

June 29, 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 the Department of the Navy's first set of data requests issued in the above-referenced proceeding.

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").

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically submitted, hand delivered and mailed to the individuals listed below.

_____/S/_____
Linda Samuelian

June 29, 2009
Date

**National Grid (NGrid) – Request for Change in Electric Distribution Rates
Docket No. 4065 - Service List as of 6/26/09**

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NAVY Data Request 1-1

Request:

Please provide a copy of all Exhibits and Schedules in the instant filing in native format (i.e., WORD and EXCEL or a compatible format). EXCEL workbooks should be provided with all formulas and links intact.

Response:

Pursuant to Commission Rule 1.18(c)(3), the Company objects to this question because the request is overly broad and places an undue burden on the Company to produce every document in this proceeding in a “native format.” Moreover, the request is not reasonably structured to produce information that is probative of the issues to be determined in this proceeding. Notwithstanding this objection, the Company will provide specific materials in their “native format,” i.e., in WORD or EXCEL format, if a request is made for a specific file or set of files.

NAVY Data Request 1-2

Request:

Please provide a copy of all workpapers supporting the Schedules contained in the Testimony in native format (i.e., WORD and EXCEL or a compatible format). EXCEL workbooks should be provided with all formulas and links intact.

Response:

Pursuant to Commission Rule 1.18(c)(3), the Company objects to this question because the request is overly broad and places an undue burden on the Company to produce every workpaper in this proceeding in a “native format.” Moreover, the request is not reasonably structured to produce information that is probative of the issues to be determined in this proceeding. Notwithstanding this objection, the Company will provide specific materials in their “native format,” i.e., in WORD or EXCEL format, if a request is made for a specific file or set of files.

NAVY Data Request 1-3

Request:

Please provide a copy of all interrogatories, requests to produce or other requests for information received by the Company from participants in this proceeding.

Response:

The Company made its first filing of responses to data requests in this proceeding on Friday, June 26, 2009. The Company included the Navy's designated representative on the service list for this filing and will continue to do so with future filings. Therefore, the Navy will receive a copy of all interrogatories, requests to produce or other requests for information received by the Company from participants in this proceeding.

NAVY Data Request 1-4

Request:

Please provide, when available, a copy of all discovery responses, including responses to both interrogatories and requests to produce.

Response:

Please see the Company's response to NAVY 1-3.