

August 20, 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**

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Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's<sup>1</sup> responses to data requests issued by the Commission and the Division 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

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<sup>1</sup> 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 20, 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 <b>BULK</b>
COMM 1-2	Filed	6/26/2009	O'Brien		Attachments COMM 1-2 A-D <b>BULK</b>
COMM 1-3	Filed	6/26/2009	Dinkel		Attachments COMM 1-3 A-B <b>BULK</b>
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 <b>BULK</b>
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) <b>BULK</b>
COMM 1-9	Filed	6/26/2009	Dinkel	C-attachment	Attachments COMM 1-9 (1-11) <b>BULK</b>
COMM 1-10	Filed	6/26/2009	Dinkel		Attachment COMM 1-10 (hard copy only) <b>BULK</b>
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) <b>Bulk</b>
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) <b>BULK</b>
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) <b>BULK</b>
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) <b>BULK</b>
COMM 1-34	Filed	6/26/2009	Dowd		Attachments COMM 1-34 (1-2) <b>BULK</b>
COMM 1-35	Filed	6/26/2009	Dowd		Attachment COMM 1-35 <b>BULK</b>
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

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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) <b>BULK</b>
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) <b>BULK</b>
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 <b>BULK</b> (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) <b>BULK</b>
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) <b>BULK</b>
COMM 1-91	Filed	6/26/2009	O'Brien		Attachment DIV 4-21 (1-2) <b>BULK</b>
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		

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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	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				
<b>COMM 2-40</b>	<b>Filed Herewith</b>	<b>8/20/2009</b>	<b>O'Brien</b>		Attachments COMM 2-40 (1-2) <b>BULK</b>
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

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COMM 2-50	Filed	8/14/2009	Wynter		
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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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	8/18/2009	O'Brien		Attachment DIV 3-4
DIV-3-5	Filed	7/6/2009	O'Brien		
DIV-3-6	Filed	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	8/18/2009	Pettigrew		Attachment DIV 3-20
DIV-3-21	Filed	7/6/2009	Pettigrew		

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DIV-3-22	Filed	8/18/2009	O'Brien/Dowd		
DIV-4-1	Filed	7/6/2009	Moul		Attachments DIV 4-1 (1-2) <b>BULK</b>
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
DIV-4-21	Filed	7/6/2009	O'Brien		Attachment DIV 4-21 (1-2) <b>BULK</b>
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	<b>C-attachments</b>	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 <b>BULK</b>
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)
<b>DIV-6-15 (a)</b>	<b>Filed Herewith</b>	<b>8/20/2009</b>	<b>Tierney</b>		Attachment DIV 6-15(a)
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)
<b>DIV-6-26</b>	<b>Filed Herewith</b>	<b>8/20/2009</b>	<b>Tierney</b>		
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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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		
<b>DIV-7-5</b>	<b>Filed Herewith</b>	<b>8/20/2009</b>	<b>King</b>		
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	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	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		
<b>DIV-8-22</b>	<b>Filed</b>	<b>8/20/2009</b>	<b>Wynter</b>		Attachment DIV 8-22
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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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	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 <b>BULK</b>
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	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	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		
<b>DIV-11-4</b>	<b>Filed Herewith</b>	<b>8/20/2009</b>	<b>Pettigrew</b>		
DIV-11-5	Filed	8/18/2009	Pettigrew		
<b>DIV-11-6</b>	<b>Filed Herewith</b>	<b>8/20/2009</b>	<b>Pettigrew</b>		
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) <b>BULK</b>
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		
DIV-11-22	Pending				

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<b>DIV-11-23</b>	<b>Filed Herewith</b>	<b>8/20/2009</b>	<b>Pettigrew</b>		
DIV-11-24	Filed	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	8/18/2009	Pettigrew		
DIV-11-31	Filed	8/18/2009	Pettigrew		
DIV-11-32	Pending				
<b>DIV-11-33</b>	<b>Filed Herewith</b>	<b>8/20/2009</b>	<b>Pettigrew</b>		Attachments DIV 11-33 (1-4) <b>BULK</b>
DIV-11-34	Filed	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) <b>BULK</b> 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) <b>BULK</b>
DIV-12-2	Filed	8/11/2009	O'Brien		Attachment DIV 12-2 (1-2) <b>BULK</b>
DIV-12-3	Filed	8/18/2009	O'Brien		Attachments DIV 12-3 (CD- ROM) <b>BULK</b>
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) <b>BULK</b>
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		
<b>DIV-12-10</b>	<b>Filed Herewith</b>	<b>8/20/2009</b>	<b>O'Brien</b>		
DIV-12-11	Filed	8/18/2009	O'Brien		
DIV-12-12	Pending				
DIV-12-13	Pending				
DIV-12-14	Filed	8/18/2009	O'Brien		
DIV-12-15	Filed	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) <b>BULK</b>
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	8/18/2009	Pettigrew		
DIV-14-10	Filed	8/18/2009	Pettigrew		

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DIV-14-11	Filed	8/18/2009	Pettigrew		Attachments DIV 14-11 (1-8) <b>BULK</b>
DIV-14-12	Filed	8/18/2009	Pettigrew		Attachments DIV 14-12 (1-2) <b>BULK</b>
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		
<b>DIV-14-25</b>	<b>Filed Herewith</b>	<b>8/20/2009</b>	<b>Pettigrew</b>		Attachment DIV 14-25
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) <b>BULK</b>
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		
<b>DIV-17-7</b>	<b>Filed Herewith</b>	<b>8/20/2009</b>	<b>Dowd</b>		
DIV-17-8	Pending				
<b>DIV-17-9</b>	<b>Filed Herewith</b>	<b>8/20/2009</b>	<b>Dowd</b>		
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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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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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		

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GWC-1-1	Pending				
GWC-1-2	Pending				
GWC-1-3	Pending				
GWC-1-4	Pending				
GWC-1-5	Pending				
<b>Discovery Log Ends Here: August 20, 2009</b>					

Commission Data Request 2-40

Request:

Please provide a copy of the current IFA between NEP and Narragansett.

Response:

Please see Attachment 1 to COMM-2-40 for a copy of the current Tariff and formula rate provisions. Attachment 2 to COMM-2-40 is the most recent monthly calculation for the month of June 09 of the IFA.

Division Data Request 6-15

Request:

Re: page 59 of 97, lines 13-19, of witness Tierney's testimony, please:

- a. Identify those expenditures that National Grid believes are "out of the control of the utility;"
- b. Describe how the listed rate making tools accommodate customers' interests and concerns, in addition to accommodating "investment requirements and a fair return to investors."
- c. Identify each utility (not utility holding company) that has encountered a significant decline in credit worthiness since the start of the current economic recession that was not brought about, or heavily contributed to, by credit problems or collateral requirements faced by its unregulated affiliates.

Response:

Please note that the Company has previously responded to other parts of this question.

a. The Company considers costs outside of its control to be the types of costs that are completely, or primarily, a result of external forces over which the Company cannot exercise management discretion. Examples of these types of costs would be include, but not be limited to: (1) costs arising from weather or the need to address weather impacts; (2) costs created or identified through judicial, legislative or governmental action (such as property tax); and (3) costs driven by market forces, such as pension or pension-related costs (largely a function of market performance and interest rates) and commodity costs (driven by laws of supply and demand). Please see Attachment DIV 6-15(a) for additional detail relating to this response.



Narragansett Electric Company  
d/b/a National Grid  
Examples of Non-Controllable Costs

**2005 - 2008 Storm Costs**

	2005 Storm Costs	2006 Storm Costs	2007 Storm Costs	2008 Storm Costs
Normal Costs	\$ 595,460	\$ 707,136	\$ 489,437	\$ 564,854
Incremental Costs	2,374,064	4,154,845	3,300,029	4,623,345
Total	<u>\$ 2,969,524</u>	<u>\$ 4,861,981</u>	<u>\$ 3,789,466</u>	<u>\$ 5,188,199</u>

**2005 - 2008 Property Tax Expense**

	2005 Property Taxes	2006 Property Taxes	2007 Property Taxes	2008 Property Taxes
Total	<u>\$ 16,329,901</u>	<u>\$ 19,083,224</u>	<u>\$ 17,136,969</u>	<u>\$ 17,959,422</u>

**2005 - 2008 Vehicle and Equipment Fuel Costs**

	2005	2006	2007	2008
Total	<u>\$ 944,408</u>	<u>\$ 1,181,391</u>	<u>\$ 1,228,442</u>	<u>\$ 1,526,745</u>

**2005 - 2008 Pension / OPEB Expense**

	2005	2006	2007	2008
FAS 106 Pension	\$ 9,241,646	\$ 8,828,567	\$ 9,493,453	\$ 9,287,485
	7,511,139	6,858,021	8,084,881	7,474,069
Total	<u>\$ 16,752,785</u>	<u>\$ 15,686,588</u>	<u>\$ 17,578,334</u>	<u>\$ 16,761,554</u>

**2005 - 2008 Uncollectible Expense**

	2005	2006	2007	2008
Total	<u>\$ 8,290,947</u>	<u>\$ 11,439,881</u>	<u>\$ 13,086,541</u>	<u>\$ 12,748,167</u>

Division Data Request 6-26

Request:

Please provide the Company's best estimates of the RDR adjustments it would expect to apply to each rate class when the first RDR rate adjustments become effective assuming all of its proposals in this proceeding are approved and the Company's energy efficiency objectives for 2010 are achieved. Please include in the response to this request full documentation of the data, workpapers, calculations, and assumptions upon which the Company relies to produce the requested estimates.

Response:

Please see the Company's response to Division Data Request 6-19(f) which provides estimates for RDR adjustments, by rate class, for 2010, 2011 and 2012, assuming that the Commission approves all of the Company's rate proposals in this docket.

Division Data Request 7-5

Request:

Re: page 6 of 27, line 20, of the testimony of witness King. Please provide the measures that National Grid intends to use to assess whether it is in fact the “*foremost international electricity and natural gas company.*”

Response:

Please see the response to Division Data Request 7-1.

Division Data Request 8-22

Request:

Do you have a systematic process for transferring charged off account balances to active accounts?

- a. If yes, please provide detail on the process as well as monthly historical volumes (i.e., 2007-YTD2009), including:
  - i. Total number of accounts and total balance due
  - ii. Total dollars collected, if applicable
  - iii. Total dollars transferred to active accounts

Response:

Yes. The following is abstracted from the Job Aid within the Company's response to DIV 8-7 bi at Attachment DIV 8-7a & 7bi.

**“Customers with Prior Service**

**Account not Active Final Bill with a Balance or Written Off**

Request full balance be paid for new service, if not possible, negotiate with customer for a down payment (minimum of 50% of total balance must be paid) and a 3 to 6 month payment plan on the balance. If the customer claims protection, you may lower to 25% of total balance with a 12 month plan.”

Please refer to Attachment DIV 8-22 for the dollar volumes and accounts since January 2008. The data is unavailable for the months prior to the CSS conversion in January 2008.

**Narragansett Electric**  
**Transfer to Active information**  
**January 2008 - June 2009**

	Residential		NonResidential		Totals		Paid toward	Write-Off
	Count	Amount	Count	Amount	Count	Amount	Original Transfer	of Transfer
Jan-2008	62	\$19,874.53			<b>62</b>	<b>\$19,874.53</b>	\$4,208.73	\$4,453.43
Feb-2008	214	\$56,539.60	4	\$3,897.68	<b>218</b>	<b>\$60,437.28</b>	\$13,913.24	\$16,917.11
Mar-2008	279	\$65,914.72	9	\$780.56	<b>288</b>	<b>\$66,695.28</b>	\$14,369.51	\$16,633.28
Apr-2008	453	\$95,803.71	1	\$540.40	<b>454</b>	<b>\$96,344.11</b>	\$26,203.78	\$19,874.25
May-2008	237	\$31,970.58	7	\$5,029.74	<b>244</b>	<b>\$37,000.32</b>	\$8,869.55	\$6,945.34
Jun-2008	402	\$62,470.46	11	\$1,538.60	<b>413</b>	<b>\$64,009.06</b>	\$16,035.47	\$16,504.24
Jul-2008	373	\$54,806.28	12	\$6,640.69	<b>385</b>	<b>\$61,446.97</b>	\$12,565.86	\$13,295.24
Aug-2008	313	\$45,407.11	3	\$2.33	<b>316</b>	<b>\$45,409.44</b>	\$9,918.97	\$8,759.81
Sep-2008	280	\$50,956.05	2	\$2,032.40	<b>282</b>	<b>\$52,988.45</b>	\$13,942.65	\$4,716.71
Oct-2008	540	\$94,100.11	6	\$283.25	<b>546</b>	<b>\$94,383.36</b>	\$21,215.55	\$8,407.39
Nov-2008	500	\$137,782.83	2	\$364.91	<b>502</b>	<b>\$138,147.74</b>	\$31,377.39	\$7,005.14
Dec-2008	390	\$90,939.06	2	\$29,355.92	<b>392</b>	<b>\$120,294.98</b>	\$23,412.71	\$2,782.49
Jan-2009	333	\$83,767.27	1	\$54.10	<b>334</b>	<b>\$83,821.37</b>	\$26,196.95	\$4,416.58
Feb-2009	405	\$115,100.75	1	\$56.51	<b>406</b>	<b>\$115,157.26</b>	\$28,132.59	\$2,155.62
Mar-2009	518	\$146,255.95	5	\$1,012.15	<b>523</b>	<b>\$147,268.10</b>	\$34,087.09	\$130.07
Apr-2009	384	\$106,735.99	8	\$3,255.27	<b>392</b>	<b>\$109,991.26</b>	\$32,609.37	\$112.50
May-2009	392	\$103,215.98	4	\$775.44	<b>396</b>	<b>\$103,991.42</b>	\$26,677.07	\$0.13
Jun-2009	363	\$68,280.24	55	\$15,742.61	<b>418</b>	<b>\$84,022.85</b>	\$10,848.09	\$125.51

(1) January '08 was the first month of the CSS system conversion.

Division Data Request 11-4

Request:

Page 6, lines 21-22: Please name all companies that National Grid considers to meet the description of “similarly designed electric distribution systems in the Northeast U.S.” Does National Grid compare its reliability statistics such as SAIDI and SAIFI to those statistics of other companies? If so, please provide those comparisons with as much detail as National Grid possesses for the years 2001 through 2009.

Response:

National Grid participated in an IEEE benchmarking study in 2006 that included many utilities throughout the United States, including participants in the Northeast. National Grid compared its reliability performance against a group of utilities that the Company considers to be its peers. The group of utilities identified in the peer group included utilities in the Northeastern United States including Northeast Utilities, NSTAR, PSE&G and Energy East. The SAIFI and SAIDI results were compiled for the entire peer group, including utilities in the Northeast. This information is set forth below in aggregate. For a comparison of National Grid’s statistics to those of other companies in this survey, please see the response to DIV 14-14.

The factors considered by the Company in selecting peer utilities were total electric customers, total square miles, MWh sales, MWh per customer, customers per square mile and financial performance. These factors were evaluated using the following scoring model:

Relative Weight	Retail Customers	Sales MWh	Service Territory	MWh/CS	CS/Sq. Mile	ROE Quartile	
	1	0.5	1	0.5	0.5	Q1	2
If a given factor is +/- 50% of National Grid then the points listed above are assigned						Q2	1.5
						Q3	1
						Q4	0
						NA	1

The total list of possible peers was then reduced to a peer set of 12 utilities based on existing available data in order to minimize the data collection process.

Comparison Charts

National Grid is not authorized to disclose the other participants or the data relating to them due to confidentiality provisions associated with this study. However National Grid provides the following data for comparison purposes.

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 11-4 (cont.)

Holding Company	Customers	% Residential	Sales MWh	Sq Miles	MWh per Cust	Custs per Sq Mile
#1	2,345,476	87%	70,881,302	30,015	30	78
#2	3,865,959	86%	255,500,769	16,404	66	236
#3	1,835,927	88%	31,425,223	30,515	17	60
#4	5,198,002	90%	124,933,921	13,238	24	393
#5	4,403,852	88%	107,165,541	33,468	24	132
#6	4,329,846	89%	102,583,375	15,315	24	283
#7	1,865,407	89%	36,227,508	11,660	19	160
#8	1,106,771	85%	21,426,613	1,804	19	614
#9	4,985,194	88%	83,584,772	69,280	17	72
#10	1,344,373	87%	36,112,405	9,644	27	139
#11	2,054,975	87%	43,299,156	1,425	21	1442
#12	4,172,848	86%	157,159,271	44,953	38	93
National Grid USA	3,336,380	88%	65,159,243	29,900	20	111

As part of the benchmarking exercise, National Grid did not provide, and therefore was not privy to, information relating to the amount of revenue generation or the average distribution rate per kWh.

For this part of the survey, National Grid was represented as a single entity, and not by individual operating company.

The reliability data provided on page 3 of this response breaks down the information into each National Grid operating company for 2006. The benchmark reliability results from the 2006 IEEE survey are shown below for the overall peer group and the individual National Grid Companies.

Division Data Request 11-4 (cont.)

**2006 Performance Results for Peer Group:**

2006 Performance Results for Peer Group			
Quartile	SAIDI IEEE	SAIFI IEEE	CAIDI IEEE
1	89.11	1.02	96.96
2	138.15	1.24	112.00
3	178.69	1.41	129.57
4	294.25	2.98	214.09

**SAIDI Excluding Major Events for National Grid Companies:**

	Performance	SAIDI Gap to Q1 (Minutes)
NG-NH	294.25	205.14
NG-NY (IDS/SIR)	198.02	108.91
NG-MA	135.16	46.05
NG-NY	132.01	42.90
NG	122.34	33.23
NG-RI	71.89	Met
NG-LIPA	65.90	Met

**SAIFI Excluding Major Events for National Grid Companies:**

	Performance	SAIFI Gap to Q1 (Frequency)
NG-NH	2.98	1.96
NG-NY (IDS/SIR)	1.38	0.35
NG-MA	1.21	0.370
NG-NY	1.17	Met
NG	1.10	0.07
NG-RI	0.82	Met
NG-LIPA	0.76	Met



Division Data Request 11-4 (cont.)

**CAIDI Excluding Major Events for National Grid Companies:**

	Performance	CAIDI Gap to Q1 (Minutes)
NG-NY (IDS/SIR)	143.49	46.53
NG-NY	130.44	33.49
NG	111.62	14.67
NG-NH	98.64	1.68
NG-MA	96.96	Met
NG-LIPA	87.70	Met
NG-RI	74.42	Met

Division Data Request 11-6

Request:

Page 7 lines 15-20: Please describe the improvements that will result in a safer environment and improved environmental compliance. Include a description of the Company's efforts before and after these changes.

Response:

National Grid has certified its Environmental Management System (EMS) in accordance with ISO 14001 standards. By doing so, National Grid is required to set environmental targets and objectives each year, which are designed to continually improve environmental performance. In addition, EMS is audited each year by ISO 14001-certified auditors. Examples of actions that National Grid has taken to improve performance include:

- The specification for construction of pad-mounted transformers was revised to include sealing of conduits and foundation openings to prevent migration of oil to the subsurface in the event that an oil spill occurs. Previously, such openings were not sealed which allowed oils spills to migrate to the subsurface.
- All known PCB transformers, defined as > 500 ppm PCB by the US EPA, have been removed from service or retro-filled with non-PCB transformer oil. In accordance with EPA regulations, previously National Grid registered and routinely inspected all known PCB transformers.
- Recycling efforts at Company facilities have been re-invigorated resulting in improved compliance with the MA solid waste ban on items such as recyclable paper and cardboard. Previously, recycling was managed on a facility-specific level. By initiating a company-wide recycling program we can ensure that recycling is occurring at all facilities.

SPCC Plans in Rhode Island were developed to meet the federal regulatory requirements. In 2006, federal regulations were revised and the plans required revision in response. Also, plans need to be recertified every 5 years or when any oil-filled equipment (> 55 gallons) are added or removed during capital projects.

Rhode Island Substation Scheduled SPCC Plan Updates	
2009	13
2010	25
2011	36
2012	5
2013	24
Total:	103

Division Data Request 11-23

Request:

Please provide all evidence that the Company has that can demonstrate that the costs associated with the new I&M Strategy, as estimated in Mr. Pettigrew's exhibits, are truly incremental and not included elsewhere in the Company's costs or filing.

Response:

The Company has performed similar activities as those described in the I&M Strategy during the Test Year (CY 2008), such as feeder hardening, cutout replacements, underground maintenance, and targeted pole replacements, which are part of the new I&M Strategy. Since the Company anticipates that similar activities will be performed under the I&M program, the Company calculated the incremental costs associated with these activities in Schedule NG-JP-1 by comparing the estimated Rate Year (CY 2010) costs to the Test Year cost. Therefore, the costs for the new I&M Strategy as reflected in Company's case are truly incremental and not included elsewhere.

Division Data Request 11-33

Request:

In Rhode Island, does the Company jointly own any distribution poles with Verizon or others? If so, please provide a copy of any Joint Ownership agreements and other documents relative to pole ownership, including but not limited to a description the geographic areas in which National Grid is responsible for setting poles and how any O&M costs are shared.

Response:

The Company does have a Joint Ownership Agreement with Verizon regarding pole replacements. The following Intercompany Operating Procedures ("IOPs") apply to joint owned pole replacement:

- IOP A3 - Agreement of the parties is required for joint pole replacement or installation (Attachment DIV-11-33-1).
- IOP C1 - Geographically assigns custodial responsibilities between the joint owners (Attachment DIV-11-33-2).
- IOP C2 - Assigns maintenance responsibility for poles, including repairs or replacements following storms or other emergency events, to the custodial joint owner (Attachment DIV-11-33-3).
- IOP J5 - Allocates costs for tree trimming during storms between the joint pole owners (Attachment DIV-11-33-4).

Division Data Request 12-10

Request:

Please indicate, by FERC account, any decreases in direct Narragansett costs that will be able to be made by the 2010 rate year (and which are reflected in the rate filing) because of services that have been or will be provided by KeySpan.

Response:

There is no expectation that direct Narragansett costs will decrease by the 2010 rate year due to services that have been or will be provided by KeySpan.

Division Data Request 14-25

Request:

Has the company performed or had any outside organization or consultant performed a lightning strike assessment for the National Grid electric distribution system in Rhode Island? If the answer is yes, provide a copy of the assessment and a detailed description of how National Grid intends to utilize such an assessment.

Response:

The Company has not performed, nor has any outside organization or consultant performed, a lightning strike assessment on its electric distribution system in Rhode Island. The Company does utilize lightning caused interruption data as an input to prioritize feeders selected for Feeder Hardening

The Company performed a review entitled "Rhode Island Lightning Mitigated Feeder Review," which reviewed eight feeders mitigated for lightning from 2002 through 2005. The feeders were chosen based on lightning caused interruptions. This review is provided in Attachment DIV 14-25.

# **Rhode Island Lightning Mitigated Feeder Review**

**January 25, 2006**

**Vincent J. Forte, Jr.**

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## Introduction

A pilot program was developed to mitigate several distribution feeders in Rhode Island for lightning. These feeders were mitigated from 2002 through 2005. A review of the cost to mitigate and the reliability performance change has been conducted. This report documents that review and draws conclusions and recommendations regarding future lightning mitigation efforts.

## Executive Summary

Eight feeders were mitigated in Rhode Island for lightning from 2002 through 2005.

For the very limited number of feeders able to be reviewed using the old financial tracking systems, cost is greater than expected. Due to difficulty with the old financial tracking system, it is uncertain whether this information reflects only the cost and scope of this pilot program.

Reliability performance dramatically improved after remediation, despite a corporate wide trend of worsening performance with respect to lightning caused interruptions.

The pilot program should be continued. Better tracking of cost and work scope should be performed for any additional feeders mitigated.

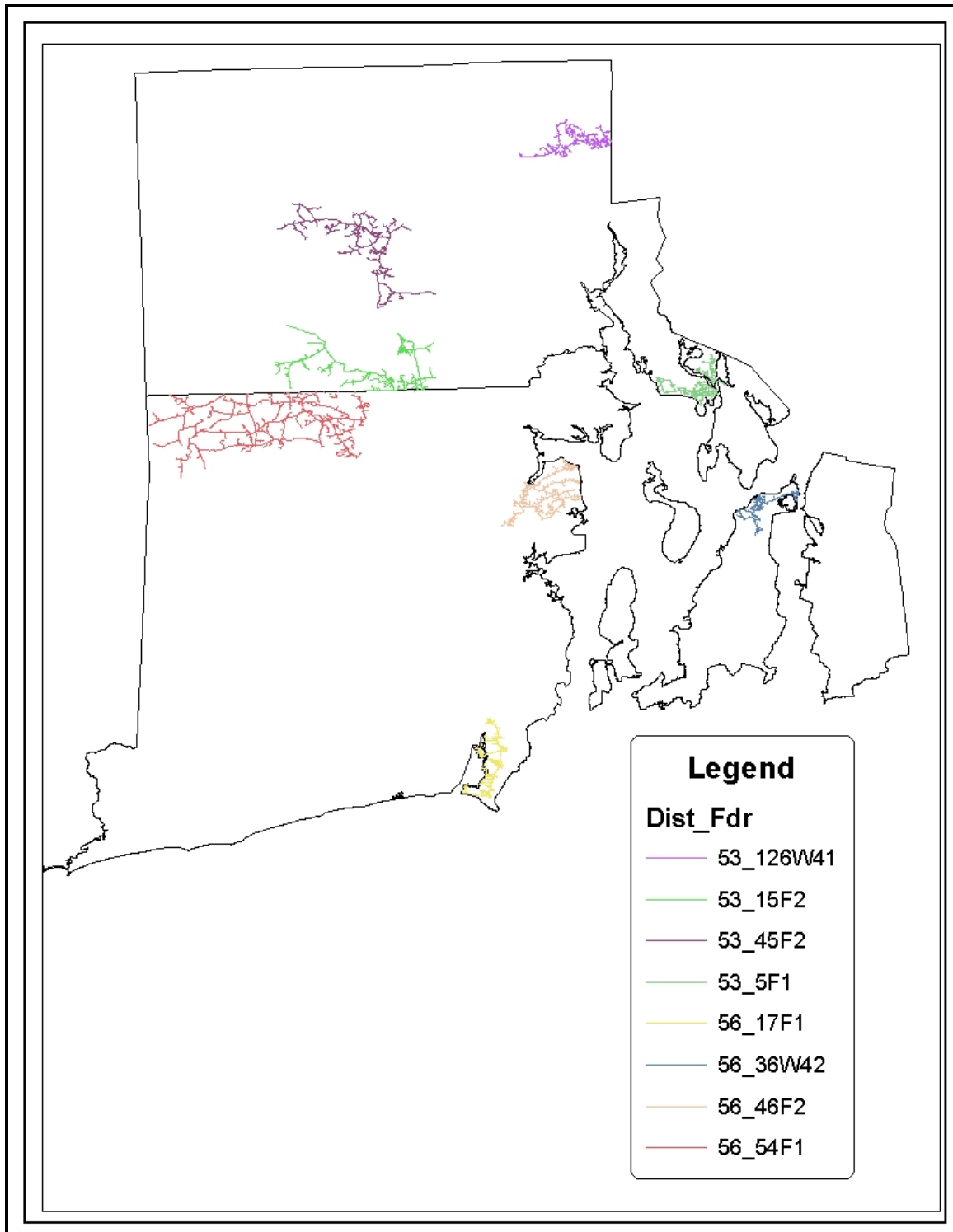
## Feeders Mitigated

The following eight distribution feeders (Figure 1) were recommended for remediation. The year remediation was recommended to be performed is also noted in Figure 1. The selection of feeders was made by Asset Strategy and Performance and other Operations engineers through the use of models and a consensus process. Each year this selection process was repeated.

Division	District	District #	2002 FY2003	2003 FY2004	2004 FY2005	2005 FY2006
Ocean State	Capital	53	15F2	45F2	5F1	126W41
Ocean State	Coastal	56	54F1	17F1	36W42	46F2

Figure 1: Mitigated Feeder Table

These feeders are scattered over Rhode Island. Figure 2 shows the feeders in relation to our Rhode Island service territory.



**Figure 2: Mitigated Feeder Map**

## Pilot Program Expectations

When the pilot program was developed and the feeders chosen, certain expectations for mitigation costs and reliability improvement were estimated.

### ***Expected Mitigation Expenditures***

Figure 3 below shows expected costs by feeder, which was developed early in the pilot.

District	Feeder	Cost
Capital	126W41	\$ 43,428
Capital	15F2	\$ 107,252
Capital	45F2	\$ 43,428
Capital	5F1	\$ 75,920
Coastal	17F1	\$ 56,566
Coastal	36W42	\$ 46,525
Coastal	46F2	\$ 92,122
Coastal	54F1	\$ 43,428

**Figure 3: Mitigation Cost Estimate**

These early cost estimates were developed using feeder mileage data and average cost per mile for lightning mitigation. The mitigation cost was developed using material cost data for arresters, labor cost data, and estimates of labor hours required to mitigate which was obtained from computapole tables, sampling of construction orders, and discussions with NE Operations personnel.

### ***Expected Reliability Improvement***

Also developed early in the pilot were expected customer minutes interrupted (CMI) improvements by feeder (Figure 4). This expectation was developed assuming a less than perfect result from remediation efforts. A 70% factor applied to historic lightning interruptions by feeder was used as the average benefit possible. This factor was developed from consensus discussions with Operations engineers and previous studies conducted by consultants. The historic interruptions were averaged over five years to account for inherent variability from lightning.

District	Feeder	Delta CMI
Capital	126W41	37,278
Capital	15F2	92,879
Capital	45F2	58,952
Capital	5F1	92,704
Coastal	17F1	49,890
Coastal	36W42	61,496
Coastal	46F2	29,968
Coastal	54F1	92,740

**Figure 4: Estimated Improvement**

## Results Achieved

IDS system data was used to determine the actual CMI improvement achieved since the pilot was begun. Due to the variability of lightning, this data was also normalized by lightning density actually experienced in the areas near each feeder. In addition, lightning events on all feeders in general were also investigated to insure the general trends were not driving the results measured on the pilot feeders.

Remediation costs were investigated to validate assumptions made early in the pilot process.

## *Actual Mitigation Expenditures*

The cost of remediation for two feeders (Figure 5) was obtained from Francis Nangle in Work Planning and Bob Brawley in Resource Planning NE. Data was not available for all feeders on an individual basis. This work was done under the old work order management system in NE, which provided a limited capability for retrieving information.

Project#	Feeder #	Capex	Removal	Opex	Total
C02532	5F1	118,484	7,714	71,695	197,892
C02533	36W42	122,421	19,255	43,456	185,132

**Figure 5: Mitigation Expenditures**

These costs are on average 3.1 times greater than originally projected. There appears to be additional work scope beyond this pilot included on these orders. However, this is not

easily verified because of the difficulty in retrieving charge data using the old system. We are currently attempting to retrieve paper records to verify the scope included in these orders.

## Reliability Improvement Achieved

Figure 6 lists the feeders with an improving or deteriorating SAIDI (which is proportional to CMI). Figure 7 shows the mitigation CMI benefit obtained for two classes of feeders. One class are those feeders with an improvement in SAIDI and the second includes feeders with deteriorating SAIDI.

Improving Feeders	Deteriorating Feeders	Too early to know
53_15F2	56_17F1	56_46F2
56_54F1	53_45F2	53_126W41
	53_5F1	
	56_36W42	

Figure 6: Improving versus Deteriorating Feeders

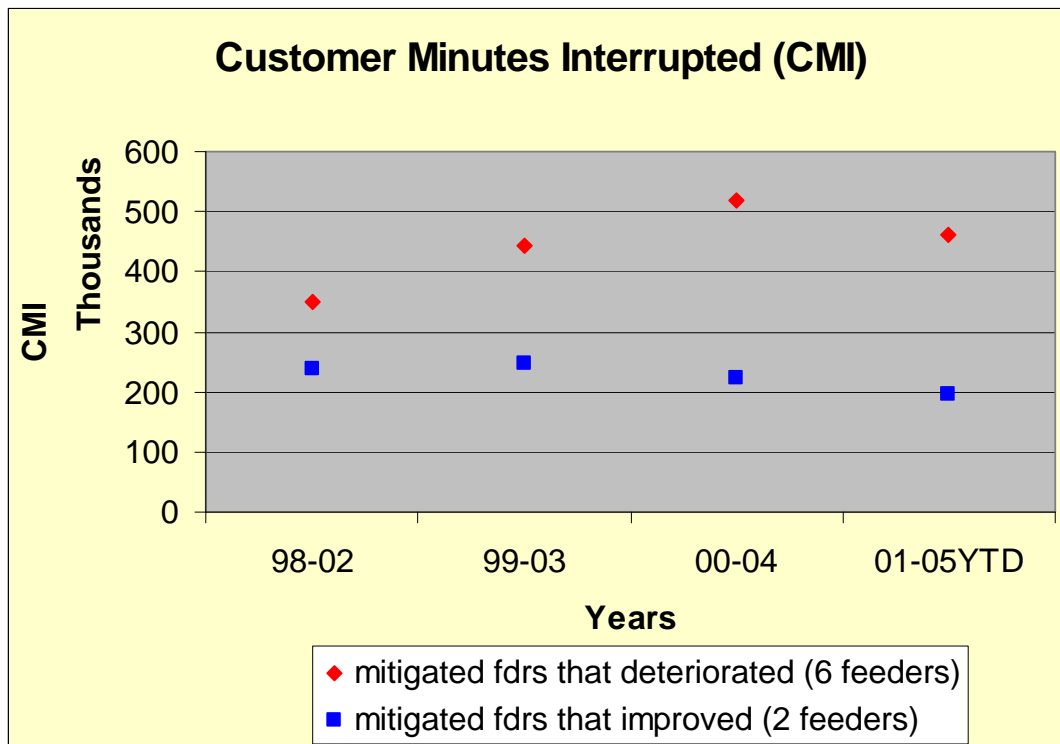


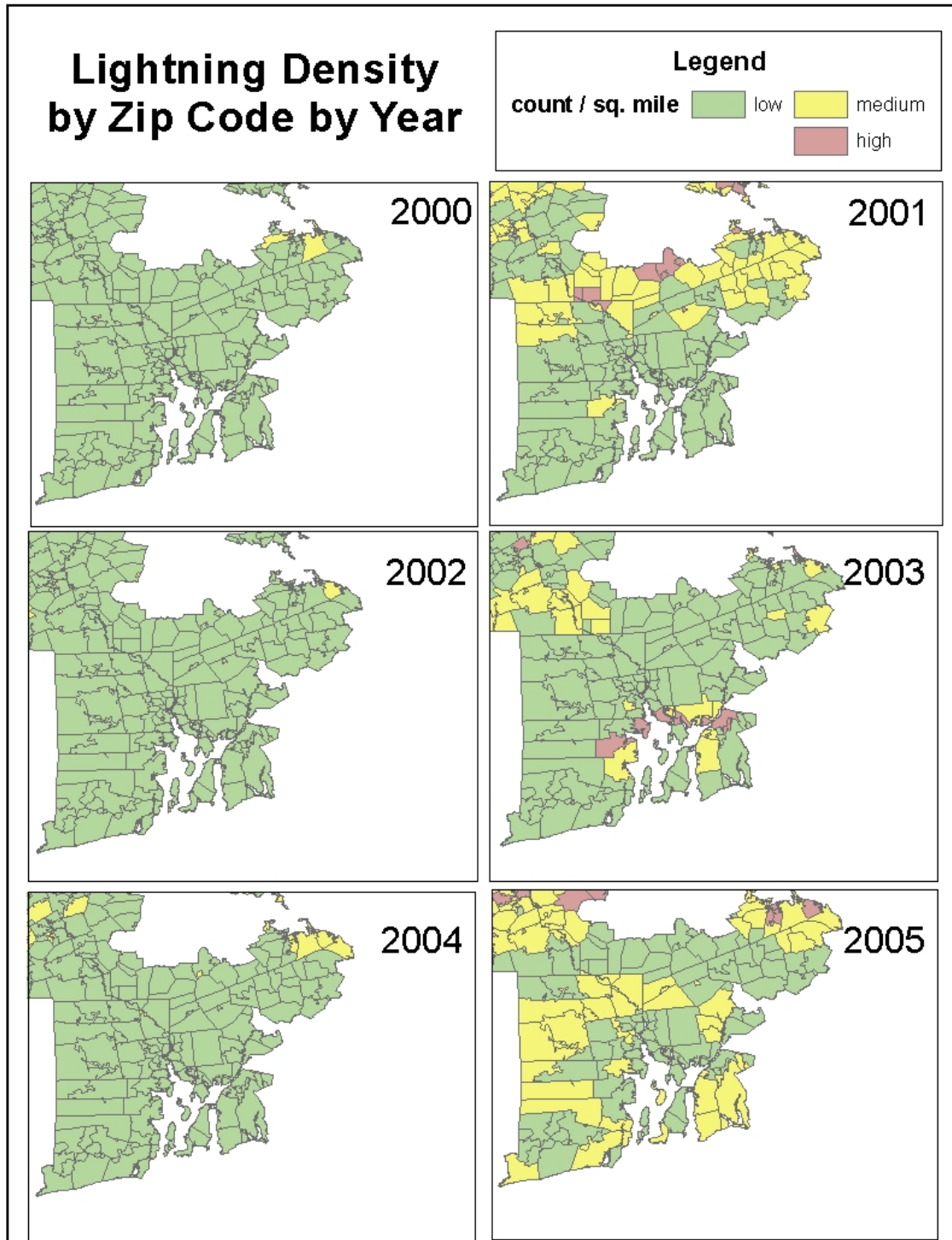
Figure 7: Mitigation Benefit Obtained

Improving Feeders	Deteriorating Feeders	Too early to know
53_15F2	56_17F1	56_46F2
56_54F1	53_45F2	53_126W41
	53_5F1	
	56_36W42	

From Figure 6 and Figure 7 it appears that lightning remediation has improved performance of two feeders. On an overall basis it appears the pilot has arrested an increasing trend in lightning events. However, results are masked by the variability of lightning from year to year. For this reason the data should be viewed on a normalized basis.

### Reliability Improvement Normalized by Lightning Exposure

Lightning varies considerably as can be seen in Figure 8. For this reason it is necessary to include many years of data to normalize results by density. Normalization allows for viewing the data to clearly see change associated with mitigation rather than change associated with weather variation. Figure 9 shows the five year lightning density by zip code for our service territory and where the mitigated feeders are located. This information was used to normalize the reliability results obtained from the lightning mitigation program. The specific normalization process is described in Appendix I.



**Figure 8: Lightning Density by Year**

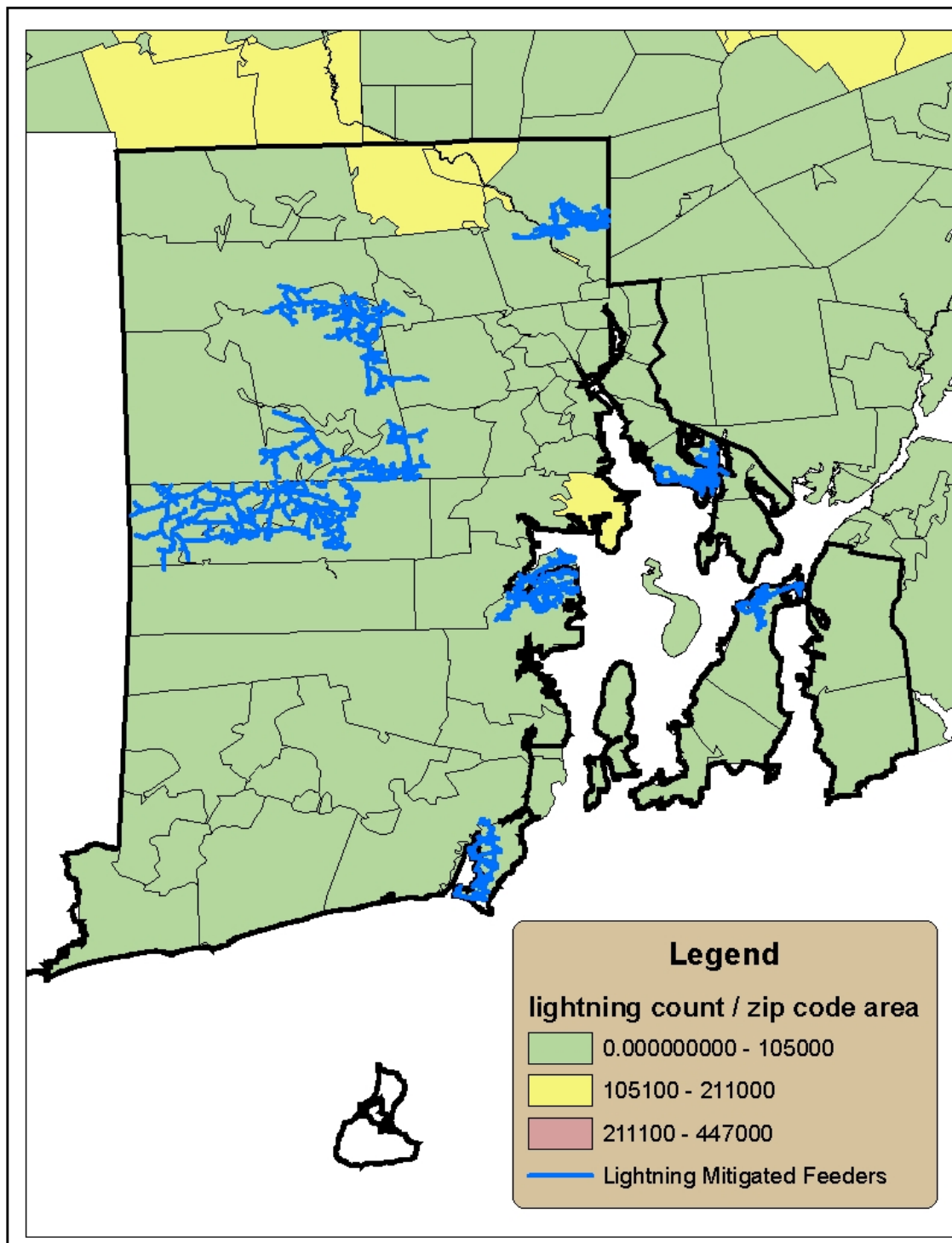


Figure 9: Lightning Density for Five Years & Mitigated Feeders



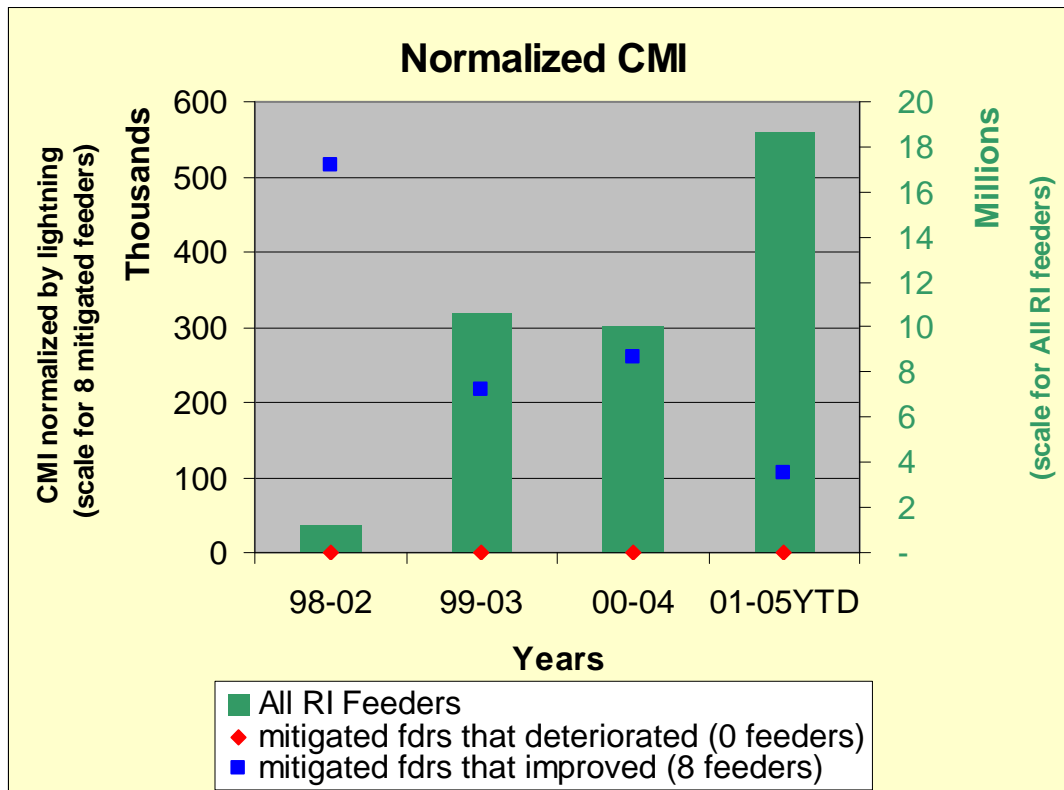


Figure 10: Normalized Mitigation Benefit Obtained

Feeders were grouped into three categories. Those with improving CMI, deteriorating CMI, and those mitigated too recently to be able to measure change in CMI. Figure 10 summarizes the CMI for the two groups that change can be measured for and plots this against a backdrop of CMI for all feeders in Rhode Island.

Improving Feeders	Deteriorating Feeders	Too early to know
53_15F2	none	56_46F2
56_54F1		53_126W41
56_17F1		
53_45F2		
53_5F1		
56_36W42		

Figure 11 lists the feeders in each group.

Improving Feeders	Deteriorating Feeders	Too early to know
53_15F2	none	56_46F2

56_54F1		53_126W41
56_17F1		
53_45F2		
53_5F1		
56_36W42		

**Figure 11: Improving versus Deteriorating Feeders - Normalized**

Normalization has allowed for variability of lightning to be factored into the analysis. The normalized view clearly shows a greater benefit than first glance with out normalization of the data would suggest. A marked improvement in reliability performance has been achieved through the lightning mitigation program. The improvement is also contrasted by the system trend for unmitigated feeders.

While definitely a dramatic turn around in performance the CMI benefit obtained is only half of that expected.

## Conclusions

- The general lightning related reliability performance trend for Rhode Island is deteriorating.
- Eight feeders across Rhode Island have been mitigated for lightning from 2002 through 2005.
- On a normalized basis, mitigated feeders display improved reliability performance due to lightning caused events. While dramatic it is only half of expectations.
- Actual costs for lightning mitigation appear to be 3.1 times greater than anticipated. However, only two work order cost totals were able to be obtained and no detailed information regarding work scope performed on these orders was retrievable.

## Summary

A pilot program was developed in Rhode Island for lightning. These feeders were mitigated from 2002 through 2005 and a review of the cost and the reliability performance change has been conducted.

Reliability performance was normalized to account for the annual variability of lightning. Also, lightning density near the mitigated feeders was also included to account for the geographic variability of lightning.

Tracking of cost was not complete enough to insure only the lightning mitigation program scope was worked on the construction orders. Also, only two orders were able

to be retrieved from the old financial system. This places some uncertainty regarding the actual costs for this pilot.

From the figures obtained, cost is greater than expected and benefit lower than expected. However, a dramatic reversal in deteriorating lightning performance was still achieved.

## **Recommendations**

- The pilot program should be continued since significant improvement in reliability performance was achieved (even though not to the extent expected).
- Analysis should continue to better understand why reliability performance results are not as great as originally expected.
- Better tracking of cost and work scope should be performed for any additional feeders mitigated.

## Appendix I: Lightning Normalization Process Description

Lightning varies considerably, for this reason it is necessary to include many years of data to normalize results by density. Normalization allows for viewing the data to clearly see change associated with mitigation rather than change associated with weather variation.

The five most recent years of lightning density by zip code for our service territory was used to normalize the reliability results obtained from the lightning mitigation program and to compare this program against all feeders normalized in the same way.

The normalization process was performed using the following process steps:

1. Customer Minutes Interrupted (CMI) for interruptions due to lightning for each feeder were totaled for each year and a five year average calculated.
2. Lightning strikes were totaled for each zip code by year.
3. For each zip code that a feeder is located inside its boundary, the total strikes for that zip code was summed by year for that feeder.
4. Feeder data is normalized using the following equation:

$$\frac{(\text{step 1 CMI for feeder})}{((\text{step 3 yearly lightning count for feeder})/\text{min}(\text{step 3 yearly lightning count for feeder}))}$$

Normalizing in this manner keeps the units in CMI and ratios the actual value in a consistent manner so that the exposure experienced is reflected in the values. Thus changes in a feeder's normalized CMI is not due to the variability of lightning but to other factors, such as mitigation measures performed.

Division Data Request 17-7

Request:

Please provide average union wage levels in 2008 for Narragansett Electric, Massachusetts Electric, Nantucket Electric, and the National Grid Service Company.

Response:

The average union wage levels for 2008 are as follows:

Nantucket Electric Co	\$87,482.72
Massachusetts Electric Co	\$68,390.19
National Grid Service Co	\$56,646.09
Narragansett Electric Co.	\$68,647.54

The data above represents the average annual base union wages for each company.

Division Data Request 17-9

Request:

Please provide average non-union wage levels in 2008 for Narragansett Electric, Massachusetts Electric, Nantucket Electric, and the National Grid Service Company.

Response:

The average non-union wage levels for 2008 are as follows:

Massachusetts Electric Co	\$72,100.83
Nantucket Electric Co	\$103,661.22
Narragansett Electric Co	\$77,968.81
National Grid Service Co	\$82,768.43

These amounts represent the average annual non-union base salary for each 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

August 20, 2009  
Date

**National Grid (NGrid) – Request for Change in Electric Distribution Rates**  
**Docket No. 4065 - Service List as of 7/22/09**

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