2009 | King | | |
| DIV-7-12 | Filed | 7/22/2009 | King | | |
| DIV-7-13 | Filed | 7/22/2009 | King | | |
| DIV-7-14 | Filed | 8/18/2009 | O'Brien | | |
| DIV-7-15 | Filed | 7/22/2009 | King | | |
| DIV-7-16 | Filed | 7/22/2009 | Gorman | | |
| DIV-7-17 | Filed | 7/22/2009 | Gorman | | Attachment DIV 7-17 |
| DIV-7-18 | Filed | 7/22/2009 | Smithling | | Attachment DIV 7-18 |
| DIV-7-19 | Filed Herewith | 8/18/2009 | Dowd | | Attachment DIV 7-19 (b-c) |
| DIV-7-20 | Filed | 7/22/2009 | King | | |
| DIV-7-21 | Filed | 7/22/2009 | King | | |
| | | | | | |
| DIV-8-1 | Pending | | | | |
| DIV-8-2 | Filed | 8/3/2009 | Wynter | | Attachment DIV 8-2 |
| DIV-8-3 | Filed | 7/22/2009 | Wynter | | Attachment DIV 8-3 (hard copy only) |
| DIV-8-4 | Filed | 7/22/2009 | Gorman | | Attachment DIV 8-4 (excel) |
| DIV-8-5 | Filed | 7/22/2009 | Wynter | | Attachment DIV 8-5 |
| DIV-8-6 | Filed | 8/3/2009 | Wynter | | |
| DIV-8-7 a-g (no d) | Filed | 8/3/2009 | Wynter | | Attachments DIV 8-7 (a-g, no d) |
| DIV-8-7(d) | Filed | 8/11/2009 | Wynter | | Att. DIV 8-7(d) |
| DIV-8-8 | Filed | 7/22/2009 | Wynter | | |
| DIV-8-9 | Filed | 8/3/2009 | Wynter | | Attachment DIV 8-9 |
| DIV-8-10 | Filed | 8/18/2009 | Wynter | | Attachment DIV 8-10 |
| DIV-8-11 | Filed | 7/22/2009 | Wynter | | |
| DIV-8-12 | Filed | 8/3/2009 | Wynter | | |
| DIV-8-13 | Filed | 8/3/2009 | Wynter | | |
| DIV-8-14 | Filed | 8/3/2009 | Wynter | | |
| DIV-8-15 | Filed | 8/3/2009 | Wynter | | |
| DIV-8-16 | Filed | 8/3/2009 | Wynter | | |
| DIV-8-17 | Filed Herewith | 8/18/2009 | Wynter | | Attachment DIV 8-17 |
| DIV-8-18 | Filed | 8/3/2009 | Wynter | | Attachment DIV 8-18 |
| DIV-8-19 | Filed | 8/3/2009 | Wynter | | Attachment DIV 8-19 |
| DIV-8-20 | Pending | | | | |
| DIV-8-21 | Filed | 8/3/2009 | Wynter | | |
| DIV-8-22 | Pending | | | | |
| DIV-8-23 | Filed | 8/3/2009 | Wynter | | Attachment DIV 8-23 |
| DIV-8-24 | Filed | 8/3/2009 | Wynter | | |
| DIV-8-25 | Filed | 8/3/2009 | Wynter | | Attachments DIV 8-25 (a-i) |
| | | | | | |
| DIV-9-1 | Filed | 7/22/2009 | Pettigrew | | |
| DIV-9-2 | Filed | 7/22/2009 | O'Brien | | |
| DIV-9-3 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-4 | Filed | 7/22/2009 | Gorman | | |

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| Information Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| DIV-9-5 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-6 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-7 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-8 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-9 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-10 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-11 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-12 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-13 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-14 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-15 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-16 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-17 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-18 | Filed | 7/22/2009 | Gorman | | |
| DIV-9-19 | Filed | 7/22/2009 | Gorman | | |
| | | | | | |
| DIV-10-1 | Filed Herewith | 8/18/2009 | Pettigrew/O'Brien | | |
| DIV-10-2 | Pending | | | | |
| DIV-10-3 | Filed | 7/22/2009 | Gorman | | Attachment DIV 10-3 |
| DIV-10-4 | Filed | 7/22/2009 | Gorman | | Attachment DIV 10-4 |
| DIV-10-5 | Filed | 8/11/2009 | Gorman | | Attachment DIV 10-5 (1-4) EXCEL files BULK |
| DIV-10-6 | Filed | 7/22/2009 | Gorman | | Attachment DIV 10-6 (excel) |
| DIV-10-7 | Filed | 7/22/2009 | Dowd | | |
| DIV-10-8 | Pending | | | | |
| DIV-10-9 | Filed | 7/22/2009 | Dowd | | |
| DIV-10-10 | Filed | 8/11/2009 | O'Brien | | Attachment DIV 10-10 |
| DIV-10-11 | Filed | 8/18/2009 | O'Brien | | |
| DIV-10-12 | Filed | 7/22/2009 | Wynter | | |
| DIV-10-13 | Filed | 8/11/2009 | Wynter | | Attachment DIV 10-13 (1-2) |
| DIV-10-14 | Filed | 7/22/2009 | Kateregga | | |
| DIV-10-15 | Filed | 7/22/2009 | O'Brien | | |
| DIV-10-16 | Filed | 7/22/2009 | O'Brien | | |
| DIV-10-17 | Filed | 8/18/2009 | O'Brien | | Attachment DIV 10-17 |
| DIV-10-18 | Filed | 8/18/2009 | O'Brien | | |
| DIV-10-19 | Filed | 8/18/2009 | O'Brien | | Attachment DIV 10-19 |
| DIV-10-20 | Filed | 7/22/2009 | Dowd | | |
| DIV-10-21 | Filed | 7/22/2009 | Dowd | | |
| DIV-10-22 | Filed | 7/22/2009 | Dowd | | |
| DIV-10-23 | Filed Herewith | 8/18/2009 | O'Brien | | |
| DIV-10-24 | Filed | 7/22/2009 | O'Brien | | Attachment DIV 10-24 |
| DIV-10-25 | Filed | 7/22/2009 | O'Brien | | |
| DIV-10-26 | Filed | 7/22/2009 | O'Brien | | |
| DIV-10-27 | Filed Herewith | 8/18/2009 | O'Brien | | |
| DIV-10-28 | Filed | 7/22/2009 | Gorman | | |
| DIV-10-29 | Filed | 7/22/2009 | Wynter | | |
| | | | | | |
| DIV-11-1 | Filed | 8/18/2009 | Pettigrew | | Attachments DIV 11-1 (1-2) |
| DIV-11-2 | Filed | 8/11/2009 | Pettigrew | | |
| DIV-11-3 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-11-4 | Pending | | | | |
| DIV-11-5 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-11-6 | Pending | | | | |
| DIV-11-7 | Pending | | | | |
| DIV-11-8 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-11-9 | Pending | | | | |
| DIV-11-10 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-11-11 | Pending | | | | |
| DIV-11-12 | Filed | 8/18/2009 | Pettigrew | | Attachments DIV 11-12 (1-3) BULK |
| DIV-11-13 | Filed | 8/18/2009 | Pettigrew | | Attachment DIV 11-13 |
| DIV-11-14 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-11-15 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-11-16 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-11-17 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-11-18 | Filed | 8/18/2009 | Pettigrew | | Attachment DIV 11-18 |
| DIV-11-19 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-11-20 | Filed | 8/11/2009 | O'Brien | | Attachment DIV-11-20 (1-2) |
| DIV-11-21 | Filed | 8/18/2009 | Pettigrew | | |

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| Information Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| DIV-11-22 | Pending | | | | |
| DIV-11-23 | Pending | | | | |
| DIV-11-24 | Filed Herewith | 8/18/2009 | Pettigrew | | |
| DIV-11-25 | Filed | 8/11/2009 | Pettigrew | | Attachment DIV-11-25 |
| DIV-11-26 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-11-27 | Pending | | | | |
| DIV-11-28 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-11-29 | Pending | | | | |
| DIV-11-30 | Filed Herewith | 8/18/2009 | Pettigrew | | |
| DIV-11-31 | Filed Herewith | 8/18/2009 | Pettigrew | | |
| DIV-11-32 | Pending | | | | |
| DIV-11-33 | Pending | | | | |
| DIV-11-34 | Filed Herewith | 8/18/2009 | Pettigrew | | |
| DIV-11-35 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-11-36 | Pending | | | | |
| DIV-11-37 | Pending | | | | |
| DIV-11-38 | Filed | 8/11/2009 | Dinkel | | Att. DIV 11-38 (1-17) BULK hard copy only |
| DIV-11-39 | Filed | 8/11/2009 | Pettigrew | | Attachment DIV-11-39 EXCEL file |
| DIV-11-40 | Filed | 8/11/2009 | Gorman | | |
| DIV-11-41 | Filed | 8/18/2009 | Gorman | | |
| DIV-11-42 | Pending | | | | |
| | | | | | |
| DIV-12-1 | Filed | 8/18/2009 | O'Brien | | Attachments DIV 12-1 (CD-ROM) BULK |
| DIV-12-2 | Filed | 8/11/2009 | O'Brien | | Attachment DIV 12-2 (1-2) BULK |
| DIV-12-3 | Filed | 8/18/2009 | O'Brien | | Attachments DIV 12-3 (CD- ROM) BULK |
| DIV-12-4 | Filed | 8/18/2009 | O'Brien | | Attachment DIV 12-4 (excel) |
| DIV-12-5 | Pending | | | | |
| DIV-12-6 | Filed | 8/18/2009 | O'Brien | | Attachment 12-6 (excel) BULK |
| DIV-12-7 | Filed | 8/18/2009 | O'Brien | | Attachment 12-7 |
| DIV-12-8 | Filed | 8/18/2009 | O'Brien | | |
| DIV-12-9 | Filed | 8/18/2009 | O'Brien | | |
| DIV-12-10 | Pending | | | | |
| DIV-12-11 | Filed | 8/18/2009 | O'Brien | | |
| DIV-12-12 | Pending | | | | |
| DIV-12-13 | Pending | | | | |
| DIV-12-14 | Filed Herewith | 8/18/2009 | O'Brien | | |
| DIV-12-15 | Filed Herewith | 8/18/2009 | O'Brien | | |
| DIV-12-16 | Filed | 8/14/2009 | O'Brien | | |
| DIV-12-17 | Pending | | | | |
| DIV-12-18 | Filed | 8/11/2009 | O'Brien | | |
| DIV-12-19 | Filed | 8/11/2009 | O'Brien | | |
| | | | | | |
| DIV-13-1 | Filed | 8/11/2009 | Gorman | | |
| DIV-13-2 | Filed | 8/11/2009 | Gorman | | |
| DIV-13-3 | Filed | 8/11/2009 | O'Brien | | |
| DIV-13-4 | Filed | 8/11/2009 | O'Brien | | |
| DIV-13-5 | Filed | 8/11/2009 | Walter | | |
| DIV-13-6 | Filed | 8/11/2009 | Gorman | | Attachment DIV-13-6 EXCEL |
| DIV-13-7 | Filed | 8/14/2009 | Gorman | | Attachment DIV-13-7 |
| DIV-13-8 | Filed | 8/11/2009 | Gorman | | |
| DIV-13-9 | Filed | 8/11/2009 | Gorman | | |
| DIV-13-10 | Filed | 8/11/2009 | Gorman | | |
| | | | | | |
| DIV-14-1 | Filed | 8/18/2009 | Pettigrew | | Attachments DIV 14-1 (1-8) BULK |
| DIV-14-2 | Filed | 8/18/2009 | Pettigrew | | Attachment DIV 14-2 |
| DIV-14-3 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-14-4 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-14-5 | Filed | 8/18/2009 | Pettigrew | | Attachment DIV 14-5 |
| DIV-14-6 | Filed | 8/18/2009 | Pettigrew | | Attachment DIV 14-6 |
| DIV-14-7 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-14-8 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-14-9 | Filed Herewith | 8/18/2009 | Pettigrew | | |
| DIV-14-10 | Filed Herewith | 8/18/2009 | Pettigrew | | |

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| Information Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| DIV-14-11 | Filed | 8/18/2009 | Pettigrew | | Attachments DIV 14-11 (1-8) BULK |
| DIV-14-12 | Filed | 8/18/2009 | Pettigrew | | Attachments DIV 14-12 (1-2) BULK |
| DIV-14-13 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-14-14 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-14-15 | Pending | | | | |
| DIV-14-16 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-14-17 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-14-18 | Filed | 8/18/2009 | Pettigrew | | Attachment DIV 14-18 |
| DIV-14-19 | Filed | 8/18/2009 | Pettigrew | | Attachment DIV 14-19 |
| DIV-14-20 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-14-21 | Filed | 8/18/2009 | Pettigrew | | Attachment DIV 14-21 |
| DIV-14-22 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-14-23 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-14-24 | Filed | 8/18/2009 | Pettigrew | | |
| DIV-14-25 | Pending | | | | |
| DIV-15-1 | Filed | 8/11/2009 | Gorman | | |
| DIV-15-2 | Filed | 8/11/2009 | Gorman | | Attachment DIV 15-2 (1-2) |
| DIV-15-3 | Filed | 8/14/2009 | Fields | | |
| DIV-15-4 | Filed | 8/11/2009 | O'Brien | | |
| DIV-16-1 | Filed | 8/11/2009 | Fields | | Attachment DIV 16-1 |
| DIV-16-2 | Filed | 8/11/2009 | Fields | | |
| DIV-16-3 | Filed | 8/11/2009 | Fields | | Attachment DIV 16-3 |
| DIV-16-4 | Filed | 8/11/2009 | Fields | | Attachment DIV 16-4 |
| DIV-16-5 | Filed | 8/11/2009 | Fields | | |
| DIV-16-6 | Filed | 8/11/2009 | Fields | | |
| DIV-16-7 | Filed | 8/11/2009 | Fields | | |
| DIV-16-8 | Filed | 8/11/2009 | Fields | | |
| DIV-16-9 | Filed | 8/11/2009 | Fields | | Att. DIV 16-9 (1-5) BULK |
| DIV-16-10 | Filed | 8/11/2009 | Fields | | |
| DIV-16-11 | Filed | 8/11/2009 | Fields | | |
| DIV-16-12 | Filed | 8/11/2009 | Fields | | |
| DIV-16-13 | Filed | 8/11/2009 | Fields | | |
| DIV-16-14 | Filed | 8/11/2009 | Fields | | |
| DIV-16-15 | Filed | 8/11/2009 | Fields | | |
| DIV-16-16 | Filed | 8/18/2009 | Fields | | |
| DIV-16-17 | Filed | 8/11/2009 | Fields | | Attachment DIV 16-17 |
| DIV-16-18 | Filed | 8/11/2009 | Fields | | |
| DIV-16-19 | Filed | 8/11/2009 | Fields | | |
| DIV-16-20 | Filed | 8/11/2009 | Fields | | |
| DIV-16-21 | Filed | 8/11/2009 | Fields | | |
| DIV-16-22 | Filed | 8/11/2009 | Fields | | |
| DIV-16-23 | Filed | 8/11/2009 | Fields | | Attachment DIV 16-23 |
| DIV-16-24 | Filed | 8/11/2009 | Fields | | |
| DIV-16-25 | Filed | 8/11/2009 | Fields | | |
| DIV-16-26 | Filed | 8/11/2009 | Fields | | |
| DIV-17-1 | Filed | 8/18/2009 | O'Brien | | Attachment DIV 17-1 |
| DIV-17-2 | Filed | 8/18/2009 | O'Brien | | Attachment DIV 17-2 |
| DIV-17-3 | Filed | 8/18/2009 | Pettigrew | | Attachment DIV 17-3(e) |
| DIV-17-4 | Pending | | | | |
| DIV-17-5 | Pending | | | | |
| DIV-17-6 | Filed | 8/18/2009 | Wynter | | |
| DIV-17-7 | Pending | | | | |
| DIV-17-8 | Pending | | | | |
| DIV-17-9 | Pending | | | | |
| DIV-17-10 | Pending | | | | |
| DIV-17-11 | Pending | | | | |
| DIV-17-12 | Filed | 8/14/2009 | Gorman | | |
| DIV-17-13 | Filed | 8/14/2009 | Gorman | | |
| DIV-18-1 | Filed | 8/11/2009 | Gorman | | Attachment DIV 18-1 |
| DIV-18-2 | Filed | 8/14/2009 | Gorman | | |
| DIV-18-3 | Filed | 8/11/2009 | Gorman | | |
| DIV-18-4 | Filed | 8/11/2009 | Gorman | | |
| DIV-18-5 | Filed | 8/14/2009 | Pettigrew | | |

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| Information Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| DIV-19-1 | Pending | | | | |
| DIV-19-2 | Pending | | | | |
| | | | | | |
| DIV-20-1 | Pending | | | | |
| DIV-20-2 | Pending | | | | |
| DIV-20-3 | Pending | | | | |
| DIV-20-4 | Pending | | | | |
| DIV-20-5 | Pending | | | | |
| DIV-20-6 | Pending | | | | |
| | | | | | |
| DIV-21-1 | Pending | | | | |
| DIV-21-2 | Pending | | | | |
| DIV-21-3 | Pending | | | | |
| DIV-21-4 | Pending | | | | |
| DIV-21-5 | Pending | | | | |
| | | | | | |
| DIV-22-1 | Pending | | | | |
| DIV-22-2 | Pending | | | | |
| DIV-22-3 | Pending | | | | |
| DIV-22-4 | Pending | | | | |
| DIV-22-5 | Pending | | | | |
| DIV-22-6 | Pending | | | | |
| DIV-22-7 | Pending | | | | |
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| | | | | | |
| Information Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| NAVY-1-1 | Filed | 6/29/2009 | | | |
| NAVY-1-2 | Filed | 6/29/2009 | | | |
| NAVY-1-3 | Filed | 6/29/2009 | | | |
| NAVY-1-4 | Filed | 6/29/2009 | | | |
| | | | | | |
| NAVY-2-1 | Filed | 7/22/2009 | Gorman, Wynter, O'Brien | | Excel attachments |
| NAVY-2-2 | Filed | 7/22/2009 | Gorman, O'Brien | | Excel attachments |
| | | | | | |
| NAVY-3-1 | Filed | 8/18/2009 | Gorman | | Attachment NAVY 3-1 (a) |
| NAVY-3-2 | Filed | 8/14/2009 | Fields/Gorman | | |
| NAVY-3-3 | Filed | 8/14/2009 | Gorman | | |
| NAVY-3-4 | Filed | 8/14/2009 | Gorman | | |
| NAVY-3-5 | Pending | | | | |
| NAVY-3-6 | Filed | 8/14/2009 | Gorman | | |
| NAVY-3-7 | Filed | 8/18/2009 | Gorman | | Attachments NAVY 3-7 (1-2) Excel |
| NAVY-3-8 | Filed | 8/18/2009 | Gorman | | |

| | | | | | |
|--|---------------|-------------------|----------------|---------------------|--------------------|
| | | | | | |
| The Narragansett Electric Company d/b/a National Grid | | | | | |
| Docket 4065 | | | | | |
| Discovery Log | | | | | |
| As of: August 18, 2009 | | | | | |
| [C-denotes confidentiality is being sought] | | | | | |
| | | | | | |
| Information Request | Status | Date Filed | Witness | CONFIDENTIAL | Attachments |
| GWC-1-1 | Pending | | | | |
| GWC-1-2 | Pending | | | | |
| GWC-1-3 | Pending | | | | |
| GWC-1-4 | Pending | | | | |
| GWC-1-5 | Pending | | | | |
| Discovery Log Ends Here: August 18, 2009 | | | | | |

Commission Data Request 2-3

Request:

How is the cost of main office and special purpose facilities allocated to Rhode Island ratepayers?

Response:

Expenses allocated to The Narragansett Electric Company as a result of opening the New England main office at Reservoir Woods Waltham are calculated by applying factors determined using a common methodology and multiplied against specific expense amounts.

Architects renderings of the space were created identifying work stations, offices, and all other amenity space, with occupancy assigned to specific Lines of Business based on headcount information provided by the various occupying business units. Each Line of Business charges specific rates to entities based on established Bill Pools that consider asset base and customers served. These rates are established using methodologies previously presented to the Commission.

This analysis for estimated occupancy and allocation rates by Lines of Business of their costs to a specific entity are multiplied by the total costs to calculate the expenses to specific entities.

An allocation to the Electric Organization of 50.6% and then to The Narragansett Electric Company of 24.77% (for FY09 as cited in pre-filed testimony) yields the percentage of cost noted for the rate year 2010.

Call Center activities for The Narragansett Electric Company customers are conducted at National Grid's 55 Bearfoot Road, Northborough, MA location. Costs are allocated based on a similar method to that identified above.

At present, the Narragansett Electric Dispatch and Control location costs are incurred at the 642 George Washington Highway, Lincoln, RI location and are direct charged as the facility solely serves the customers of The Narragansett Electric Company.

Division Data Request 3-4

Request:

Referring to NG-RLO-3, Page 5, please provide the actual costs to achieve (“CTA”) incurred in 2008 and in 2009 to date. The response should summarize the costs incurred by type (e.g., severance, systems modification, facilities relocation, etc.)

Request:

Please see Attachment DIV 3-4 for detail regarding actual costs to achieve incurred in 2008 and to date through June 2009.

Please note that in reviewing the data, the Company has discovered that the amount of non-recurring costs identified as Costs to Achieve (“CTA”) and removed from the cost of service was inadvertently overstated. The correct amount of CTA should have been \$3,631,835 rather than \$4,031,080, resulting in a difference of \$399,245. The error was primarily due to the following partially offsetting issues:

- 1) Costs associated with transformation for the January through March 2008 period were incorrectly classified as CTA, and subsequently removed from the cost of service. In order to capture transformation costs, the Company recycled an old project number with an initial description of “US Business Review and Other” but did not update the project description to “Transformation” until April 2009 to coincide with the beginning of the March 31, 2009 fiscal year. Because costs incurred under the “US Business Review and Other” project description were eliminated from the cost of service as CTA, the improper inclusion of the transformation costs under this project description resulted in CTA being overstated and the cost of service being understated by approximately \$480,000.
- 2) The Company generally accumulates and reports on information on a fiscal year basis. As a result, data used to compile the test year (calendar year 2008) CTA amount reflected amounts for the applicable periods in fiscal years ended March 31, 2008 and March 31, 2009. The amount for fiscal year ended March 31, 2008 was preliminary rather than final, such that it did not include final entries recorded as part of the fiscal year-end March 31, 2008 close. This resulted in the net exclusion of certain non-recurring costs as CTA, principally those associated with the KeySpan integration, amounting to an overstatement to the cost of service of approximately \$120,000.

Division Data Request 3-4 (cont.)

- 3) The manual CTA adjustment of \$229,265 was based on an estimate of the fiscal year 2009 amount applicable to calendar year 2008. Based on actual calendar year 2008 data, the amount of the adjustment should have been \$190,232, resulting in an understatement to the cost of service of \$39,033.

The Company will include this adjustment as part of any updates to Schedules provided in this proceeding.

**The Narragansett Electric Company
d/b/a National Grid
CTA
Calendar Year 2008**

| Line | Sum of Posted Jnl \$ | | | | CY |
|------|----------------------|--|------------------------------|-----------------------------|-----------|
| | Business Unit | Expense Type | Expense Type Descr | Project Descr | 2008 |
| 1 | 49 | 100 | Consultants | Keyspan Integration | 182,979 |
| 2 | | | | Non CTA Exceptional | 104,317 |
| 3 | | | | USBR | 61,291 |
| 4 | | 100 Total | | | 348,588 |
| 5 | | 110 | Contractors Services | Finance Integration | 4,717 |
| 6 | | | | Keyspan Integration | 748,352 |
| 7 | | | | Non CTA Exceptional | 7,590 |
| 8 | | | | USBR | 3,519 |
| 9 | | 110 Total | | | 764,178 |
| 10 | | 200 | Employee Expenses | Finance Integration | 1,963 |
| 11 | | | | Keyspan Integration | 47,962 |
| 12 | | | | New England Gas Integration | 1,783 |
| 13 | | | | Non CTA Exceptional | 284 |
| 14 | | | | USBR | (389) |
| 15 | | 200 Total | | | 51,603 |
| 16 | | 300 | Hardware | Keyspan Integration | 120 |
| 17 | | 300 Total | | | 120 |
| 18 | | 400 | Other | Keyspan Integration | (669,856) |
| 19 | | | | New England Gas Integration | 82,512 |
| 20 | | | | Non CTA Exceptional | - |
| 21 | | 400 Total | | | (587,344) |
| 22 | | 500 | Rental/Lease Non-Real Estate | Keyspan Integration | 77,104 |
| 23 | | 500 Total | | | 77,104 |
| 24 | | B01 | FAS 106 | Keyspan Integration | 69,328 |
| 25 | | B01 Total | | | 69,328 |
| 26 | | B06 | Pension | Keyspan Integration | 2,296,536 |
| 27 | | | | New England Gas Integration | 324,426 |
| 28 | | | | Non CTA Exceptional | 56,837 |
| 29 | | B06 Total | | | 2,677,799 |
| 30 | | M10 | Materials Outside Vendor | Finance Integration | 54 |
| 31 | | | | Keyspan Integration | 30,082 |
| 32 | | | | New England Gas Integration | 2,500 |
| 33 | | M10 Total | | | 32,636 |
| 34 | | P30 | Bonus & Misc Pay | Finance Integration | 405 |
| 35 | | | | Keyspan Integration | (8,749) |
| 36 | | | | New England Gas Integration | 7,244 |
| 37 | | | | Non CTA Exceptional | 27,808 |
| 38 | | | | USBR | 11 |
| 39 | | P30 Total | | | 26,719 |
| 40 | | Grand Total | | | 3,460,730 |
| 41 | | | | | |
| 42 | | Plus March 2009 Adjustment (FERC 923000) - Consultants - KeySpan Integration | | | 190,232 |
| 43 | | | | | |
| 44 | | Subtotal | | | 3,650,962 |
| 45 | | | | | |
| 46 | | Less Transmission already adjusted out of Cost of Service | | | (19,127) |
| 47 | | | | | |
| 48 | | Total CTA that should have been adjusted out of Cost of Service | | | 3,631,835 |

**The Narragansett Electric Company
d/b/a National Grid
CTA
Calendar Year 2009 through June**

| Line | Sum of Posted Jrnl \$ | | | | CY |
|------|-----------------------|---|------------------------------|---------------------|------------------|
| | Business Unit | Expense Type | Expense Type Descr | Project Descr | 2009 |
| 1 | 49 | 100 | Consultants | Finance Integration | 1,088 |
| 2 | | | | Keyspan Integration | (182,447) |
| 3 | | | | Non CTA Exceptional | 57,121 |
| 4 | | | | USBR | 20,794 |
| 5 | | 100 Total | | | (103,444) |
| 6 | | 110 | Contractors Services | Finance Integration | 7,007 |
| 7 | | | | Keyspan Integration | 150,525 |
| 8 | | | | USBR | 16,724 |
| 9 | | 110 Total | | | 174,256 |
| 10 | | 150 | Donations | Keyspan Integration | 605 |
| 11 | | 150 Total | | | 605 |
| 12 | | 200 | Employee Expenses | Finance Integration | 571 |
| 13 | | | | Keyspan Integration | 33,934 |
| 14 | | | | Non CTA Exceptional | 1,306 |
| 15 | | 200 Total | | | 35,810 |
| 16 | | 300 | Hardware | Keyspan Integration | 5,171 |
| 17 | | 300 Total | | | 5,171 |
| 18 | | 350 | Software | Keyspan Integration | 333 |
| 19 | | 350 Total | | | 333 |
| 20 | | 400 | Other | Keyspan Integration | 174,138 |
| 21 | | | | Non CTA Exceptional | 60 |
| 22 | | 400 Total | | | 174,198 |
| 23 | | 500 | Rental/Lease Non-Real Estate | Keyspan Integration | 34,824 |
| 24 | | 500 Total | | | 34,824 |
| 25 | | B01 | FAS 106 | Keyspan Integration | 43,726 |
| 26 | | B01 Total | | | 43,726 |
| 27 | | B06 | Pension | Keyspan Integration | 1,654,495 |
| 28 | | B06 Total | | | 1,654,495 |
| 29 | | M10 | Materials Outside Vendor | Keyspan Integration | 4,188 |
| 30 | | M10 Total | | | 4,188 |
| 31 | | M20 | Materials From Inventory | Keyspan Integration | 26 |
| 32 | | M20 Total | | | 26 |
| 33 | | M50 | Materials Stores Handling | Keyspan Integration | 5 |
| 34 | | M50 Total | | | 5 |
| 35 | | P15 | Regular Pay Monthly | Keyspan Integration | 2,394 |
| 36 | | P15 Total | | | 2,394 |
| 37 | | P30 | Bonus & Misc Pay | Finance Integration | 706 |
| 38 | | | | Keyspan Integration | 150,178 |
| 39 | | | | Non CTA Exceptional | 7,494 |
| 40 | | P30 Total | | | 158,378 |
| 41 | | P50 | Time Not Worked | Keyspan Integration | 390 |
| 42 | | P50 Total | | | 390 |
| 43 | | Grand Total | | | 2,185,353 |
| 44 | | | | | |
| 45 | | Less costs associated with Transmission | | | (9,000) |
| 46 | | | | | |
| 47 | | CTA - January - June 2009 | | | <u>2,176,354</u> |

Division Data Request 3-6

Request:

Referring to Workpaper NG-RLO-4, please describe the adjustment of \$229,265, and provide supporting calculations.

Response:

The adjustment of \$229,265 on Workpaper NG-RLO-4 relates to CTA costs incurred in the calendar year but were not recorded specifically as CTA in the Company's general ledger. These costs were subsequently reclassified to CTA accounting in 2009, and therefore, are included in the 2008 CTA amount deducted from the cost of service.

Please note that the amount included in the cost of service was based on an estimate of the fiscal year 2009 amount applicable to calendar year 2008. Based on actual calendar year 2008 data, the amount of the adjustment should have been \$190,232 as opposed to \$229,265. The details of the \$190,232 are reflected in Attachment DIV 3-6. As indicated in the response to DIV 3-4, the Company will include this adjustment as part of any updates to Schedules provided in this proceeding.

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4065
Attachment to Rhode Island Division's Third Set of Data Requests 3-6
Page 1 of 2

The Narragansett Electric Company d/b/a National Grid
CTA Adjustment per Workpaper NG-RLO-4

| <u>Line</u> | <u>Description</u> | <u>Amount</u> | |
|-------------|---|---------------------|----|
| | | (a) | |
| 1 | Deloitte | \$ 3,011,861 | 1/ |
| 2 | Ernst & Young | 447,288 | 2/ |
| 3 | Other | 391,701 | |
| 4 | | | |
| 5 | Total | <u>\$ 3,850,850</u> | |
| | Amount Allocated to Narragansett Electric | 190,232 | 3/ |

1/ Merger-related issues including, fixed asset review, compliance, processes, SOX, etc.

2/ Merger-related tax issues

3/ See Page 2

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4065
Attachment to Rhode Island Division's Third Set of Data Requests 3-6
Page 2 of 2

The Narragansett Electric Company d/b/a National Grid
CTA Adjustment per Workpaper NG-RLO-4

| <u>Line</u> | <u>Company</u> | <u>Percentage Allocated</u> | <u>Amount Allocated</u> |
|-------------|---|---------------------------------|-----------------------------|
| | | (a) | (b) |
| 1 | National Grid USA | 0.29% | \$ 11,167 |
| 2 | Nantucket Electric Company | 0.19% | 7,317 |
| 3 | Massachusetts Electric Company | 11.80% | 454,400 |
| 4 | NE Hydro - Trans Electric Co | 0.21% | 8,087 |
| 5 | New England Hydro - Trans Corp | 0.18% | 6,932 |
| 6 | New England Power Company | 2.18% | 83,949 |
| 7 | New England Electric Trans Co | 0.02% | 770 |
| 8 | Granite State Electric Company | 0.44% | 16,944 |
| 9 | Narragansett Gas Company | 2.66% | 102,433 |
| 10 | Narragansett Electric Company | 4.94% | 190,232 |
| 11 | Niagara Mohawk Power Corp | 27.94% | 1,075,927 |
| 12 | Boston Gas Company | 6.33% | 243,759 |
| 13 | Colonial Gas Company | 1.49% | 57,378 |
| 14 | Energy North | 0.86% | 33,117 |
| 15 | KeySpan Electric Services, LLC | 10.85% | 417,817 |
| 16 | KeySpan Generation Services, LLC | 2.86% | 110,134 |
| 17 | KeySpan Energy Development | 0.38% | 14,633 |
| 18 | KeySpan Energy Delivery (LI & NY) | 17.25% | 664,272 |
| 19 | KeySpan Energy Trading Services, LLC | 0.10% | 3,851 |
| 20 | KeySpan Glenwood Energy Center, LLC | 0.14% | 5,391 |
| 21 | KeySpan Port Jefferson Energy Center, LLC | 0.14% | 5,391 |
| 22 | KeySpan Services, Inc. | 3.32% | 127,848 |
| 23 | KeySpan Energy Corp | 1.17% | 45,055 |
| 24 | Seneca Upshur Petroleum | 0.70% | 26,956 |
| 25 | NG Ravenswood Serv (post-sale) | 3.55% | 136,705 |
| 26 | KeySpan E&P Joint Venture 50% | 0.01% | 385 |
| 27 | | | |
| 28 | Total | 100.00% | \$ 3,850,850 |

Division Data Request 3-20

Request:

Referring to NG-JP-2, please provide the actual expense incurred by month in 2009 to date for each line item and the expenses incurred in the corresponding months in 2008.

Response:

Please refer to Attachment DIV-3-20 for the actual expense incurred by month in calendar year 2008 and to date in calendar year 2009.

Please note that, because Hazard Tree Off-Cycle work is conducted by a specialized crew that works throughout the New England states, no expenses were incurred in April or May as the crews had not yet commenced work in Rhode Island. However, the expected Hazard Tree Off-Cycle work is still on schedule to be completed by year-end.

Attachment DIV-3-20 also shows no actual expenses incurred for Cycle Trimming in the months of April and May which is due, in large part, to the Company's implementation of a new contractor invoicing system and the existence of outstanding invoices. The fact that work cannot be billed by the contractor until the entire feeder unit has been completed, audited and approved as complete is also a contributing factor.

Forestry CY 2008 - by Work Type

Charges to Forestry Depts and Asset Strategy Dept 88200

Excludes any charges to reg account 408xxx

| Sum of GL Act \$ | | Period | | | | | | | | | | | | Grand Total |
|------------------|----------------------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|---------------|--------------|----------------|--------------|----------------|
| State | Work Type | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | |
| RI | Cycle Trimming | \$489,373.52 | \$239,029.68 | \$533,725.45 | \$338,718.40 | \$192,698.00 | \$47,766.48 | \$121,266.65 | \$645,791.91 | \$368,490.65 | | \$823,308.45 | \$628,369.87 | \$4,428,539.06 |
| | Hazard Tree On-Cycle | \$8,883.25 | \$15,872.03 | \$10,159.45 | \$4,809.48 | \$19,370.31 | \$7,824.86 | \$7,007.53 | \$5,224.64 | \$15,025.64 | \$25,357.63 | \$29,270.90 | \$43,128.80 | \$191,934.52 |
| | Hazard Tree Off-Cycle | \$115,833.42 | \$89,563.89 | \$117,112.61 | \$3,256.38 | \$18,869.20 | \$189,302.81 | \$43,103.50 | \$9,642.78 | \$79,415.36 | \$99,523.99 | \$53,355.60 | \$19,586.46 | \$838,566.00 |
| | Interim/Spot Trim | \$7,553.06 | \$11,368.39 | \$7,048.97 | \$25,107.71 | \$14,190.73 | \$5,076.75 | \$3,891.78 | \$18,023.79 | \$24,414.81 | \$10,420.73 | \$18,059.65 | \$18,618.52 | \$163,774.89 |
| | Sub-T | | \$16,281.50 | \$1,048.00 | \$22,485.82 | \$3,240.00 | \$5,136.02 | \$17,078.48 | \$60,955.64 | \$43,691.62 | \$49,219.15 | \$16,931.87 | \$45,297.02 | \$281,365.12 |
| | Police Detail | \$38,193.22 | \$20,323.90 | \$20,913.62 | \$10,135.45 | \$8,030.75 | \$8,440.62 | \$5,410.15 | \$3,951.02 | \$14,892.90 | \$10,590.98 | \$19,855.85 | \$36,653.38 | \$197,391.84 |
| | Customer Requests | \$17,171.73 | \$40,640.69 | \$11,622.96 | \$14,998.71 | \$38,142.15 | \$23,605.81 | \$17,016.99 | \$22,214.65 | \$13,523.33 | \$28,265.71 | \$33,722.61 | \$30,659.65 | \$291,584.99 |
| | Trouble Maintenance | \$12,011.78 | \$13,079.06 | \$176,764.17 | \$8,362.02 | \$7,190.85 | \$13,283.59 | \$18,874.34 | \$13,055.90 | -\$157,025.10 | \$12,857.58 | \$11,523.49 | \$12,298.79 | \$142,276.47 |
| | Other Veg Costs-Contractor | \$19,290.62 | \$23,923.93 | \$10,327.44 | \$8,021.33 | \$21,372.36 | \$41,540.10 | \$21,388.55 | \$21,787.01 | \$31,734.91 | \$10,581.88 | \$27,674.96 | \$6,250.15 | \$243,893.24 |
| | Other Veg Costs-All Other | \$18,577.95 | \$22,257.90 | \$23,303.08 | \$24,479.01 | \$22,493.40 | \$19,607.10 | \$21,714.73 | \$17,769.50 | \$21,149.69 | \$25,047.19 | \$20,787.50 | \$20,947.41 | \$258,134.46 |
| RI Total | | \$726,888.55 | \$492,340.97 | \$912,025.75 | \$460,374.31 | \$345,597.75 | \$361,584.14 | \$276,752.70 | \$818,416.84 | \$455,313.81 | \$271,864.84 | \$1,054,490.88 | \$861,810.05 | \$7,037,460.59 |
| Grand Total | | \$726,888.55 | \$492,340.97 | \$912,025.75 | \$460,374.31 | \$345,597.75 | \$361,584.14 | \$276,752.70 | \$818,416.84 | \$455,313.81 | \$271,864.84 | \$1,054,490.88 | \$861,810.05 | \$7,037,460.59 |

Forestry CY 2009 thru May - by Work Type

Charges to Forestry Depts and Asset Strategy Dept 88200

Excludes any charges to reg account 408xxx

| Sum of GL Act \$ | | Period | | | | | |
|------------------|----------------------------|--------------|--------------|----------------|--------------|-------------|----------------|
| State | Work Type | Jan | Feb | Mar | Apr | May | Grand Total |
| RI | Cycle Trimming | \$562,351.48 | \$203,088.42 | \$1,641,951.77 | | | \$2,407,391.67 |
| | Hazard Tree On-Cycle | \$13,638.94 | \$4,480.52 | \$42,282.38 | \$10,996.29 | \$600.00 | \$71,998.13 |
| | Hazard Tree Off-Cycle | | \$9,928.15 | \$13,936.41 | | | \$23,864.56 |
| | Interim/Spot Trim | \$8,636.30 | \$3,826.04 | \$7,542.00 | \$4,142.77 | | \$24,147.11 |
| | Sub-T | \$29,968.47 | \$26,033.41 | \$110,080.19 | \$41,523.78 | \$4,160.82 | \$211,766.67 |
| | Police Detail | \$10,191.43 | \$9,146.90 | \$49,718.91 | \$19,407.95 | \$38,062.23 | \$126,527.42 |
| | Customer Requests | \$20,845.46 | \$5,762.63 | \$38,810.66 | \$13,678.28 | \$672.00 | \$79,769.03 |
| | Trouble Maintenance | \$13,912.75 | \$3,322.11 | \$11,451.05 | \$7,549.82 | \$158.14 | \$36,393.87 |
| | Other Veg Costs-Contractor | \$16,217.56 | \$9,426.67 | \$33,095.72 | \$17,806.91 | \$7,400.03 | \$83,946.89 |
| | Other Veg Costs-All Other | \$10,778.82 | \$18,318.34 | \$16,301.40 | \$19,147.33 | \$18,714.83 | \$83,260.72 |
| RI Total | | \$686,541.21 | \$293,333.19 | \$1,965,170.49 | \$134,253.13 | \$69,768.05 | \$3,149,066.07 |
| Grand Total | | \$686,541.21 | \$293,333.19 | \$1,965,170.49 | \$134,253.13 | \$69,768.05 | \$3,149,066.07 |

Division Data Request 7-19

Request:

Re: pages 22 and 23 of 27, of the testimony of witness King. Please:

- a. Identify the numbers and percentages of current employees by labor classification (i.e., union, non-union, management, and executive management) that continue to participate in Company's sponsored defined benefit pension plans;
- b. Provide the National Grid's overall pension liabilities and pension assets as of December 31 of each of the last five years and the portions of those pension assets and liabilities that are assessed to be the responsibility of the Company's Rhode Island distribution utility operations;
- c. Provide National Grid's overall OPEB liabilities and OPEB assets as of December 31 of each of the last five years and the portions of those OPEB assets and liabilities that are assessed to be the responsibility of the Company's Rhode Island distribution utility operations.

Response:

- (a) Employees in all classifications participate in Company-sponsored defined benefit pension plans. Defined benefit plans take many forms, including both final average pay designs and cash balance type plans. Although the majority of employees participate in a final average pay type design, new non-union hires into Narragansett Electric and Service Company on or after July 15, 2002 participate in a cash-balance type plan design. The cash-balance pension plan provides a lower level of retirement benefit and therefore involves less cost than the final average pay design previously used by the Company. At this time, there are 8 employees of Narragansett Electric Company and 1,286 employees of the Service Company participating in the cash-balance plan representing 1.8% and 46.2% of current employees, respectively.
- (b) Please see Attachment DIV 7-19 (b).
- (c) Please see Attachment DIV 7-19 (c).

**The Narragansett Electric Company d/b/a National Grid
Pension Plan Assets and Liabilities
Calendar Year 2008**

NGUSA

| | December <u>2008</u> | December <u>2007</u> | Plan Assets December <u>2006</u> | December <u>2005</u> | December <u>2004</u> |
|------------------|-------------------------|-------------------------|--|-------------------------|-------------------------|
| Qualified - FAPP | 1,119,935,034 | 1,581,338,040 | 1,518,045,120 | 1,212,306,534 | 1,160,123,815 |
| Nonqualified | - | - | - | - | - |
| Total | <u>1,119,935,034</u> | <u>1,581,338,040</u> | <u>1,518,045,120</u> | <u>1,212,306,534</u> | <u>1,160,123,815</u> |

The Narragansett Electric Company

| | December <u>2008</u> | December <u>2007</u> | Plan Assets December <u>2006</u> | December <u>2005</u> | December <u>2004</u> | |
|------------------|-------------------------|-------------------------|--|-------------------------|-------------------------|-----|
| Qualified - FAPP | n/a | n/a | n/a | n/a | n/a | (1) |
| Nonqualified | n/a | n/a | n/a | n/a | n/a | (1) |
| Total | <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | <u>n/a</u> | |

NGUSA

| | December <u>2008</u> | December <u>2007</u> | Plan Liabilities - PBO December <u>2006</u> | December <u>2005</u> | December <u>2004</u> |
|------------------|-------------------------|-------------------------|---|-------------------------|-------------------------|
| Qualified - FAPP | 1,518,203,342 | 1,574,230,003 | 1,517,182,894 | 1,351,677,591 | 1,320,946,369 |
| Nonqualified (2) | 108,819,718 | 105,660,157 | 100,174,104 | 96,861,807 | 102,280,593 |
| Total | <u>1,627,023,060</u> | <u>1,679,890,160</u> | <u>1,617,356,998</u> | <u>1,448,539,398</u> | <u>1,423,226,962</u> |

The Narragansett Electric Company

| | December <u>2008</u> | December <u>2007</u> | Plan Liabilities - PBO December <u>2006</u> | December <u>2005</u> | December <u>2004</u> | |
|------------------|-------------------------|-------------------------|---|-------------------------|-------------------------|-----|
| Qualified - FAPP | n/a | n/a | n/a | n/a | n/a | (1) |
| Nonqualified | n/a | n/a | n/a | n/a | n/a | (1) |
| Total | <u>-</u> | <u>-</u> | <u>-</u> | <u>-</u> | <u>-</u> | |

- (1) The National Grid companies participate in a common pension plan, and therefore, do not have separate accounts from which their share of fund assets can be determined. In addition, National Grid does not have projected benefit obligation (PBO) values on a Narragansett Electric basis for the dates requested. PBO amounts for Narragansett Electric were provided as of April 1, 2007 and 2008 in response to COMM 1-48.
- (2) Nonqualified liabilities reflect the PBO for all nonqualified plans and not just the ESRP. Only the costs of the ESRP are included in the revenue requirement in this proceeding. National Grid does not have separate PBO values by nonqualified plan with the exception of December 2004. Of the \$102 million shown for the December 2004 PBO for all nonqualified plans, the ESRP portion of this total is \$63 million or 62% of the total. The ESRP portion of the amounts shown for December 2005 to 2008 is roughly proportionately similar to December 2004.

**The Narragansett Electric Company d/b/a National Grid
OPEB Plan Assets and Liabilities
Calendar Year 2008**

| NGUSA | Plan Assets | | | | |
|-------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| | December <u>2008</u> | December <u>2007</u> | December <u>2006</u> | December <u>2005</u> | December <u>2004</u> |
| Total | 340,187,803 | 482,395,433 | 441,322,715 | 363,357,895 | 345,665,693 |

| The Narragansett Electric Company | Plan Assets | | | | |
|-----------------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| | December <u>2008</u> | December <u>2007</u> | December <u>2006</u> | December <u>2005</u> | December <u>2004</u> |
| Total | 60,570,846 | 87,444,616 | 80,965,248 | 68,676,892 | 64,922,559 |

| NGUSA | Plan Liabilities - PBO | | | | |
|-------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| | December <u>2008</u> | December <u>2007</u> | December <u>2006</u> | December <u>2005</u> | December <u>2004</u> |
| Total | 838,218,579 | 813,097,183 | 784,396,995 | 759,443,462 | 715,765,604 |

| The Narragansett Electric Company | Plan Liabilities - PBO | | | | |
|-----------------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|
| | December <u>2008</u> | December <u>2007</u> | December <u>2006</u> | December <u>2005</u> | December <u>2004</u> |
| Total | 144,551,581 | 146,050,300 | 144,405,633 | 148,247,721 | 141,273,839 |

Division Data Request 8-17

Request:

Please provide data on payment arrangements by month for 2007, 2008 and YTD May 2009, with the following breakdown (residential accounts):

- a. Total dollars and number of accounts with payment arrangements
- b. Total number of plans established
- c. Number of accounts with defaults (i.e., number of broken agreements)
- d. Percentage of accounts with payment arrangements that paid on schedule

Response:

Please see Attachment DIV 8-17 for the requested information.

| | <u>Count</u> | DPA's \$ | Plans <u>Negotiated</u> | Plans <u>Broken</u> | % with DPA's that <u>paid on schedule</u> |
|--------|--------------|-------------|----------------------------|------------------------|---|
| Jan-07 | na | na | 2,904 | 3,626 | |
| Feb-07 | na | na | 3,027 | 3,953 | |
| Mar-07 | na | na | 3,491 | 2,682 | |
| Apr-07 | na | na | 5,139 | 3,657 | |
| May-07 | na | na | 5,673 | 3,899 | |
| Jun-07 | na | na | 4,738 | 3,765 | |
| Jul-07 | na | na | 4,467 | 4,319 | |
| Aug-07 | na | na | 3,845 | 4,464 | |
| Sep-07 | na | na | 5,159 | 6,144 | |
| Oct-07 | na | na | 5,371 | 5,368 | |
| Nov-07 | na | na | 3,569 | 4,440 | |
| Dec-07 | na | na | 2,619 | 3,283 | |
| Jan-08 | na | na | 3,821 | 4,930 | |
| Feb-08 | na | na | 4,787 | 4,692 | |
| Mar-08 | na | na | 5,493 | 5,816 | |
| Apr-08 | na | na | 5,597 | 2,927 | |
| May-08 | na | na | 6,668 | 5,394 | |
| Jun-08 | na | na | 5,476 | 6,283 | |
| Jul-08 | na | na | 5,884 | 6,583 | |
| Aug-08 | na | na | 6,456 | 6,893 | |
| Sep-08 | na | na | 8,110 | 7,657 | |
| Oct-08 | na | na | 8,320 | 6,771 | |
| Nov-08 | na | na | 5,104 | 6,727 | |
| Dec-08 | na | na | 5,755 | 8,301 | |
| Jan-09 | 13,685 | \$7,034,060 | 5,709 | 6,259 | 54% |
| Feb-09 | 13,542 | \$7,135,559 | 5,128 | 4,692 | 65% |
| Mar-09 | 14,263 | \$7,904,043 | 6,187 | 5,553 | 61% |
| Apr-09 | 14,267 | \$8,227,827 | 5,740 | 5,332 | 63% |
| May-09 | 14,949 | \$9,329,293 | 6,361 | 5,140 | 66% |

Company did not begin tracking payment plan accounts and \$'s for Rhode Island until Jan'09.

Division Data Request 10-1

Request:

Referring to Workpaper RLO-4, did the Company incur any “transformation” expenses in 2008 in addition to the costs to achieve? If so, please explain the nature of the transformation expenses incurred in 2008. The response should describe the expenditures and the objectives of the transformation efforts.

Response:

Yes, the Company incurred “transformation” costs in 2008 to implement measures with an objective of streamlining and automating work functions. These costs are separate from, and in addition to, costs to achieve and exceptional costs that are shown in Workpaper RLO-4.

Transformation expenses are expenses incurred by the Company in the normal course of business to improve the efficiency and effectiveness of its operations. The Company has an obligation to work on a continual basis to contain O&M costs. The Company meets this obligation in large part by maintaining an ongoing "transformation" effort to identify and undertake opportunities that are intended to streamline the Company's operations and make them more cost effective, in addition to advancing other safety and environmental objectives where possible. The costs associated with the implementation of new business processes and other improvements are normal recurring operating costs that the Company incurs from period to period as part of its effort to contain O&M costs over the long-term.

Within Electricity Distribution Operations, the Company's continuing obligation to improve and streamline its delivery of service to customers has taken the form of a "transformation" process. The term “transformation” is intended to refer to the Company’s goal of becoming a first quartile performer in North America in safety, efficiency, reliability and customer satisfaction. The objectives of the EDO transformation efforts are to:

- Identify best practices and establish streamlined processes to support the operating model;
- Strive for operational excellence in customer service, reliability, safety, and efficiency;
- Develop asset strategies and regulatory support to enhance the long term sustainability of the Company's networks;
- Develop new approaches to planning the Company's networks and customer services, and

Prepared by or under the supervision of: John Pettigrew and Robert L. O'Brien

Division Data Request 10-1 (cont.)

- Create a high-performance culture.

The costs incurred to achieve streamlining or automation of work functions were associated with the following functions:

- Employee-related costs, including base pay, overtime pay, benefits and overheads
- Employee business expenses
- Materials
- Contractor costs for incremental resources sourced to assist in the review process and augment the internal employees working on these efforts
- Outside services costs related to the engagement of third party consultants that provide specialized services and capabilities
- Information Technology expenditures related to the enablement of specific process automation or delivery of new or improved capabilities within the solution portfolio

Division Data Request 10-23

Request:

Referring to the response to Division Data Request 1-17, please explain the reasons for the fluctuations in the “Expense Total” amounts in the months in 2009.

Response:

The fluctuations in the expense totals are attributed to accrual adjustments. The accruals are estimated during the Company’s fiscal year based on a rolling twelve-month average and are trued up as existing claims are paid and new claims are reported. As a result, there are fiscal year-end true up adjustments in February and March 2009 that impact the expenses recorded in those months, but when viewed on a cumulative-to-date basis the expense levels are reasonable.

When comparing January through May 2009 to the same time period in 2008, the 2009 increase is approximately \$200 thousand (\$1.742 million vs. \$1.934 million).

Division Data Request 10-27

Request:

Referring to the response to Commission Data Request 1-93, please provide a brief description of payments to each vendor in excess of \$100,000 in 2008.

Response:

The chart below lists individual matters for which in excess of \$100,000 was paid during 2008.

| Number | Firm | Matter | 2008 Spend |
|---------------|-------------------------|-----------------------------------|-------------------|
| 1 | Hinckley Allen & Snyder | Constellation Energy FCM Dispute | \$419k |
| 2 | McDermott Will & Emery | Fibertech FCC Matter | \$327k |
| 3 | Covington & Burling | Delaware S&W Adversary Proceeding | \$193k |
| 4 | Patton Boggs | J.M. Mills Landfill | \$104k |

Description of payments:

1. The Constellation Energy FCM Dispute Matter involved a dispute over the applicability of a Fuel Adjustment Factor to the calculation of payments to a power supplier for the period 2005 through 2009 under certain wholesale Standard Offer Supply Agreements.
2. The Fibertech FCC Matter involved a pole attachment complaint Fibertech lodged with the FCC over attachments it was seeking to make in Rhode Island. Though the complaint was provided to the FCC, it was settled before it was actually logged as a formal complaint against National Grid and Verizon.
3. The Delaware S&W Adversary Proceeding Matter was a bankruptcy adversary proceeding related to environmental enforcement actions and insurance recovery litigation with regard to certain NECO sites in Rhode Island and Massachusetts.
4. National Grid is one of many entities that have been named in an action seeking reimbursement of cleanup costs of the JM Mills Landfill Superfund Site. Patton Boggs, outside counsel to National Grid, has been conducting the defense of this action as well as actively investigating it to learn what, if any, responsibility

Division Data Request 10-27 (cont.)

National Grid has for the site. Among the actions taken by counsel are locating and reviewing numerous historical records, locating/contacting witnesses, and attending and taking depositions of drivers who transported waste to or from the site. Counsel has also prepared pleadings and responses to discovery demands and attended various meetings.

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4065
Responses to Division Eleventh Set of Data Requests
Issued July 8, 2009

Division Data Request 11-24

Request:

Please provide annual capital and O&M budgets for Narragansett Electric for the most recent five years, showing both projected and actual spending.

Response:

Please see the chart below for the requested information.

| | Capital (\$M) | | O&M (\$M) | |
|------------------|---------------|--------|-----------|--------|
| | Budget | Actual | Budget | Actual |
| Fiscal Year 2005 | 40.4 | 48.1 | 70.0 | 92.0 |
| Fiscal Year 2006 | 43.9 | 45.8 | 121.4 | 130.3 |
| Fiscal Year 2007 | 45.0 | 51.4 | 149.4 | 158.5 |
| Fiscal Year 2008 | 54.0 | 58.0 | 143.5 | 155.5 |
| Fiscal Year 2009 | 58.7 | 55.3 | 154.9 | 173.5 |

Division Data Request 11-30

Request:

Page 35: Please describe the DCIG and provide a list of employees or other individuals that comprise this group. Also, provide a list of projects that this group has approved in the last five years.

Response:

The purpose of the Distribution Capital Investment Group is to: provide executive oversight (consistent with its governance) of the CAPEX budget development; monitor CAPEX work plan execution; and review and approve major projects (i.e., greater than \$1M) within the plan from initial sanction to closure (including any required re-sanction).

The Distribution Capital Investment Group members are:

| Name | Title | Location |
|------------------|---|-----------------|
| John Pettigrew | Chief Operating Officer and Executive Vice President of Electricity Distribution, Operations and Generation | Waltham, MA |
| Patrick Hogan | Senior Vice President, Network Strategy | Waltham, MA |
| Lynda Ryan | Chief Financial Officer, Electricity Distribution Business | Waltham, MA |
| Peter Zschokke | Director, Regulatory Research and Special Projects | Waltham, MA |
| Chris Brouillard | Director, Investment Management | Waltham, MA |
| Mary Fuller | Program Management | Waltham, MA |
| Neil Proudman | Vice President Construction Delivery | Waltham, MA |
| Ross Turrini | Vice President, Procurement | Waltham, MA |
| Chris Root | Senior Vice President, Customer Operations | Waltham, MA |
| Richard Murphy | Senior Vice President, Energy Solution Services | Waltham, MA |

Division Data Request 11-31

Request:

Page 35: Please describe the Distribution Executive Committee and provide a list of employees or other individuals that comprise this group. Also, provide a list of projects that this group has approved in the last five years.

Response:

The purpose of the Distribution Executive Committee (“DEC”) is to review and approve large capital projects and other commitments to carry out projects, pursuant to its proposed delegated authority from the National Grid USA Board of Directors. Large capital projects to be approved by DEC are defined as projects that fall within the authority delegated by the National Grid USA Board. DEC approves projects above \$10 million that have been reviewed by the Distribution Capital Investment Group (“DCIG”) or by the Generation Capital Investment Group (“GCIG”). The Committee will also review and approve expenditures related to Site Remediation and Investigation and other expenditures related to the Company’s legal obligations under environmental laws and regulations.

The DEC Members are:

Thomas King - Committee Chair
Executive Director, Electricity Distribution and Generation
Waltham, MA

John Pettigrew
Chief Operating Officer & Executive Vice President, EDO&G
Waltham, MA

Lynda Ryan
CFO, Electricity Distribution Business
Waltham, MA

Lisa Crutchfield
Executive Vice President, Regulatory Affairs
Waltham, MA

Division Data Request 11-34

Request:

Does National Grid's new I&M Strategy apply to all JO distribution poles, or only to those poles for which National Grid is responsible for setting?

Response:

The Company's I&M strategy applies to all poles including those jointly owned.

Division Data Request 12-14

Request:

Mr. O'Brien testifies on p. 48 that \$2.4 million in merger savings have already been achieved. Please provide a table showing the portion of the merger savings received, to date, by Narragansett, by FERC account.

Response:

The requested information is not available by FERC account. As discussed in the response to Division data Request 3-7, merger synergy savings are being tracked by line of business initiatives. In order to show the line of business savings by individual operating company, the lines of business split their savings from each initiative into a relevant bill pool, intended to replicate how these avoided costs would have been allocated to each individual operating company. This required a degree of estimation as some assumptions were necessary in identifying which bill pool would be appropriate based upon the operating companies receiving the benefit of each initiative.

Division Data Request 12-15

Request:

If the merger-related adjustments provided in response to Question 13 do not total to the \$3.25 million in customer net savings per FERC account described by Mr. O'Brien, please explain the difference and how this is reflected in Mr. Gorman's revenue requirement.

Response:

As indicated in the response to Division Data Request 12-11 and detailed in Schedule NG-RLO-3, the merger-related adjustments total \$3,250,000 in customer net savings. The steady state net synergy savings for Narragansett are estimated at \$6,500,000 (\$8,600,000 of synergies less \$2,100,000 of cost to achieve amortization). The Company is proposing a 50/50 sharing of this net synergy amount, or \$3,250,000. During the test year, Narragansett realized \$2,400,000 of synergies. Consequently, the revenue requirement adjustment for the rate year amounts to an incremental \$850,000 credit as reflected in Mr. Gorman's cost of service.

Division Data Request 14-9

Request:

Provide a copy of National Grid's plant aging studies and a comprehensive description of how National Grid applies its aging studies.

Request:

National Grid does not conduct plant aging studies but does develop age profiles on an ad hoc basis for specific assets as required for strategy development.

National Grid does not view age is the sole indicator of asset condition. Other indicators utilized by National Grid, where applicable, are diagnostic test results, operating history, technology, vendor support and application. These indicators as well as age are used to model assets targeted for replacement.

Division Data Request 14-10

Request:

Does National Grid believe that a plant aging study should be the only criteria for plant replacement? What criteria does National Grid believe should be utilized for the determination of plant replacement other than age of the plant?

Request:

National Grid does not view age is the sole indicator of asset condition. Other indicators utilized by National Grid where applicable are diagnostic test results, operating history, technology, vendor support and application. These indicators as well as age are used to model assets targeted for replacement.