

September 30, 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'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

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

	TI	Narragancott Electric	Company d/b/a Natio	nal Grid	
	The	Narragansett Electric	Company d/b/a Natio cet 4065	nai Grid	
			very Log		
		As or: Sept	ember 30, 2009		
[C-denotes confidentiality is	hoina cought]				
C-denotes confidentiality is	being soughtj				
Data Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
			111111111111111111111111111111111111111		Attachments COMM 1-1-3, 1-1-4,
					1-1-5, 1-1-7, 1-1-8, 1-1-9
COMM 1-1	Filed	6/26/2009	O'Brien		BULK
COMM 1-2	Filed	6/26/2009	O'Brien		Attachments COMM 1-2 A-D
					Attachments COMM 1-3 A-B
COMM 1-3	Filed	6/26/2009	Dinkel		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)
					Attachments COMM 1-6-1 & 1-6-2
COMM 1-6	Filed	6/26/2009	Dinkel	C-attachment	BULK
COMM 1-7	Filed	6/26/2009	O'Brien		Attachment COMM 1-7
COMM 4 0	Filed	0/00/0000	Dieles		Attachments COMM 1-8 (A-D)
COMM 1-8	Filed	6/26/2009	Dinkel		BULK Attahments COMM 1-9 (1-11)
COMM 1-9	Filed	6/26/2009	Dinkel	C-attachment	Attahments COMM 1-9 (1-11)  BULK
C-1 IVIIVIO	Fileu	0/20/2009	DILIKEI	O-allaUIIIIEIII	Attachment COMM 1-10
					(hard copy only)
COMM 1-10	Filed	6/26/2009	Dinkel		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		
					Attachments COMM 1-18-1,
					1-18-2, 1-18-3, 1-18-4(a) - (d)
COMM 1-18	Filed	7/14/2009	Pettigrew		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
001414.05	<b>-</b> : .	0/00/0000	OID :		Attachments COMM 1-25 (1-14)
COMM 1-25	Filed	6/26/2009	O'Brien		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)
COMM 1-27	Filed	7/6/2009	O'Brien		Attachment COMM 1-28
COMM 1-28	Filed	6/26/2009	O'Brien		Attachment Colvivi 1-26
COMM 1-29	Filed	6/26/2009	O'Brien		
COMM 1-30	Filed	6/26/2009	King		
COMM 1-31	Filed	6/26/2009	O'Brien		Attachment COMM 1-32
CONTINUE OF	i iicu	0/20/2009	Opliell		Attachment COMM 1-33 (1-3)
COMM 1-33	Filed	6/26/2009	O'Brien		BULK
	i iicu	G/20/2000	C Diloii		Attachments COMM 1-34 (1-2)
COMM 1-34	Filed	6/26/2009	Dowd		BULK
	1 11 2 2	5, 25, 2000			Attachment COMM 1-35
COMM 1-35	Filed	6/26/2009	Dowd		BULK
					Attachment DIV 2-1 (electronic
COMM 1-36	Filed	6/26/2009	Dowd		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
COMM 1-45	Filed	6/26/2009	O'Brien		Attachment COMM 1-45

#### The Narragansett Electric Company d/b/a National Grid Docket 4065 **Discovery Log** As of: September 30, 2009 [C-denotes confidentiality is being sought] Data Request Date Filed Witness CONFIDENTIAL Attachments Status COMM 1-46 Filed 6/26/2009 Dowd Attachments COMM 1-47 (1-3) COMM 1-47 Filed 6/26/2009 Dowd BULK COMM 1-48 (Part 1) Filed 7/1/2009 Dowd Attachment COMM 1-48 COMM 1-48 (Parts 2-Filed 6/26/2009 O'Brien COMM 1-49 Filed 6/26/2009 O'Brien Attachments COMM 1-49 (1-5) Attachments COMM 1-50 (1-38) COMM 1-50 Filed 6/26/2009 Dowd 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 Attachments COMM 1-54 (1-2) COMM 1-54 Filed 6/26/2009 O'Brien 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 Attachment DIV 3-11 COMM 1-58 Filed 6/26/2009 O'Brien (PDF and working excel) COMM 1-58 (supp) Attachment COMM 1-58 (supp.) Filed 9/1/2009 O'Brien 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 Attachments COMM 1-62 (1-2) Filed 6/26/2009 O'Brien Attachments COMM 1-63 (A-F) A-C EXCEL FILES O'Brien COMM 1-63 Filed 8/11/2009 D & E BULK (hard copy only) COMM 1-64 Attachment COMM 1-64 Filed 6/26/2009 O'Brien 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 Attachment COMM 1-68 Filed 6/26/2009 Wynter COMM 1-69 Wynter Attachment COMM 1-69 Filed 6/26/2009 COMM 1-70 Filed 6/26/2009 Wynter Attachments DIV 4-1 (1-2) COMM 1-71 O'Brien Filed 6/26/2009 **BULK** COMM 1-72 Filed 8/24/2009 O'Brien 6/26/2009 Attachments COMM 1-73 (1-2) COMM 1-73 Filed O'Brien 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 Filed 8/21/2009 O'Brien 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 Attachments COMM 1-83 Filed 6/26/2009 O'Brien 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 Attachment COMM 1-88 COMM 1-88 Filed 6/26/2009 O'Brien Attachment COMM 1-89 COMM 1-89 Filed 6/26/2009 O'Brien Attachments COMM 1-90 (1-2) COMM 1-90 Filed 7/6/2009 O'Brien **BULK** Attachment DIV 4-21 (1-2) **COMM 1-91** Filed 6/26/2009 O'Brien **BULK** Attachment COMM 1-92 COMM 1-92 Filed 6/26/2009 O'Brien 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 COMM 1-98 7/1/2009 Filed Dowd

#### The Narragansett Electric Company d/b/a National Grid Docket 4065 **Discovery Log** As of: September 30, 2009 [C-denotes confidentiality is being sought] Data Request Status Date Filed Witness CONFIDENTIAL Attachments 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 Filed 8/21/2009 O'Brien COMM 1-107 6/26/2009 Attachment COMM 1-107 Filed O'Brien Attachment COMM 1-108 COMM 1-108 Filed 6/26/2009 Wynter 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 O'Brien Filed 8/18/2009 COMM 2-6 Filed 8/18/2009 Tierney COMM 2-7 Filed 8/18/2009 Tierney COMM 2-8 8/18/2009 Filed Tierney COMM 2-9 Filed 8/18/2009 Tierney 8/14/2009 COMM 2-10 Filed Stout COMM 2-11 Pending 8/18/2009 COMM 2-12 Filed Tierney COMM 2-13 Filed 8/18/2009 Tierney COMM 2-14 Filed 8/14/2009 Morrissey Attachment COMM 2-14 Attachments COMM 2-15 (1-2) COMM 2-15 Filed 8/14/2009 Morrissey COMM 2-16 Filed 8/18/2009 Morrissey/Stout COMM 2-17 Filed 8/18/2009 O'Brien C-attachment Attachment COMM 2-17 Attachment COMM 2-18 BULK COMM 2-18 Filed 8/21/2009 Dowd COMM 2-19 8/21/2009 Dowd Attachment COMM 2-19 BULK Filed COMM 2-20 Filed 8/21/2009 Dowd COMM 2-21 Filed 8/21/2009 Dowd COMM 2-22 8/24/2009 Filed Dowd COMM 2-23 Filed 8/27/2009 Wynter Attachment COMM 2-24 COMM 2-24 Filed 8/18/2009 O'Brien COMM 2-25 Filed 8/24/2009 O'Brien COMM 2-26 Filed 8/18/2009 O'Brien Attachment COMM 2-27 COMM 2-27 8/27/2009 O'Brien C-attachment Filed 9/30/2009 COMM 2-27 (supp.) Filed Herewith O'Brien C-attachment Attachments COMM 2-27 (1-2) 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 Filed 8/24/2009 Wynter COMM 2-37 Filed 8/14/2009 Wynter COMM 2-38 Filed 8/14/2009 Wynter COMM 2-39 Filed 8/27/2009 Wynter Attachments COMM 2-40 (1-2) COMM 2-40 8/20/2009 O'Brien Filed **BULK** COMM 2-41 Filed 8/24/2009 Pettigrew Attachments COMM 2-41 (1-2) COMM 2-42 Filed 8/18/2009 O'Brien Attachment COMM 2-42 COMM 2-43 Filed 8/24/2009 O'Brien Attachment COMM 2-43 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 8/14/2009 Attachment COMM 2-49 Filed Wynter COMM 2-50 Filed 8/14/2009 Wynter

	The Na	arragansett Electric C		ional Grid	
			et 4065		
			ery Log		
		As of: Septe	mber 30, 2009		
C-denotes confidentiality	is being sought]				
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	Filed	8/24/2009	O'Brien		
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		
				1	
COMM 3-1	Filed	9/1/2009	Pettigrew		Attachment COMM 3-1
COMM 3-2	Filed	9/1/2009	Wynter		Attachment COMM 3-2
COMM 3-3	Filed	9/1/2009	Wynter		
COMM 3-4	Pending				
					Attachments COMM 3-5 (1-11
COMM 3-5	Filed	9/1/2009	Legal Dept.		BULK
COMM 3-6	Filed	9/10/2009	O'Brien		Attachment COMM 3-6
COMM 4-1	Filed Herewith	9/30/2009	Dowd		Attachments COMM 4-1 (1-2)
COMM 4-2	Filed Herewith	9/30/2009	Gorman		•
COMM 4-3	Pending				
COMM 4-4	Pending				
COMM 4-5	Filed Herewith	9/30/2009	Wynter		
COMM 4-6	Filed Herewith	9/30/2009	Wynter		
COMM 4-7	Filed Herewith	9/30/2009	O'Brien		Attachments COMM 4-7 (1-2)
COMM 4-8	Filed Herewith	9/30/2009	Wynter		Attachments COMM 4-8
		5,70,,200			, masimisms committee
COMM 5-1	Filed Herewith	9/30/2009	Wynter		Attachment COMM 5-1
COMM 5-2	Filed Herewith	9/30/2009	Wynter		
COMM 5-3	Filed Herewith	9/30/2009	Wynter		
COMM 5-4	Filed Herewith	9/30/2009	O'Brien		Attachment COMM 5-4
COMM 5-5	Pending	0.00,200	O Diloii		, addinion Common
COMM 5-6	Pending				
COMM 5-7	Filed Herewith	9/30/2009	Wynter		
· · · · · · · · · · · · · · · · · ·	7 HOG FIGIOWALI	0,00,200	**********		
COMM 6-1	Filed Herewith	9/30/2009	O'Brien		
J C 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	1 lied Helewilli	3/30/2003	O Di leil		

	The		c Company d/b/a Nation	nal Grid	
			oket 4065 overy Log		
			otember 30, 2009		
[C-denotes confidentiality is	being sought]				
Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
DIV-1-1 DIV-1-2	Filed Filed	6/26/2009 7/1/2009	O'Brien O'Brien		Attachment DIV 1-1 Attachment DIV 1-2
DIV-1-2 DIV-1-3	Filed	7/1/2009	O'Brien		Attachment DIV 1-3
211 10		17172000	0 2		Attachments DIV 1-3
DIV 1-3 (Supp.)	Filed	9/1/2009	O'Brien		(Corrected) and (Supp.)
DIV-1-4	Filed	6/26/2009	O'Brien		
DIV-1-5 DIV-1-6	Filed Filed	6/26/2009 7/1/2009	O'Brien O'Brien		
DIV-1-0	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		
OIV-1-10 (Supp.)	Filed	9/1/2009	O'Brien		A., I
DIV-1-11 DIV-1-12	Filed Filed	6/26/2009 6/26/2009	Dowd O'Brien		Attachment DIV 1-11 Attachment DIV 1-12
DIV-1-12 DIV-1-13	Filed	6/26/2009	Dowd		Attachment DIV 1-12 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 DIV-1-20	Filed Filed	6/26/2009 6/26/2009	O'Brien Dowd		Attachment DIV 1-20
DIV-1-20	Filed	7/1/2009	O'Brien		Attachment DIV 1-20
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 DIV-1-27	Filed Filed	6/26/2009 6/26/2009	O'Brien O'Brien		Attachment DIV 1-26
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
OIV 1-32 (Supp.)	Filed	9/1/2009	O'Brien		Attachment DIV 1-32 (Supp
DIV-1-33	Filed	6/26/2009	O'Brien		Attachment DIV 1-32 (Supp
DIV-1-34	Filed	6/26/2009	O'Brien		
					Attachment DIV 2-1 (electro
DIV-2-1 DIV-2-2	Filed Filed	7/1/2009	Gorman Gorman	C-attachment	only)
DIV-2-3	Filed	6/26/2009 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 Gorman		
DIV-2-9 DIV-2-10	Filed Filed	6/26/2009 6/26/2009	Gorman		Attachment DIV 2-10
DIV-2-10	Filed	6/26/2009	Gorman		/ titadrimont biv 2 10
DIV-2-12	Filed	6/26/2009	Gorman		
DIV-3-1	Filed	7/6/2009	O'Brien		A
DIV-3-2 DIV-3-3	Filed Filed	8/18/2009 7/6/2009	O'Brien O'Brien		Attachments DIV 3-2 (1-4 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
OIV-3-7	Filed	8/3/2009	O'Brien		Attachment DIV 3-7
DIV-3-8 (Supp.) DIV-3-9 (Supp.)	Filed Filed	8/3/2009 8/3/2009	Morrissey Morrissey		Attachment DIV 3-8 (Supp Attachment DIV 3-9 (Supp
DIV-3-9 (Supp.)	Filed	7/6/2009	Morrissey		Attachment DIV 3-9 (Supp
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		Attachment DIV 2.4.4
DIV-3-14 DIV-3-15	Filed Filed	7/6/2009 7/6/2009	O'Brien/Morrissey Morrissey		Attachment DIV 3-14 Attachment DIV 3-15
DIV-3-16	Filed	7/6/2009	Pettigrew		, addinion DIV 0-10

	I NE		: Company d/b/a Natio :ket 4065	nai Grid	
			overy Log		
		As of: Sep	tember 30, 2009	T	
[C donates confidentiality	. ia haina aaah41				
[C-denotes confidentiality	r is being soughtj				
Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
DIV-3-17 DIV-3-18	Filed Filed	7/6/2009 7/6/2009	Pettigrew Pettigrew		
DIV-3-19	Filed	8/21/2009	Pettigrew		
DIV-3-20	Filed	8/18/2009	Pettigrew		Attachment DIV 3-20
DIV-3-21	Filed	7/6/2009	Pettigrew		
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		BOEK
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 04	Filed	7/0/2000	OlDrien		Attachment DIV 4-21 (1-2)
DIV-4-21 DIV-4-22	Filed	7/6/2009 7/6/2009	O'Brien Moul		BULK Attachment DIV 4-22 (1-2)
DIV-4-22 DIV-4-23	Filed	7/6/2009	Dinkel		Attachment DIV 4-22 (1-2) Attachment DIV 4-23
DIV-4-23	Filed	7/6/2009	Moul		Attachment DIV 4-23
DIV-4-24	Filed	7/6/2009	Moul		
DIV-4-25	Filed	7/6/2009	Moul		
DIV-4-27	Filed	7/6/2009	Moul		Attachment DIV 4-27
DIV-4-21	i ileu	170/2009	IVIOUI		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	O uttuominonto	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	Filed	8/21/2009	Pettigrew		
DIV 0 7 (2 )		6.5.15.5.5			Attachment DIV 6-7
DIV-6-7 (Supp.)	Filed	8/24/2009	Pettigrew		(Supplemental)
DIV-6-8	Filed	8/21/2009	Tierney		Attachment Div 6-8
DIV-6-9	Filed	7/14/2009	Tierney		
DIV-6-10	Filed	7/14/2009	Tierney		
DIV-6-11	Filed	7/14/2009	Tierney		Augustus 2014 (2014) - 2014
DIV-6-12	Filed	7/14/2009	Tierney		Attachments DIV 6-12 (a) and
DIV-6-12 DIV-6-13 (a) - (d)	Filed	7/14/2009	Tierney		(d) Attachment DIV 6-13
DIV-6-13 (a) - (d)	Filed	8/21/2009	Tierney		VITACIIIIGIII DIA 0-19
2.70 0 10 (0)	i iicu	3/2 1/2003	Tierriey		Attachment DIV 6-14
DIV-6-14	Filed	7/14/2009	Tierney		(hard copy only)
DIV-6-15 (a)	Filed	8/20/2009	Tierney		Attachment DIV 6-15(a)
DIV-6-15 (b) and (c)	Filed	7/22/2009	Tierney		
DIV-6-16	Filed	8/21/2009	Pettigrew		
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	Filed		, ·		Attachments DIV 6-19 and
(f)		7/22/2009	Tierney		DIV 6-19-F (1-2)
DIV-6-19 (e)	Filed	8/21/2009	Tierney/O'Brien		
DIV-6-20	Filed	7/14/2009	Tierney		
DIV-6-21	Filed	7/14/2009	Tierney		
DIV-6-22	Filed	7/14/2009	Tierney		

		Doc	ket 4065				
Discovery Log As of: September 30, 2009							
		As or. Sep	10 July 2003				
C-denotes confidentialit	y is being sought]						
Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments		
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	8/20/2009	Tierney		Attachment DIV C 07 (weekin		
DIV-6-27	Filed	7/14/2009	Tierney		Attachment DIV 6-27 (workin excel included)		
DIV-6-28	Filed	7/14/2009	Tierney		excer moraded)		
DIV-6-29	Filed	7/14/2009	Tierney				
DIV-6-30	Filed	7/22/2009	Tierney				
DIV-6-31 (a) - (d) and	Filed						
f)		7/22/2009	Tierney				
DIV-6-31 (e)	Filed	8/18/2009	Tierney		A		
DIV-6-32 DIV-6-33	Filed	8/18/2009 7/14/2009	O'Brien		Attachment DIV 6-32		
DIV-6-33	Filed Filed	7/14/2009	Tierney Tierney		Attachment DIV 6-34 (1-2)		
21 V =U=U <del>=1</del>	riieu	1/22/2009	пешеу		Attachment DIV 6-34 (1-2) Attachment DIV 6-35 (c) and		
DIV-6-35	Filed	7/14/2009	Tierney		(d)		
DIV-6-36	Filed	7/14/2009	Gorman		V-7		
DIV-6-37	Filed	7/14/2009	Gorman		Attachment DIV 6-37(a)		
DIV-6-38	Filed	7/14/2009	Tierney		(-)		
DIV-6-39	Filed	8/21/2009	Tierney				
DIV-7-1	Filed	8/3/2009	King				
OIV-7-2	Filed	7/22/2009	King/Pettigrew				
DIV-7-3	Filed	7/22/2009	King				
0IV-7-4	Filed	7/22/2009	Wynter				
DIV-7-5 DIV-7-6	Filed	8/20/2009 7/22/2009	King Wynter/Stout		Attachment DIV 7-6		
0-7-0	Filed	7/22/2009	vvyntei/Stout		Attachment DIV 7-7 (a) (har		
DIV-7-7	Filed	7/22/2009	Fields		copy only) and (b)		
OIV-7-8	Filed	8/18/2009	Dowd		copy only) and (b)		
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		Attack   DIV 7.47		
DIV-7-17 DIV-7-18	Filed	7/22/2009 7/22/2009	Gorman Smithling		Attachment DIV 7-17 Attachment DIV 7-18		
DIV-7-16 DIV-7-19	Filed Filed	8/18/2009	Dowd		Attachment DIV 7-19 (b-c)		
DIV-7-19	Filed	7/22/2009	King		Attachment DIV 1-19 (b-c)		
DIV-7-21	Filed	7/22/2009	King				
DIV-8-1	Filed	8/21/2009	Wynter		Attachment DIV 8-1		
DIV-8-2	Filed	8/3/2009	Wynter		Attachment DIV 8-2		
	Filed				Attachment DIV 8-3 (har		
DIV-8-3		7/22/2009	Wynter		copy only)		
DIV-8-4 DIV-8-5	Filed	7/22/2009	Gorman		Attachment DIV 8-4 (excel) Attachment DIV 8-5		
	Filed	7/22/2009	Wynter		Attachment DIV 8-5		
DIV-8-6 DIV-8-7 a-g (no d)	Filed Filed	8/3/2009 8/3/2009	Wynter Wynter		Attachments DIV 8-7		
Σιν-υ-1 α-y (110 u)	Fileu	0/3/2009	vvyriter		(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		
0IV-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				
OIV-8-13	Filed	8/3/2009	Wynter				
OIV-8-14	Filed	8/3/2009	Wynter				
DIV-8-15	Filed	8/3/2009	Wynter				
DIV-8-16	Filed	8/3/2009	Wynter		Attack and DD / O / =		
OIV-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 DIV-8-20	Filed	8/3/2009 8/20/2009	Wynter Wynter		Attachment DIV 8-19 Attachment DIV 8-20		
DIV-8-20 DIV-8-21	Filed Filed	8/3/2009	Wynter		Attaciment DIV 8-20		
DIV-8-21	Filed	8/20/2009	Wynter		Attachment DIV 8-22		
DIV-8-23	Filed	8/3/2009	Wynter		Attachment DIV 8-23		

DIV-10-7		Th		ket 4065	nal Grid		
Confederation   Status   Data Filed   Witness   CONFIDENTIAL   Attachments   Div-9-26   Filed   95/2009   Wynter   Attachments DIV-9-26   Filed   95/2009   Wynter   Attachments DIV-9-26   Filed   7/22/2009   O'Brien   DIV-9-27   Filed   7/22/2009   O'Brien   DIV-9-28   Filed   7/22/2009   O'Brien   DIV-9-29   Filed   7/2							
Information Request			As of: Sep	tember 30, 2009	I		
Information Request	[C-denotes confidentiality	v is being sought]					
DIV-9-24	Lo denotes connacidant	y is being sought					
DIV-9-24		_					
Div-9-15					CONFIDENTIAL	Attachments	
DIV-9-1				-		Attachments DIV 8-25 (a-i)	
Division   Division	DIV-0-23	i ileu	0/3/2009	vvyntei		Attachments DIV 0-23 (a-i)	
Divy-9-3	DIV-9-1	Filed	7/22/2009	Pettigrew			
DIV-9-4   Field   77222009   Gorman   DIV-9-6   Field   77222009   Gorman   DIV-9-6   Field   77222009   Gorman   DIV-9-7   Field   77222009   Gorman   DIV-9-8   Field   77222009   Gorman   DIV-9-8   Field   77222009   Gorman   DIV-9-10   Field   77222009   Gorman   DIV-9-10   Field   77222009   Gorman   DIV-9-10   Field   77222009   Gorman   DIV-9-10   Field   77222009   Gorman   DIV-9-11   Field   77222009   Gorman   DIV-9-12   Field   77222009   Gorman   DIV-9-12   Field   77222009   Gorman   DIV-9-13   Field   77222009   Gorman   DIV-9-14   Field   77222009   Gorman   DIV-9-15   Field   77222009   Gorman   DIV-9-15   Field   77222009   Gorman   DIV-9-16   Field   77222009   Gorman   DIV-9-16   Field   77222009   Gorman   DIV-9-16   Field   77222009   Gorman   DIV-9-17   Field   77222009   Gorman   DIV-9-18   Field   77222009   Gorman   DIV-9-18   Field   77222009   Gorman   DIV-9-19   Field   77222009   Gorman   DIV-9-19   Field   77222009   Gorman   DIV-9-10-2   Field   8212009   Dorman   Attachment DIV 10-10-2   Field   8212009   Dorman   Attachment DIV 10-10-2   Field   77222009   Gorman   Attachment DIV 10-10-2   Field   77222009   Dowd   Dowd   Dowd   Dowd   Dowd   Dowd   Do	DIV-9-2	Filed	7/22/2009	O'Brien			
Divy-9-5							
Divy-9-6							
Div-9-7							
DIV-9-B							
DIV-9-9							
DIV-9-10							
DIV-9-12	DIV-9-10		7/22/2009	Gorman			
DIV-9-13	DIV-9-11	Filed	7/22/2009	Gorman			
Divi-9-14							
DIV-9-16							
Division							
DIV-9-17							
DIV-9-18							
DIV-9-19							
DIV-10-2	DIV-9-19		7/22/2009	Gorman			
DIV-10-2							
DIV-10-3		Filed					
DIV-10-4   Filed   7/22/2009   Gorman   Attachment DIV 10-5   EXCEL files   DIV-10-5   Filed   8/11/2009   Gorman   Attachment DIV 10-6   EXCEL files   DIV-10-7   Filed   7/22/2009   Dowd   DIV-10-8   Filed   8/21/2009   Dowd   Attachment DIV 10-8   Filed   8/21/2009   Dowd   Attachment DIV 10-8   DIV-10-9   Filed   7/22/2009   Dowd   Attachment DIV 10-8   DIV-10-9   Filed   8/11/2009   Dowd   DIV-10-10   Filed   8/11/2009   Dowd   DIV-10-11   Filed   8/11/2009   O'Brien   Attachment DIV 10-10   DIV-10-12   Filed   7/22/2009   Wynter   Attachment DIV 10-13   Filed   8/11/2009   Wynter   Attachment DIV 10-13   DIV-10-13   Filed   7/22/2009   Wynter   Attachment DIV 10-13   DIV-10-14   Filed   7/22/2009   O'Brien   DIV-10-15   Filed   7/22/2009   O'Brien   DIV-10-16   Filed   7/22/2009   O'Brien   DIV-10-16   Filed   7/22/2009   O'Brien   DIV-10-17   Filed   8/18/2009   O'Brien   DIV-10-18   Filed   8/18/2009   O'Brien   DIV-10-19   Filed   8/18/2009   O'Brien   DIV-10-19   Filed   8/18/2009   O'Brien   DIV-10-19   Filed   8/18/2009   O'Brien   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   7/22/2009   Dowd   DIV-10-24   Filed   7/22/2009   O'Brien   Attachment DIV 10-10   DIV-10-24   Filed   7/22/2009   O'Brien   Attachment 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   Pettigrew   DIV-10-28   Filed   8/18/2009   Pettigrew   DIV-10-29   Filed   8/18/2009   Pettigrew   DIV-11-1   Filed   8/18/2009							
Attachment DIV 10-5   Filed   8/11/2009   Gorman   Attachment DIV 10-6   EXCEL files   BULK							
DIV-10-5	DIV-10-4	Filed	7/22/2009	Gorman			
DIV-10-5							
DIV-10-6	DIV-10-5	Filed	8/11/2009	Gorman			
DIV-10-8         Filed         8/21/2009         Dowd         Attachments DIV 10-8 INV-10-9         Filed         7/22/2009         Dowd         Attachments DIV 10-8 INV-10-10         Filed         7/22/2009         Dowd         Attachment DIV 10-10         Attachment DIV 10-10         DIV-10-11         Filed         8/14/2009         O'Brien         Attachment DIV 10-10         Attachment DIV 10-12         Biled         8/14/2009         Wynter         Attachment DIV 10-13         Filed         8/14/2009         Wynter         Attachment DIV 10-13         Attachment DIV 10-13         Attachment DIV 10-13         Attachment DIV 10-13         Filed         7/22/2009         Kateregga         Attachment DIV 10-13         DIV-10-14         Filed         7/22/2009         O'Brien         Attachment DIV 10-13         DIV-10-15         Filed         7/22/2009         O'Brien         Attachment DIV 10-13         D'V-10-16         Filed         7/22/2009         O'Brien         Attachment DIV 10-13         D'V-10-15         Filed         8/18/2009         O'Brien         Attachment DIV 10-13         Bried         8/18/2009         O'Brien         Attachment DIV 10-13         Bried         8/18/2009         O'Brien         Attachment DIV 10-12         D'V-10-20         Filed         8/18/2009         D'Brien         Attachment DIV 10-22         D'V-10-22         Filed         7/2				Gorman		Attachment DIV 10-6 (excel)	
DIV-10-9	DIV-10-7	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   Attachment DIV 10-13   Filed   8/11/2009   Wynter   Attachment DIV 10-13   DIV-10-13   Filed   8/11/2009   Wynter   Attachment DIV 10-13   DIV-10-14   Filed   7/22/2009   O'Brien   DIV-10-15   Filed   7/22/2009   O'Brien   DIV-10-16   Filed   7/22/2009   O'Brien   Attachment DIV 10-10   DIV-10-17   Filed   8/18/2009   O'Brien   DIV-10-18   Filed   8/18/2009   O'Brien   Attachment DIV 10-10   DIV-10-19   Filed   8/18/2009   O'Brien   Attachment DIV 10-10   DIV-10-19   Filed   7/22/2009   Dowd   DOWd   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   Attachment DIV 10-24   Filed   7/22/2009   O'Brien   Attachment DIV 10-25   Filed   7/22/2009   O'Brien   DIV-10-25   Filed   7/22/2009   O'Brien   DIV-10-25   Filed   7/22/2009   O'Brien   DIV-10-26   Filed   7/22/2009   O'Brien   DIV-10-28   Filed   7/22/2009   O'Brien   DIV-10-28   Filed   8/18/2009   O'Brien   DIV-10-29   Filed   8/18/2009   O'Brien   DIV-10-29   Filed   8/18/2009   Pettigrew   DIV-11-3   Filed   8/18/2009   Pettigrew   DIV-11-4   Filed   8/18/2009   Pettigrew   DIV-11-4   Filed   8/18/2009   Pettigrew   DIV-11-4   Filed   8/18/2009   Pettigrew   DIV-11-6   Filed   8/18/2009   Pettigrew   DIV-11-7   Filed   8/18/2009   Pettigrew   DIV-11-8   Filed   8/18/2009   Pettigrew   DIV-11-9   Filed   8/18/2009   Pettigrew   DIV-11-9   Filed   8/18/2009   Pettigrew   Attachment DIV 11-1   DIV-11-9   Filed   8/18/2009   Pettigrew   Attachment DIV 11-1   DIV-11-10   Filed   8/18/		Filed				Attachments DIV 10-8 (1-4)	
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           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           DIV-10-18         Filed         8/18/2009         O'Brien           DIV-10-19         Filed         8/18/2009         O'Brien           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         7/22/2009         O'Brien           DIV-10-24         Filed         7/22/2009         O'Brien           DIV-10-25         Filed         7/22/2009         O'Brien           DIV-10-27         Filed         7/22/2009         O'Brien           DIV-10-28         Filed         8/18/2009         Pettigrew							
DIV-10-12						Attachment DIV 10-10	
DIV-10-13         Filed         8/11/2009         Wynter         Attachment DIV 10-13           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           DIV-10-18         Filed         8/18/2009         O'Brien           DIV-10-19         Filed         8/18/2009         O'Brien           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           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         Wynter    DIV-11-1     Filed     8/18/2009     Petti							
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           DIV-10-18         Filed         8/18/2009         O'Brien           DIV-10-19         Filed         8/18/2009         O'Brien           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           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         8/18/2009         Pettigrew           DIV-11-1         Filed         8/18/2009         Pettigrew						Attachment DIV 10-13 (1-2)	
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 10-10   DIV-10-18   Filed   8/18/2009   O'Brien   Attachment DIV 10-10   DIV-10-19   Filed   8/18/2009   O'Brien   Attachment DIV 10-10   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-10-22   Filed   7/22/2009   Dowd   DIV-10-23   Filed   8/18/2009   O'Brien   Attachment DIV 10-24   Filed   8/18/2009   O'Brien   Attachment DIV 10-25   Filed   7/22/2009   O'Brien   DIV-10-26   Filed   7/22/2009   O'Brien   DIV-10-26   Filed   7/22/2009   O'Brien   DIV-10-26   Filed   7/22/2009   O'Brien   DIV-10-28   Filed   7/22/2009   O'Brien   DIV-10-29   Filed   8/18/2009   O'Brien   DIV-10-29   Filed   8/18/2009   Pettigrew   DIV-10-29   Filed   8/18/2009   Pettigrew   DIV-11-2   Filed   8/18/2009   Pettigrew   DIV-11-4   Filed   8/18/2009   Pettigrew   DIV-11-4   Filed   8/18/2009   Pettigrew   DIV-11-5   Filed   8/18/2009   Pettigrew   DIV-11-6   Filed   8/18/2009   Pettigrew   DIV-11-6   Filed   8/18/2009   Pettigrew   DIV-11-6   Filed   8/18/2009   Pettigrew   DIV-11-7   Filed   8/18/2009   Pettigrew   DIV-11-8   Filed   8/18/2009   Pettigrew   Attachment DIV 11-10   DIV-11-8   Filed   8/18/2009   Pettigrew   Attachment DIV 11-10   DIV-11-10   Filed   8/18/2009   Pettigrew   Attachment DIV 11-11   DIV-11-12   Filed						Attachment Biv 10 13 (12)	
DIV-10-17							
DIV-10-18   Filed   8/18/2009   O'Brien   Attachment DIV 10-19   Filed   8/18/2009   O'Brien   Attachment DIV 10-10   DIV-10-20   Filed   7/22/2009   Dowd   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-10-23   Filed   7/22/2009   O'Brien   DIV-10-25   Filed   7/22/2009   O'Brien   DIV-10-25   Filed   7/22/2009   O'Brien   DIV-10-26   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   O'Brien   DIV-10-29   Filed   7/22/2009   O'Brien   DIV-10-29   Filed   8/18/2009   Pettigrew   DIV-11-2   Filed   8/18/2009   Pettigrew   DIV-11-3   Filed   8/18/2009   Pettigrew   DIV-11-4   Filed   8/20/2009   Pettigrew   DIV-11-4   Filed   8/20/2009   Pettigrew   DIV-11-6   Filed   8/20/2009   Pettigrew   DIV-11-6   Filed   8/20/2009   Pettigrew   DIV-11-7   Filed   8/24/2009   Pettigrew   DIV-11-8   Filed   8/24/2009   Pettigrew   DIV-11-8   Filed   8/18/2009   Pettigrew   DIV-11-8   Filed   8/18/2009   Pettigrew   DIV-11-8   Filed   8/18/2009   Pettigrew   DIV-11-9   Filed   8/18/2009   Pettigrew   DIV-11-10   Filed   8/18/2009   Pettigrew   Attachment DIV 11-10   DIV-11-9   Filed   8/18/2009   Pettigrew   Attachment DIV 11-10   DIV-11-10   Filed   8/18/2009   Pettigrew   Attachment DIV 11-10   DIV-11-12   Filed   8/18/2009   Pettigrew   Attachment DIV 11	DIV-10-16	Filed	7/22/2009	O'Brien			
DIV-10-19	DIV-10-17	Filed		O'Brien		Attachment DIV 10-17	
DIV-10-20							
DIV-10-21						Attachment DIV 10-19	
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           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  DIV-11-2  Filed  8/18/2009  Pettigrew  DIV-11-3  Filed  8/18/2009  Pettigrew  DIV-11-4  Filed  8/20/2009  Pettigrew  DIV-11-5  Filed  8/20/2009  Pettigrew  DIV-11-6  Filed  8/20/2009  Pettigrew  Attachment DIV 11-10  DIV-11-8  Filed  8/18/2009  Pettigrew  Attachment DIV 11-10  DIV-11-9  Filed  8/18/2009  Pettigrew  Attachment DIV 11-11  DIV-11-10  Filed  8/18/2009  Pettigrew  Attachments DIV 11-11  DIV-11-10  Filed  8/20/2009  Pettigrew  Attachments DIV 11-11  CDIV-11-11  Filed  8/21/2009  Pettigrew  Attachments DIV 11-11  (CD-ROM)  Attachments DIV 11-12  BULK							
DIV-10-23							
DIV-10-24							
DIV-10-25						Attachment DIV 10-24	
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-11-29         Filed         8/18/2009         Pettigrew           DIV-11-1         Filed         8/18/2009         Pettigrew           DIV-11-2         Filed         8/18/2009         Pettigrew           DIV-11-3         Filed         8/20/2009         Pettigrew           DIV-11-4         Filed         8/20/2009         Pettigrew           DIV-11-5         Filed         8/18/2009         Pettigrew           DIV-11-6         Filed         8/20/2009         Pettigrew           DIV-11-7         Filed         8/18/2009         Pettigrew           Attachment DIV 11-1           DIV-11-9         Filed         9/1/2009         Pettigrew           Attachments DIV 11-11           DIV-11-10         Filed         8/21/2009         Pettigrew           Attachments DIV 11-11           CD-ROM)							
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-10-29           Filed         8/18/2009         Pettigrew           DIV-11-1         Filed         8/18/2009         Pettigrew           DIV-11-3         Filed         8/18/2009         Pettigrew           DIV-11-3         Filed         8/20/2009         Pettigrew           DIV-11-4         Filed         8/20/2009         Pettigrew           DIV-11-5         Filed         8/18/2009         Pettigrew           DIV-11-6         Filed         8/20/2009         Pettigrew           DIV-11-7         Filed         8/24/2009         Pettigrew           DIV-11-8         Filed         8/18/2009         Pettigrew           DIV-11-9         Filed         8/18/2009         Pettigrew           DIV-11-10         Filed         8/21/2009         Pettigrew           Attachments DIV 11-11           DIV-11-11         Filed         8/21/2009         Pettigrew    Attachments DIV 11-12  BULK							
DIV-10-29   Filed   7/22/2009   Wynter				O'Brien			
DIV-11-1							
DIV-11-2         Filed         8/11/2009         Pettigrew           DIV-11-3         Filed         8/18/2009         Pettigrew           DIV-11-4         Filed         8/20/2009         Pettigrew           DIV-11-5         Filed         8/18/2009         Pettigrew           DIV-11-6         Filed         8/20/2009         Pettigrew           DIV-11-7         Filed         8/24/2009         Pettigrew           DIV-11-8         Filed         8/18/2009         Pettigrew           DIV-11-9         Filed         9/1/2009         Pettigrew           DIV-11-10         Filed         8/18/2009         Pettigrew           DIV-11-11         Filed         8/21/2009         Pettigrew           Attachments DIV 11-11         (CD-ROM)           DIV-11-12         Filed         8/18/2009         Pettigrew	DIV-10-29	Filed	7/22/2009	Wynter			
DIV-11-2         Filed         8/11/2009         Pettigrew           DIV-11-3         Filed         8/18/2009         Pettigrew           DIV-11-4         Filed         8/20/2009         Pettigrew           DIV-11-5         Filed         8/18/2009         Pettigrew           DIV-11-6         Filed         8/20/2009         Pettigrew           DIV-11-7         Filed         8/24/2009         Pettigrew           DIV-11-8         Filed         8/18/2009         Pettigrew           DIV-11-9         Filed         9/1/2009         Pettigrew           DIV-11-10         Filed         8/18/2009         Pettigrew           DIV-11-11         Filed         8/21/2009         Pettigrew           Attachments DIV 11-11         (CD-ROM)           DIV-11-12         Filed         8/18/2009         Pettigrew	DIV 11 1	Eden	0/40/0000	Dattiar		Attachments DIV 44 4 (4.0)	
DIV-11-3         Filed         8/18/2009         Pettigrew           DIV-11-4         Filed         8/20/2009         Pettigrew           DIV-11-5         Filed         8/18/2009         Pettigrew           DIV-11-6         Filed         8/20/2009         Pettigrew           DIV-11-7         Filed         8/24/2009         Pettigrew           DIV-11-8         Filed         8/18/2009         Pettigrew           DIV-11-9         Filed         9/1/2009         Pettigrew           DIV-11-10         Filed         8/18/2009         Pettigrew           DIV-11-11         Filed         8/21/2009         Pettigrew           Attachments DIV 11-11         (CD-ROM)           Attachments DIV 11-12         Filed         8/18/2009         Pettigrew				•		Auachments DIV 11-1 (1-2)	
DIV-11-4         Filed         8/20/2009         Pettigrew           DIV-11-5         Filed         8/18/2009         Pettigrew           DIV-11-6         Filed         8/20/2009         Pettigrew           DIV-11-7         Filed         8/24/2009         Pettigrew           DIV-11-8         Filed         8/18/2009         Pettigrew           DIV-11-9         Filed         9/1/2009         Pettigrew           DIV-11-10         Filed         8/18/2009         Pettigrew           DIV-11-11         Filed         8/21/2009         Pettigrew           Attachments DIV 11-11         (CD-ROM)           Attachments DIV 11-12         Filed         8/18/2009         Pettigrew				•			
DIV-11-5         Filed         8/18/2009         Pettigrew           DIV-11-6         Filed         8/20/2009         Pettigrew           DIV-11-7         Filed         8/24/2009         Pettigrew           DIV-11-8         Filed         8/18/2009         Pettigrew           DIV-11-9         Filed         9/1/2009         Pettigrew           DIV-11-10         Filed         8/18/2009         Pettigrew           DIV-11-11         Filed         8/21/2009         Pettigrew           DIV-11-11         Filed         8/21/2009         Pettigrew           Attachments DIV 11-11         (CD-ROM)           Attachments DIV 11-12         Filed         8/18/2009         Pettigrew				•			
DIV-11-6         Filed         8/20/2009         Pettigrew           DIV-11-7         Filed         8/24/2009         Pettigrew         Attachment DIV 11-           DIV-11-8         Filed         8/18/2009         Pettigrew         Attachment DIV 11-           DIV-11-9         Filed         9/1/2009         Pettigrew         Attachment DIV 11-           DIV-11-10         Filed         8/18/2009         Pettigrew         Attachments DIV 11-11           DIV-11-11         Filed         8/21/2009         Pettigrew         Attachments DIV 11-12           DIV-11-12         Filed         8/18/2009         Pettigrew         BULK				•			
DIV-11-8         Filed         8/18/2009         Pettigrew           DIV-11-9         Filed         9/1/2009         Pettigrew         Attachment DIV 11-           DIV-11-10         Filed         8/18/2009         Pettigrew         Attachments DIV 11-11           DIV-11-11         Filed         8/21/2009         Pettigrew         (CD-ROM)           DIV-11-12         Filed         8/18/2009         Pettigrew         Attachments DIV 11-12           BULK         BULK         BULK				•			
DIV-11-9         Filed         9/1/2009         Pettigrew         Attachment DIV 11-           DIV-11-10         Filed         8/18/2009         Pettigrew         Attachments DIV 11-11           DIV-11-11         Filed         8/21/2009         Pettigrew         (CD-ROM)           DIV-11-12         Filed         8/18/2009         Pettigrew         Attachments DIV 11-12           BULK         BULK			8/24/2009	Pettigrew		Attachment DIV 11-7	
DIV-11-10         Filed         8/18/2009         Pettigrew           DIV-11-11         Filed         8/21/2009         Pettigrew         Attachments DIV 11-11 (CD-ROM)           DIV-11-12         Filed         8/18/2009         Pettigrew         Attachments DIV 11-12 BULK				•			
Attachments DIV 11-11				•		Attachment DIV 11-9	
DIV-11-11         Filed         8/21/2009         Pettigrew         (CD-ROM)           DIV-11-12         Filed         8/18/2009         Pettigrew         Attachments DIV 11-12           BULK         BULK	וט-11-10	Filed	8/18/2009	Pettigrew		Attachments DIV/44 44 (1.0)	
DIV-11-12 Filed 8/18/2009 Pettigrew Attachments DIV 11-12 BULK	DI\/-11-11	Eilad	0/24/2000	Pottigrow		, ,	
DIV-11-12 Filed 8/18/2009 Pettigrew <b>BULK</b>	וו-וו-אוט	riied	0/21/2009	relligiew		` '	
	DIV-11-12	Filed	8/18/2009	Pettigrew			
רוי-יוסן אורן אורן אורן אורן אורן אורן אורן אור	DIV-11-13	Filed	8/18/2009	Pettigrew		Attachment DIV 11-13	
DIV-11-14 Filed 8/18/2009 Pettigrew	DIV-11-14			•			

Divi-11-9				et 4065		
Information Request			As or. Sept	ember 30, 2009		
Divi-1-15	[C-denotes confidentialit	y is being sought]				
District   Filed	Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
Divi-1-17		Filed	8/18/2009	Pettigrew		
Divi-1-19	DIV-11-16	Filed	8/18/2009	Pettigrew		
Divi-11-9	DIV-11-17	Filed	8/18/2009	Pettigrew		
Divinition	DIV-11-18	Filed	8/18/2009	Pettigrew		Attachment DIV 11-18
Divi-1-121	DIV-11-19	Filed	8/18/2009			
DIV-11-22	DIV-11-20	Filed	8/11/2009	O'Brien		Attachment DIV 11-20 (1-2)
DIV-11-23	DIV-11-21	Filed	8/18/2009	Pettigrew		
DIV-11-24	DIV-11-22	Filed	8/21/2009	Pettigrew		Attachment DIV 11-22
DIV-11-25		Filed	8/20/2009	Pettigrew		
Div.11-26		Filed	8/18/2009	Pettigrew		
DIV-11-27		Filed	8/11/2009	Pettigrew		Attachment DIV 11-25
Divinition   Petitigrew   C-attachment   Attachment Divinition   Attachment Divinition   Divinition   Petitigrew   C-attachment   Attachment Divinition   Divinition   Petitigrew   Divinition   Divinition   Petitigrew   Divinition   Divinition   Petitigrew   Divinition   Divinition   Petitigrew   Divinition   Divin	DIV-11-26	Filed	8/18/2009	Pettigrew		
Divinition   Petitigrew   C-attachment   Attachment Divinition   Attachment Divinition   Divinition   Petitigrew   C-attachment   Attachment Divinition   Divinition   Petitigrew   Divinition   Divinition   Petitigrew   Divinition   Divinition   Petitigrew   Divinition   Divinition   Petitigrew   Divinition   Divin	DIV-11-27	Filed	8/21/2009	Pettigrew		Attachments DIV 11-27 (1-2
DIV-11-29						
Divi-13-00   Filed					C-attachment	Attachment DIV 11-29
Diviliance    Filed						
Div-11-32						
Div.11-33						
DIV-11-34						Attachments DIV 11-33 (1-4
DIV-11-35						BULK
DIV-11-36				- U		
DIV-11-37						
DIV-11-38						Attachment DIV 11-36
DIV-11-38	DIV-11-37	Filed	8/27/2009	Tierney		
Attachment DIV-11-38	DIV-11-38	Filed	8/11/2009	Dinkel		, ,
DIV-11-39			3.7.7.200			
Div-1-40	DIV-11-39	Filed	8/11/2009	Pettigrew		
Attachment DIV 11-42   Bulk   Bulk	DIV-11-40	Filed	8/11/2009	Gorman		
DIV-12-1	DIV-11-41		8/18/2009	Gorman		
Pettigrew   Pett						Attachment DIV 11-42 (1-3)
DIV-12-1	DIV-11-42	Filed	8/24/2009	Pettigrew		` '
DIV-12-1						
Attachment DIV 12-2 (1-but 12-3)	DIV-12-1	Filed	8/18/2009	O'Brien		
DIV-12-2		1 1100	0/10/2000	0 2		, ,
DiV-12-3	DIV-12-2	Filed	8/11/2009	O'Brien		
DIV-12-3						
DIV-12-4	DIV-12-3	Filed	8/18/2009	O'Brien		,
Attachment 12-6 (exce   BULK   DIV-12-7   Filed   8/18/2009   O'Brien   Attachment 12-6 (exce   BULK   DIV-12-8   Filed   8/18/2009   O'Brien   Attachment 12-7   DIV-12-8   Filed   8/18/2009   O'Brien   DIV-12-10   Filed   8/20/2009   O'Brien   DIV-12-11   Filed   8/20/2009   O'Brien   DIV-12-12   Filed   8/24/2009   O'Brien   DIV-12-13   Filed   8/24/2009   O'Brien   DIV-12-14   Filed   8/18/2009   O'Brien   DIV-12-15   Filed   8/18/2009   O'Brien   DIV-12-16   Filed   8/18/2009   O'Brien   DIV-12-16   Filed   8/18/2009   O'Brien   DIV-12-17   Filed   8/21/2009   O'Brien   DIV-12-18   Filed   8/11/2009   O'Brien   DIV-12-19   Filed   8/11/2009   O'Brien   DIV-12-19   Filed   8/11/2009   O'Brien   DIV-13-2   Filed   8/11/2009   O'Brien   DIV-13-4   Filed   8/11/2009   O'Brien   DIV-13-4   Filed   8/11/2009   O'Brien   DIV-13-5   Filed   8/11/2009   O'Brien   DIV-13-6   Filed   8/11/2009   Gorman   DIV-13-6   Filed   8/11/2009   Gorman   DIV-13-7   Filed   8/11/2009   Gorman   Attachment DIV-13-7   DIV-13-7   Filed   8/11/2009   Gorman   Attachment DIV-13-7   DIV-13-8   Filed   8/11/2009   Gorman   Attachment DIV-13-7   DIV-13-8   Filed   8/11/2009   Gorman   DIV-13-7   Filed   8/11/200						Attachment DIV 12-4 (exce
Attachment 12-6 (exce   BULK   DIV-12-7   Filed   8/18/2009   O'Brien   Attachment 12-6 (exce   BULK   DIV-12-8   Filed   8/18/2009   O'Brien   Attachment 12-7   DIV-12-8   Filed   8/18/2009   O'Brien   DIV-12-10   Filed   8/20/2009   O'Brien   DIV-12-11   Filed   8/20/2009   O'Brien   DIV-12-12   Filed   8/24/2009   O'Brien   DIV-12-13   Filed   8/24/2009   O'Brien   DIV-12-14   Filed   8/18/2009   O'Brien   DIV-12-15   Filed   8/18/2009   O'Brien   DIV-12-16   Filed   8/18/2009   O'Brien   DIV-12-16   Filed   8/18/2009   O'Brien   DIV-12-17   Filed   8/21/2009   O'Brien   DIV-12-18   Filed   8/11/2009   O'Brien   DIV-12-19   Filed   8/11/2009   O'Brien   DIV-12-19   Filed   8/11/2009   O'Brien   DIV-13-2   Filed   8/11/2009   O'Brien   DIV-13-4   Filed   8/11/2009   O'Brien   DIV-13-4   Filed   8/11/2009   O'Brien   DIV-13-5   Filed   8/11/2009   O'Brien   DIV-13-6   Filed   8/11/2009   Gorman   DIV-13-6   Filed   8/11/2009   Gorman   DIV-13-7   Filed   8/11/2009   Gorman   Attachment DIV-13-7   DIV-13-7   Filed   8/11/2009   Gorman   Attachment DIV-13-7   DIV-13-8   Filed   8/11/2009   Gorman   Attachment DIV-13-7   DIV-13-8   Filed   8/11/2009   Gorman   DIV-13-7   Filed   8/11/200		Filed				
DIV-12-6   Filed   8/18/2009   O'Brien   Attachment 12-7	-		/=	9		Attachment 12-6 (excel)
Div-12-7	DIV-12-6	Filed	8/18/2009	O'Brien		` '
DIV-12-8						
DIV-12-9						
DIV-12-10						
DIV-12-11						
DIV-12-12						
DIV-12-13						
DIV-12-14						
DIV-12-15						Attachment DIV 12-13 (exce
DIV-12-16						
DIV-12-17						
DIV-12-18						
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   DIV-13-6   Filed   8/14/2009   Gorman   Attachment DIV-13-7   DIV-13-8   Filed   8/11/2009   Gorman   Attachment DIV-13-7   DIV-13-8   Filed   8/11/2009   Gorman   DIV-13-9   DIV-1						
DIV-13-1		Filed				
DIV-13-2	DIV-12-19	Filed	8/11/2009	O'Brien		
DIV-13-2						
DIV-13-3						
DIV-13-4						
DIV-13-5 Filed 8/11/2009 Walter		Filed				
Attachment DIV-13-6   Filed   8/11/2009   Gorman   EXCEL						
DIV-13-6         Filed         8/11/2009         Gorman         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-13-5	Filed	8/11/2009	Walter		Attachment DIV 42.0
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-13-6	Filed	8/11/2009	Gorman		
DIV-13-8         Filed         8/11/2009         Gorman           DIV-13-9         Filed         8/11/2009         Gorman						Attachment DIV-13-7
DIV-13-9 Filed 8/11/2009 Gorman						
DIV-13-10 Filed 8/11/2009 Gorman						

	The	e Narragansett Electric Docl	Company d/b/a Nati ket 4065	onal Grid	
		Disco	very Log ember 30, 2009		
		·			
[C-denotes confidentiality	is being sought]				
Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
DIV-14-1	Filed	8/18/2009	Dottigrow		Attachments DIV 14-1 (1-8) <b>BULK</b>
DIV-14-1 DIV-14-2	Filed	8/18/2009	Pettigrew Pettigrew		Attachment DIV 14-2
DIV-14-3	Filed	8/18/2009	Pettigrew		Attachment BIV 14 2
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		All
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-14-12	Filed	8/18/2009	Pettigrew		DOLK
DIV-14-14	Filed	8/18/2009	Pettigrew		
DIV-14-15	Filed	8/27/2009	Pettigrew		
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 DIV-14-24	Filed	8/18/2009 8/18/2009	Pettigrew		
DIV-14-24 DIV-14-25	Filed Filed	8/20/2009	Pettigrew Pettigrew		Attachment DIV 14-25
DIV-14-23	Fileu	0/20/2009	1 ettigrew		Attachment DIV 14-23
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 DIV-16-3	Filed	8/11/2009	Fields		Attachment DIV 40.0
DIV-16-3 DIV-16-4	Filed Filed	8/11/2009 8/11/2009	Fields Fields		Attachment DIV 16-3 Attachment DIV 16-4
DIV-16-5	Filed	8/11/2009	Fields		Attachment DIV 10-4
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 DIV-16-17	Filed Filed	8/18/2009 8/11/2009	Fields Fields		Attachment DIV 16-17
DIV-16-17	Filed	8/11/2009	Fields		Autominent DIV 10-17
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 DIV-16-26	Filed Filed	8/11/2009 8/11/2009	Fields Fields		
DIV-17-1	Filed	8/18/2009	O'Brien		Attachment DIV 17-1
DIV-17-1	Filed	8/18/2009	O'Brien		Attachment DIV 17-1
DIV-17-2	Filed	8/18/2009	Pettigrew		Attachment DIV 17-3(e)
DIV-17-3 Revised	Filed	8/24/2009	Pettigrew		Attachment DIV 17-3(c)
DIV-17-4	Filed	8/24/2009	Pettigrew		2 1 1 2(5)
DIV-17-5	Filed	8/24/2009	O'Brien		Attachment DIV 17-5(b)
DIV-17-6	Filed	8/18/2009	Wynter		
DIV-17-7	Filed	8/20/2009	Dowd		
DIV-17-8	Filed	8/24/2009	O'Brien		

	The	Narragansett Electric	Company d/b/a Nat et 4065	ional Grid	
			very Log		
			ember 30, 2009		
C-denotes confidentiality	is being sought]				
Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
DIV-17-9	Filed	8/20/2009	Dowd		
DIV-17-10	Filed	8/24/2009	O'Brien		
DIV-17-11	Filed	8/24/2009	O'Brien		Attachment DIV 17-11
DIV-17-12	Filed	8/14/2009	Gorman		
DIV-17-13	Filed	8/14/2009	Gorman		
DIV 40.4		0/44/0000			100
DIV-18-1 DIV-18-2	Filed Filed	8/11/2009 8/14/2009	Gorman Gorman		Attachment DIV 18-1
DIV-18-3	Filed	8/11/2009	Gorman		
DIV-18-4	Filed	8/11/2009	Gorman		
DIV-18-5	Filed	8/14/2009	Pettigrew		
211 10 0	1 lied	0/11/2000	. cangion		
					Attachments DIV 19-1 (1-2)
DIV-19-1	Filed	8/21/2009	Teehan		BULK
					Attachments DIV 19-1 (1-3)
DIV-19-2	Filed	8/21/2009	O'Brien		BULK
DIV 00 4		0/07/0000			Au 1
DIV-20-1 DIV-20-2	Filed	8/27/2009	Gorman		Attachment DIV 20-1
DIV-20-2 DIV-20-3	Filed	8/21/2009 8/21/2009	Gorman Gorman		Attachment DIV 20-2
DIV-20-3 DIV-20-4	Filed Filed	8/21/2009	Gorman		
DIV-20-5	Filed	8/27/2009	Gorman		Attachment DIV 20-5
DIV-20-3	riieu	0/21/2009	Goillian		Attachments DIV 20-6 (1-6)
DIV-20-6	Filed	9/1/2009	Gorman		BULK
DIV-21-1	Filed	8/24/2009	O'Brien		Attachment DIV 21-1
DIV-21-1	Filed	8/27/2009	O'Brien		Attachment DIV 21-1
DIV-21-3	Filed	8/21/2009	O'Brien		Attacriment DIV 21-2
DIV-21-4	Filed	8/21/2009	Gorman		
DIV-21-4 (Supp.)	Filed	9/1/2009	Gorman		
DIV-21-5	Filed	8/24/2009	O'Brien		
			•		
DIV-22-1	Filed	9/1/2009	Pettigrew		
DIV-22-2	Filed	9/1/109	Pettigrew		Attachments DIV 22-2 (1-2)
DIV-22-3	Filed	8/27/2009	O'Brien		Attachments DIV 22-3 (1-3)
DIV-22-4	Filed	9/1/2009	Pettigrew	C-attachment	Attachment DIV 22-4 BULK
DIV-22-5	Filed	9/1/2009	Pettigrew O'Brien		Attacker and DIV 00.0
DIV-22-6 DIV-22-7	Filed Filed	8/27/2009 8/27/2009	O'Brien		Attachment DIV 22-6 Attachment DIV 22-7 (a-b)
DIV-22-7	Filed	8/27/2009	OBrien		Attachment DIV 22-7 (a-b)
DIV-23-1(A)	Filed	9/1/2009	O'Brien	T	
DIV-23-1(B)	Filed	9/1/2009	Gorman		Attachment DIV 23-1(B)
DIV-23-2	Filed	9/1/2009	O'Brien		
DIV-23-3	Filed	9/1/2009	O'Brien		
DIV-23-4	Filed	9/1/2009	Gorman		
DIV-23-5	Filed	9/1/2009	O'Brien		Attachment DIV 23-5
DIV-23-6	Filed	9/1/2009	O'Brien		Attachment DIV 23-6
DIV-24-1	Filed Herewith	9/30/2009	Wynter		Attachment DIV 24-1 BULK
DIV-24-1 DIV-24-2	Filed Herewith	9/30/2009	Wynter	+	Audument DIV 24-1 BULK
DIV-24-2 DIV-24-3	Filed	9/10/2009	Wynter	+	
DIV-24-4	Filed	9/10/2009	Wynter		
DIV-24-5	Filed	9/10/2009	Wynter		
DIV-24-6	Filed	9/10/2009	Wynter		
DIV-24-7	Filed Herewith	9/30/2009	Wynter		Attachment DIV 24-7
DIV-25-1	Filed Herewith	9/30/2009	Wynter		Attachment DIV 25-1
DIV-26-1	Filed Herewith	9/30/2009	Wynter		Attachment DIV 26-1 (excel)
DIV-26-2	Filed Herewith	9/30/2009	Wynter	+	Attachment DIV 26-2
			•	•	

	The		ic Company d/b/a Natior	nal Grid	
			ocket 4065		
			covery Log		
		As of: Se	ptember 30, 2009	T	
IO desertes essentistantisticati	. b. dan a samb				
[C-denotes confidentiality is	s being sought]				
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			
				l	
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 (a, b & e)	Filed	8/21/2009	Gorman		Attachments NAVY 3-5(b) (1-3)
NAVY-3-5 (c & d)	Filed	8/24/2009	O'Brien		Attachment NAVY 3-5© BULK
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		_,

					1
	The	e Narragansett Electric	Company d/b/a Natio	onal Grid	
			ket 4065		
		Disco	overy Log		
		As of: Sep	tember 30, 2009		
[C-denotes confidentiality	ty is being sought]				
Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
GWC-1-1	Filed	8/27/2009	Gorman		
GWC-1-2	Filed	8/27/2009	Gorman		Attachment GWC 1-2
GWC-1-3	Filed	8/27/2009	Gorman		Attachment GWC 1-3
GWC-1-4	Filed	8/27/2009	Gorman		
GWC-1-5	Filed	8/27/2009	Gorman		
		Discovery Log Ends I	Here: September 30,	2009	



September 30, 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 <u>Motion for Protective Treatment</u>

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of National Grid's<sup>1</sup> Motion for Protective Treatment concerning the Company's response to the Commission's second set of data requests being filed under separate cover in the above-captioned proceeding. Specifically, the Company is requesting confidential treatment of Attachments COMM 2-27-1 and COMM 2-27-2, as permitted by Commission Rule 1.2(g) and R.I.G.L. § 38-2-2(4)(i)(B).

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

The hon

**Enclosures** 

cc: Docket 4065 Service List

T: 401-784-7667 F: 401-784-4321 thomas.teehan@us.ngrid.com www.nationalgrid.com

<sup>&</sup>lt;sup>1</sup> The Narragansett Electric Company d/b/a National Grid ("Company").

# STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS RHODE ISLAND PUBLIC UTILITIES COMMISSION

	)	
National Grid	)	
Application to Change Rate Schedules	)	Docket No. 4065
	)	
	)	

### MOTION OF NATIONAL GRID FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION

Now comes The Narragansett Electric Company d/b/a National Grid ("National Grid" or the "Company") and hereby requests that the Rhode Island Public Utilities Commission (the "Commission) grant protection from public disclosure of certain confidential, competitively sensitive and proprietary information submitted in this proceeding, as permitted by Commission Rule 1.2(g) and by R.I.G.L. § 38-2-2(4)(i)(B).

#### I. BACKGROUND

On September 30, 2009, the Company filed responses to data requests issued by the Commission and the Rhode Island Division of Public Utilities and Carriers in the above-referenced proceeding concerning the Company's application for a change in base rates. In those data requests, the Commission requested confidential information on hourly rates charged to National Grid for legal matters it has conducted as a response to Data Request COMM-2-27 (Supp.). For the reasons stated below, the Company requests that the hourly rates for legal counsel be protected from public disclosure.

#### II. LEGAL STANDARD

The Commission's Rule 1.2(g) provides that access to public records shall be granted in accordance with the Access to Public Records Act ("APRA"), R.I.G.L. §38-2-1, et seq. Under APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a "public record," unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I.G.L. §38-2-2(4). Therefore, to the extent that information provided to the Commission falls within one of the designated exceptions to the public records law, the Commission has the authority under the terms of APRA to deem such information to be confidential and to protect that information from public disclosure.

In that regard, R.I.G.L. §38-2-2(4)(i)(B) provides that the following records shall not be deemed public:

Trade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature.

The Rhode Island Supreme Court has held that the determination as to whether this exemption applies requires the application of a two-pronged test set forth in Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I.2001). The first prong of the test assesses whether the information was provided voluntarily to the governmental agency. Providence Journal, 774 A.2d at 47. If the answer to the first question is affirmative, then the question becomes whether the information is "of a kind that would customarily not be released to the public by the person from whom it was obtained." Id.

In addition, the Court has held that the agencies making determinations as to the disclosure of information under APRA may apply the balancing test established by the Court in <u>Providence Journal v. Kane</u>, 577 A.2d 661 (R.I.1990). Under this balancing test, the Commission may protect information from public disclosure if the benefit of such protection outweighs the public interest inherent in disclosure of information pending before regulatory agencies.

#### III. BASIS FOR CONFIDENTIALITY

National Grid seeks protection from public disclosure for the confidential and proprietary pricing information set forth in the Company's response to Data Request COMM-2-27 (Supp.). Information relating to the competitive rates charged to National Grid for outside services is not provided to the public because of the damage that would be caused to the negotiating positions of both the Company and its vendors. The Company is requesting that the confidential price data be protected from public disclosure because of the critical importance of maintaining bargaining leverage and protecting access to outside services who may be sensitive about the disclosure of their billing rates to the public realm.

Should this information be made available to the public, the Company's consultants would be placed in a competitive disadvantage vis-à-vis their respective competitors because the competitors would have information by which to base any future bids for providing services to the Company or other clients of the legal service provider. Moreover, disclosure of such information may place the Company's legal consultants at a competitive disadvantage with respect to their existing and potential clients with respect to negotiating fees for services. This result would disadvantage the Company to the

extent that the Company's consultants determine in the future not to bid on the Company's requests for services because of the potential competitive disadvantages that may arise should they do so.

Consistent with the standard for confidentiality established under Rhode Island law, the confidential price terms are information "of a kind that would customarily not be released to the public by the person from whom it was obtained." The Company is under no obligation in any other forum to disclose the information and, as is customary in relation to competitive rates for outside service providers, the Company would not ordinarily release the information in a public forum because of the detrimental impact that such a release would have on the interests of the Company (and its customers) in protecting the Company's ability to negotiate with vendors on a going forward basis. Accordingly, in this case, the need to ensure that the confidential and proprietary customer data are protected outweighs the general public interest inherent in disclosure of information pending before regulatory agencies.

#### V. CONCLUSION

The confidential price terms contained in the Company's response to Data Request COMM 2-27 (Supp.) should be protected from the public record, because release of this information would be detrimental to the public interest. Accordingly, the Company requests that the Commission protect the confidential information submitted in response to Data Request COMM 2-27 (Supp.).

**WHEREFORE**, the Company respectfully requests that the Commission grant its Motion for Protective Treatment as stated herein.

Respectfully submitted,

#### **NATIONAL GRID**

By its attorneys,

Thomas R. Teehan, Esq.

H Tucken

National Grid 280 Melrose Street Providence, RI 02907

(401) 784-7667

Cheryl M. Kimball, Esq. (RI #6458)

Keegan Werlin LLP 265 Franklin Street

Boston, Massachusetts 02110

CDX Je Vill

(617) 951-1400

Dated: September 30, 2009

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Responses to Commission Second Set of Data Requests Issued July 29, 2009

### Commission Data Request 2-27 (Supplemental)

#### Request:

Please specify the type of legal work performed by each of the law firms identified in Commission 1-93, the number of hours billed, the hourly rate and what services and/or products were paid for.

#### Response:

Please see Attachments COMM 2-27-1 and COMM 2-27-2 for the requested information in the years 2006 and 2007, respectively.

The hourly rate information is confidential. Therefore, the Company is providing redacted attachments for the public record. A Motion for Protective Treatment will be filed separately with the Commission in relation to the attachments.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-1 (REDACTED) Page 1 of 2

		Rate Range	
	Hours	Low High	Description of Services
DLER POLLOCK & SHEEHAN PC	n/a		General
	0.5		Litigation
	1.6		Litigation
	4.6		Litigation
	10.9		Litigation
	24.2		Litigation
	29.7		Litigation
	132.9		Litigation
	153.4		Litigation
	273.1		Litigation
DLER POLLOCK & SHEEHAN PC			
LSTON & BIRD LLP	23.5		Federal/Regulatory
	120.3		Federal/Regulatory
	8		Litigation/Environmental
	285.9		Federal/Regulatory
	131.3		Federal/Regulatory
	63.6		Federal/Regulatory
	63.6		Federal/Regulatory
	96.9		Litigation/Environmental
	96.9		Litigation/Environmental
	11.3		Federal Regulatory
	1.5		Corporate/Commercial
	54.7		
			Litigation/Environmental
	54.7		Federal/Regulatory
	2.9		Corporate/Commercial
	79.4		Federal/Regulatory
	6.8		Federal/Regulatory
	890.8		General
	1		Corporate/Commercial
	74.2		Federal/Regulatory
	2.9		Federal/Regulatory
	15.9		Federal/Regulatory
	56.2		Federal/Regulatory
	56.2		Federal/Regulatory
	56.2		Federal/Regulatory
	56.2		Regulatory
	52.1		Litigation
	109.1		General
	109.1		General
	109.1		General
	109.1		General
	142.3		Regulatory
	641.7		Regulatory
	641.7		Regulatory
	582.7		General
	582.7		General
	582.7		General
	197.46		General
	197.46		General
	160.7		Regulatory
	325.7		Regulatory
	325.7		Regulatory
	509.5		Regulatory
	117.9		Regulatory
	117.9		Regulatory
	257.6		Regulatory
STON & BIRD LLP	257.0		Regulatory
	21/2		
WDITCH AND DEWEY LLP	N/A		General
	0.1		Litigation/Environmental
	1.4		Litigation
	1.6		Litigation
	1.8		Litigation
	1.1		Litigation
	1.4		Claims/Litigation
			General
	2.1		Litigation
	2.1		Litigation
	5.1		Litigation
	5.1 5.3		Litigation Litigation
	5.1 5.3 7.3		Litigation Litigation Litigation
	5.1 5.3 7.3 8.9		Litigation Litigation Litigation Litigation
	5.1 5.3 7.3 8.9 12.4		Litigation Litigation Litigation Litigation Litigation Litigation
	5.1 5.3 7.3 8.9		Litigation Litigation Litigation Litigation
	5.1 5.3 7.3 8.9 12.4 14.6		Litigation Litigation Litigation Litigation Litigation Litigation Litigation Litigation
	5.1 5.3 7.3 8.9 12.4 14.6 6.7		Litigation
	5.1 5.3 7.3 8.9 12.4 14.6 6.7		Litigation
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6		Litigation
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6 30.8		Litigation Litigation/Environmental
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6		Litigation
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6 30.8		Litigation Litigation/Environmental Litigation/Environmental
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6 30.8 42.1 64.8		Litigation Litigation/Environmental Litigation/Environmental Litigation/Environmental
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6 30.8 42.1 64.8 63.7		Litigation Litigation/Environmental Litigation/Environmental Litigation/Environmental Litigation/Environmental Litigation/Environmental Litigation/Environmental
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6 30.8 42.1 64.8 63.7 57.3		Litigation Litigation/Environmental Litigation/Environmental Litigation/Environmental Litigation/Environmental Litigation/Environmental Litigation/Environmental Litigation/Environmental
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6 30.8 42.1 64.8 63.7 57.3 67.3		Litigation Litigation/Environmental
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6 30.8 42.1 64.8 63.7 57.3 81.8		Litigation Litigation/Environmental
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6 30.8 42.1 64.8 63.7 57.3 67.3 81.8 69.7		Litigation Litigation/Environmental
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6 30.8 42.1 64.8 63.7 57.3 67.3 81.8 69.7 46.4		Litigation Litigation/Environmental
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6 30.8 42.1 64.8 63.7 57.3 67.3 81.8 69.7 46.4		Litigation Litigation/Environmental
	5.1 5.3 7.3 8.9 12.4 14.6 6.7 12.1 16.6 30.8 42.1 64.8 63.7 57.3 67.3 81.8 69.7 46.4		Litigation Litigation/Environmental



The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-1 (REDACTED) Page 2 of 2

Calendar 2006		Rate	Range	7
	Hours	Low	High	Description of Services
GLENN E DAWSON ESQ	-72.9			General
	18.50			Litigation/Environmental
				General
	19.20			Litigation/Environmental
	72.40			General
	70.10			Litigation/Environmental/Corporate/Commercial
	9.60			Property/General Litigation
				General
	80.70			General
	15.60			Real Estate/Property
	10.00			General
	72.90			General
	72.90			General
	35.20			Real Estate/Property
	103.20			General
	43.60			Litigation/Environmental
LENN E DAWSON ESQ				
IINCKLEY ALLEN & SNYDER LLP	18.85			General
	29.45			General
	15.95			General
	60.50			General
	41.50			General
	13.00			Litigation/Environmental
	49.69			General
	80.05			General
	95.55			Litigation/Environmental
	55.45			Litigation/Environmental
	144.90			Litigation/Environmental
	52.00			Litigation/Environmental
	181.85			General
INCKLEY ALLEN & SNYDER LLP	1011.00			Contra
NIXON PEABODY LLP	1.20			Litigation
NAON I LABOUT LLI	1.20			General
	1.50			Litigation/Environmental
	1.70			Regulatory
	1.50			
	2.80			Litigation/Environmental Litigation/Environmental
	43.70			Litigation/Environmental/Corporate/Commercial
	2.40			Regulatory
	3.50			Litigation/Environmental
	1.60			Regulatory
	5.40			Litigation/Environmental/Corporate/Commercial
	3.90			Regulatory
	8.00			Litigation/Environmental
	8.90			Regulatory
	8.10			Regulatory
	1.70			Corporate/Commercial
	13.90			Corporate/Commercial
	10.40			Regulatory
	13.80			Regulatory
IXON PEABODY LLP				
/ILMER CUTLER PICKERING HALE & DORR LLP	0.8			Litigation/Environmental
, ,	0.8			Litigation/Environmental
	0.9			Litigation/Environmental
	1.1			Litigation/Environmental
	3.1			Litigation/Environmental
	4.8			Litigation/Environmental
	7 -			Litigation/Environmental
	7.7	_		
	35.3			Litigation/Environmental
	35.3 44			Litigation/Environmental Litigation/Environmental
	35.3 44 94.5			Litigation/Environmental Litigation/Environmental Litigation/Environmental
	35.3 44			Litigation/Environmental Litigation/Environmental



Calendar 2007	2007		Range	
	Hours	Low	High	Description of Services
ADLER POLLOCK & SHEEHAN PC	15.7			Claims
	14.3			Claims
	39.7			Claims
	55.2			Claims
	71.8			Claims
	60.2			Claims
	60.5			Claims
	70.5			Claims
	88			Claims
	154.5			Claims
	177.9			Claims
	318.3			Claims
	320.6			Claims
ADLER POLLOCK & SHEEHAN PC				
ALSTON & BIRD LLP	93.7			Corporate Commercial
	0.5			State Transmission
	0.5			Corporate Commercial
	0.5			Corporate Commercial
	0.4			State Transmission
	4.5			State Regulatory
	1			Corporate Commercial
	1			State Transmission
	1.3			Litigation/Environmental
	25.3			Federal Regulatory
	2			State Transmission
	7			State Transmission
	4.8			Litigation/Environmental
	5.7			Federal Regulatory
	5.3			General FERC
	5.2			Corporate Commercial
	9.7			Federal Regulatory
	N/A			General

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-2 (REDACTED) Page 1 of 11

Calendar 2007			Range	
	Hours	Low	High	Description of Services
ALSTON & BIRD LLP	23			State Regulatory
	N/A			General
	8.5			Federal Regulatory
	11.9			Litigation/Environmental
	17.5			Federal Regulatory
	83.7			Regulatory
	11.3			State Transmission
	99.8			Contract/Commercial
	57.6			VARIOUS
	40.6			General FERC
	21.9			Federal Regulatory
	26.7			Federal Regulatory
	38.3			General FERC
	31.4			Litigation/Environmental
	31.2			Federal Regulatory
	39.1			Federal Regulatory
	32.1			Federal Regulatory
	47.4			General FERC
	38.9			Federal Regulatory
	33.1			State Transmission
	44.2			Federal Regulatory
	67.5			Federal Regulatory
	93.7			Litigation/Environmental
	93.7			Corporate Commercial
	149.6			Federal Regulatory
	179.8			Federal Regulatory
ALSTON & BIRD LLP				
BOWDITCH AND DEWEY LLP	0.2			Real Estate
	0.2			Real Estate
	0.2			Real Estate
	0.4			Real Estate
	0.4			Real Estate

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-2 (REDACTED) Page 2 of 11

Calendar 2007	Γ	Rate	Range	
	Hours	Low	High	Description of Services
BOWDITCH AND DEWEY LLP	0.5			Real Estate
	0.6			Real Estate
	22.5			Real Estate
	0.8			Real Estate
	1			Real Estate
	1			Real Estate
	1.4			Claims
	4.6			Real Estate
	2.9			Claims
	5.4			Real Estate
	3.9			State Regulatory
	5.6			State Regulatory
	5			Claims
	7.8			Litigation/Environmental
	10.3			State Regulatory
	9.1			State Regulatory
	11.1			State Regulatory
	11.4			State Regulatory
	15.2			State Regulatory
	16.7			Real Estate
	17.5			State Regulatory
	19.2			Real Estate
	31.5			Litigation/Environmental
	67.4			Litigation/Environmental
	76.5			Litigation/Environmental
	194.1			Litigation/Environmental
	109.1			Litigation/Environmental
	133.5			Litigation/Environmental
	157			Litigation/Environmental
	107.1			Litigation/Environmental
	185.8			Real EState
	138			Litigation

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-2 (REDACTED) Page 3 of 11

Calendar 2007		Rate	Range	
	Hours	Low	High	Description of Services
	174.1		_	Litigation
BOWDITCH AND DEWEY LLP				
GLENN E DAWSON ESQ	N/A			Misc. Cust. Ops. Issues (Tel.Tolls)
	N/A			Misc. Cust. Ops. Issues (Tel.Tolls)
	N/A			Misc. Cust. Ops. Issues (Tel.Tolls)
	0.1			Arbitration
	0.1			Labor/Employment
	0.2			Labor/Employment
	0.2			Labor/Employment
	0.2			Labor/Employment
	N/A			Arbitration (Mileage Exp.)
	0.3			Labor/Employment
	0.4			Arbitration
	0.7			Corporate Commercial
	0.8			Labor/Employment
	1.3			Labor/Employment
	1.4			Labor/Employment
	1.5			Labor/Employment
	N/A			General
	1.9			Labor/Employment
	N/A			General
	2.5			Labor/Employment
	2.6			Labor/Employment
	2.6			Labor/Employment
	3.2			Labor/Employment
	4.1			Labor/Employment
	N/A			General
	4.4			Labor/Employment
	6.7			Labor/Employment
	7.4			Labor/Employment
	14.8			Labor/Employment
	14.4			Labor/Employment

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-2 (REDACTED) Page 4 of 11

Calendar 2007		Rate	Range	7
	Hours	Low	High	Description of Services
GLENN E DAWSON ESQ	19.3			Labor/Employment
	N/A			General
	25			Labor/Employment
	26.6			Arbitration
	28			Labor/Employment
	29.7			Labor/Employment
	30.5			Labor/Employment
	30.9			Arbitration
GLENN E DAWSON ESQ				
HINCKLEY ALLEN & SNYDER LLP	0.1			Claims
	0.1			Claims
	0.2			Litigation/Environmental
	0.4			Claims
	0.4			Claims
	0.5			Claims
	0.5			Claims
	0.5			Claims
	0.6			Claims
	0.6			Claims
	0.4			Litigation/Environmental
	0.6			Claims
	0.7			Litigation/Environmental
	0.7			Claims
	N/A			Litigation/Environmental
	0.8			Claims
	0.6			Litigation/Environmental
	0.8			Claims
	0.9			Claims
	<u>-</u>			

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-2 (REDACTED) Page 5 of 11

Calendar 2007			Range	
	Hours	Low	High	Description of Services
HINCKLEY ALLEN & SNYDER LLP	0.9		_	Litigation/Environmental
	1			Claims
	0.5			Claims
	0.9			Claims
	1.1			Litigation/Environmental
	0.9			Litigation/Environmental
	1.2			Claims
	0.9			Litigation/Environmental
	0.9			Litigation/Environmental
	1.3			Claims
	1.4			Claims
	1.5			Claims
	0.1			Claims
	1.6			Claims
	1.6			Claims
	1.3			Litigation/Environmental
	1.8			Claims
	2.1			Litigation/Environmental
	2.0			Claims
	7.5			Litigation/Environmental
	2.2			Claims
	2.3			Claims
	1.6			Claims
	2.2			Claims
	2.4			Claims
	2.8			Claims
	2.3			Claims
	2.3			Claims
	2.3			Claims
	3.0			Claims
	3.9			Claims
	2.2			Litigation/Environmental

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-2 (REDACTED) Page 6 of 11

Calendar 2007		Rate	Range	
	Hours	Low	High	Description of Services
INCKLEY ALLEN & SNYDER LLP	2.8			Claims
	1.6			Litigation/Environmental
	2.6			Litigation/Environmental
	3.1			Claims
	2.3			Litigation/Environmental
	4.1			Claims
	3.0			Litigation/Environmental
	3.6			Claims
	3.5			Claims
	2.8			Litigation/Environmental
	2.9			Litigation/Environmental
	3.0			Litigation/Environmental
	4.1			Claims
	4.0			Claims
	4.2			Claims
	4.2			Claims
	4.9			Litigation/Environmental
	5.0			Claims
	5.1			Claims
	6.0			Claims
	4.4			Litigation/Environmental
	6.4			Litigation/Environmental
	4.4			Litigation/Environmental
	5.0			Litigation/Environmental
	3.9			Litigation/Environmental
	6.8			Claims
	1.8			Litigation/Environmental
	7.3			Claims
	6.1			Litigation
	6.4			Litigation
	8.7			Claims
	9.3			Claims

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-2 (REDACTED) Page 7 of 11

Calendar 2007	F	Rate	Range	
	Hours	Low	High	Description of Services
IINCKLEY ALLEN & SNYDER LLP	9.4			Claims
	8.6			Claims
	9.5			Claims
	10.1			Claims
	9.6			Claims
	7.8			Litigation
	8.9			Litigation
	8.1			Litigation
	11.8			Claims
	12.6			Litigation
	14.8			Claims
	14.8			Claims
	15.6			Claims
	12.4			Litigation
	17.4			Claims
	21.3			Claims
	8.4			Claims
	19.5			Litigation
	20.5			Litigation
	18.1			Litigation
	15.6			Litigation
	28.8			Litigation
	22.7			Litigation
	29.3			Claims
	19.8			Litigation
	35.9			Litigation
	32.7			Claims
	40.5			Claims
	19.2			Claims
	30.9			Claims
	47.6			Claims
	48.4			Claims

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-2 (REDACTED) Page 8 of 11

Calendar 2007	2007		Range	]
	Hours	Low	High	Description of Services
HINCKLEY ALLEN & SNYDER LLP	54.0		_	Litigation
	53.1			Litigation
	52.3			Litigation/Environmental
	4.3			Litigation
	67.1			Claims
	80.9			Litigation
	83.0			Litigation
	102.0			Litigation
	171.9			Litigation
	161.4			Litigation
	173.7			Litigation
	174.3			Litigation
	170.8			Litigation
HINCKLEY ALLEN & SNYDER LLP				
NIXON PEABODY LLP	0.4			Litigation
	0.5			Litigation
	1.0			State
	1.3			General
	1.6			Litigation
	1.6			State
	1.5			State
	2.5			General
	4.9			State
	3.1			State
	3.3			General
	2.8			State
	3.8			General
	3.9			State
	10.0			State
	5.2			State
	5.7			General
	5.8			General

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-2 (REDACTED) Page 9 of 11

endar 2007		Rate I	Range	
	Hours	Low	High	Description of Services
NIXON PEABODY LLP	5.8		_	General
	13.3			State
	16.9			State
	9.5			Litigation
	20.1			State
	10.5			Litigation
	7.7			General
	10.7			State
	21.3			State
	9.9			General
	27.0			State
	14.6			Litigation
	16.6			State
	39.3			State
	27.2			Litigation
	29.3			Litigation
	29.5			Litigation
	44.0			State
NIXON PEABODY LLP				
PARTRIDGE SNOW & HAHN LLP	1.9			Real Estate
	4.1			Real Estate
	12.2			Real Estate
	14.6			Real Estate
	15.3			Real Estate
	16.8			Real Estate
	23.1			Real Estate
	24.3			Real Estate
	25.1			Real Estate
PARTRIDGE SNOW & HAHN LLP				
RUSSELL R JOHNSON III	1.0			Bankruptcy
	0.3			Bankruptcy
	1.0			Bankruptcy

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-2 (REDACTED) Page 10 of 11

Calendar 2007		Rate Range		
	Hours	Low	High	Description of Services
RUSSELL R JOHNSON III	7.1			Bankruptcy
	9.6			Bankruptcy
	19.2			Bankruptcy
	23.9			Bankruptcy
	51.7			Bankruptcy
	71.0			Bankruptcy
RUSSELL R JOHNSON III				
•	•			

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. COMM 2-27-2 (REDACTED) Page 11 of 11 The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Responses to Commission Fourth Set of Data Requests Issued September 10, 2009

\_\_\_\_\_

### Commission Data Request 4-1

### Request:

Please explain in detail the various pension programs offered to employees including but not limited to type of program, years of service required, employee contribution and matching contribution, if any.

#### Response:

Attached are valuation reports on the Company's non-qualified (Attachment COMM 4-1-1) and qualified (Attachment COMM 4-1-2) pension plans. The detailed description of the plans is on pages 41-44 of the qualified plan report and pages 6-10 of the non-qualified plan report. None of the pension plans provide for either employee or matching contributions.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C Docket No. 4065 Responses to Commission Fourth Set of Data Requests Attachment Comm 4-1-1 Page 1 of 5

### **Plan Provisions**

### **Executive Supplemental Retirement Plan (ESRP)**

**Effective Date** 

August 1, 1978.

**Eligibility** 

Executive officers, other participants in the Incentive Plan and other employees selected by the Compensation Committee of the Board of Directors of National Grid USA Companies.

**Benefit Commencement** 

Benefits shall commence on the date in which the participant or spouse first receives benefits under Final Average Pay Plan I.

Normal Retirement Benefit Amount As of any date, 1/12th times:

- 1.5% of Final Average Earnings (FAE) times service up to 10 years; plus
- 1.3% of FAE times service between 10 and 20 years; plus
- 1.25% of FAE times service between 20 and 30 years; plus
- 0.6% of FAE times service in excess of 30 years; plus
- 0.70% of FAE in excess of covered compensation times service up to 35 years; minus
- Benefit payable from Final Average Pay Plan I; minus
- Any benefit payable on a straight life annuity basis which was accrued, under a plan maintained by an employer other than the National Grid USA Companies, for service granted pursuant to the additional service provision.

### Early Retirement Benefit Amount

- If participant prior to January 1, 1996, unreduced benefits equal to the normal retirement benefit.
- If participation begins after December 31, 1995, reduced benefits using the FAP I early reduction factors.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C Docket No. 4065 Responses to Commission Fourth Set of Data Requests Attachment Comm 4-1-1 Page 2 of 5

#### Plan Provisions (continued)

#### Executive Supplemental Retirement Plan (continued)

## Preretirement Spouse's Benefit

Eligibility

The spouse of a participant vested under Final Average Pay Plan I who has not had a termination of employment is entitled to a preretirement spouse benefit if the participant dies before benefit payments commence.

Benefit

If death occurs on or after earliest retirement age, an annual benefit equal to 100% (50% if terminated) of the benefit the participant would have received had he retired on the day preceding his death having elected a 100% (50% if terminated) joint and survivor annuity.

If death occurs prior to earliest retirement age, an annual benefit equal to 50% of the benefit the participant would have received had he terminated his employment on the day preceding his death, survived to earliest retirement age, and elected a 50% joint and survivor annuity. The benefit is payable at the date the employee would have attained age 55.

# Vesting and Forfeiture of Benefits

A participant's benefit shall be 100% vested after 5 years of pension service. A participant will forfeit his benefit if before the earlier of age 65 or 5 years following termination of employment he, without prior consent of the Compensation Committee, enters into or in any manner takes part in any business which is in competition with National Grid USA Companies or any of its subsidiaries.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C Docket No. 4065 Responses to Commission Fourth Set of Data Requests Attachment Comm 4-1-1 Page 3 of 5

#### Plan Provisions (continued)

#### Executive Supplemental Retirement Plan (continued)

**Definitions** 

Pension Service Pension service as provided by Final Average Pay Pension

Plan I.

Pensionable Pay Total compensation received or deferred including incentive

compensation and incentive share awards.

Final Average Earnings The average of the highest 5 consecutive calendar years of

pensionable pay during the 10-year period ending on the earlier

of the participant's termination date or retirement date.

Covered Compensation The 35-year average of social security wage bases ending in the

year the participant reaches social security retirement age.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C Docket No. 4065 Responses to Commission Fourth Set of Data Requests Attachment Comm 4-1-1 Page 4 of 5

#### Plan Provisions (continued)

#### Retirement Supplement Plan (RSP)

**Effective Date** 

November 1, 1979. Latest amendment effective April 1, 1991.

Eligibility

Any of those officers of the National Grid USA Companies who participated in the plan as of February 1, 1991 or are designated as participants in the plan by the Compensation Committee of the Board of Directors of the National Grid USA

Companies.

Plan Type

The Retirement Supplement Plan provides automatic indexing of benefits from the qualified pension plan and the Executive Supplemental Retirement Plan. For retired members, each year's adjustment equals Moody's Corporate Bond rate for the prior year less 200 basis points, but never more than the percentage increase in the Consumer Price Index for the prior

year and never less than zero.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C Docket No. 4065 Responses to Commission Fourth Set of Data Requests Attachment Comm 4-1-1 Page 5 of 5

#### Plan Provisions (continued)

#### Other Nonqualified Benefit Agreements

Effective Date Effective date specified in participant's individual contract.

Eligibility Employees selected by National Grid USA Companies.

Plan Type Individual service agreements providing at age 62 a benefit

which when combined with the benefit from the

National Grid USA Companies' Final Average Pay Pension Plan I equals the benefit the participant would have received from the qualified plan had the participant earned 30 (or such other number of years contained in the agreement) years of service. Such benefit will be reduced by any vested benefit

received from a previous employer.

Vesting Such benefit will be vested after 5 years of continuing service

with National Grid USA Companies.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Responses to Commission Fourth Set of Data Requests Attachment Comm 4-1-2 Page 1 of 4

#### **Plan Provisions**

**Effective Date** 

December 30, 1943.

Eligibility

Upon date of hire.

**Normal Retirement** 

Eligibility

Later of (1) or (2):

- (1) Age 65.
- (2) 5 years of service.

Benefit

#### For nonunion employees hired prior to July 15, 2002:

- 1.50% of Final Average Compensation (FAC) times service up to 10 years; plus
- 1.30% of FAC times service between 10 and 20 years; plus
- 1.25% of FAC times service between 20 and 30 years; plus
- 0.60% of FAC times service in excess of 30 years; plus
- 0.53% of FAC in excess of Covered Compensation times service up to 35 years.

Certain minimum accrued benefits may apply.

#### For nonunion employees hired after July 14, 2002:

An account is established for each participant with pay credits and interest credits allocated to the accounts each month.

Pay Credit (as a percent of compensation)

Years of Service	<u>Percentage</u>
0 but less than 5	4.0%
5 but less than 10	5.0%
10 but less than 15	6.0%
15 but less than 20	7.0%
20 or more	8.0%

41

#### Plan Provisions (continued)

#### For union employees:

• 1.90% of FAC times service up to 30 years; plus 1.00% of FAC times service in excess of 30 years; minus

1.333% of Social Security Amount times service (maximum 46.66%).

#### For ProvEnergy Union employees:

Equal to (i) for Local 12431-01 and the greater of (ii) and (iii) for Local 12431-02

- i) 1.6% of average monthly compensation per year of service
- ii) 1.5% of average monthly compensation per year of service
- iii) 2.0% of average monthly compensation per year of service less 1<sup>2</sup>/<sub>3</sub>% of expected monthly social security benefit per year of service not in excess of 30 years, plus 1.5% of average monthly compensation per year of service in excess of 30 years

#### For Valley Resources Union employees:

1.75% of average monthly compensation per year of service up to 20 years plus 1.5% of average monthly compensation per year of service in excess of 20 years (but not more than 20 years) minus 1% of expected monthly social security benefit per year of service up to 40 years

**Early Retirement**Eligibility

Benefit

Age 55 and 5 years of service (or age 61, if union).

Age at Retirement	Tables I	Table II
55	0.65	0.42
56	0.70	0.46
57	0.75	0.50
58	0.80	0.54
59	0.85	0.60
60	0.90	0.64
61	0.96	0.96
62	1.00	1.00
63	1.00	1.00
64	1.00	1.00
65	1.00	1.00

Table I: Participants with age and service of at least 85 at termination;

Table II: Participants with age plus service less than 85 at termination.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Responses to Commission Fourth Set of Data Requests Attachment Comm 4-1-2 Page 3 of 4

#### Plan Provisions (continued)

#### **Vested Retirement**

Eligibility

100% vested after 5 years of service.

Benefit

Accrued normal retirement benefit payable at normal retirement date or, as early as age 55. The early retirement reduction factors apply.

#### Preretirement Spouse's Benefit

Eligibility

Spouses of active participants who die after becoming vested and spouses of vested terminated participants who die before benefits commence.

Benefit

If death occurs on or after earliest retirement age, an annual benefit equal to 100% (50% if terminated) of the benefit the participant would have received had he retired on the day preceding his death having elected a 100% (50% if terminated) joint and survivor annuity.

If death occurs prior to earliest retirement age, an annual benefit equal to 50% of the benefit the participant would have received had he terminated his employment on the day preceding his death, survived to earliest retirement age, and elected a 50% joint and survivor annuity. The benefit is payable at the date the employee would have attained age 55.

Normal Form of Benefit

Life annuity, if single. 50% joint and survivor annuity, if married.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Responses to Commission Fourth Set of Data Requests Attachment Comm 4-1-2 Page 4 of 4

#### Plan Provisions (continued)

#### **Definitions**

Covered Compensation 35-year average of the taxable wage bases under the

Social Security Act ending in the year that the participant

attains social security retirement age.

Social Security Amount The estimated age 65 Primary Old Age Insurance Amount

under the Act in effect on the date of termination,

assuming no future earnings after termination.

Compensation Total earnings include regular pay, Goals cash bonus,

incentive compensation, annual bonuses, and salary reduction contributions to the Thrift Plans, the Dependent Care Assistance Plan, and any Section 125 plan. Overtime pay and premium pay are excluded for union employees. For purposes of determining the Pay Credit within the

cash balance account, base pay is used.

Final Average Compensation The annual average of the 60 highest consecutive months

out of the 120 months preceding termination.

#### Commission Data Request 4-2

#### Request:

Please list all of the reconciling/adjustment mechanisms and the calculation of such proposed by National Grid in this matter.

#### Response:

The five reconciling/adjustment mechanisms proposed by National Grid and the formulas for the calculation of their respective adjustment factors are set forth in the table below:

		RIPUC Pending	Book 7
Adjustment Mechanism	Schedule	Tariff No.	Page No.
Standard Offer	NG-RLO-6	2014	3
Adjustment Provision			
Distribution Adjustment	n/a	2015	5
Provision			
Pension/OPEB	NG-RLO-5	2016	7
Adjustment Provision			
Revenue Decoupling	NG-RLO-7	2017	8
Mechanism Provision			
Inspection and	n/a	2018	11
Maintenance Cost			
Adjustment Provision			

The specific computations are as follows:

#### 1. Standard Offer Adjustment Provision

a. Standard Offer Service Supply Reconciliation:

Please see response to Commission Data Request 4-3 for Standard Offer Service Supply Reconciliation formula.

#### Commission Data Request 4-2 (cont.)

b. Standard Offer Service Administrative Cost Reconciliation - The following calculation is performed for each of two customer groups- small and large.

$$SOSAC = (WCI + RES + GIS + ED + ADM + UNC + (SOAFR \times i)) \div kWh$$

Where:

- SOSAC = the Standard Offer Service administrative cost adjustment factor for the rate year for each customer group;
- WCI = the cost of working capital related to the provision of standard offer for the current year at the pre-tax WACC approved in this proceeding;
- RES = the estimated administrative costs to be incurred during the current year for complying with the Renewable Energy Standards;
- GIS = the estimated costs to be incurred during the current year associated with NEPOOL's Generation Information System attributable to standard offer service load;
- ED = the estimated costs to be incurred during the current year for creating the environmental disclosure label;
- ADM = the estimated costs associated with procurement of standard offer service during the current year including requests for bids, contract negotiations, and execution and contract administration and the estimated costs of notifying standard offer service customers of the rates for standard offer and the associated costs of updating the Company's billing system;
- UNC = the uncollectible accounts expense associated with the amounts billed by the Company for standard offer service for the current year, computed on the same basis as in this proceeding, calculated separately for the small and large customer groups;

#### Commission Data Request 4-2 (cont.)

SOAFR = for each customer group, the over or under collection of prior period Standard Offer Service Administrative Costs, computed by comparing the <u>actual</u> amounts incurred by the Company in the prior year for each item listed above and the amount billed to and collected from customers pursuant to the Standard Offer Service Administrative Costs provision in the prior year;

i = interest at the rate of customer deposits; and

kWh = annual forecasted kWh deliveries during the recovery period for the customer group.

#### 2. Distribution Adjustment Provision:

$$DAF = (A + B + PPRA) \div kWh$$

Where:

DAF = Distribution Adjustment Factor for the current year;

A = Increase/decrease in annual costs, revenue or revenue requirement in excess of \$500,000 attributable to:

- 1) legislative or regulatory changes;
- 2) externally-imposed accounting rules; or
- 3) delivery bad debt determined as the actual delivery net write-offs during the prior calendar year exceeding \$5,020,477 (or such amount as approved in Docket No. 4065);
- B = Regulatory cost reallocations resulting from the reassignment of costs and/or revenues now allocated to generation (e.g., stranded costs), transmission, or distribution functions to or away from the distribution function by the Commission, the Federal Energy Regulatory Commission, the New England Power Pool, the Independent System Operator New England, or any other official agency having authority over such matters;
- PPRA = over or under collection of any amounts to be recovered or refunded during the prior calendar; and
- kWh = Forecasted Retail Delivery kWh for the rate year.

#### 3. Pension/OPEB Adjustment Provision:

 $POAF = ((POC - THR) + PPRA) \div kWh$ 

Where:

POCAF = Pension/OPEB Cost Adjustment Factor for the rate year;

POC = the Company's expense recorded on the Company's books of account pursuant to SFAS 87 and SFAS 106 associated with Pension and other post-retirement employee benefits ("OPEB") for the twelve months ended September 30th.

THR = annual threshold of \$14,243,640 (base amount as established in

Docket No. 4065);

PPRA = over or under collection of any amounts to be recovered during the

prior year ended September 30<sup>th</sup>

kWh = forecasted kWh during the rate year

#### 4. Revenue Decoupling Mechanism Provision

The RDR Plan Adjustment Factor will be calculated as follows:

 $RDRPAF_Y = RDRPRR_{Y+}RDRPRA_Y$ 

Where

 $RDRPAF_Y = the RDR Plan Adjustment Factor;$ 

RDRPRRy = the RDR Plan Revenue Reconciliation Adjustment (defined

below);

RDRPRA<sub>Y</sub> = the RDR Plan Revenue Adjustment (defined below); and

Y = current year

The RDR Plan Revenue Reconciliation Adjustment will be calculated as follows:

 $RDRPRRA_Y = (REV - ATR_Y) \div kWh$ 

#### Commission Data Request 4-2 (cont.)

Where:

RDRPRRA<sub>Y</sub> = the RDR Plan Revenue Reconciliation Adjustment;

REV = Actual billed revenue for each rate class during the reconciliation period;

ATR<sub>v</sub> = Annual Target Revenue for each rate class, calculated as:

 $ATR_Y = RCRR + RDRPRR_{Y-1} + NIA_Y + CumCapEx_Y$ 

Where:

RCRR = the rate class revenue requirements approved by the Commission in Docket No. 4065;

 $RDRPRR_{Y-1}$  = the RDR Plan Revenue Reconciliation from the prior year;

 $NIA_Y =$  the net inflation adjustment (defined below); and

CumCapEx<sub>Y</sub> = the cumulative net capital expenditure adjustment (defined below)

kWh = forecasted total company kilowatt-hour deliveries for the year during which the RDRPRRA will be in effect

The <u>RDR Plan Revenue Adjustment</u> shall consist of four components as defined below. The RDR Plan Revenue Adjustment will be calculated separately for each rate class as follows:

 $RDRPRA_Y = (RCRR + NIA_Y + CapEx_Y + CumCapEx_Y) \div kWh$ 

Where:

 $RDRPRA_Y = the RDR Plan Revenue Adjustment;$ 

RCRR= the rate class revenue requirements approved by the

Department in Docket No. 4065;

 $NIA_{Y} =$  the net inflation adjustment (defined below);

 $CapEx_Y =$  the net capital expenditure adjustment (defined below);

CumCapEx<sub>Y</sub> = the cumulative net capital expenditure adjustment (defined below); and

kWh = forecasted kilowatt-hour deliveries by rate class for the year during which the RDRPRA will be in effect

The Net Inflation Adjustment is calculated as follows:

$$NIA_{Y} = NOESI_{Y-1} \times (((GDP-PI_{Y} - GDP-Pi_{Y-1})/GDP-PI_{Y-1}) - PO)$$

Where:

 $NIA_Y =$  the net inflation adjustment;

 $NOESI_{Y-1} =$  the net operating expense subject to inflation as calculated in

the prior year's NIA;

 $GDP-PI_Y =$  the four quarter average gross domestic product price index for

the current year ending June; and

GDP-PI<sub>Y-1</sub> = the four quarter average gross domestic product price index for

the prior year ending June

PO = Productivity Offset which shall be equal to 0.5%

The NetCapEx adjustment is calculated as follows:

$$NetCapEx_Y = ( \{ [ (NetCapEx_{Y-1} + NetCapEx_{Y-2})/2 \times 75\% ] + CWIP1 - CWIP2 - DepEx - BkDep - DIT \}/2) * WACC + BkDep$$

Where:

Net  $CapEx_Y =$  the current year net capital expenditure adjustment;

Net CapEx<sub>Y-1</sub>=the prior year actual net capital expenditure; and

Net CapEx<sub>Y-2</sub>=actual net capital expenditure for the year that is two years prior to the current year

CWIP1 = the end of year construction work in progress balance

CWIP2 = the beginning of year construction work in progress balance

DepEx = Depreciation Expense from Docket No. 4065

BkDep = Net Depreciable Plant times composite depreciable rate from

Docket No. 4065;

DIT = [Tax Depreciation less BkDep] times effective income tax rate

WACC = Weighted Average Cost of Capital from Docket No. 4065

The total <u>NetCapEx adjustment</u> is allocated among rate classes based on a rate base allocator as determined in its distribution rate case in Docket No. 4065.

The <u>Cumulative Net Capital Expenditure Adjustment</u> is calculated as follows:

 $CumNetCapEx_Y = (ARB_Y * WACC) + BkDep$ 

Where:

 $ARB_Y =$  average Rate Base = (prior year Rate Base + current year Rate Base/2)

Rate Base = CDA - ABD - DITRes + DITRev

Where:

CDA = Plant Additions – (Rate Year 2010 Depreciation Expense from Docket No. 4065)

ABD = Accumulated Book Depreciation, computed on Net Depreciable Additions

DITRes = Deferred Income Tax Reserve, computed on Net Depreciable Additions

DITRev = Deferred Income Tax Reversal on 2008 Assets

WACC = Weighted Average Cost of Capital from Docket No. 4065

BkDep = Cumulative Net Depreciable Additions times composite rate

from Docket No. 4065

#### 5. Inspection & Maintenance Cost Adjustment Provision

 $I\&MCF = ((I\&MC - THR) + PPRA) \div kWh$ 

Where:

I&MCF = Inspection and Maintenance Cost Adjustment Factor for the rate year;

I&MC = actual inspection and maintenance costs for the prior calendar year as

approved by the Department for recovery in the current year;

THR = annual threshold of \$4,146,635 (base amount approved in Docket No.

4065);

PPRA = over or under collection of any amounts to be recovered or refunded

during the prior calendar; and

KWH = forecasted kWh for the rate year.

#### Commission Data Request 4-5

#### Request:

Does National Grid employ any Consumer Advocates (as proposed in RI) in any of its US service territories? If so, identify where, how many, job duties and salary.

#### Response:

National Grid employs thirteen (13) Consumer Advocates. Nine (9) Consumer Advocates are in various locations throughout upstate New York, 2 Consumer Advocates are located in Brooklyn and two (2) Consumer Advocates are located in Long Island.

The job duties of the Consumer Advocates in all the Company's territories are the same as those outlined in Commission Data Request 1-103:

- Respond to low-income and other customers who have demonstrated an inability to pay through agency referral, crisis management and early intervention
- Establish and maintain good working relationships with customers, human services employees and other external customers
- Serve as a liaison to address, respond and resolve escalated cases for all external customers
- Meet quarterly with community agencies to ensure our services and programs are communicated
  - Assist in the development of new programs
  - Assess customer circumstance for qualifications of existing Company programs
  - Outreach and Education Internal and External
    - o Consumer Contact including home visits when appropriate
    - o Research and develop sources of assistance funds for customers
    - o Represent the company at all appropriate community programs to educate and assist customers on available programs and services
    - Serve as member of board or participate in community organizations
    - o Liaison with Contact Centers and Collections on a monthly basis
  - Training
    - Agencies-on site training for low income agencies, counties or associations
    - o Internal training- sensitivity and program training
    - Periodic reviews of relevant Company practices to ensure compliance with policy and continued better interest of relevant customers
    - o Perform trouble shooting and/or root cause analysis of referrals

#### Commission Data Request 4-5 (cont.)

The following are the salaries for the 13 Consumer Advocates:

Consumer Advocate Location	Consumer Advocate Salary
Upstate New York	\$69,239
Upstate New York	\$68,311
Upstate New York	\$65,000
Upstate New York	\$61,800
Upstate New York	\$56,000
Upstate New York	\$68,508
Upstate New York	\$61,800
Upstate New York	\$67,443
Upstate New York	\$66,937
Downstate-Brooklyn	\$48,100
Downstate-Brooklyn	\$52,000
Long Island	\$54,500
Long Island	\$70,700

\_\_\_\_\_

#### Commission Data Request 4-6

#### Request:

With regard to the response to COMM 1-104, why is no portion of the cost associated with Consumer Advocate positions being allocated to gas operations?

#### Response:

As noted in the responses to COMM 1-104 and DIV 10-29, because essentially all of Rhode Island's gas customers are also electric customers of the Company, the Company is proposing to allocate 100 percent of the costs associated with the Consumer Advocates to electric operations and to recover those costs through electric distribution rates for ease of administration. The Company would be agreeable to an allocation of these costs to electric and gas operations and to record actual Consumer Advocacy costs based on underlying cost causation to the electric and gas lines of business as incurred. If an allocation is preferable, the Company suggests using the number of electric and gas customers as an appropriate allocation in this proceeding.

\_\_\_\_\_

#### Commission Data Request 4-7

#### Request:

With regard to the response to COMM 2-43, please provide a breakdown of the \$70,101,543 of Service Company allocated costs identified as "Other O&M Expenses".

#### Response:

In reviewing the Attachment to the response to Commission Data Request 2-43, the Company discovered that it had incorrectly calculated by the known and measurable adjustment associated with the elimination of Other Operation and Maintenance Expenses billed to New England Power Company related to the Integrated Facilities Agreement. This resulted in a shift in approximately \$1.6 million in costs from those charged to the Company by the National Grid Service Companies to those charged by the Company and Other Affiliates. Please see Attachment COMM 4-7-1 for a revised Attachment COMM 2-43.

Please see Attachment COMM 4-7-2 for detail of the revised "Other O&M Expenses" charged to the Company by the National Grid Service Companies by originating company and FERC account.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Attachment 1 to COMM 4-7 Page 1 of 1 Revision to COMM 2-43

# The Narragansett Electric Company, d/b/a National Grid Pro-Forma Income Statement Revenue Requirement For The Twelve Months Ended December 31, 2010

Line No.	Description		Adjusted Pro Forma with Rate Increase		ngansett Electric Other Affiliates	NG Service Cos.	Not Assigned 1/	Total
			(h)					
(	Operating Expenses:							
1	Purchased Power	\$	37,947	\$	37,947		\$	37,947
2	Transmission O&M - Wheeling Costs - NEP		-					-
3	Transmission O&M - Integrated Facilities Agreement		-					-
4	Energy Efficiency O&M		-					-
5	Other Operation & Maintenance Expenses		137,113,118		68,638,733	68,474,385		137,113,118
6	Uncollectible Expense		5,020,447		5,020,442	5		5,020,447
7	Commodity Cost Tracker		9,751,787		9,751,787			9,751,787
8	Donations		548,593		311,968	236,625		548,593
9	Pension and OPEB cost Recovery (R.I.P.U.C. Dkt No. 3617)		2,511,132		2,511,132			2,511,132
10	Environmental Response Fund		3,078,000		3,078,000			3,078,000
11	Merger Related Cost to Achieve		2,100,000				2,100,000	2,100,000
12	Depreciation		41,465,676		41,465,676			41,465,676
13	Municipal Tax		20,085,331		20,085,331			20,085,331
14	Payroll Tax		3,699,741		1,913,721	1,786,019		3,699,740
15	Other Taxes		274,629		255,636	18,993		274,629
16	Remove Commodity Cost Tracker		(9,751,787)		(9,751,787)			(9,751,787)
17	Gross Receipts Tax (GRT)		-					-
18	Amortization of Investment Tax Credit		-					-
19	Amortization of Loss on Reacquired Debt		686,219		686,219			686,219
20	Interest on Customer Deposits		75,229		75,229			75,229
21	Estimated NGRID/KeySpan Transaction Synergies		(6,200,000)				(6,200,000)	(6,200,000)
22	Company Share of Net Synergies		3,250,000				3,250,000	3,250,000
23	Federal & Deferred Income Tax		18,999,287		18,999,287			18,999,287
24		<u> </u>	_	<u> </u>	•			
25	Total Operating Expenses	\$	232,745,348	\$	163,079,321	\$ 70,516,027 \$	(850,000) \$	232,745,348

<sup>1/</sup> Detail by Originating Companies not defined.

The Narragansett Electric Company Pro Forma Income Statement Detail of Other Operation & Maintenance Expenses

From:	Regulatory Account	Regulatory Account Description	Total
NG USA Service Company	562000	Trans Operations-Substations	
	566000	Trans Operations-Misc Exp	
	580000	Dist Oper-Supervision & Eng	\$1,132,0
	581000	Dist Oper-Load Dispatching	\$2,019,
	582000	Dist Oper-Substations	\$629,
	583000	Dist Oper-Overhead Lines	\$2,895,
	584000	Dist Oper-Underground Lines	\$322,
	585000 586000	Dist Oper-Outdoor Lighting Dist Oper-Electric Meters	\$2,
	587000	Dist Oper-Electric Meters  Dist Oper-CustomerInstallation	\$233, \$167,
	588000	Dist Oper-Customer instantation  Dist Oper-Misc Expenses	\$3,750,
	589000	Dist Oper-Rents	\$3,730,
	589001	Rents-Building-Dist-Elim	\$49.
	589002	Rents-Equip-Dist-Elim	\$
	590000	Dist Maint-Supervision & Eng	\$
	592000	Dist Maint-Substations	\$899,
	592010	Dist Maint-Substations-Trouble	\$406,
	593000	Dist Maint-Overhead Lines	\$3,956,
	593010	Dist Maint-OH Lines-Trouble	\$1,
	593020	Dist Maint-OH Lines-Veg Mgmt	\$1,526,
	594000	Dist Maint-Underground Lines	\$2,168,
	595000	Dist Maint-Line Transformers	\$58,
	596000	Dist Maint-Outdoor Lighting	\$380,
	597000	Dist Maint-Electric Meters	\$231,
	598000	Dist Maint-Misc Distr Plant	\$
	880000	Gas Oper-Misc Expenses	61 121
	901000 902000	Cust Acct-Supervision Cust Acct-Meter Reading Exp	\$1,131, \$114,
	903000	Cust Acct-Meter Reading Exp  Cust Records & Collection	\$8,647,
	904000	Uncollectible Accounts	\$376,
	905000	Cust Acct-Misc Expenses	\$1,021,
	907000	Cust Service-Supervision	\$82,
	908000	Cust Assistance Expenses	\$497,
	909000	Info&Instruct Advertising Exp	\$111,
	910000	Cust Service-Misc Expenses	\$2,095,
	912000	Demo & Selling Expenses	
	916000	Sales-Misc Expenses	\$
	920000	A&G-Salaries	\$7,411,
	921000	A&G-Office Supplies	\$6,783,
	923000	A&G-Outside Services Employed	\$395,
	924000	Property Insurance	\$11,
	925000	Injuries & Damages Insurance	\$1,878,
1	926000	Employee Pensions & Benefits	\$9,403,
	928000	Regulatory Comm Expenses	\$511,
	930200 930210	A&G-Misc Expenses A&G-Research & Development	\$902, \$122,
	931000	A&G-Research & Development A&G-Rents	\$3,120,
	931005	Airplane Rent Expense-Elim	\$3,120,
	931005	NE Share CSS Costs-Elim	\$605,
	935000	A&G Maint-General Plant-Elec	\$201,
NGUSA Service Company Total	1,55000	PACCO Frank Central Frank-Lite	\$66,297,
KeySpan Corporate Services, LLC	588000	Dist Oper-Misc Expenses	\$132,
.yr parparate per reces, EDC	902000	Cust Acct-Meter Reading Exp	\$132,
	912000	Demo & Selling Expenses	\$
	920000	A&G-Salaries	\$1,039,
	921000	A&G-Office Supplies	\$478,
	923000	A&G-Outside Services Employed	\$226,
	925000	Injuries & Damages Insurance	\$5,
	926000	Employee Pensions & Benefits	(\$41,
	930200	A&G-Misc Expenses	\$29,
	tal		\$1,871,
KeySpan Corporate Services, LLC To		1	0.51
KeySpan Corporate Services, LLC To KeySpan Utility Services, LLC	920000	A&G-Salaries	
KeySpan Utility Services, LLC	920000 921000	A&G-Salaries A&G-Office Supplies	\$51, \$1,

\_\_\_\_\_

#### Commission Data Request 4-8

#### Request:

With regard to the responses to COMM 2-51 & DIV 8-25, on one worksheet, please provide for each of the last four years:

- a) The fees paid to outside collection agents.
- b) The amount of money collected from customers by outside collection agents.
- c) The net amount remitted to the Company by the outside collection agents.

#### Response:

Please see the Attachment COMM 4-8 for the requested information along with the footnotes beneath the tables included therein.

#### COLLECTION AGENCY FEE HISTORY NARRAGANSETT ELECTRIC (1)

Sum of Pos	tod Irni \$			MON	TH												
Business	The string			IVIOIY													
Unit	Bus Unit Descr	CAL YEAR	Project Descr		Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Grand Total
49	Narragansett Electric Company	2005	Agency Support (Primary)				\$	4,956 \$	4,161 \$	3,022 \$	520 \$	- \$	11,522 \$	23,045	\$	7,625	\$ 54,851
			Agency Support (Secondary)					\$	37,978 \$	45,929 \$	12,670 \$	27,097 \$	11,767 \$	37,298 \$	21,372 \$	22,938	\$ 217,048
			Agency Support (Tertiary)				\$	13,184	\$	13,163 \$	154 \$	- \$	14,278 \$	47,783 \$	11,242 \$	12,229	\$ 112,034
		2005 Total					\$	18,140 \$	42,139 \$	62,114 \$	13,344 \$	27,097 \$	37,567 \$	108,126 \$	32,614 \$	42,792	\$ 383,933
		2006	Agency Support (Primary)	\$	8,598 \$	7,131 \$	11,240 \$	8,507 \$	11,093 \$	8,146 \$	10,829 \$	13,709 \$	10,434 \$	13,299 \$	9,486 \$	12,953	125,425
			Agency Support (Secondary)	\$	18,475 \$	16,215 \$	16,687 \$	15,504 \$	21,639 \$	13,257 \$	14,965 \$	17,079 \$	13,222 \$	14,661 \$	11,791 \$	13,138	\$ 186,634
			Agency Support (Tertiary)	\$	15,541 \$	18,933 \$	13,794 \$	20,107 \$	15,786 \$	11,760 \$	9,848 \$	14,918	\$	12,681 \$	11,059 \$	10,252	154,678
		2006 Total		\$	42,614 \$	42,279 \$	41,721 \$	44,118 \$	48,519 \$	33,163 \$	35,643 \$	45,706 \$	23,656 \$	40,640 \$	32,337 \$	36,342	\$ 466,737
		2007	Agency Support (Primary)	\$	10,242 \$	10,546 \$	8,770 \$	9,351 \$	11,623 \$	8,779 \$	10,945 \$	9,899 \$	15,363 \$	24,295 \$	9,576 \$	10,638	\$ 140,026
			Agency Support (Secondary)	\$	16,040 \$	24,085 \$	18,834 \$	14,739 \$	18,163 \$	13,675 \$	14,484 \$	12,402 \$	12,873 \$	13,543 \$	19,039 \$	11,942	189,818
			Agency Support (Tertiary)	\$	22,573 \$	18,583 \$	16,628 \$	13,734 \$	17,823 \$	14,272 \$	13,991 \$	11,119 \$	10,025 \$	10,855 \$	8,743 \$	7,780	\$ 166,126
		2007 Total		\$	48,855 \$	53,215 \$	44,233 \$	37,823 \$	47,609 \$	36,726 \$	39,419 \$	33,420 \$	38,260 \$	48,693 \$	37,358 \$	30,359	\$ 495,970
		2008	Agency Support (Primary)	\$	9,096 \$	4,119 \$	7,340 \$	7,484 \$	6,147 \$	4,262 \$	7,695 \$	8,232 \$	11,759 \$	6,448 \$	8,421 \$	7,660	\$ 88,661
			Agency Support (Secondary)	\$	17,073 \$	10,695 \$	13,090 \$	12,125 \$	9,278 \$	13,818 \$	10,753 \$	7,608 \$	9,107 \$	7,677 \$	6,675 \$	8,030	125,930
			Agency Support (Tertiary)	\$	10,829 \$	16,478 \$	16,185 \$	16,823 \$	11,623 \$	9,266 \$	11,947 \$	8,702 \$	27,462 \$	18,475 \$	11,232 \$	11,630	\$ 170,651
		2008 Total		\$	36,998 \$	31,292 \$	36,615 \$	36,432 \$	27,048 \$	27,346 \$	30,395 \$	24,542 \$	48,328 \$	32,599 \$	26,328 \$	27,320	\$ 385,242
		2009	Agency Support (Primary)	\$	5,493 \$	6,880 \$	11,599 \$	5,742 \$	4,888 \$	6,510							\$ 41,111
			Agency Support (Secondary)	\$	5,057 \$	8,216 \$	16,414 \$	9,158 \$	10,362 \$	11,644							\$ 60,851
			Agency Support (Tertiary)	\$	9,302 \$	16,960 \$	19,008 \$	13,020 \$	11,743 \$	12,165							\$ 82,198
		2009 Total	•	\$	19,852 \$	32,056 \$	47,021 \$	27,919 \$	26,993 \$	30,318							\$ 184,160
	Narragansett Electric Company	Total		\$	148,320 \$	158,841 \$	169,591 \$	164,433 \$	192,308 \$	189,667 \$	118,801 \$	130,764 \$	147,811 \$	230,058 \$	128,636 \$	136,813	\$ 1,916,043
00049 Total	ľ			\$	148,320 \$	158,841 \$	169,591 \$	164,433 \$	192,308 \$	189,667 \$	118,801 \$	130,764 \$	147,811 \$	230,058 \$	128,636 \$	136,813	\$ 1,916,043
Grand Total	l .			\$	148,320 \$	158,841 \$	169,591 \$	164,433 \$	192,308 \$	189,667 \$	118,801 \$	130,764 \$	147,811 \$	230,058 \$	128,636 \$	136,813	1,916,043

	COLLECTED FROM COSTOMERS BY OUTSIDE AGENCIES NARRAGANSETT ELECTRIC (2)																	
Sum of Post	ted Jrnl \$			MON	NTH													
Business																		
Unit	Bus Unit Descr	CAL YEAR	Project Descr		Jan	Feb		Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Grand Total
49	Narragansett Electric Company	2005	Agency Support (Primary)								\$	49,813 \$	60,190 \$	85,776 \$	53,735 \$	53,499 \$	40,644	\$ 343,657
			Agency Support (Secondary)					\$	21,694 \$	13,752 \$	1,953 \$	44,822 \$	28,311 \$	24,816 \$	27,964 \$	35,760 \$	43,313	\$ 242,384
			Agency Support (Tertiary)								\$	19,358 \$	43,514 \$	20,452 \$	22,283 \$	22,852 \$	22,052	\$ 150,511
		2005 Total		\$	-	\$ -	\$	- \$	21,694 \$	13,752 \$	1,953 \$	113,993 \$	132,015 \$	131,044 \$	103,982 \$	112,111 \$	106,009	\$ 736,552
		2006	Agency Support (Primary)	\$	62,065	\$ 49,248	\$	101,243 \$	31,816 \$	61,734 \$	70,955 \$	65,164 \$	85,016 \$	118,309 \$	113,655 \$	117,444 \$	127,203	\$ 1,003,852
			Agency Support (Secondary)	\$	67,002	\$ 85,329	\$	99,383 \$	74,950 \$	77,664 \$	85,797 \$	72,113 \$	74,935 \$	81,931 \$	80,871 \$	82,139 \$	74,890	\$ 957,004
			Agency Support (Tertiary)	\$	28,632	\$ 40,384	\$	51,426 \$	20,703 \$	27,260 \$	31,136 \$	20,032 \$	23,089 \$	19,180 \$	28,417 \$	24,889 \$	55,239	\$ 370,387
		2006 Total		\$	157,699	\$ 174,961	\$	252,052 \$	127,469 \$	166,658 \$	187,888 \$	157,309 \$	183,040 \$	219,420 \$	222,943 \$	224,472 \$	257,332	\$ 2,331,243
		2007	Agency Support (Primary)	\$	104,662	\$ 90,538	\$	81,451 \$	60,638 \$	61,765 \$	48,715 \$	68,222 \$	121,080 \$	142,117 \$	147,640 \$	94,534 \$	86,172	\$ 1,107,534
			Agency Support (Secondary)	\$	97,585	\$ 110,125	\$	118,366 \$	88,139 \$	117,529 \$	87,885 \$	78,172 \$	76,132 \$	69,870 \$	116,999 \$	83,253 \$	74,077	\$ 1,118,132
			Agency Support (Tertiary)	\$	32,148	\$ 42,261	\$	43,122 \$	36,152 \$	48,002 \$	30,574 \$	26,315 \$	28,883 \$	29,215 \$	29,071 \$	34,495 \$	22,795	\$ 403,033
		2007 Total		\$	234,395	\$ 242,924	\$	242,939 \$	184,929 \$	227,296 \$	167,174 \$	172,709 \$	226,095 \$	241,202 \$	293,710 \$	212,282 \$	183,044	\$ 2,628,699
		2008	Agency Support (Primary)	\$	68,156	\$ 40,874	\$	68,600 \$	71,570 \$	64,577 \$	64,706 \$	85,181 \$	105,708 \$	88,386 \$	126,954 \$	101,311 \$	92,912	\$ 978,935
			Agency Support (Secondary)	\$	88,182	\$ 74,162	\$	64,191 \$	59,370 \$	56,878 \$	86,327 \$	51,916 \$	43,830 \$	43,154 \$	45,720 \$	31,280 \$	44,717	\$ 689,727
			Agency Support (Tertiary)	\$	43,947	\$ 54,745	\$	53,944 \$	47,876 \$	41,145 \$	36,945 \$	41,718 \$	33,044 \$	30,314 \$	39,283 \$	28,727 \$	28,153	\$ 479,841
		2008 Total		\$	200,285	\$ 169,781	\$	186,735 \$	178,816 \$	162,600 \$	187,978 \$	178,815 \$	182,582 \$	161,854 \$	211,957 \$	161,318 \$	165,782	\$ 2,148,503
		2009	Agency Support (Primary)	\$	79,179	\$ 102,754	\$	80,817 \$	64,151 \$	53,988 \$	66,590		•	•	•			\$ 447,479
			Agency Support (Secondary)	\$	41,165	\$ 47,072	\$	81,644 \$	51,278 \$	55,999 \$	57,982							\$ 335,140
			Agency Support (Tertiary)	\$	29,555	\$ 54,898	\$	50,417 \$	45,918 \$	34,508 \$	27,491						Ī	\$ 242,787
		2009 Total		\$	149,899	\$ 204,724	\$	212,878 \$	161,347 \$	144,495 \$	152,063 \$	- \$	- \$	- \$	- \$	- \$	-	\$ 1,025,406
	Narragansett Electric Company	Total		\$	742,278	\$ 792,389	\$	894,604 \$	674,254 \$	714,801 \$	697,055 \$	622,826 \$	723,731 \$	753,521 \$	832,593 \$	710,183 \$	712,168	\$ 8,870,404
00049 Total	•			\$	742,278	\$ 792,389	\$	894,604 \$	674,254 \$	714,801 \$	697,055 \$	622,826 \$	723,731 \$	753,521 \$	832,593 \$	710,183 \$	712,168	\$ 8,870,404
<b>Grand Total</b>				\$	742,278	\$ 792,389	\$	894,604 \$	674,254 \$	714,801 \$	697,055 \$	622,826 \$	723,731 \$	753,521 \$	832,593 \$	710,183 \$	712,168	\$ 8,870,404

1	NET REMITTED TO COMPANY FROM OUTSIDE AGENCIES NARRAGANSETT ELECTRIC :	(3)	
	MONTH		

Sum of Pos	sted Jrnl \$			MON	ITH													
Business																		
Unit	Bus Unit Descr	CAL YEAR	Project Descr		Jan	Feb	Mar	Apr	May	Ju	un	Jul	Aug	Sep	Oct	Nov	Dec	Grand Total
49	9 Narragansett Electric Company	2005	Agency Support (Primary)								\$	47,759 \$	54,140 \$	77,319 \$	48,720 \$	42,670 \$	35,703	\$ 306,311
			Agency Support (Secondary)				\$	7,956	4,817	\$	630 \$	1,086 \$	14,013 \$	15,405 \$	14,605 \$	18,906 \$	21,587	
			Agency Support (Tertiary)								\$	14,731 \$	31,856 \$	14,935 \$	16,267 \$	16,686 \$	16,017	\$ 110,492
		2005 Total		\$			\$ - \$	7,956			630 \$	63,576 \$	100,009 \$	107,659 \$	79,592 \$	78,262 \$	73,307	
		2006	Agency Support (Primary)	\$	55,889		82,969 \$	27,095			63,791 \$	58,766 \$	70,369 \$	65,957 \$	78,900 \$	65,914 \$	70,758	\$ 730,841
			Agency Support (Secondary)	\$	34,113		57,765 \$	43,408	40,074		46,439 \$	36,980 \$	39,243 \$	45,433 \$	41,301 \$	35,921 \$	33,180	
			Agency Support (Tertiary)	\$	20,909		37,550 \$	15,108 \$			22,729 \$	14,404 \$	16,456 \$	13,415 \$	20,183 \$	16,763 \$	39,135	
		2006 Total	<u> </u>	\$	110,911		178,284 \$	85,611			132,959 \$	110,150 \$	126,068 \$	124,805 \$	140,384 \$	118,598 \$	143,073	
		2007	Agency Support (Primary)	\$	58,507		57,755 \$	48,524			43,184 \$	58,076 \$	75,133 \$	111,680 \$	134,588 \$	86,158 \$	77,970	
			Agency Support (Secondary)	\$	38,354		57,939 \$	47,205			41,739 \$	38,186 \$	39,998 \$	33,233 \$	36,512 \$	68,118 \$	37,545	
			Agency Support (Tertiary)	\$	21,979		26,878 \$	22,316 \$			18,711 \$	16,840 \$	16,748 \$	14,812 \$	21,405 \$	25,525 \$	16,852	
		2007 Total		\$	118,840		142,572 \$	118,045			103,634 \$	113,102 \$	131,879 \$	159,725 \$	192,505 \$	179,801 \$	132,367	
		2008	Agency Support (Primary)	\$	61,828		62,431 \$	64,848	58,413		59,690 \$	77,734 \$	96,177 \$	80,433 \$	118,783 \$	92,994 \$	85,622	\$ 896,034
			Agency Support (Secondary)	\$	45,301		40,180 \$	36,497	32,278		25,085 \$	28,025 \$	26,149 \$	20,742 \$	24,486 \$	17,323 \$	28,206	\$ 365,561
			Agency Support (Tertiary)	\$	32,341	\$ 40,383	39,881 \$	35,378			27,219 \$	30,828 \$	24,388 \$	22,344 \$	29,009 \$	21,168 \$	20,750	
		2008 Total		\$	139,470		142,492 \$	136,723			111,994 \$	136,587 \$	146,714 \$	123,519 \$	172,278 \$	131,485 \$	134,578	
		2009	Agency Support (Primary)	\$	72,043		73,236 \$	58,020 \$	48,863		60,861							\$ 406,136
			Agency Support (Secondary)	\$	26,309		47,826 \$	34,410 \$			34,703							\$ 201,656
			Agency Support (Tertiary)	\$	21,824		37,207 \$	33,914 \$			20,396							\$ 179,502
		2009 Total		\$	120,176		158,269 \$	126,344			115,960 \$	- \$	- \$	- \$	- \$	- \$	-	\$ 787,294
	Narragansett Electric Company	Total		\$	489,396		621,617 \$	474,679			465,177 \$	423,416 \$	504,671 \$	515,708 \$	584,759 \$	508,146 \$	483,325	
00049 Total				\$	489,396	\$ 531,656	621,617 \$	474,679	492,668		465,177 \$	423,416 \$	504,671 \$	515,708 \$	584,759 \$	508,146 \$	483,325	
Grand Total				\$	489,396	\$ 531,656	\$ 621,617 \$	474,679	492,668	\$ 4	465,177 \$	423,416 \$	504,671 \$	515,708 \$	584,759 \$	508,146 \$	483,325	\$ 6,095,219

- (1) Table 1 is a copy of the response to COMM 2-51. This is a query of the General Ledger filtered for charges to specific work orders and projects. This data is based on a revenue month-end and not a calendar month-end.

  (2) Table 2 is data from production reports of the various collection agencies. This includes some proceeds sent directly to National Grid from the customer for which a collection commission was generated. This data is based on a calendar month-end.

  (3) Table 3 is the net amount remitted to National Grid from the collection agencies. This comes from production reports of the various collection agencies and is based on a calendar month-end. This is net of all commissions, misc collection costs, and any proceeds directly sent to National Grid from the customer (see footnote 2).

  (4) Because of timing differences related to the month-end, direct journal entries charged to the specific projects not from a batch journal, and the inclusion of the direct customer payments in Table 2, it is not possible to mathematically reconcile back to the first table from the data in Tables 2 & 3.

#### Commission Data Request 5-1

#### Request:

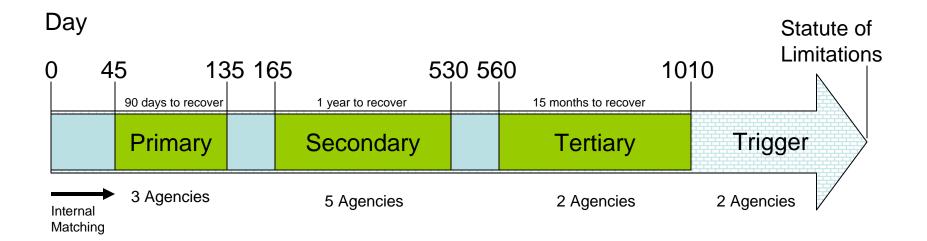
With regard to the response to COMM 2-52, please explain what is meant by the term "collection tier"?

#### Response:

The "collection tier" is simply the level within the collection treatment path that accounts reach, referring to the primary, secondary, tertiary and trigger stages of collection. This was noted in the collection timeline laid out in the Company's response to DIV 8-6 and more easily illustrated by the chart in the supplemental attachment to DIV 8-23. Attachment DIV 8-23 is re-submitted here for ease of reference.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Att. DIV 8-23 Page 1 of 1

### Legacy National Grid Collection Agency Timeline



#### Commission Data Request 5-2

#### Request:

Over the past 3 years, has the company received any complaints relating to the conduct / activities of its outside collection agents? If so, how many, when did they occur, what actions did the company take as a result of the complaints, how were the complaints resolved?

#### Response:

The Company has no record of receiving complaints from Narragansett Electric customers during the past three years relative to the conduct or activities of its outside collection agencies.

#### Commission Data Request 5-3

#### Request:

Has the company terminated its relationship with any outside collection agent as the result of customer complaints, violations of the fair debt collections practices act, etc.? If yes, please explain.

#### Response:

No, the Company has not terminated its relationship with any outside collection agent for those reasons.

#### Commission Data Request 5-4

#### Request:

Please itemize the \$1,926,502 of outside collection activities presented in the response to COMM 2-55.

#### Response:

Please see Attachment COMM 5-4 for the requested information.

# The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Attachment to Commission's Fifth Set of Data Requests 5-4 Page 1 of 1

Line #	Activity	Activity Description	Expense Type	Expense Type Description	Total
1	AG0990	Credit & Collections	100	Consultants	\$45,871.88
2			110	Contractors Services	\$1,489,694.92
3		Credit & Collections Total			\$1,535,566.80
4	AG0990 T	`otal			\$1,535,566.80
5	Grand Tot	al			\$1,535,566.80
6					
7				Inflation Calculation for 2009	0.705%
8					
9				Inflation Adjustment for 2009	10,825.75
10					
11				Total for 2009	1,546,392.55
12					
13				Inflation Calculation for 2010	0.251%
14					
15				Inflation Adjustment for 2010	3,854.27
16					
17				Total for 2010	1,550,246.82
18					
19			Incremental (	COS amounts per NG-RLO-2, Page 21	376,255
20					
21				Rate Year Outside Collection Exp	1,926,501.82

#### Commission Data Request 5-7

#### Request:

Response to DIV 10-13, Attachment DIV 10-13-2, Page 12 of 30. Please explain what is meant by "Contradictory Staff Positions" in relation to Rhode Island's Regulatory Framework?

#### Response:

The phrase is in reference to the roles and goals of the Division and the Commission, particularly in the areas of terminations of special needs customers, residential deposits, and deferred payment agreements.

These roles and goals, which at times appear to be in conflict, provide a necessary and meaningful balance of varying priorities and aid the Company in formulating its collection strategies. Furthermore, as noted in its direct testimony, the Company recognizes ". . . there is an inherent conflict between the ratemaking policies that require the Company to work to mitigate the level of uncollectible accounts and public policies imposing restrictions on the billing and collection process to protect the health and safety of customers. The Company is extremely sensitive to the fact that electric service is a public necessity and that public-interest considerations must be taken into account in relation to service initiation, shut-off, and restoration requirements. The health and safety of customers is of paramount importance to the Company, and the Company is committed to cooperating with the Commission in addressing these issues." See, Direct Testimony of Rudolph L. Wynter, Jr., page 5 of 23, lines 12-19.

#### Commission Data Request 6-1

#### Request:

Please provide actual calculations for each of the reconciling mechanisms proposed.

#### Response:

National Grid is proposing the following five reconciling mechanisms:

- 1. Standard Offer Adjustment Provision
- 2. Distribution Adjustment Provision
- 3. Pension/OPEB Adjustment Provision
- 4. Revenue Decoupling Mechanism Provision
- 5. Inspection and Maintenance Cost Adjustment Provision

Please refer to the response to Commission Data Request 4-2 for the detailed calculations underlying the reconciling mechanisms. In addition, please refer to the response to Division Data Request 6-19(f) for illustrative calculations of the Pension/OPEB Adjustment Provision, the Revenue Decoupling Mechanism Provision, and the Inspection and Maintenance Cost Adjustment Provision.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Responses to Division Twenty-Fourth Set of Data Requests Issued August 25, 2009

#### **Division Data Request 24-1**

#### Request:

#### DIV 5-A Historical Charge Off Data

- 1. For 2007-2009 YTD data submitted, please provide the following additional information on non-residential accounts:
  - a. Was there an active security deposit on the account at the time of final bill?
    - i. If yes, what was the amount of the deposit held?
    - ii. Was the deposit applied to the final bill balance prior to write off?

#### Response:

1(a)(i). Please see the updated spreadsheet presented as Attachment DIV-24-1 for 2008-2009 YTD in column 'V'. There were only 406 accounts that had a deposit applied to the balance prior to write off in 2008 and 2009. Prior to the Customer Service System (CSS) conversion, CIS did not have a field that identified the deposits together with a date field.

1(a)(ii). Yes, in CSS the deposit is always applied to the final bill balance prior to write-off.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Responses to Division Twenty-Fourth Set of Data Requests Issued August 25, 2009

#### **Division Data Request 24-2**

#### Request:

#### DIV 5-A Historical Charge Off Data

- 2. For 2007-2009 YTD data, please provide the following data on both residential and non-residential accounts:
  - a. Was there an active payment plan on the account at the time the account became inactive?
  - b. If yes, what was the total remaining balance due of the plan for each account at the time the account became inactive?
    - i. For the accounts with payment plans, what was the level of the step plan for each account at the time the account became inactive (i.e., N01, N03, N04, P01, P1B ...)?

#### Response:

- 2(a). Please see Attachment DIV 24-1 in columns W and X.
- 2(b). Please see Attachment DIV 24-1 in column W.
- 2(b)(i). Please see Attachment DIV 24-1 in column X.

It was not possible to determine payment plan status prior to the Customer Service System conversion.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Responses to Division Twenty-Fourth Set of Data Requests Issued August 25, 2009

#### **Division Data Request 24-7**

#### Request:

#### DIV 8-16 Deposits

- 1. For 2007-2009 YTD, please provide a monthly summary of security deposits held on non-residential accounts, including:
  - a. The total number of accounts with security deposits
  - b. The total dollar balance of security deposits held

#### Response:

Please refer to Attachment DIV 24-7 for a monthly summary of security deposits held on non-residential accounts.

# Deposits for Narragansett Electric (1) (Non-Residential)

		Accounts	System	
		with	Accounts with	\$ Amount of
Month (2)		Deposit (3)	Deposit (4)	Deposit (5)
Jul-2009		3,880	6,344	\$ 2,667,213.70
Jun-2009		3,864	6,323	\$ 2,668,566.22
May-2009		3,871	6,260	\$ 2,673,068.33
Apr-2009		3,873	6,251	\$ 2,710,897.18
Mar-2009		3,860	6,214	\$ 2,748,449.66
Feb-2009	(3a)	3,811	6,183	\$ 2,713,442.21
Jan-2009	(3a)	3,796	6,158	\$ 2,727,680.36
Dec-2008	(3a)	3,799	6,164	\$ 2,705,555.56
Nov-2008	(3a)	3,815	6,189	\$ 2,753,345.31
Oct-2008	(3a)	3,800	6,165	\$ 2,792,176.72
Sep-2008	(3a)	3,759	6,099	\$ 2,792,009.49
Aug-2008	(3a)	3,737	6,063	\$ 2,794,758.17
Jul-2008	(3a)	3,716	6,029	\$ 2,808,607.86
Jun-2008	(3a)	3,678	5,967	\$ 2,809,274.98
May-2008	(3a)	3,656	5,931	\$ 2,827,013.55
Apr-2008	(3a)	3,629	5,887	\$ 2,822,392.36
Mar-2008	(3a)	3,571	5,793	\$ 2,755,001.45
Feb-2008	(3a)	3,438	5,578	\$ 2,651,742.54
Jan-2008	(3a)	3,257	5,284	\$ 2,666,142.00

- (1) Cash deposits only
- (2) Data is as of month-end
- (3) The Company has specifically been tracking detailed deposit information beginning Mar 2009. These are the non-res accounts with an existing deposit balance @ mo-end.
- (3a) Estimated Jan'08 thru Feb'09 accounts using the avg % of Mar'09 thru Jul'09 accounts vs. the System accounts.
- (4) System generated accounts include those that received a complete refund or may have had the deposit applied against AR balances by mo-end.
- (5) System generated non-res deposit balances @ mo-end
- (6) For the months prior to January 2008 (before CSS conversion), the deposit data is not readily available.

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Responses to Division Twenty-Fifth Set of Data Requests Issued August 26, 2009

#### **Division Data Request 25-1**

#### Request:

#### **DIV 8-17 Payment Arrangements**

- 1. Please provide additional detail on deferred payment agreements in the following format:
  - a. See attached Excel spreadsheet, "Div 8-17 Follow Up DPAs 082509."

#### Response:

Please see Attachment DIV 25-1.

#### Deferred Payment Agreements (1)

2009 YTD R	esidential Standard									
	(2)	(3)	(3)	(4)	(4)	(5)	(5)	(6)	(6)	
	# of Active	# of	\$ Amt.	Total # of	\$ Amt. Of					
	Agmts. on Hand	New Actv.	of New	Active Agrmts.	Active Agrmts.	Paid in	Paid in	Default	Default	Default
	at Beg. of Month	Agrmnts.	<b>Agreements</b>	on Hand (YTD)	on Hand (YTD)	Full #	Full Amount	Number	<u>Amount</u>	<u>Rate</u>
January	6,148	2,143	1,689,027.15	1,983	1,554,187.63	399	167,786.85	1,620	1,441,061.48	26.4%
February	5,636	1,929	1,659,723.90	3,334	2,641,632.34	300	143,946.18	1,442	1,368,247.37	25.6%
March	5,324	2,216	2,216,291.92	4,230	3,541,037.09	273	140,957.38	1,671	1,798,840.71	31.4%
April	5,061	2,335	2,358,997.89	4,953	4,322,129.42	221	104,506.81	1,737	1,931,951.33	34.3%
May	5,045	3,240	3,050,576.53	6,421	5,652,243.04	243	107,712.69	2,151	2,222,643.79	42.6%
June	5,248	2,609	2,408,875.56	6,650	5,680,295.90	147	66,691.73	1,408	1,464,848.85	26.8%
July	4,388	2,440	2,153,944.50	6,637	5,666,697.34	81	27,227.57	669	717,129.47	15.2%
August	2,554	2,209	1,829,984.40	6,503	5,411,639.10	16	26,783.24	240	225,447.30	9.4%
September	-	-	-	-	-	-	-	-	-	#DIV/0!
October	-	-	-	-	-	-	-	-	-	#DIV/0!
November	-	-	-	-	-	-	-	-	-	#DIV/0!
December	=	-	-	=	=	-	-	-	=	#DIV/0!

2009 YTD R	esidential Protected									
	# of Active	# of	\$ Amt.	Total # of	\$ Amt. Of					
	Agmts. on Hand	New Actv.	of New	Active Agrmts.	Active Agrmts.	Paid in	Paid in	Default	Default	Default
	at Beg. of Month	Agrmnts.	<u>Agreements</u>	on Hand (YTD)	on Hand (YTD)	Full #	Full Amount	Number	<u>Amount</u>	<u>Rate</u>
January	9,946	3,438	2,251,806.41	3,219	2,084,699.36	1,227	585,150.26	2,127	1,603,635.98	21.4%
February	9,547	3,055	2,294,374.69	5,511	3,764,814.92	985	512,199.32	1,898	1,655,203.82	19.9%
March	9,099	3,819	2,885,277.93	7,373	5,142,098.11	1,067	568,602.39	2,378	2,034,597.74	26.1%
April	8,778	3,230	2,575,109.10	8,229	5,894,303.72	730	395,508.33	2,102	1,868,610.87	23.9%
May	8,402	2,874	2,021,350.91	8,503	5,994,954.72	530	273,275.97	1,734	1,351,202.37	20.6%
June	7,277	3,051	1,975,771.52	8,065	5,330,942.25	348	171,865.66	1,515	1,073,064.66	20.8%
July	5,684	2,776	1,715,427.88	7,664	4,904,250.23	126	60,304.19	696	543,748.55	12.2%
August	3,266	2,605	1,471,696.49	7,091	4,282,003.49	35	14,261.24	259	197,580.09	7.9%
September	=	-	=	=	-	-	=	-	=	#DIV/0!
October	-	-	-	-	-	-	-	-	-	#DIV/0!
November	-	-	-	-	-	-	-	-	-	#DIV/0!
December	-	-	=	-	=	-	-	-	=	#DIV/0!

2009 YTD N	on-Residential									
	# of Active Agmts. on Hand	# of New Actv.	\$ Amt. of New	Total # of Active Agrmts.	\$ Amt. Of Active Agrmts.	Paid in	Paid in	Default	Default	Default
	at Beg. of Month	Agrmnts.	Agreements	on Hand (YTD)	on Hand (YTD)	Full #	Full Amount	Number	<u>Amount</u>	<u>Rate</u>
January	135	105	530,276.83	97	466,493.87	31	162,882.54	72	292,516.17	53.3%
February	186	128	1,390,389.31	197	1,634,057.01	36	94,309.82	89	1,278,762.88	47.8%
March	253	165	1,360,419.02	283	2,213,051.17	39	616,078.50	118	667,248.17	46.6%
April	310	164	764,339.82	338	2,600,802.07	37	68,717.79	102	579,135.38	32.9%
May	342	130	682,964.86	354	2,581,234.62	23	63,739.13	86	341,266.35	25.1%
June	325	140	629,455.08	339	2,434,578.03	15	16,172.27	82	356,780.48	25.2%
July	280	141	529,718.26	334	2,337,007.12	8	14,161.82	65	240,953.68	23.2%
August	208	119	489,008.78	277	1,552,251.39	-	-	12	31,595.59	5.8%
September	-	-	-	-	-	-	-	-	-	#DIV/0!
October	-	-	-	-	-	-	-	-	-	#DIV/0!
November	=	-	=	-	-	-	=	-	=	#DIV/0!
December	=	-	=	-	-	-	=	-	=	#DIV/0!

- (1) Table represents any payment agreement (including active and final)
  (2) "# of Active Agmnts. On Hand at Beg. Of Month": # of payment agreements (including active & final) established prior to the beginning of the month
- (3) "# of New Activ Agrimits": Any payment agreements established during that month.
  (4) "Total # of Active Agrimits on Hand (YTD)" and "\$ Amt Of Active Agrims. on Hand (YTD)": Any agreements (including active or final) created since Jan 1, 2009 and still active in each month.
  (5) "Paid in Full #" and "Paid in Full Amount": Agreements established in each month that are fully paid any time up to the data pull thru Aug 31, '09.
  (6) "Default Number" & "Default Amount": Total # of agreements defaulting during each month and the total balance for those defaulted agreements

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Responses to Division Twenty-Sixth Set of Data Requests Issued August 27, 2009

\_\_\_\_\_

#### **Division Data Request 26-1**

#### Request:

Please indicate why certain data provided in Div 8-20 is missing or does not match the monthly termination data contained the Electric Termination Report (Docket 1725). Div 8-20 in Excel format is attached for reference. The Excel spreadsheet illustrates the data variation between the two reports (i.e., see red font).

#### Response:

The response to DIV 8-20 was prepared using the information set forth in the Company's response to COMM 1-108. The data set forth in COMM 1-108 differs to some extent from the data provided in the Electric Termination Report (Docket 1725) because the answer to COMM 1-108 was derived from several internal reports rather than simply taking the information provided the Electric Termination Report (Docket 1725). This was necessary because the response to DIV 8-20 required dollar amounts as well as customer counts, while only customer counts are reported in the Electric Termination Report. As a result, the Company had to access different data sources to compile the information provided in DIV 8-20. Please see Attachment DIV 26-1 for additional information.

9/30/2009

The Narragansett Electric Company
drib Nabonal Grid
R.I.P. U.C. Docket No. 4065
Attachment to the Division's 28th Set of date a exponses 22-1
Response to Division 8-20
Issued July 2, 2009
page 1 of 1

Narragansett Electric Company	)ata request for Monticello Con	Data request for Monticello Consulting–Narragansett Electric Co. RIPUC Docket 4065	o. RIPUC Docket 4065										page 1 of 1
ZOUZONFSILIL OII 101 NOII-PAYHEIR ACIVITY	Jan-07 Number Dollars	Number Dollars	Mar-07 Number Dollars	Apr-07 Number Dollars	May-07 Dollars	Number Dollars	Number Dollars	Aug-07 Number Dollars	Sep-07 Number Dollars	Oct-07 Number Dollars	Number Dollars N	Dec-07 Number Dollars Nur	YTD Dollars
Residential SONP Field Orders:  Non-Protected Customers	69	69	69				na				. \$	. \$	
Protected Customers Total Res. SONP Field Orders	 	· · · · · · · · · · · · · · · · · · ·		na na 1,929 \$ 1,057,431	na na 3,642 \$ 4,126,525	na 4,411 \$ 4,	na na na 5,416 \$ 4,439,947	na na 5,684 \$ 3,988,237	na na 5,295 \$ 3,230,825	na na 6,722 \$ 4,482,324	na   \$	· · · · · · · · · · · · · · · · · · ·	3,103 \$ 25
Non-Residential SONP Field Orders:	639 \$ 1,227,052	657 \$ 1,172,531	743 \$ 1,332,526	963 \$ 1,264,051	595 \$ 824,124	1,104 \$ 1,879,016	979 \$ 1,235,076	976 \$ 1,044,186	762 \$ 1,368,694	761 \$ 1,475,148	1,227 \$ 2,242,304	786 \$ 1,505,637	10,192 \$ 16,570,342
Residential SONP (Actual Terminations): Non-Protected Customers	99 6			1,100 \$ 849,653	1,681	na	na	na	na	na	9		
Protected Customers From Docket 1725) Protected Customers (From Docket 1725) Total Res. SONP Total Res. SONP (From Docket 1725)	η (c)	n ω	n 69	1,100 \$ 849,653	2,252 \$ 2,353,237 1,681 5,71 2,252					3,701 \$ 2,256,404 3,014 687 3,701	, , , , , , , , , , , , , , , , , , ,	77 67	18,767 \$ 13,682,592 14,837 3,930 18,767
Non-Residential SONP (Actual Terminations):	107 \$ 172,984	93 \$ 141,986	158 \$ 233,414	154 \$ 181,083	54 \$ 62,068	3 184 \$ 230,800	113 \$ 121,360	120 \$ 145,870	81 \$ 87,157	121 \$ 162,562	208 \$ 277,949	114 \$ 158,781	1,507 \$ 1,976,014
Residential Service Restorations (SONP): Non-Protected Customers Protected Customers Total Res. Restorations	- na	na na	- RA	ла па 839 па	ла па па па 1,748 па	na na na na 1,936 na	na na na 2,319 na	na na na 2,424 na	na na na 2,452 na	na na na 3.087 na	- na	- Language	na na na 14,805 na
Non-Residential Service Restorations (SONP):	66 na	69 na	108 na	105 na	37 na	119 na	74 na	81 na	44 na	83 na	127 na	68 па	981 na
2008 SONPShut Off for Non-Payment Activity	Jan-08 Dollars	CSS Conversion (Project One Feb-08 Number Dollars	Mar-08 Number Dollars	Apr-08 Number Dollars	May-08 Number Dollars	Jun-08 Number Dollars	Jul-08 Number Dollars	Aug-08 Number Dollars	Sep-08 Number Dollars	Oct-08 Number Dollars	Nov-08 Dollars N	Dec-08 Number Dollars Nur	YTD Dollars
Residential SONP Field Orders:  Non-Protected Oustomers Protected Oustomers Total Res. SOND Fisal Orders		<u>м</u> м		1,287 <b>\$</b> 743,755 90 <b>\$</b> 68,644	3,879 \$ 2,376,539 310 \$ 217,432 4189 \$ 2593 971	6,692 \$	6,740 \$ 2,355,264 636 \$ 274,830 7376 \$ 2630,003	5,192 \$ 1,837,337 1,084 \$ 666,051 6,276 \$ 2,503,388	6.751 \$ 2,169,495 1,834 \$ 1,107,975 8 585 \$ 3,277,470	5,296 \$ 2,071,047 1,347 \$ 819,973 6,643 \$ 2,801,019	5 \$ 2,369		35,842 \$ 15,172,804 5,860 \$ 3,488,506 41,702 \$ 18,661,310
Non-Residential SONP Field Orders:	· 9		· •	· 69	9	604 \$	\$ 609	69	69	69	\$ 1,42	784 \$ 920,894	69
Residential SONP (Actual Terminations):													
Non-Pro Pro	•			898 <b>\$</b> 499,867 41 <b>\$</b> 45,667	2,637	3,015				2,613 \$ 904,622 590 \$ 435,938	so so		18,122 \$ 7,439,716 2,401 \$ 1,768,280
Total Res. SONP Non-Protected Customers (From Docket 1725) Protected Customers (from Docket 1725)		· •	· •	939 \$ 545,534 934 6	2,757 \$ 2,920 34	3,173 \$ 1 3,145 37	3,217 \$ 3,175 38	2,962 \$ 2,610 370	4,270 \$ 3,482 768	3,203 \$ 1,340,560 2,715 492	2 \$ 1,529	· · · · ·	69
Non-Residential SONP (Actual Terminations):		<del>ω</del>	<u>ω</u>	78   \$ 77.782		3,182	39,297		4,230	3,207	160 \$ 134,299	58 \$ 42,342	1,162 \$ 937,284
Residential Service Restorations (SONP):	<i>G</i>	<i>ω</i>	<i>σ</i>	e.	5,512	1 731	\$   660 6	1 751	\$ 6126	4		<i></i>	6
Protected Customers Total Res. Restorations				37 \$ 45,840 504 \$ 242,061	96 \$ 91,332 1,608 \$ 784,440	1,836 \$ 763,954 763,954	153 \$ 100,129 2,252 \$ 705,135	206 \$ 185,908 1,957 \$ 613,768	3,003 \$ 931,886	202 \$ 104,986 2,326 \$ 600,977	· · · · · · · · · · · · · · · · · · ·	 	1,090 \$ 766,143 13,486 \$ 4,642,221
Non-Residential Service Restorations (SONP):			7 \$ 5,812	26 \$ 19,012	61 \$ 57,478	38 \$ 40,533	54 \$ 25,165	78 \$ 43,862	79 \$ 97,351	150 \$ 204,090	711,02 \$   67	37 \$ 21,257	609 \$ 584,676
YTD 2009 SONP-Shut Off for Non-Payment Activity	ran-09	Feb-09	Mar-09	Apr-09	Mav-09	60-uil.		() () () () () () () () () () () () () (					YTD
Residential SONP Field Orders:	Number Dollars	Number Dollars	Number Dollars	Number Dollars	Number Dollars							Nuring Nuring	Number Dollars
Non-Protected Customers Protected Customers Total Res. SONP Field Orders	 	3 \$ 528	 	2,968 \$ 2,078,444 190 \$ 215,279 3,158 \$ 2,293,722	4,461 \$ 2,540,254 1,420 \$ 1,233,879 5,881 \$ 3,774,133	1 5,580 \$ 2,859,121 1,756 \$ 1,463,504 7,336 \$ 4,322,625							13,012 \$ 7,478,346 3,366 \$ 2,912,662 <b>16,378</b> \$ 10,391,008
Non-Residential SONP Field Orders:	908 \$ 1,129,760	758 \$ 994,615	726 \$ 941,993	901 \$ 1,200,181	1,360 \$ 1,187,214	1,067 \$ 1,031,788		M					5,720 \$ 6,485,551
Residential SONP (Actual Terminations):	<i>G</i> .	\$ 612	65	1662 \$ 1137563	2203 \$ 1216.050	2524 \$ 1321908							65
Protected Customers Total Res. SONP	 	2 \$ 412	 	€ 69 69	မာမာ	3,401 \$ 2							1,576 \$ 1,553,966 7,967 \$ 5,229,899
Non-Protected Customers (From Docket 1725) Protected Customers(from Docket 1725) Total Res. SONP (From Docket 1725)			ຕຸ ຕ	1,722 4 1,726		2,593 846 3,439							6,486 1,511 7,997
Non-Residential SONP (Actual Terminations):	130 \$ 118,071	96 \$ 72,949	14										734 \$ 537,711
Residential Service Restorations (SONP):					-							$\bigvee$	
Non-Protected Customers Protected Customers	\$ \$	1 \$ 182	\$ \$	69 69	1,443 \$ 543,567 138 \$ 79,384	1,902 \$							4,171 \$ 1,563,645 341 \$ 218,533
Total Res. Restorations	· •	1 \$ 182	· •>	852 \$ 422,801	1,581 \$ 622,951	2,078 \$							4,512 \$ 1,782,178
Non-Residential Service Restorations (SONP):	62 \$ 56,766	50 \$ 56,287	60 \$ 60,832	70 \$ 62,708	71 \$ 36,347	66 \$ 55,532		X X				X X	379 \$ 328,471

1) na = data not available . . . whereas a zero = actual zero 2) \$'s represent arrears at the time of the field order and/or termination

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4065 Responses to Division Twenty-Sixth Set of Data Requests Issued August 27, 2009

#### **Division Data Request 26-2**

#### Request:

With regard to Electric Termination Report (Docket 1725), please explain what "Special Agreements" are and how they differ from Payment Plans. Electric Termination Report (Docket 1725) in PDF format is attached for reference.

#### Response:

As of the August 2009 Electric Termination Report (Docket 1725), "Special Agreements" are now being referred to as "Flexible Payment Plans". Under either description, these are payment plans that extend beyond the minimum guidelines set forth by the Commission. For instance, agreements offered to customers on a P01 step plan with installments in excess of 12 would be classified as "Flexible" (or "Special" under the former terminology).

#### **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.

<u>/S/</u>	<u>September 30, 2009</u>
Linda Samuelian	Date

# National Grid (NGrid) – Request for Change in Electric Distribution Rates Docket No. 4065 - Service List as of 8/25/09

Name/Address	E-mail Distribution	Phone/FAX
Thomas R. Teehan, Esq.	Thomas.teehan@us.ngrid.com	401-784-7667
National Grid.		401-784-4321
280 Melrose St.	Joanne.scanlon@us.ngrid.com	
Providence, RI 02907		
Cheryl M. Kimball, Esq. (for NGrid)	ckimball@keeganwerlin.com	617-951-1400
Keegan Werlin LLP		617-951-1354
265 Franklin Street	lindas@keeganwerlin.com	
Boston, MA 02110		
Leo Wold, Esq. (for Division)	Lwold@riag.ri.gov	401-222-2424
Dept. of Attorney General		401-222-3016
150 South Main St.	Steve.scialabba@ripuc.state.ri.us	
Providence, RI 02903	David.stearns@ripuc.state.ri.us	
	David.steariis@ffpuc.state.ff.us	
Ladawn S. Toon, Esq.	Ltoon@riag.ri.gov	401-222-2424
Dept. of Attorney General	dmacrae@riag.ri.gov	401-222-3016
150 South Main St.		
Providence, RI 02903	Mtobin@riag.ri.gov	
Audrey Van Dyke, Esq.	Audrey.VanDyke@navy.mil	202-685-1931
Naval Facilities Engineering Command		202-433-2591
Litigation Headquarters		
720 Kennon Street, S.E. Bdg. 36, Rm 136		
Washington Navy Yard, DC 20374		
Khojasteh (Kay) Davoodi	Khojasteh.Davoodi@navy.mil	202-685-3319
Naval Facilities Engineering Command		202-433-7159
Director, Utility Rates and Studies Office	T 11 @ '1	
1322 Patterson Avenue SE	Larry.r.allen@navy.mil	
Washington Navy Yard, DC 20374-5065		
Jerry Elmer, Esq.	Jelmer@clf.org	401-351-1102
Conservation Law Foundation		401-351-1130
55 Dorrance Street		
Providence, RI 02903		
Michael McElroy, Esq. (for TEC-RI)	McElroyMik@aol.com	401-351-4100
Schacht & McElroy		401-421-5696
PO Box 6721		
Providence, RI 02940-6721		

		101 101 0010
John Farley, Executive Director	jfarley316@hotmail.com	401-621-2240
The Energy Council of RI		401-621-2260
One Richmond Square Suite 340D		
Providence, RI 02906		
Jean Rosiello, Esq. (for Wiley Ctr.)	jeanrosiello@cox.net	401-751-5090
MacFadyen Gescheidt & O'Brien		401-751-5096
Jeremy C. McDiarmid, Esq.	jmcdiarmid@env-ne.org	617-742-0054
Environment Northeast (ENE)		
6 Beacon St., Suite 415		
Boston, MA 02108		
W. Mark Russo (for ENE)	mrusso@frlawri.com	
Ferrucci Russo, P.C.		
55 Pine St.		
Providence, RI 02903		
Roger E. Koontz	rkoontz@env-ne.org	
Environment Northeast		
15 High Street		
Chester, CT 06412		
R. Daniel Prentiss, P.C. (for EERMC)	dan@prentisslaw.com	401-824-5150
Prentiss Law Firm		401-824-5181
One Turks Head Place, Suite 380		
Providence, RI 02903		
Samuel P. Krasnov (for EERMC)	skrasnow@env-ne.org	
203 S. Main Street		
Providence, RI 02903		
S. Paul Ryan (for EERMC)	spryan@eplaw.necoxmail.com	
670 Willett Avenue		
Riverside, RI 02915-2640		
Maurice Brubaker	mbrubaker@consultbai.com	
Brubaker and Associates		
P.O. Box 412000		
St Louis, Missouri 63141-2000		
Ali Al-Jabir	aaljabir@consultbai.com	
Brubaker and Associates		
5106 Cavendish Dr.		
Corpus Christi, TX 78413		
David Effron	Djeffron@aol.com	603-964-6526
Berkshire Consulting	<u>zjemon e weneem</u>	000 701 0020
12 Pond Path		
North Hampton, NH 03862-2243		
Bruce Oliver	Boliver.rha@verizon.net	703-569-6480
Revilo Hill Associates	Bonver.ma e venzon.met	703 307 0100
7103 Laketree Drive		
Fairfax Station, VA 22039		
Dale Swan	dswan@exeterassociates.com	410-992-7500
Exeter Associates	dowan e cacterassociates.com	410-992-3445
5565 Sterrett Place		710-772-3 <del>74</del> 3
Suite 310		
Columbia, MD 21044		
Communa, MD 21044		

Matthew Kahal	mlzohol@ayatarassaaiatas.aam	410-992-7500
	mkahal@exeterassociates.com	
c/o/ Exeter Associates		410-992-3445
5565 Sterrett Place		
Suite 310		
Columbia, MD 21044		
Bruce Gay	bruce@monticelloconsulting.com	843-767-9001
Monticello Consulting Group		843-207-8755
4209 Buck Creek Court		
North Charleston, SC 29420		
Lee Smith	lees@lacapra.com	617-778-5515
Richard Hahn		Ext. 117
Mary Neal	rhahn@lacapra.com	617-778-2467
LaCapra Associates	_	
One Washington Mall, 9th Floor	mneal@lacapra.com	
Boston, MA 02108		
File original & nine (9) copies w/:	Lmassaro@puc.state.ri.us	401-780-2107
Luly E. Massaro, Commission Clerk	Anault@puc.state.ri.us	401-941-1691
Public Utilities Commission		_
89 Jefferson Blvd.	Plucarelli@puc.state.ri.us	
Warwick, RI 02889	Nucci@puc.state.ri.us	
	Sccamara@puc.state.ri.us	