

February 2, 2010

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 and Record Requests**

Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's¹ responses to data requests issued by the Commission (specifically, COMM 15-3, COMM 15-5, COMM 16-1 and COMM 16-2). To the best of the Company's knowledge, the requests that remain outstanding as of this date are as follows:

COMM 12-3 (requesting historical cost information)
COMM 15-7 (update of rate-case expense, including Division's cost)
RR-COMM-45 (information on details of debt issuance, when completed)
TEC-RI 1-1 (information on rate design impact)

The Company is endeavoring to complete these responses as quickly as possible and will file responses as they are completed. If the Company's list of outstanding responses is inaccurate, please let us know.

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/
Karen Horan

February 2, 2010
Date

**National Grid (NGrid) – Request for Change in Electric Distribution Rates
Docket No. 4065 - Service List as of 10/28/2009**

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Commission Data Request 15-3

Request:

With regard to the response to COMM 12-2 regarding pole ownership:

- a. Who is responsible for the maintenance and replacement of the jointly owned poles?
- b. If a jointly owned pole is repaired or replaced, how are the costs allocated between Narragansett and Verizon?
- c. Who determines when a jointly owned pole should be repaired and/or replaced?

Response:

(a) In accordance with the Joint Pole Ownership Agreement, National Grid (Narragansett) and Verizon share responsibility for the maintenance and the replacement of jointly owned poles. Pole placement, replacement and maintenance responsibility is assigned typically by municipal boundaries, although certain larger cities and towns are split (within the municipal boundary). These “maintenance areas” are assigned such that there is an approximate 50/50 share of maintenance responsibilities.

(b) The utility setting the pole(s) bills the other company for ownership interest. For example, if National Grid sets a joint-owned pole, then Verizon is billed the established rate, which reflects Verizon’s cost of joint ownership. Please see the Company’s response to DIV 14-24 for additional explanation.

(c) Either company can identify a need for pole repair or replacement. The Intercompany Operating Procedures define an Exchange of Notice Process (EON) whereby Verizon or National Grid notifies the other of proposed pole repairs, placements and replacements. The process also provides for the consent of the other owner and supports the billing for work preformed. Within National Grid, Engineering, Operations, Inspections, and Asset Management typically identify or approve required pole work.

Commission Data Request 15-5

Request:

The response to COMM Record Request 44 indicates that NGrid PLC capital structure consists of 62% debt. What percentage of the debt is long term? What percentage is short term?

Response:

National Grid plc's capital structure as of March 31, 2009, as determined in accordance with U.S. GAAP and adjusted for cash assets and RAV, is comprised of approximately 38 percent common equity, 61 percent long-term debt and 1 percent short-term debt.

Commission Data Request 16-1

Request:

Does Narragansett Electric (electric or gas) provide any free service pursuant to RIGL 39-2-5(1)?

Response:

The referenced section of Rhode Island law states as follows:

§ 39-2-5 Exceptions to anti-discrimination provisions. – The provisions of §§ 39-2-2– through 39-2-4 shall be subject to the following exceptions:

(1) A public utility may issue or give free transportation or service to its employees and their families, its officers, agents, surgeons, physicians, and attorneys at law, and to the officers, agents, and employees, and their families of any other public utility.

However, National Grid does not provide any free service to anyone under this statutory provision.

Commission Data Request 16-2

Request:

If the answer to the above [COMM 16-1] is yes, please identify the recipients and provide the value of the services for each of the last three years.

Response:

The answer to COMM 16-1 is that the Company does not provide this service.