Thomas R. Teehan
Senior Counsel

August 24, 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[1] responses to data requests issued by the Commission, the Division and the Navy in the above-referenced proceeding. Attached is a listing of the data requests issued to date and designating the responses included in this filing in bold.

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

Very truly yours,

Thomas R. Teehan

Enclosures

cc: Docket 4065 Service List

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

The Narragansett Electric Company d/b/a National Grid

Docket 4065

Discovery Log

As of: August 24, 2009

[C-denotes confidentiality is being sought]

Data Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
COMM 1-1	Filed	6/26/2009	O'Brien		Attachments COMM 1-1-3, 1-1-4, 1-1-5, 1-1-7, 1-1-8, 1-1-9 **BULK**
COMM 1-2	Filed	6/26/2009	O'Brien		Attachments COMM 1-2 A-D
COMM 1-3	Filed	6/26/2009	Dinkel		Attachments COMM 1-3 A-B **BULK**
COMM 1-4	Filed	6/26/2009	O'Brien		
COMM 1-5	Filed	7/22/2009	O'Brien/Dinkel		Attachments COMM 1-5 (1-3)
COMM 1-6	Filed	6/26/2009	Dinkel	C-attachment	Attachments COMM 1-6-1 & 1-6-2 **BULK**
COMM 1-7	Filed	6/26/2009	O'Brien		Attachment COMM 1-7
COMM 1-8	Filed	6/26/2009	Dinkel		Attachments COMM 1-8 (A-D) **BULK**
COMM 1-9	Filed	6/26/2009	Dinkel	C-attachment	Attahments COMM 1-9 (1-11) **BULK**
COMM 1-10	Filed	6/26/2009	Dinkel		Attachment COMM 1-10 (hard copy only) **BULK**
COMM 1-11	Filed	6/26/2009	O'Brien		
COMM 1-12	Filed	7/1/2009	Dinkel/Morrissey		Attachments COMM 1-12 (1-2)
COMM 1-13	Filed	6/26/2009	Dinkel		Attachment COMM 1-13
COMM 1-14	Filed	6/26/2009	Dinkel		Attachment COMM 1-14
COMM 1-15	Filed	6/26/2009	Dinkel		Attachment COMM 1-15
COMM 1-16	Filed	6/26/2009	O'Brien		Attachments COMM 1-16 (1-12)
COMM 1-17	Filed	7/6/2009	Pettigrew		
COMM 1-18	Filed	7/14/2009	Pettigrew		Attachments COMM 1-18-1, 1-18-2, 1-18-3, 1-18-4(a) - (d) **Bulk**
COMM 1-19	Filed	8/11/2009	O'Brien		Attachment COMM 1-19
COMM 1-20	Filed	6/26/2009	O'Brien		
COMM 1-21	Filed	6/26/2009	O'Brien		Attachments COMM 1-21 (1-4)
COMM 1-22	Filed	6/26/2009	O'Brien		Attachments COMM 1-22 (1-2)
COMM 1-23	Filed	6/26/2009	O'Brien		Attachments COMM 1-23 (1-2)
COMM 1-24	Filed	6/26/2009	O'Brien		Attachment COMM 1-24
COMM 1-25	Filed	6/26/2009	O'Brien		Attachments COMM 1-25 (1-14) **BULK**
COMM 1-25 (supp.)	Filed	8/11/2009	O'Brien		Attachments COMM 1-25 (1-3)
COMM 1-26	Filed	6/26/2009	O'Brien		Attachment COMM 1-26
COMM 1-27	Filed	8/18/2009	O'Brien		Attachments COMM 1-27 (1-3) **BULK**
COMM 1-28	Filed	7/6/2009	O'Brien		Attachment COMM 1-28
COMM 1-29	Filed	6/26/2009	O'Brien		
COMM 1-30	Filed	6/26/2009	O'Brien		
COMM 1-31	Filed	6/26/2009	King		
COMM 1-32	Filed	6/26/2009	O'Brien		Attachment COMM 1-32
COMM 1-33	Filed	6/26/2009	O'Brien		Attachment COMM 1-33 (1-3) **BULK**
COMM 1-34	Filed	6/26/2009	Dowd		Attachments COMM 1-34 (1-2) **BULK**
COMM 1-35	Filed	6/26/2009	Dowd		Attachment COMM 1-35 **BULK**
COMM 1-36	Filed	6/26/2009	Dowd		Attachment DIV 2-1 (electronic only)
COMM 1-37	Filed	6/26/2009	O'Brien		Attachment COMM 1-37
COMM 1-38	Filed	6/26/2009	O'Brien		Attachment COMM 1-38
COMM 1-39	Filed	8/18/2009	O'Brien		Attachment COMM 1-39
COMM 1-40	Filed	6/26/2009	Dowd		Attachment COMM 1-40
COMM 1-41	Filed	6/26/2009	Dowd		Attachment COMM 1-41
COMM 1-42	Filed	6/26/2009	Dowd		Attachment COMM 1-42
COMM 1-43	Filed	6/26/2009	Dowd		Attachment COMM 1-43
COMM 1-44	Filed	6/26/2009	Dowd		Attachment COMM 1-44

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Docket 4065					
Discovery Log					
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Data Request	**Status**	**Date Filed**	**Witness**	**CONFIDENTIAL**	**Attachments**
COMM 1-45	Filed	6/26/2009	O'Brien		Attachment COMM 1-45
COMM 1-46	Filed	6/26/2009	Dowd		
COMM 1-47	Filed	6/26/2009	Dowd		Attachments COMM 1-47 (1-3) **BULK**
COMM 1-48 (Part 1)	Filed	7/1/2009	Dowd		Attachment COMM 1-48
COMM 1-48 (Parts 2-5)	Filed	6/26/2009	O'Brien		
COMM 1-49	Filed	6/26/2009	O'Brien		Attachments COMM 1-49 (1-5)
COMM 1-50	Filed	6/26/2009	Dowd		Attachments COMM 1-50 (1-38) **BULK**
COMM 1-51	Filed	6/26/2009	Dowd		
COMM 1-52	Filed	6/26/2009	Dowd		Attachment COMM 1-52
COMM 1-53	Filed	6/26/2009	Dowd		Attachment COMM 1-53
COMM 1-54	Filed	6/26/2009	O'Brien		Attachments COMM 1-54 (1-2)
COMM 1-55	Filed	7/14/2009	O'Brien		Attachment COMM 1-55
COMM 1-56	Filed	6/26/2009	O'Brien		
COMM 1-57	Filed	6/26/2009	O'Brien		Attachment COMM 1-57
COMM 1-58	Filed	6/26/2009	O'Brien		Attachment DIV 3-11 (PDF and working excel)
COMM 1-59	Filed	6/26/2009	O'Brien		Attachment COMM 1-59
COMM 1-60	Filed	7/1/2009	O'Brien		Attachment COMM 1-60 (A-B)
COMM 1-61	Filed	6/26/2009	Dowd		
COMM 1-62	Filed	6/26/2009	O'Brien		Attachments COMM 1-62 (1-2)
COMM 1-63	Filed	8/11/2009	O'Brien		Attachments COMM 1-63 (A-F) A-C EXCEL FILES D & E **BULK** (hard copy only)
COMM 1-64	Filed	6/26/2009	O'Brien		Attachment COMM 1-64
COMM 1-65	Filed	6/26/2009	O'Brien		Attachments COMM 1-65
COMM 1-66	Filed	6/26/2009	O'Brien		Attachments COMM 1-66 (1-2)
COMM 1-67	Filed	6/26/2009	O'Brien		Attachments COMM 1-67 (1-3)
COMM 1-68	Filed	6/26/2009	Wynter		Attachment COMM 1-68
COMM 1-69	Filed	6/26/2009	Wynter		Attachment COMM 1-69
COMM 1-70	Filed	6/26/2009	Wynter		
COMM 1-71	Filed	6/26/2009	O'Brien		Attachments DIV 4-1 (1-2) **BULK**
COMM 1-72	**Filed Herewith**	**8/24/2009**	**O'Brien**		
COMM 1-73	Filed	6/26/2009	O'Brien		Attachments COMM 1-73 (1-2)
COMM 1-74	Filed	7/6/2009	O'Brien		
COMM 1-75	Filed	6/26/2009	O'Brien		
COMM 1-76	Filed	7/1/2009	O'Brien		Attachment COMM 1-76
COMM 1-77	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	Filed	6/26/2009	O'Brien		Attachments COMM 1-83
COMM 1-84	Filed	6/26/2009	O'Brien		Attachment COMM 1-84
COMM 1-85	Filed	6/26/2009	O'Brien		Attachment COMM 1-85
COMM 1-86	Filed	6/26/2009	O'Brien		
COMM 1-87	Filed	6/26/2009	O'Brien		
COMM 1-88	Filed	6/26/2009	O'Brien		Attachment COMM 1-88
COMM 1-89	Filed	6/26/2009	O'Brien		Attachment COMM 1-89
COMM 1-90	Filed	7/6/2009	O'Brien		Attachments COMM 1-90 (1-2) **BULK**
COMM 1-91	Filed	6/26/2009	O'Brien		Attachment DIV 4-21 (1-2) **BULK**
COMM 1-92	Filed	6/26/2009	O'Brien		Attachment COMM 1-92
COMM 1-93	Filed	6/26/2009	O'Brien		
COMM 1-94	Filed	6/26/2009	O'Brien		Attachment COMM 1-94
COMM 1-95	Filed	6/26/2009	O'Brien		Attachment COMM 1-95
COMM 1-96	Filed	6/26/2009	King		Attachment COMM 1-96
COMM 1-97	Filed	6/26/2009	O'Brien		

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

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COMM 2-50	Filed	8/14/2009	Wynter		
COMM 2-51	Filed	8/14/2009	Wynter		Attachment COMM 2-51
COMM 2-52	Filed	8/14/2009	Wynter		
COMM 2-53	Filed	8/14/2009	Wynter		
COMM 2-54	Filed	8/14/2009	Wynter		Attachment COMM 2-54 (1-2)
COMM 2-55	**Filed Herewith**	**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		
COMM 3-1	Pending				
COMM 3-2	Pending				
COMM 3-3	Pending				
COMM 3-4	Pending				
COMM 3-5	Pending				
COMM 3-6	Pending				

The Narragansett Electric Company d/b/a National Grid

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

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Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
DIV-3-22	Filed	8/18/2009	O'Brien/Dowd		
DIV-4-1	Filed	7/6/2009	Moul		Attachments DIV 4-1 (1-2) **BULK**
DIV-4-2	Filed	7/6/2009	Dinkel		
DIV-4-3	Filed	7/6/2009	Dinkel		
DIV-4-4	Filed	7/6/2009	Dinkel		
DIV-4-5	Filed	7/6/2009	O'Brien		
DIV-4-6	Filed	7/6/2009	Moul		
DIV-4-7	Filed	7/6/2009	Dinkel		Attachment DIV 4-7
DIV-4-8	Filed	7/6/2009	Dinkel		Attachments DIV 4-8 (1-3)
DIV-4-9	Filed	7/6/2009	Dinkel		Attachment DIV 4-9
DIV-4-10	Filed	7/6/2009	Dinkel		
DIV-4-11	Filed	7/14/2009	O'Brien		Attachment DIV 4-11
DIV-4-12	Filed	7/6/2009	Dinkel		
DIV-4-13	Filed	7/6/2009	Moul		
DIV-4-14	Filed	7/6/2009	Moul		
DIV-4-15	Filed	7/6/2009	Moul		Attachment DIV 4-15
DIV-4-16	Filed	7/6/2009	Moul		Attachment DIV 4-16 (1-2)
DIV-4-17	Filed	7/6/2009	Moul		
DIV-4-18	Filed	7/6/2009	Moul		
DIV-4-19	Filed	7/6/2009	Moul		Attachment DIV 4-19
DIV-4-20	Filed	7/6/2009	Moul		Attachment DIV 4-20
DIV-4-21	Filed	7/6/2009	O'Brien		Attachment DIV 4-21 (1-2) **BULK**
DIV-4-22	Filed	7/6/2009	Moul		Attachment DIV 4-22 (1-2)
DIV-4-23	Filed	7/6/2009	Dinkel		Attachment DIV 4-23
DIV-4-24	Filed	7/6/2009	Moul		
DIV-4-25	Filed	7/6/2009	Moul		
DIV-4-26	Filed	7/6/2009	Moul		
DIV-4-27	Filed	7/6/2009	Moul		Attachment DIV 4-27
DIV-5-A	Filed	7/22/2009	Wynter	**C-attachments**	Attachments DIV 5-A (1-3)
DIV-5-B	Filed	7/22/2009	Wynter		Attachment DIV 5-B
DIV-5-C	Filed	7/22/2009	Wynter		Attachment DIV 5-C
DIV-6-1	Filed	7/14/2009	Tierney		
DIV-6-2	Filed	7/14/2009	Tierney		
DIV-6-3	Filed	7/14/2009	Tierney		
DIV-6-4	Filed	7/14/2009	Tierney		
DIV-6-5	Filed	7/14/2009	Tierney		
DIV-6-6	Filed	7/14/2009	Tierney		Attachment DIV 6-6 **BULK**
DIV-6-7	Filed	8/21/2009	Pettigrew		
DIV-6-7 Supplemental	**Filed Herewith**	**8/24/2009**	**Pettigrew**		Attachment DIV 6-7 (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		
DIV-6-12	Filed	7/14/2009	Tierney		Attachments DIV 6-12 (a) and (d)
DIV-6-13 (a) - (d)	Filed	7/22/2009	Tierney		Attachment DIV 6-13
DIV0-6-13 (e)	Filed	8/21/2009	Tierney		
DIV-6-14	Filed	7/14/2009	Tierney		Attachment DIV 6-14 (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 (f)	Filed	7/22/2009	Tierney		Attachments DIV 6-19 and 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		
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		

The Narragansett Electric Company d/b/a National Grid

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Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
DIV-6-27	Filed	7/14/2009	Tierney		Attachment DIV 6-27 (working excel included)
DIV-6-28	Filed	7/14/2009	Tierney		
DIV-6-29	Filed	7/14/2009	Tierney		
DIV-6-30	Filed	7/22/2009	Tierney		
DIV-6-31 (a) - (d) and (f)	Filed	7/22/2009	Tierney		
DIV-6-31 (e)	Filed	8/18/2009	Tierney		
DIV-6-32	Filed	8/18/2009	O'Brien		Attachment DIV 6-32
DIV-6-33	Filed	7/14/2009	Tierney		
DIV-6-34	Filed	7/22/2009	Tierney		Attachment DIV 6-34 (1-2)
DIV-6-35	Filed	7/14/2009	Tierney		Attachment DIV 6-35 (c) and (d)
DIV-6-36	Filed	7/14/2009	Gorman		
DIV-6-37	Filed	7/14/2009	Gorman		Attachment DIV 6-37(a)
DIV-6-38	Filed	7/14/2009	Tierney		
DIV-6-39	Filed	8/21/2009	Tierney		
DIV-7-1	Filed	8/3/2009	King		
DIV-7-2	Filed	7/22/2009	King/Pettigrew		
DIV-7-3	Filed	7/22/2009	King		
DIV-7-4	Filed	7/22/2009	Wynter		
DIV-7-5	Filed	8/20/2009	King		
DIV-7-6	Filed	7/22/2009	Wynter/Stout		Attachment DIV 7-6
DIV-7-7	Filed	7/22/2009	Fields		Attachment DIV 7-7 (a) (hard copy only) and (b)
DIV-7-8	Filed	8/18/2009	Dowd		
DIV-7-9	Filed	7/22/2009	Pettigrew		
DIV-7-10	Filed	7/22/2009	King		
DIV-7-11	Filed	7/22/2009	King		
DIV-7-12	Filed	7/22/2009	King		
DIV-7-13	Filed	7/22/2009	King		
DIV-7-14	Filed	8/18/2009	O'Brien		
DIV-7-15	Filed	7/22/2009	King		
DIV-7-16	Filed	7/22/2009	Gorman		
DIV-7-17	Filed	7/22/2009	Gorman		Attachment DIV 7-17
DIV-7-18	Filed	7/22/2009	Smithling		Attachment DIV 7-18
DIV-7-19	Filed	8/18/2009	Dowd		Attachment DIV 7-19 (b-c)
DIV-7-20	Filed	7/22/2009	King		
DIV-7-21	Filed	7/22/2009	King		
DIV-8-1	Filed	8/21/2009	Wynter		Attachment DIV 8-1
DIV-8-2	Filed	8/3/2009	Wynter		Attachment DIV 8-2
DIV-8-3	Filed	7/22/2009	Wynter		Attachment DIV 8-3 (hard copy only)
DIV-8-4	Filed	7/22/2009	Gorman		Attachment DIV 8-4 (excel)
DIV-8-5	Filed	7/22/2009	Wynter		Attachment DIV 8-5
DIV-8-6	Filed	8/3/2009	Wynter		
DIV-8-7 a-g (no d)	Filed	8/3/2009	Wynter		Attachments DIV 8-7 (a-g, no d)
DIV-8-7(d)	Filed	8/11/2009	Wynter		Att. DIV 8-7(d)
DIV-8-8	Filed	7/22/2009	Wynter		
DIV-8-9	Filed	8/3/2009	Wynter		Attachment DIV 8-9
DIV-8-10	Filed	8/18/2009	Wynter		Attachment DIV 8-10
DIV-8-11	Filed	7/22/2009	Wynter		
DIV-8-12	Filed	8/3/2009	Wynter		
DIV-8-13	Filed	8/3/2009	Wynter		
DIV-8-14	Filed	8/3/2009	Wynter		
DIV-8-15	Filed	8/3/2009	Wynter		
DIV-8-16	Filed	8/3/2009	Wynter		
DIV-8-17	Filed	8/18/2009	Wynter		Attachment DIV 8-17
DIV-8-18	Filed	8/3/2009	Wynter		Attachment DIV 8-18
DIV-8-19	Filed	8/3/2009	Wynter		Attachment DIV 8-19
DIV-8-20	Filed	8/20/2009	Wynter		Attachment DIV 8-20
DIV-8-21	Filed	8/3/2009	Wynter		
DIV-8-22	Filed	8/20/2009	Wynter		Attachment DIV 8-22
DIV-8-23	Filed	8/3/2009	Wynter		Attachment DIV 8-23
DIV-8-24	Filed	8/3/2009	Wynter		
DIV-8-25	Filed	8/3/2009	Wynter		Attachments DIV 8-25 (a-i)
DIV-9-1	Filed	7/22/2009	Pettigrew		

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

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DIV-11-19	Filed	8/18/2009	Pettigrew		
DIV-11-20	Filed	8/11/2009	O'Brien		Attachment DIV 11-20 (1-2)
DIV-11-21	Filed	8/18/2009	Pettigrew		
DIV-11-22	Filed	8/21/2009	Pettigrew		Attachment DIV 11-22
DIV-11-23	Filed	8/20/2009	Pettigrew		
DIV-11-24	Filed	8/18/2009	Pettigrew		
DIV-11-25	Filed	8/11/2009	Pettigrew		Attachment DIV 11-25
DIV-11-26	Filed	8/18/2009	Pettigrew		
DIV-11-27	Filed	8/21/2009	Pettigrew		Attachments DIV 11-27 (1-2)
DIV-11-28	Filed	8/18/2009	Pettigrew		
DIV-11-29	Pending				
DIV-11-30	Filed	8/18/2009	Pettigrew		
DIV-11-31	Filed	8/18/2009	Pettigrew		
DIV-11-32	**Filed Herewith**	**8/24/2009**	**Pettigrew**		
DIV-11-33	Filed	8/20/2009	Pettigrew		Attachments DIV 11-33 (1-4) **BULK**
DIV-11-34	Filed	8/18/2009	Pettigrew		
DIV-11-35	Filed	8/18/2009	Pettigrew		
DIV-11-36	Pending				
DIV-11-37	Pending				
DIV-11-38	Filed	8/11/2009	Dinkel		Att. DIV 11-38 (1-17) **BULK** hard copy only
DIV-11-39	Filed	8/11/2009	Pettigrew		Attachment DIV-11-39 EXCEL file
DIV-11-40	Filed	8/11/2009	Gorman		
DIV-11-41	Filed	8/18/2009	Gorman		
DIV-11-42	**Filed Herewith**	**8/24/2009**	**Pettigrew**		Attachment DIV 11-42 (1-3) **BULK**
DIV-12-1	Filed	8/18/2009	O'Brien		Attachments DIV 12-1 (CD-ROM) **BULK**
DIV-12-2	Filed	8/11/2009	O'Brien		Attachment DIV 12-2 (1-2) **BULK**
DIV-12-3	Filed	8/18/2009	O'Brien		Attachments DIV 12-3 (CD-ROM) **BULK**
DIV-12-4	Filed	8/18/2009	O'Brien		Attachment DIV 12-4 (excel)
DIV-12-5	Filed	8/21/2009	King		Attachment 12-5
DIV-12-6	Filed	8/18/2009	O'Brien		Attachment 12-6 (excel) **BULK**
DIV-12-7	Filed	8/18/2009	O'Brien		Attachment 12-7
DIV-12-8	Filed	8/18/2009	O'Brien		
DIV-12-9	Filed	8/18/2009	O'Brien		
DIV-12-10	Filed	8/20/2009	O'Brien		
DIV-12-11	Filed	8/18/2009	O'Brien		
DIV-12-12	**Filed Herewith**	**8/24/2009**	**O'Brien**		
DIV-12-13	**Filed Herewith**	**8/24/2009**	**O'Brien**		Attachment DIV 12-13 (excel)
DIV-12-14	Filed	8/18/2009	O'Brien		
DIV-12-15	Filed	8/18/2009	O'Brien		
DIV-12-16	Filed	8/14/2009	O'Brien		
DIV-12-17	Filed	8/21/2009	Dowd		
DIV-12-18	Filed	8/11/2009	O'Brien		
DIV-12-19	Filed	8/11/2009	O'Brien		
DIV-13-1	Filed	8/11/2009	Gorman		
DIV-13-2	Filed	8/11/2009	Gorman		
DIV-13-3	Filed	8/11/2009	O'Brien		
DIV-13-4	Filed	8/11/2009	O'Brien		
DIV-13-5	Filed	8/11/2009	Walter		
DIV-13-6	Filed	8/11/2009	Gorman		Attachment DIV-13-6 EXCEL
DIV-13-7	Filed	8/14/2009	Gorman		Attachment DIV-13-7
DIV-13-8	Filed	8/11/2009	Gorman		
DIV-13-9	Filed	8/11/2009	Gorman		
DIV-13-10	Filed	8/11/2009	Gorman		
DIV-14-1	Filed	8/18/2009	Pettigrew		Attachments DIV 14-1 (1-8) **BULK**
DIV-14-2	Filed	8/18/2009	Pettigrew		Attachment DIV 14-2
DIV-14-3	Filed	8/18/2009	Pettigrew		

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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		
DIV-14-11	Filed	8/18/2009	Pettigrew		Attachments DIV 14-11 (1-8) **BULK**
DIV-14-12	Filed	8/18/2009	Pettigrew		Attachments DIV 14-12 (1-2) **BULK**
DIV-14-13	Filed	8/18/2009	Pettigrew		
DIV-14-14	Filed	8/18/2009	Pettigrew		
DIV-14-15	Pending				
DIV-14-16	Filed	8/18/2009	Pettigrew		
DIV-14-17	Filed	8/18/2009	Pettigrew		
DIV-14-18	Filed	8/18/2009	Pettigrew		Attachment DIV 14-18
DIV-14-19	Filed	8/18/2009	Pettigrew		Attachment DIV 14-19
DIV-14-20	Filed	8/18/2009	Pettigrew		
DIV-14-21	Filed	8/18/2009	Pettigrew		Attachment DIV 14-21
DIV-14-22	Filed	8/18/2009	Pettigrew		
DIV-14-23	Filed	8/18/2009	Pettigrew		
DIV-14-24	Filed	8/18/2009	Pettigrew		
DIV-14-25	Filed	8/20/2009	Pettigrew		Attachment DIV 14-25
DIV-15-1	Filed	8/11/2009	Gorman		
DIV-15-2	Filed	8/11/2009	Gorman		Attachment DIV 15-2 (1-2)
DIV-15-3	Filed	8/14/2009	Fields		
DIV-15-4	Filed	8/11/2009	O'Brien		
DIV-16-1	Filed	8/11/2009	Fields		Attachment DIV 16-1
DIV-16-2	Filed	8/11/2009	Fields		
DIV-16-3	Filed	8/11/2009	Fields		Attachment DIV 16-3
DIV-16-4	Filed	8/11/2009	Fields		Attachment DIV 16-4
DIV-16-5	Filed	8/11/2009	Fields		
DIV-16-6	Filed	8/11/2009	Fields		
DIV-16-7	Filed	8/11/2009	Fields		
DIV-16-8	Filed	8/11/2009	Fields		
DIV-16-9	Filed	8/11/2009	Fields		Att. DIV 16-9 (1-5) **BULK**
DIV-16-10	Filed	8/11/2009	Fields		
DIV-16-11	Filed	8/11/2009	Fields		
DIV-16-12	Filed	8/11/2009	Fields		
DIV-16-13	Filed	8/11/2009	Fields		
DIV-16-14	Filed	8/11/2009	Fields		
DIV-16-15	Filed	8/11/2009	Fields		
DIV-16-16	Filed	8/18/2009	Fields		
DIV-16-17	Filed	8/11/2009	Fields		Attachment DIV 16-17
DIV-16-18	Filed	8/11/2009	Fields		
DIV-16-19	Filed	8/11/2009	Fields		
DIV-16-20	Filed	8/11/2009	Fields		
DIV-16-21	Filed	8/11/2009	Fields		
DIV-16-22	Filed	8/11/2009	Fields		
DIV-16-23	Filed	8/11/2009	Fields		Attachment DIV 16-23
DIV-16-24	Filed	8/11/2009	Fields		
DIV-16-25	Filed	8/11/2009	Fields		
DIV-16-26	Filed	8/11/2009	Fields		
DIV-17-1	Filed	8/18/2009	O'Brien		Attachment DIV 17-1
DIV-17-2	Filed	8/18/2009	O'Brien		Attachment DIV 17-2
DIV-17-3	Filed	8/18/2009	Pettigrew		Attachment DIV 17-3(e)
DIV-17-3 Revised	**Filed Herewith**	**8/24/2009**	**Pettigrew**		Attachment DIV 17-3(c)
DIV-17-4	**Filed Herewith**	**8/24/2009**	**Pettigrew**		
DIV-17-5	**Filed Herewith**	**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 Herewith**	**8/24/2009**	**O'Brien**		
DIV-17-9	Filed	8/20/2009	Dowd		
DIV-17-10	**Filed Herewith**	**8/24/2009**	**O'Brien**		
DIV-17-11	**Filed Herewith**	**8/24/2009**	**O'Brien**		Attachment DIV 17-11
DIV-17-12	Filed	8/14/2009	Gorman		

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DIV-17-13	Filed	8/14/2009	Gorman		
DIV-18-1	Filed	8/11/2009	Gorman		Attachment DIV 18-1
DIV-18-2	Filed	8/14/2009	Gorman		
DIV-18-3	Filed	8/11/2009	Gorman		
DIV-18-4	Filed	8/11/2009	Gorman		
DIV-18-5	Filed	8/14/2009	Pettigrew		
DIV-19-1	Filed	8/21/2009	Teehan		Attachments DIV 19-1 (1-2) **BULK**
DIV-19-2	Filed	8/21/2009	O'Brien		Attachments DIV 19-1 (1-3) **BULK**
DIV-20-1	Pending				
DIV-20-2	Filed	8/21/2009	Gorman		Attachment DIV 20-2
DIV-20-3	Filed	8/21/2009	Gorman		
DIV-20-4	Filed	8/21/2009	Gorman		
DIV-20-5	Pending				
DIV-20-6	Pending				
DIV-21-1	**Filed Herewith**	**8/24/2009**	**O'Brien**		Attachment DIV 21-1
DIV-21-2	Pending				
DIV-21-3	Filed	8/21/2009	O'Brien		
DIV-21-4	Filed	8/21/2009	Gorman		
DIV-21-5	**Filed Herewith**	**8/24/2009**	**O'Brien**		
DIV-22-1	Pending				
DIV-22-2	Pending				
DIV-22-3	Pending				
DIV-22-4	Pending				
DIV-22-5	Pending				
DIV-22-6	Pending				
DIV-22-7	Pending				
DIV-23-1	Pending				
DIV-23-2	Pending				
DIV-23-3	Pending				
DIV-23-4	Pending				
DIV-23-5	Pending				
DIV-23-6	Pending				

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Information Request	**Status**	**Date Filed**	**Witness**	**CONFIDENTIAL**	**Attachments**
NAVY-1-1	Filed	6/29/2009			
NAVY-1-2	Filed	6/29/2009			
NAVY-1-3	Filed	6/29/2009			
NAVY-1-4	Filed	6/29/2009			
NAVY-2-1	Filed	7/22/2009	Gorman, Wynter, O'Brien		Excel attachments
NAVY-2-2	Filed	7/22/2009	Gorman, O'Brien		Excel attachments
NAVY-3-1	Filed	8/18/2009	Gorman		Attachment NAVY 3-1 (a)
NAVY-3-2	Filed	8/14/2009	Fields/Gorman		
NAVY-3-3	Filed	8/14/2009	Gorman		
NAVY-3-4	Filed	8/14/2009	Gorman		
NAVY-3-5 (a, b & e)	Filed	8/21/2009	Gorman		Attachments NAVY 3-5(b) (1-3)
NAVY-3-5 (c & d)	**Filed Herewith**	**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		

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Information Request	**Status**	**Date Filed**	**Witness**	**CONFIDENTIAL**	**Attachments**
GWC-1-1	Pending				
GWC-1-2	Pending				
GWC-1-3	Pending				
GWC-1-4	Pending				
GWC-1-5	Pending				
Discovery Log Ends Here: August 24, 2009					

Certificate of Service

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

/S/ August 24, 2009
Linda Samuelian Date

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

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Commission Data Request 1-72

Request:

Please itemize by account and amount all advertising and media-related costs included in operations and maintenance expense. Please also include a copy of each and every advertisement and the cost of each.

Response:

During calendar year 2008, the Company incurred advertising costs for energy efficiency (DSM) in the amount of $146,367; corporate brand recognition expense in the amount of $508,532, and general customer advertising in the amount of $201,379. However, please note that no amounts associated with DSM and corporate brand recognition costs were included in the revenue requirement in this case.

For the invoices, please see the Company's Initial Filing, Filing Requirements Book 1 of 2, starting at bate stamp 411, which shows advertising costs included in Accounts 909 and 930 with invoice support. Please note that the Company will provide copies of the advertisements for 2008 on CD-ROM due to their size.

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

Commission Data Request 2-22

Request:

Why, as identified in Commission 1-40, did non-union employees receive a greater wage increase than union employees during the years 1999 through 2002 and 2005 through 2008?

Response:

Non-union employees do not receive across the board salary increases each year. Rather, the Company establishes a budgeted increase amount within which managers must determine salary adjustments for their direct reports. In determining the amount of increase, managers take into account the employee's individual performance, increased competencies or capabilities, relative position of current pay to the external market and relative position of current pay to internal averages. Using these factors, a salary adjustment percent is derived person by person. In a hypothetical 3.0% budget, actual increases for employees would be expected to range between 0% and 6% or higher. Further, at each review cycle, certain non-union employees are also eligible for promotion within their job family. A job family is a series of titles reflecting the progression of an employee from an entry level position to an advanced professional position. For example, in the Analyst job family, the entry level position is Analytical Assistant. If the employee demonstrates the capability to function at higher levels of complexity and independence, they could be promoted to Analyst, Senior Analyst and Principal Analyst. These are not time-based promotions. The dollar resources for these types of pay increases are also budgeted annually so that managers must accomplish all of their proposed salary adjustments within a budget.

Factors that affect the amount of the annual salary increase budget include the amount of general wage increase being provided to union employees, a review of the prevailing practices in the regional employment marketplace and the results of any specific marketplace reviews of hot skill jobs in such fields as engineering, IT and legal. At all times, the objective of the non-union pay program is to deliver competitive pay based on individual performance and capabilities.

Although this question focuses on those years when the non-union increase budget was higher than the union, if the increases are summed over the 10 year period, the non-union total is 38.3% and the union total is 40%.

Prepared by or under the supervision of: William F. Dowd

Commission Data Request 2-25

Request:

Please identify the terms of the contract with Cascor identified in Commission 1-79 noting how much Cascor has been paid per year since the inception of the contract and explaining what if any savings were achieved by outsourcing this function.

Response:

The terms of the contract with Cascor are as follows:

1. Vendor will review and evaluate all work orders for warranty eligibility.
   a. Vendor will review all work orders going forward to determine eligibility.
   b. Vendor will review last 6 months of 2008 work orders to check for possible warranty work and to check VINs for manufacturer recall.

2. Vendor will prepare and submit warranty claim forms for warranty reimbursement on behalf of National Grid to the various manufacturers and upfitters that have authorized the Company to perform in-house warranty repairs.

3. Vendor will track and provide monthly reports/files on warranty submissions and actual reimbursement dollars at the unit level in an electronic format.

4. Vendor will assist the Company in enhancing its warranty recovery including:
   a. Expanding the number of companies permitting the Company to perform in-house warranty repairs.
   b. Periodic review of in-house warranty labor rates and terms.
   c. Insuring compliance with the various in-house warranty terms and procedures.
   d. Streamlining and adjusting work order processes aimed at maximizing warranty recovery while minimizing data input.

5. The Company and Vendor will meet semi-annually to review the warranty recovery process.

The payments made by National Grid USA Service Company to Cascor since the inception of the contract total $22,485.51 to date.

In terms of the estimate of savings achieved, the Company is on track to approximately double its annual warranty recovery.

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

Commission Data Request 2-36

Request:

Please provide the derivation of the $4.00 cost per inbound call. (Sch NG-RLW-4, page 1, line 7).

Response:

At the time the $4 per call cost was developed, it was developed for all companies on the basis of the Company's CSS because credit and collections activities were performed using this system. The average cost reflects a blend of estimated contractor costs and internal labor costs. This average cost per call has fluctuated since that time as the needs of the business have been continually assessed and the resource mix devoted to this activity has changed.

Commission Data Request 2-41

Request:

With regard to Sch NG-JP-6:

a. Please explain the derivation of the 5.86% allocation to Narragansett Electric for Reservoir Woods.

b. Please provide a schedule detailing how the remaining 94.14% of Reservoir Woods costs are allocated.

c. Please identify each task / job function performed at Reservoir Woods on behalf of Rhode Island ratepayers.

d. Please explain the derivation of the 12.24% allocation to Narragansett Electric for Northborough.

e. Please provide a schedule detailing how the remaining 87.76% of Northborough costs are allocated.

f. Please identify each task / job function performed at Northborough on behalf of Rhode Island ratepayers.

Response:

(a) The costs of Reservoir Woods are allocated to the Narragansett Electric Company based on an analysis of all occupants of Reservoir Woods as designated to each specific line of business and department. Detailed architects floor plans were developed and specific spaces were assigned to house these specific employees. Based on that methodology, it was determined that 50.6% of Reservoir Woods would be occupied by or support the Electric Distribution Organization. A Company billing pool allocating costs among all Electric Distribution companies including the Narragansett Electric Company is applied. By multiplying the 50.6% total allocated to Electric Distribution by the Narragansett Electric Company allocated percentage of costs or 11.57%, a percentage of 5.86% of total costs are allocated to Narragansett.

(b) Please see Attachment COMM 2-41-1, page 2 which details the occupants and percentages or space by floor allocated to them at Reservoir Woods.

Commission Data Request 2-41 (cont.)

(c) Reservoir Woods is the main office facility in New England housing the Electric leadership, engineering, design support, regulatory, legal, procurement, human resources, labor relations and property services personnel who provide direct and indirect support to Narragansett Electric customers.

(d) Similar to the methodology noted in (a) above, National Grid estimated an allocation of the total square footage of the Northborough, MA facility based on preliminary requirements gathered from the lines of business and specific departments which will occupy Northborough when all necessary renovations are completed. National Grid had preliminary information available to estimate the occupancy at completion and will refine the occupancy calculations when final construction design and architectural renderings are complete. It is estimated that the New England Electric Distribution companies will occupy or derive the benefit of 43.5% of the total space. A Company billing pool which allocates costs among the New England Electric Distribution Companies is used. By multiplying the 43.5% total allocated to Electric Distribution by the Narragansett Electric Company allocated percentage of costs from this billing pool or 24.155%, a percentage of 10.5% of total costs are allocable to Narragansett. Please see Attachment COMM 2-41-2, page 1. However, the percentage reflected in Schedule NG-JP-6 indicates an allocated percentage of 12.24%. This percentage will be corrected and flowed through the revenue requirement when the Company submits revised schedules.

(e) Please see Attachment COMM 2-41-2, page 2, which estimates how the remaining square footage will be allocated among the Electric Distribution, Gas Distribution and Transmission businesses.

(f) National Grid's Northborough facility is currently under going extensive renovations in anticipation of its becoming the single, New England special purpose location housing dispatch and control for Narragansett Electric customers as well as the location of the Customer Contact Center that supports Rhode Island customers. It currently houses only National Grid's Customer Contact Center personnel including leadership, telephone customer service representatives and certain support personnel with responsibilities in complaint resolution and small commercial and industrial billing.

Prepared by or under the supervision of: John Pettigrew

Bill Pool	Co. No.	Company		2010	2009
00231	00004	Nantucket Electric Company	DIST	0.274%	0.203%
00231	00005	Massachusetts Electric	DIST	34.405%	34.993%
00231	00036	Niagara Mohawk Power Corp	DIST	52.595%	52.101%
00231	00041	Granite State Electric Company	DIST	0.981%	1.133%
00231	00049	Narragansett Electric Company	DIST	11.745%	11.570%
00231 Total				100.000%	100.000%

	All	NECO
Total EDO Allocation of Reservoir Woods	50.4%	5.831%

National Grid- Reservoir Woods		Segmentation %								
GROUP	% VALUE FROM TOTAL BUILDING	DIST	GAS	TRAN	BDEV	NREG	INTE	GEN	OTH	Total
FL1										
Gas Supply Planning	0.3%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%
Mergers & Acquisitions	0.8%	0.0%	0.0%	0.0%	0.6%	0.0%	0.0%	0.0%	0.1%	0.8%
Reg and Gen Council	6.4%	2.4%	2.4%	0.5%	0.0%	0.3%	0.0%	0.4%	0.4%	6.4%
Shared Prop/Office Svcs	3.9%	2.2%	1.3%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	3.9%
Human Resources	3.4%	1.8%	1.2%	0.3%	0.0%	0.0%	0.0%	0.1%	0.0%	3.4%
Customer and Markets	7.3%	4.0%	3.0%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	7.3%
Corporate Affairs	1.5%	0.6%	0.5%	0.1%	0.0%	0.1%	0.0%	0.1%	0.1%	1.5%
Internal Audit	0.9%	0.4%	0.4%	0.0%	0.0%	0.1%	0.0%	0.1%	0.0%	0.9%
TOTAL	24.4%	**11.5%**	**9.0%**	**1.3%**	**0.6%**	**0.5%**	**0.0%**	**0.7%**	**0.7%**	**24.4%**
FL2										
Transmission										
	7.1%	0.1%	0.0%	5.4%	0.0%	0.0%	0.8%	0.7%	0.0%	7.1%
	0.4%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%
	0.8%	0.0%	0.0%	0.6%	0.0%	0.0%	0.1%	0.1%	0.0%	0.8%
	0.1%	0.0%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
	1.9%	0.0%	0.0%	1.4%	0.0%	0.0%	0.2%	0.2%	0.0%	1.9%
	0.2%	0.0%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%
	10.5%	**0.2%**	**0.0%**	**8.1%**	**0.0%**	**0.0%**	**1.2%**	**1.0%**	**0.0%**	**10.5%**
IS										
	0.3%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%
	1.1%	0.5%	0.4%	0.1%	0.0%	0.0%	0.0%	0.1%	0.0%	1.1%
	3.3%	1.5%	1.2%	0.2%	0.0%	0.1%	0.0%	0.2%	0.1%	3.3%
	0.2%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%
	0.5%	0.2%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%
	0.1%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
	2.5%	1.2%	0.9%	0.1%	0.0%	0.0%	0.0%	0.1%	0.1%	2.5%
	0.5%	0.2%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%
	0.2%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%
	8.8%	**4.1%**	**3.3%**	**0.5%**	**0.0%**	**0.1%**	**0.0%**	**0.5%**	**0.4%**	**8.8%**
Finance										
	0.7%	0.4%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.7%
	1.3%	0.8%	0.3%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	1.3%
	0.8%	0.5%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.8%
	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
	0.4%	0.3%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.4%
	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
	0.5%	0.3%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.5%
	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
	4.0%	**2.4%**	**0.8%**	**0.6%**	**0.0%**	**0.0%**	**0.0%**	**0.1%**	**0.1%**	**4.0%**
Gas Distribution										
	1.1%	0.2%	0.9%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.1%
	0.7%	0.1%	0.5%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.7%
	1.2%	0.2%	1.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	1.2%
	0.2%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%
	6.6%	1.1%	5.4%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	6.6%
	4.0%	0.7%	3.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	4.0%
	0.1%	0.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.1%
	0.3%	0.0%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%
	14.1%	**2.4%**	**11.6%**	**0.0%**	**0.0%**	**0.1%**	**0.0%**	**0.0%**	**0.0%**	**14.1%**
TOTAL	37.5%	**9.1%**	**15.7%**	**9.1%**	**0.0%**	**0.3%**	**1.2%**	**1.6%**	**0.4%**	**37.5%**
FL3										
Electric Distribution										
	14.5%	11.7%	1.9%	0.0%	0.0%	0.0%	0.0%	0.8%	0.0%	14.5%
	1.9%	1.6%	0.3%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	1.9%
	1.5%	1.2%	0.2%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	1.5%
	0.2%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%
	0.6%	0.5%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.6%
	1.4%	1.1%	0.2%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	1.4%
	0.2%	0.2%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.2%
	6.8%	5.5%	0.9%	0.0%	0.0%	0.0%	0.0%	0.4%	0.0%	6.8%
	0.7%	0.6%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.7%
	2.0%	1.6%	0.3%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	2.0%
	1.4%	1.1%	0.2%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	1.4%
	1.4%	1.1%	0.2%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	1.4%
	2.0%	1.6%	0.3%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	2.0%
	34.6%	**27.9%**	**4.7%**	**0.0%**	**0.0%**	**0.0%**	**0.0%**	**2.0%**	**0.0%**	**34.6%**
SHES	**1.9%**	1.1%	0.6%	0.0%	0.0%	0.0%	0.0%	0.2%	0.0%	1.9%
Supply Chain	**1.2%**	0.7%	0.4%	0.0%	0.0%	0.0%	0.0%	0.1%	0.0%	1.2%
Tom King	**0.3%**	0.2%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%
TOTAL	38.1%	**29.9%**	**5.7%**	**0.0%**	**0.0%**	**0.1%**	**0.0%**	**2.3%**	**0.1%**	**38.1%**
BUILDING TOTALS										
TOTAL	100.0%	**50.6%**	**30.4%**	**10.4%**	**0.6%**	**0.9%**	**1.2%**	**4.6%**	**1.3%**	**100.0%**

Bill Pool EDO NE	Co No	Company	Segment	2010	2009	Diff (09-08)	Elect Co Allocations
00232	00004	Nantucket Electric Company	DIST	0.577%	0.424%	0.153%	
00232	00005	Massachusetts Electric	DIST	72.577%	73.056%	-0.479%	
00232	00041	Granite State Electric Company	DIST	2.069%	2.365%	-0.296%	
00232	00049	Narragansett Electric Company	DIST	24.777%	24.155%	0.622%	
00232 Total				100.000%	100.000%	0.000%	**10.5%**

Northboro Space Allocations
Based upon 2/10/09 Scheamtic Design

Department	Location	Sf
Gas	1st Fl	32300
Transmission	1st Fl	18700
Customer Service	2nd Fl	54400
Medical	2nd Fl	3400
Security	2nd Fl	3400
EDO	2nd Fl	32300
		144500

Allocate Out Customer Service 50% to Elctric & 50% to Gas

Department	Location	Sf	Alllocation	Total	Percentage	Occupied	Allocated
Gas	1st Fl	32300	30600	62900	43.5%		
EDO	2nd Fl	32300	30600	62900	43.5%		
Transmission	1st Fl	18700		18700	12.9%		
				144500			

Total Northboro Costs

Direct	1,191,190
Allocated	2,251,000
Total	3,442,190

Direct Costs
Percentage Allocable to EDO and Company Share of EDO:

	EDO	Total SF	EDO %	Co Share of EDO	Total Nbro Costs	Co Share of Nbro
EDO ```	32,300	144,500	22.4%			
Company share of EDO						
MECO Share			72.6%	16.2%	3,442,190	558,430
NECO Share			24.8%	5.5%	3,442,190	190,642
GSE Share						
NANT Share						

Allocated Costs
Percentage of Service Company Allocable to EDO and Company Share of EDO:

	Svc Co	Total SF	Svc Co %	EDO Share of Svc Co	EDO %	Co Share of EDO	Total Nbro Costs	Co Share of Nbro
Service Company	61,200	144,500	42.4%	50.0%	21.2%			
Company share of EDO								
MECO Share					70.0%	14.8%	3,442,190	510,254
NECO Share					26.0%	5.5%	3,442,190	189,523
GSE Share								
NANT Share								

MECO			
EDO Direct	558,430	374,883	183,547
Svc Co Allocated	510,254	685,430	(175,176)
Total	1,068,684	1,060,312	8,372

NECO			
EDO Direct	190,642		190,642
Svc Co Allocated	189,523	254,588	(65,065)
Total	380,165	254,588	125,577

Commission Data Request 2-43

Request:

With regard to Sch NG-RLO-2, page 1, Column h, line 35, Total Operating Expense of $232,745,348, please identify and quantify each amount that is a result of a Service Company allocation.

Response:

Please see Attachment DIV 2-43 for an approximate breakdown of total rate year operating expenses of $232,745,348, as shown on Schedule NG-RLO-2, page 1, Column h, line 35, between charges from affiliated service companies and charges from the Company and its operating company affiliates.

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

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 (h)	Narragansett Electric & Other Affiliates	NG Service Cos.	Not Assigned 1/	Total
	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	67,011,574	70,101,543		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						
25	Total Operating Expenses	$ 232,745,348	$ 161,452,162	$ 72,143,186	$ (850,000)	$ 232,745,348

1/ Detail by Originating Companies not defined.

Commission Data Request 2-55

Request:

What level of expense is included in the Company's rate year request that is attributable to outside collection activities?

Response:

The amount included in FERC 903 in the Company's rate year expenses attributable to outside collection activities was $1,926,502.

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

Division Data Request 6-7 (Supplemental)

Request:

Re: page 22 of 97, lines 4-8, of witness Tierney's testimony, please:

a. Document the actual levels of service reliability experienced by National Grid Customers in RI in aggregate and by rate class in each of the last five years;

b. Provide the Company's estimates of achievable levels of service reliability for RI Customers in aggregate and by rate class for 2009 and for each of the next five years;

c. With respect to the aging of energy infrastructure, provide the average age and average remaining useful life for facilities booked in each of the Company's FERC distribution plant accounts as of the end of each year for the last five years;

d. Explain and document the effects of rate freezes over the period since the National Grid - Narragansett Electric merger on the Company's investment in energy infrastructure in Rhode Island.

Response:

Please note that the information provided herewith is supplemental to the Company's original response filed on August 21, 2009.

(c) Please see Attachment DIV 6-7 (Supplemental) for the requested breakdown of information.

Prepared by or under the supervision of: John Pettigrew

NARRAGANSETT ELECTRIC COMPANY

FERC	FERC Description	Avg Rem Life	Avg Life	Avg Age
		2008	2008	2008
361	Structures	19.41	55.97	36.56
362	Station Equipment	25.97	38.33	12.36
364	Poles	18.02	26.23	8.21
365	Overhead Conductors & Devices	20.76	34.19	13.43
366	Underground Conduit	43.33	59.26	15.93
367	Underground Conductor & Devices	37.79	45.14	7.35
368	Line Transformers	13.39	24.44	11.05
369	Services	11.51	25.42	13.91
370	Meters	18.74	29.25	10.51
373	Streetlights	12.17	23.4	11.23
		2007	2007	2007
361	Structures	19.46	55.97	36.51
362	Station Equipment	26	38.33	12.33
364	Poles	17.99	26.23	8.24
365	Overhead Conductors & Devices	20.67	34.19	13.52
366	Underground Conduit	43.35	59.26	15.91
367	Underground Conductor & Devices	37.78	45.14	7.36
368	Line Transformers	13.35	24.44	11.09
369	Services	11.52	25.42	13.9
370	Meters	18.84	29.25	10.41
373	Streetlights	12.19	23.4	11.21
		2006	2006	2006
361	Structures	19.51	55.97	36.46
362	Station Equipment	26.25	38.33	12.08
364	Poles	18.07	26.23	8.16
365	Overhead Conductors & Devices	20.72	34.19	13.47
366	Underground Conduit	44.12	59.26	15.14
367	Underground Conductor & Devices	37.68	45.14	7.46
368	Line Transformers	13.24	24.44	11.2
369	Services	11.66	25.42	13.76
370	Meters	19.24	29.25	10.01
373	Streetlights	12.65	23.4	10.75

FERC	FERC Description	Avg Rem Life	Avg Life	Avg Age
		2005	2005	2005
361	Structures	15.08	55.97	40.89
362	Station Equipment	26.49	38.33	11.84
364	Poles	18.32	26.23	7.91
365	Overhead Conductors & Devices	20.93	34.19	13.26
366	Underground Conduit	44.06	59.26	15.2
367	Underground Conductor & Devices	37.58	45.14	7.56
368	Line Transformers	13.34	24.44	11.1
369	Services	11.68	25.42	13.74
370	Meters	19.9	29.25	9.35
373	Streetlights	12.86	23.4	10.54
		2004	2004	2004
361	Structures	13.62	55.97	42.35
362	Station Equipment	26.72	38.33	11.61
364	Poles	18.47	26.23	7.76
365	Overhead Conductors & Devices	21.1	34.19	13.09
366	Underground Conduit	44.56	59.26	14.7
367	Underground Conductor & Devices	37.37	45.14	7.77
368	Line Transformers	13.43	24.44	11.01
369	Services	11.13	25.42	14.29
370	Meters	20.11	29.25	9.14
373	Streetlights	13.33	23.4	10.07

Division Data Request 11-7

Request:

Page 7, line 22 to page 8: Please provide the Company's current spill prevention program and how its new plan will be different.

Response:

Spill Prevention Control and Countermeasure (SPCC) Plans in Rhode Island were developed to meet the federal regulatory requirements. In 2006, the federal regulations were revised and the SPCC Plans required revision in response (Attachment DIV 11-7 is a copy of the Company's internal procedures). In addition, SPCC Plans need to be recertified every 5 years or when any oil-filled equipment (> 55 gallons) are added or removed during capital projects.

Rhode Island Substation
Scheduled SPCC Plan Updates

2009	13
2010	25
2011	36
2012	5
2013	24
Total:	103

Prepared by or under the supervision of: John Pettigrew

nationalgrid	**National Grid** **Environmental Procedure No. 13**	Rev. No.: 4 Page No.: 1 of 17
Spill Prevention, Control and Countermeasure		Date: 01/16/09

FOREWORD

National Grid is committed to conducting business in a manner that preserves the quality of the environment by continuously seeking ways to minimize the environmental impact of past, present and future operations. We believe that aggressively addressing environmental issues is good business and in the best interest of the communities we serve, our employees, our shareholders, and all our other stakeholders.

National Grid will promote continual improvement in our environmental management system (EMS) and environmental performance and will develop internal standards to guide activities when no appropriate laws or regulations exist. This Environmental Procedure (EP) No. 13, Spill Prevention, Control and Countermeasure, provides guidance on SPCC Plan requirements.

Questions or inquiries regarding information provided in this chapter should be referred to the Director of Environmental Management New England, New York-North, New York-South or Generation/LIPA.

Approved by: David C. Lodemore
Vice President, Environmental

Record of Change

Date of Review/Revision:

Revision	Date	Description
0	04/01/06	Complete Revision of all EP's, Rev. number has been reset to Rev. 0
1	11/08/07	Attach SPCC White Paper to EP and stated that it is endorsed by senior management at 06/18/07 US Operations Committee meeting.
2	02/11/08	Complete revision to incorporate New York-South.
3	07/30/08	White Paper is now a stand alone historical document. LIPA GO to cover the management of LIPA Substation SPCC Plans.
4	01/16/09	Incorporates EPA rulemaking that full secondary containment is no longer required for tankers or trailers involved with oil transfers. General containment provisions will now apply.
5		
6		

1.0 SPILL PREVENTION, CONTROL AND COUNTERMEASURE – 40 CFR PART 112

The United States Environmental Protection Agency (U.S. EPA) has the delegated authority to regulate non-transportation-related onshore facilities under the Clean Water Act. Facilities that store or use certain quantities of oil are regulated under the Spill Prevention, Control and Countermeasure (SPCC) program which requires the development of an SPCC Plan for oil storage facilities that meet the regulatory threshold oil volumes and could reasonably discharge to navigable water. The purpose of a site's SPCC Plan is to document the equipment, workforce, procedures and steps that National Grid has/will take to conform with federal and state guidelines to: prevent the discharge of oil into navigable waters or adjoining shorelines; minimize, control and contain such a discharge in the event it does occur; and, remediate the causes of such discharges.

2.0 APPLICABILITY

The SPCC regulations apply to any owner/operator of a non-marine transportation-related (NMTR) facility that stores, uses, transfers, and/or consumes oil products and which:

- Has an aboveground oil storage capacity that is greater than 1,320 gallons; and/or
- Has underground oil storage that is more than 42,000 gallons; and
- Could reasonably be expected to discharge oil in quantities that may be harmful on or into navigable waterways.

The aboveground oil storage capacity of a facility includes all storage tanks and oil bearing electrical equipment with a capacity of 55 gallons or greater.

The term "oil" describes any kind of oil-related product in any form, including but not limited to: kerosene (No. 1 Oil), No. 2 diesel fuel, No. 6 fuel oil, gasoline, cable oil B, insulating oil, turbine lube oil, aviation synthetic lubricant, waste oil, and dielectric oil.

3.0 EXCEPTIONS

The following are exempted from the SPCC regulations:

- Containers (including electrical equipment) with a storage capacity of less than 55 gallons;
- Completely buried storage tanks subject to the federal underground storage tank program (40 CFR 280) or a state program approved under 40 CFR 281. Although not subject to SPCC regulations, these tanks must still be shown on the facility diagram.

4.0 DETERMINATION OF SPCC APPLICABILITY TO NATIONAL GRID FACILITIES

National Grid facilities shall be evaluated to determine whether or not they meet the threshold volumes of greater than 1,320 gallons of aboveground oil storage and/or greater than 42,000 gallons of underground oil storage. If a facility meets these regulatory thresholds, then an evaluation shall be made to determine if an oil release at that facility has the potential of reaching surface water. If so, then the facility is considered to be "jurisdictional" to SPCC.

4.1 Use of MOSES Computer Model

EPRI developed the MOSES-MP software (an acronym for mineral oil spill evaluation system) to predict the transport of oil in the environment and to determine the probability of an oil spill reaching a specified receptor. MOSES is a Monte Carlo-based model that generates simulations taking into account infiltration, surface slope, surface roughness and retention, vegetative cover, viscosity effects, rainfall effects, and frozen condition effects, as well as a range of release volumes from a selected source. MOSES-MP has been widely accepted as an industry standard for determining discharge probability, and the U.S. EPA, though not endorsing the software, is fully cognizant and acceptant of its use. National Grid is licensed to use MOSES and shall apply it to SPCC evaluations.

For operating equipment, which includes electrical, oil-filled equipment, the regulation requires that oil releases 'most likely to occur' should be considered [71 FR 77279]. When performing a MOSES calculation, the user shall apply a release volume ranging from 10% to 100% of the affected unit's oil capacity. This is considered a conservative approach in that most likely releases would be expected to be in the very low end of this range, if not less than 10%, and would rarely, if ever, release 100%.

When running the MOSES model in order to determine whether the facility is jurisdictional to SPCC, man-made structures cannot be used in the computer model. Therefore, station stone or other man-made changes cannot be considered to be at the site when running the MOSES model.

The selection of an acceptable probability has not been regulated and is, therefore, subjective depending on the level of risk acceptable to the owner/operator of the facility and on the intended application. National Grid shall apply a 1% probability threshold for determination of SPCC applicability.

4.2 Summary of Approach to be Utilized At National Grid to Determine SPCC Applicability

In order to determine if a National Grid facility is jurisdictional to SPCC:

Step 1 – Determine the volume of oil in use and/or storage or potentially in use and/or storage (i.e., tank design capacity).

Step 2 – If >1,320 gallons, determine whether a release of oil has the potential to reach navigable waters of the US. MOSES will be run to model the release of oil for all new facilities or during SPCC Plan re-certification if it had not initially been run.

Step 3 – If the MOSES model determines a probability of 1% or more, then it is considered that the spill has the potential to reach waters of the US.

Step 4 – If a release has the potential to reach waters of the US and the facility has >1,320 gallons of oil potentially in use or storage, then the facility is jurisdictional to SPCC, and an SPCC Plan shall be created.

5.0 GENERAL SPCC PLAN REQUIREMENTS

The SPCC Plan is a facility-specific document that describes:

- The facility layout;
- Oil storage;
- Procedures for handling oil;
- Structures or devices in place to prevent oil spills from reaching water; and,
- Countermeasures to be employed should a spill occur.

An SPCC Plan is a written description of a facility's compliance with applicable portions of 40 CFR Part 112. The plan shall be prepared in accordance with good engineering practices and shall have the full approval of management at a level to commit the necessary resources to implement the plan.

The plan shall be certified by a registered Professional Engineer (PE). The PE shall certify that:

- The plan has been prepared in accordance with the requirements of 40 CFR Part 112;
- The PE or an agent of the PE has visited and examined the facility;

- The plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards;
- Procedures for required inspections and testing have been established; and,
- The plan is adequate for the facility.

If an SPCC does not follow the prescribed format as detailed in 40 CFR Subpart A Section 112.7 and Subpart B Section 112.8, the SPCC shall include a table cross-referencing the applicable SPCC requirements to the location within the SPCC Plan as written.

The SPCC shall be maintained at the facility if it is staffed at least 4 hours per day or at the nearest field office if it is not attended 4 hours per day. The plan shall be available for review by the EPA or any other regulatory authority during normal working hours.

6.0 GENERIC SPCC PLAN ELEMENTS

In accordance with 40 CFR 112 Subpart A Section 112.7, all SPCC Plans must, at a minimum, include or address the following elements:

1. The facility's conformance with the requirements of the SPCC regulations;

2. A description of the physical layout of the facility.

3. A facility diagram that identifies:

   - The location and contents of the oil bearing aboveground containers;
   - The location of buried and partially buried tanks, even if the tanks are exempt from the SPCC regulations;
   - All transfer stations and connecting pipes.

4. The type of oil in each container and its storage capacity.

5. Discharge prevention measures including procedures for routing handling of products.

6. Discharge or drainage controls such as secondary containment.

7. Countermeasures for discharge discovery, response, and cleanup, including those that may be required of a contractor.

8. Methods of disposal of recovered materials.

9. Contact list including phone numbers for the National Response Center, cleanup contractors, and all appropriate federal, state and local agencies.

10. For each major type of potential failure (loading/unloading, tank overflow, rupture or leakage) a prediction of the direction, rate of flow and total quantity of oil which could be discharged from the facility as a result of each type of major failure.

11. A description of the appropriate containment and diversionary structures or equipment to prevent a discharge.

    a. The containment system, including the walls and the floors, must be capable of containing oil until cleanup occurs and must consist of one of the following:

        - Dikes, berms, retaining walls, or curbing
        - Culverts or gutters
        - Weirs or booms
        - Spill diversion or retention ponds
        - Sorbent materials

    b. If the installation of any of the above structures or pieces of equipment is determined not to be practicable, the SPCC must, as applicable:

        - Clearly explain why installation is impractical;
        - Provide for periodic integrity testing of the equipment;
        - Provide for periodic integrity and leak testing of any valves and piping;
        - Include an oil spill contingency plan that includes a written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

12. A description of the facility's inspection and testing program. Written procedures and a record of the required inspections and tests must be kept with the SPCC Plan for a minimum of 3 years.

13. A description of the facility's training programs relative to SPCC Plan. At a minimum, oil-handling personnel at the facility must be trained in the operation and maintenance of the equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules and regulations; general facility operations; and the contents of the facility's SPCC Plan. Training should also include discharge prevention meetings that are scheduled a minimum of once a year. Where applicable, training records shall be maintained for a minimum of three years.

14. Designation of the person(s) accountable for discharge prevention at the facility and who reports to facility management.

15. A description of the security measures taken at the facility. There shall be provisions for:

    – Fully fencing the facility. Entrances shall be guarded or locked when not in use or unmanned.
    – Ensuring that master flow and drain valves have adequate security measures so that they remain closed when not operating.
    – Ensuring that oil pumps are locked in the "off" position and located at a site accessible only to authorized personnel
    – Ensuring that pipelines are securely capped or blank flanged when not in service or when in a standby mode for an extended time.
    – Adequate lighting commensurate with the type and location of the facility that will allow for the detection of a spill during hours of darkness, and will prevent vandalism.

16. A discussion of how field constructed containers will be evaluated for the risk of failure due to brittle fracture.

17. A discussion of conformance with effective discharge prevention and containment procedures listed in the SPCC rule, as well as any applicable more stringent state regulations and guidelines.

7.0 SPCC PLAN ELEMENTS FOR NMTR ONSHORE FACILITIES

The SPCC Plan for NMTR on-shore facilities must meet, address or discuss the general SPCC requirements as detailed in Parts 5.0 and 6.0 above. In addition, the SPCC for these facilities shall provide for, address or discuss the following:

1. Facility Drainage

    a. Dikes shall be engineered with appropriate valving that will restrain drainage. Valves shall be of the manual, open and closed design. Flapper type valves shall not be used to drain diked areas.
    b. Pumps and ejectors may be used to empty diked areas, but the pumps shall be manually activated.
    c. For undiked areas, facility drainage systems shall be engineered in such a way that discharges flow into a lagoon, pond or catchment basin that will ensure the retention of the discharge within the confines of the facility. The lagoon, pond or catchment basin shall not be located in an area prone to flooding.

National Grid has implemented several containment strategies including one that allows for the percolation of storm water into the ground while providing oil containment for a period of time sufficient to allow for emergency response crews to respond. A copy of the containment design which allows accumulated storm water to percolate is incorporated in Engineering Design Procedure EDP-SUB-32.0, "Power Transformer – Oil Pit Design."

2. Bulk Storage Containers

a. Bulk storage containers must be constructed with materials that are compatible with the material stored, and compatible with varying storage conditions such as temperature and pressure.

b. Bulk storage tanks should be constructed with secondary containment that is sufficient to contain the entire contents of the largest single tank plus sufficient freeboard to contain precipitation. Diked areas must be sufficiently impervious to contain discharge oil.

c. Containment areas shall be periodically drained of accumulated rainwater.

Drainage of water from a diked area is allowed under the following conditions:

- The accumulated water is inspected for the presence of oil to ensure that no oil is discharged;
- Adequate records are kept of the event.

d. Completely or partially buried metallic storage tanks must be protected from corrosion by coatings, cathodic protection or other effective methods compatible with local soil conditions. In addition, completely buried metallic storage tanks must have regular leak tests. Refer to the National Grid Environmental Procedure No. 2, "Storage Tank Management" for specific construction and testing requirements.

e. The buried portion of a partially buried or bunkered metallic tank shall be protected from corrosion by coatings or cathodic protection compatible with the soil conditions.

f. Aboveground containers must be tested for integrity on a regular basis or whenever material repairs are done. The frequency and type of testing must take into account container size and design. Visual inspection must be combined with another testing technique such as hydrostatic, radiographic, ultrasonic, acoustic, or another type of non-destructive testing. Industry standards such as American Petroleum Institute

(API) 653 and the Steel Tank Institute "Standard for Inspection of In-Service Shop Fabricated Aboveground Tanks for Storage of Combustible and Flammable Liquids SP001-03" may be used in determining testing needs. Records of inspections and tests must be maintained.

For smaller shop-built tanks that are inspected at least monthly and are visible on all sides, visual inspection alone may suffice, subject to good engineering practice. The SPCC Plan must state why visual integrity testing alone is sufficient and provides adequate environmental protection.

g. Where applicable, control the leakage through defective heating coils by monitoring the steam return and exhaust lines for contamination, or by passing the steam return or exhaust lines through a settling tank.

h. Each container must be engineered or updated to avoid discharges. At least one of the following must be provided:

- High liquid level alarms with an audible or visual signal;
- High liquid level pump cutoff devices set to stop flow at a predetermined container volume level;
- Direct audible or code signal communication between the gauge and the pump; and,
- A fast response system for determining liquid level in each bulk storage container such as direct vision gauges.

These systems must be periodically tested to ensure proper observation. Records of these tests shall be maintained at the facility for a minimum of three years.

i. Periodically, effluent treatment facilities shall be observed in order to detect possible system upsets that could cause a discharge.

j. Visible discharges from a container shall be promptly corrected. Any accumulations of oil within a diked area due to the discharge shall be promptly removed.

k. Mobile or portable oil storage containers must be positioned to prevent a discharge to water. A means of secondary containment such as a dike or catchment basin must be provided for the container.

3. Facility Transfer Operations, Pumping and Facility Processes

Newly installed buried piping shall be provided with a protective wrapping and coating. The piping shall also be cathodically protected. Buried piping must be integrity and leak tested at the time of installation, modification, construction, relocation or replacement.

The terminal connection at the transfer point shall be capped or blank flanged and marked as to its origin when the piping is not in service or is in standby service for an extended period of time.

Pipe supports shall be designed to minimize abrasion and corrosion, and to allow for expansion and contraction.

Aboveground valves, piping and appurtenances must be inspected regularly. The inspection must assess the general condition of items such as flange joints and piping supports.

All vehicles entering the facility must have some type of warning to ensure that no vehicle will endanger aboveground piping or other facility transfer operations.

8.0 AMENDMENTS TO SPCC PLANS

SPCC Plans must be amended when there is a change in the facility design, construction, operation, or maintenance that materially affects the potential to discharge oil to water. Examples of changes that may require a plan amendment are:

- Installation or removal of oil-filled equipment/containers;
- Replacement, reconstruction, or movement of oil-filled equipment/containers;
- Reconstruction, replacement, or installation of piping systems;
- Alteration of secondary containment structures;
- Changes in product stored;
- Changes in operation; and,
- Changes in facility layout that could affect an oil discharge.

The amendment must be made to the plan within 6 months of the change and implemented no later than 6 months from the plan amendment.

9.0 REVIEW AND EVALUATION OF SPCC PLANS

Regardless of whether or not there have been any changes to a facility, a complete review and evaluation of the plan must be conducted every 5 years. As a result of the review, the SPCC must be amended, if applicable, within 6 months of the review and any changes and implemented no later than 6 months from the plan amendment.

The review must be documented, and a statement in the plan must be signed as to whether or not the plan will be amended.

Technical amendments require PE certification. Non-technical amendments such as changes to the contact list do not need to be certified by a PE.

10.0 NATIONAL GRID POLICY REGARDING IMPLEMENTATION OF THE SPCC PROGRAM

In response to the regulatory developments in 2006, a "White Paper" was developed to describe National Grid's approach to SPCC compliance. The White Paper was reviewed and endorsed by senior management during the June 18, 2007 US Operations Committee Meeting. The Company's policies regarding the implementation of the SPCC regulations as detailed in the White Paper are described with this section. The White Paper is also maintained as a separate document that can be found on the Environmental Department Infonet site.

10.1 Application of the <10,000 Gallon Qualified Facilities Alternative

The 2006 revisions to the SPCC regulations allow for certain facilities to be classified as "Qualified Facilities." To be classified as a Qualified Facility, a facility must meet the following requirements:

1. The facility must have <10,000 gallons of aggregate aboveground oil storage capacity; and

2. Must not have had either of the following in the three years prior to the SPCC Plan certification date:

   - A single discharge of oil to navigable waters exceeding 1,000 gallons, or
   - Two discharges of oil to navigable waters each exceeding 42 gallons within any 12-month period.

Eligibility is determined by the discharge history from each piece of equipment and not the entire facility.

As stated above, such discharges must have reached Waters of the US in order to count against the facility's eligibility. Detection of petroleum in groundwater monitoring wells does not qualify unless it has been documented that the groundwater has discharged to such areas as surface waters, wetlands, or other similar receptor.

A facility meeting the above criteria may prepare a self-certified plan without a PE review, subject to limitations.

It is National Grid's default position that a PE will be utilized for all SPCC Plans. However, National Grid may selectively utilize this flexibility on a case-by-case basis.

The regulatory revisions allow for SPCC Plans to be reviewed and certified by individuals that are familiar with the SPCC rule and have visited the facility. The owner/operator must certify that the plan has been prepared in accordance with sound industry practices and standards, required testing and inspection procedures have been established, the plan is being implemented, the facility meets the qualifying criteria, the plan does not deviate from the rule requirements except as allowed and certified by a PE and management has approved and committed resources to implement the plan.

Should National Grid utilize this alternative for SPCC Plan development or re-certification, a notation will be included on the SPCC Plan's certification page.

10.2 Use of Contingency Planning

The EPA has provided for contingency planning as an environmental equivalent to the general containment provisions of 40 CFR 112. It is National Grid's policy that contingency planning shall be used as the base method of compliance at all applicable facilities. Contingency Planning will include the following three elements:

1. Inspection and Monitoring Program – A facility owner or operator must be able to quickly detect a discharge from oil-filled operational equipment in order for a contingency plan to be effective. EPA has concluded that an inspection and monitoring program fulfills this requirement. National Grid already has a program in place to conduct inspections. For substations, the inspections are conducted bimonthly and documented through Substation V&O Inspection Reports.

2. Contingency Plan – A detailed oil spill response and removal plan to control, contain and recover oil discharged in quantities that may be harmful to navigable waters or adjoining shorelines is required. The elements of such a contingency plan are outlined in 40 CFR Part 109.

The basic elements, as contained in Part 109, are:

- Authorities, responsibilities and duties of all persons, organizations or agencies involved in oil removal operations are explained/detailed;
- Notification procedures for the purpose of early detection and timely notification of an oil discharge;
- Provisions to ensure that full resource capability is known and can be committed during an oil discharge;
- Provisions for well-defined and specific actions to be taken after discovery and notification of an oil discharge; and,
- Procedures to facilitate recovery of damages and enforcement measures.

The essential parts of these elements are contained in current National Grid SPCC Plans, although information may be interspersed throughout the document. Therefore, a table will be inserted in all SPCC Plans to cross-reference the contingency planning requirements to National Grid's existing SPCC Plan template. Additionally, National Grid has developed spill guidance (EG-502 series) which provide details for spill response and notification to regulators and local officials including the Local Emergency Planning Commission.

3. Commitment of Resources – A facility owner/operator must provide a written commitment of resources to expeditiously control and remove any quantity of oil discharged that may be harmful.

   National Grid currently provides such commitment in its plans, as well as within its procedures and Company policy.

10.3 Optional Use of Containment at Facilities

As stated above, most compliance with SPCC requirements will be achieved through use of Contingency Planning. However, containment and/or diversionary structures will be installed as protective measures at select facilities based upon National Grid's best management practices. Site visits will be conducted at all jurisdictional facilities. Containment/diversionary structures will be required when the site visit determines that sensitive receptors require additional protection. Sensitive receptors include:

- Water bodies that are a source of drinking water or would be projected to directly flow to such a water body prior to spill response;
- Groundwater aquifers used for drinking water;
- Water bodies of significant recreational value;
- Wetlands that are contiguous to a water body used for drinking water or of significant recreational value; and,

- Ecological habitats of significant importance such as vernal pools, rare and endangered species habitat, etc.

Note: Storm water catch basins to POTW's, isolated wetlands, lower class wetlands, intermittent streams and water bodies not used for public drinking water or recreation are, in the Company's opinion, generally not considered sufficiently sensitive to warrant containment in addition to contingency planning.

10.4 Mandatory Containment for New Large Transformers

For all projects involving new installation of large transformers with an oil capacity of >1,320 gallons and which include soil disturbance for equipment foundations, containment/diversionary structures will be installed regardless of the applicability of SPCC regulations. However, there may be cases where installation of such containment is infeasible.

10.5 Optional Containment For Three-Phase Pad-Mounted Transformers

For three-phase pad-mounted transformers, GS 2581 of the National Grid Distribution Standards contains specifications for construction of a containment sump. This specification is followed at installations where containment is required by local authorities or is otherwise justified due to sensitive environmental receptors.

10.6 Mobile Tanks

Mobile or portable oil storage containers, such as portable tanks and drums, are subject to SPCC rules. Mobile oil storage containers must be positioned or located to prevent a discharge to water. A secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container, with sufficient freeboard to contain precipitation, must be furnished. The containment must be sufficiently impervious to contain discharged oil.

Mobile facilities, such as tanker trucks and trailers, only require general containment and/or diversionary structures. General containment provisions apply both during active transfer operations and periods of temporary storage. In many cases, the general containment requirement may be met simply by the presence of a trap rock ground surface in a substation. If trap rock is to be used as general secondary containment, a review of the estimated spill radius for the volume of oil that would most likely be released needs to be performed. If, and only if, the estimated spill impacts do not affect navigable waters, the trap rock may be used as secondary containment. Alternatively (or in addition to), the general containment requirement may be met by using "active" containment. Active containment measures are those that require deployment or other

specific action by the owner or operator and may be deployed either before an activity involving the handling of oil starts, or in reaction to a discharge so long as the active measure is designed to prevent an oil spill from reaching navigable water or adjoining shorelines. Examples include: the use of storm drain covers, spill kits, and sorbent materials, or the closing of drain valves. Whatever the method of general secondary containment utilized, it must account for the most likely volume of oil to be released so that it can be contained and would not reach navigable waters.

Mobile facilities may be deployed at locations which both do and do not have an existing SPCC Plan. Since mobile facilities may require an SPCC Plan on their own or when combined with the existing oil quantities in use or storage at the location of deployment, an SPCC Plan which can be readily implemented is required. In order to comply with the requirement for an SPCC Plan (required on the first day of operation if an oil release could reach Waters of the U.S.), a single generic SPCC Plan will be developed for all tankers and mobile substations.

10.7 Mobile Substations

Mobile substations are considered to be "oil-filled operational equipment," and while subject to specific SPCC requirements, are not subject to the rules and regulations described above concerning "mobile facilities." Mobile substations consist of oil-filled electrical equipment and may be deployed at facilities which both do and do not have an existing SPCC Plan. Since mobile substations may require an SPCC Plan on their own or when combined with the existing oil quantities in use or storage at the location of deployment, a generic SPCC Plan (discussed above) will be developed. The Plan must be in place on the first day of operation.

10.8 Aboveground Storage Tanks

Tanks which are installed on concrete pads or saddles are not considered to be associated with temporary storage of oil. The contingency planning alternative to containment is not available for tanks unless a PE makes a determination of impracticability. Otherwise, all such tanks must have impervious sized secondary containment regardless of whether they contain oil or are empty.

10.9 Drums

Drums that are 55 gallons and greater in capacity are regulated by SPCC and require impervious sized secondary containment if left at the facility unattended. As an alternative to providing on-site secondary containment, National Grid may elect to return the drums at the end of each work day to a facility with properly sized secondary containment.

10.10 Tank Integrity Testing

Aboveground storage tanks will be inspected for integrity in accordance with API 653, STI SP001-03 or an equivalent industry standard. Adherence to this standard meets the requirements of 40 CFR 112.8(c)(6) for "visual inspection with another testing technique."

At substations where AST(s) are located, the AST(s) will, at a minimum, be inspected monthly in accordance with applicable state and local regulations. The inspections will include a check for leaks and structural integrity. National Grid implements the state requirements for tank inspections in accordance with EG-200MA, EG-200NH, EG-200NY and EG-200RI.

In addition to the above, National Grid implements the specific provisions applicable to each type of tank that may be in use as listed below. If there is a difference between state requirements and those listed below, the more stringent requirements are implemented.

1. Tanks on Saddles or Supports

   These shop-built tanks are raised tanks such that all sides of the tank, including the tank bottom are accessible for visual inspection. Such elevated shop built single-wall tanks will be inspected monthly by a knowledgeable National Grid inspector per Section 6.0 of the STI Standard SP-001 (revised July, 2006). In addition, such tanks with a capacity > 5,000 gallons will be subject to formal external inspections by a certified inspector every 20 years per Section 7.0 of the STI Standard SP-001 (revised July, 2006).

2. Double-Wall Tanks

   These shop-built tanks are located on a concrete pad or other relatively impervious material, and the outer shell is supported off the pad by steel supports. These features act as a barrier between the outer wall and the ground and by design the inner tank wall is not in contact with the ground (soil). The interstitial space of these tanks is provided with leak detection or is included in the tank inspection so that leaks will be readily detected. Leakage from the outer shell would also be readily detected during inspection due to the impervious surface upon which the tank is located. Double-wall tanks will be inspected monthly by a knowledgeable National Grid inspector per Section 6.0 of the STI Standard SP-001 (revised July, 2006). In addition, double-wall tanks with a capacity > 5000 gallons will be subject to formal external inspections by a certified inspector every 20 years per Section 7.0 of the STI Standard SP-001 (revised July, 2006). The formal external

inspections do no include non-destructive integrity testing. Rather, they include a detailed visual external inspection, verification that the leak detection system, if present, is working, and the check for a leak of the presence of water in the interstice.

3. Integral (Belly) Tanks

Integral (belly) tanks are tanks that are built into emergency generators. They are UL-listed tanks that are located at the base of the generator and are within a diked containment basin. The containment basin is sized to contain the loss of the AST contents – either lube oil or engine coolant fluid – and is equipped with an audible and visual alarm that indicates if a leak has occurred. Access to the basin is provided so that it may be inspected for leaks during scheduled inspections. The bottom of the basin and the enclosed AST are not visible. However, by design, the AST is not in contact with the ground (soil) and any leaks to the basin would be contained and readily detected. For such tanks, National Grid will use environmentally equivalent protective measures in lieu of integrity testing. The configuration of the emergency generator system, provisions for secondary containment with leak alarms, weekly system inspections and annual alarm testing, and provisions for follow-up actions in accordance with the STI Standard SP-001 (revised July, 2006) are considered good engineering practices to ensure that small leaks that could develop in the tank shell will be detected before they become significant, escape secondary containment, and reach the environment. This approach to such tanks provides adequate environmentally equivalent protection to the requirements of 112.8(c)(6) for integrity testing.

10.11 Policies Regarding Substation on Long Island

The electrical substations on Long Island are owned by the Long Island Power Authority (LIPA) and maintained by National Grid under a Management Services Agreement. On August 14, 2007, legacy KeySpan General Operations Procedure GO-10422 entitled, "Procedure for the Development and Maintenance of Spill Prevention, Control and Countermeasure Plans (SPCC) for LIPA Owned Substations and Fluid Filled Electric Cable Systems" was put into effect. National Grid will follow the policies with this procedure when dealing with the creation and maintenance of SPCCs for LIPA substations. GO-10422 is maintained as a separate document that can be found on the Environmental Department Infonet site.

10.12 SPCC Training

SPCC training programs shall be managed in accordance with National Grid Environmental Procedure No. 12 (EP 12) entitled, "Environmental Training."

Division Data Request 11-32

Request:

Page 38 to 41: For each cost containment strategy, please provide and estimate of the cost to implement and the expected savings or benefits.

Response:

The following tables provide the estimated costs associated with the EDO transformation, as taken from the July 1, 2009 business case. The annual benefits represent the value of benefits to be achieved annually once the capability is fully delivered or implemented. The projected costs and benefits represent unconstrained amounts, and do not reflect risk to achieve these results. Actual performance may produce different results. This information represents the incremental costs associated with the areas identified within the cost containment strategy and is representative of all EDO operating entities, for which the Company is included.

The table below reflects estimated costs to implement over the five year fiscal period. The projected costs and benefits represent unconstrained amounts, and do not reflect risk to achieve these results. Actual performance may produce different results.

($m)	**FY 08/09**	**FY 09/10**	**FY 10/11**	**FY 11/12**	**FY 12/13**
Contracting Strategies	2.6	2.3	-	-	0.1
Customer Management	2.0	3.0	0.6	0.6	0.4
Design	2.7	8.6	8.3	0.6	0.4
Execute Work	10.8	12.9	6.9	7.6	6.5
Manage Assets	3.3	4.1	3.0	1.6	1.5
Operate Network	1.8	4.8	4.7	7.1	7.0

The following table represents the estimated savings or benefits.

O&M Benefits

($m)	**FY 08/09**	**FY 09/10**	**FY 10/11**	**FY 11/12**	**FY 12/13**
Contracting Strategies	0.3	2.7	3.2	3.3	3.4
Customer Management	0.1	0.3	0.3	0.4	0.5
Design	0.2	3.8	6.7	7.8	8.0
Execute Work	0.7	11.3	19.4	22.9	26.1
Manage Assets	0.2	2.0	3.3	3.4	3.5
Operate Network	-	1.1	1.6	4.0	5.4

Prepared by or under the supervision of: John Pettigrew

Division Data Request 11-32 (cont.)

Capital Benefits

($m)	**FY 08/09**	**FY 09/10**	**FY 10/11**	**FY 11/12**	**FY 12/13**
Contracting Strategies	0.4	3.7	4.2	4.3	4.4
Customer Management	-	0.1	0.1	0.1	0.1
Design	0.3	6.0	10.9	12.6	13.0
Execute Work	2.1	16.3	23.8	27.7	31.7
Manage Assets	0.2	7.5	15.9	16.6	17.1
Operate Network	-	-	-	-	-

The primary value drivers that contribute to the benefits for this effort include:

- Centralization and standardization of our design and clerical functions
- Contractor utilization and pricing savings
- Planning and Estimating effectiveness
- Improvements in field work force productivity
- Outsourcing of non-core activities
- Control center consolidations
- Better supervisor to work force ratios

Prepared by or under the supervision of: John Pettigrew

Division Data Request 11-32 (cont.)

Cost Strategy	**Specific strategies/approach**
Asset Management	◆ Standardized design templates and practices ◆ Improved estimating capability ◆ Integrated planning and efficient capital allocation ◆ Unified asset information repository
Customer Management	◆ Single point of accountability for customer requests ◆ End-to-end coordination across processes that touch customers ◆ Consistent customer experience with customer markets and gas
Contracting Strategies	◆ Long-term 3rd party relationships optimized to achieve construction efficiency ◆ Common capability for managing commercial arrangements with T & D ◆ Coordination of contract terms and approaches across LoB's
Work Delivery	◆ Optimize work coordination to maximize crew efficiency ◆ Increase productive time from 5 hrs to 6 hrs ◆ Facilitate crews leaving depots quicker (i.e. 15 minutes) ◆ Supervisor to focus on productivity ◆ Centralize support activities ◆ Standardization of work practices
Construction Design	◆ Design focus on core design and field support activities: ◆ Centralized to drive productivity and standards ◆ Field investigation tasks scheduled to support centralized design ◆ Design QA ensure constructability of designs by company, contractor crews
Network Operations	◆ Consolidation of distribution control centers: ◆ Consolidate centers from 9 to 3 ◆ Standardize across all regions ◆ Consolidate systems to a single suite ◆ Leverage workforce model which backs up one another across each control centre
EDO Transformation Program Costs	◆ Costs associated with delivering the EDO Transformation program including: ◆ Consultancy costs ◆ Contractor costs ◆ Internal Resources ◆ Business related expenses

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Division Data Request 11-42

Request:

Has the Company performed, or is the Company in possession of, any benchmarking studies that compare the operations, management practices, and financial situation of National Grid to other electric distribution companies in the last five years? If so, please provide copies of those studies.

Response:

Please see Attachments DIV-11-42-1 through DIV-11-42-3.

Division Data Request 12-12

Request:

Please provide an electronic workpaper that shows the known and measurable changes in column b, p. 2 of NG-RLO-2 by FERC account.

Response:

The amounts relating to the known and measurable changes on Schedule NG-RLO-2, page 2, column (b) reflect the sum of column (3) plus columns (6) through (16) of the EXCEL spreadsheet provided in the response to Division Data Request 12-13.

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

Division Data Request 12-13

Request:

Please provide an electronic spreadsheet that shows all 2008 expenses in accounts 580 to 935 as reported in Narragansett's FERC Form 1 and then show in separate columns the adjustments made to these numbers: 1); 2) to reflect other known and measurable changes to the test year; 3) to reflect other adjustments to achieve the rate year. The table should show all changes from 2008 FERC Form 1 values by FERC account to the 2010 numbers by account shown in Mr. Gorman's cost of service study, Exhibit NG-HSG-P-1, "Total Distribution Revenue Requirement Class Allocation, pp.4-5."

Response:

Please see Attachment DIV 12-3 for the electronic spreadsheet which reflects known and measurable and pro forma adjustments made in arriving at the $147 million of operating expenses as reflected on Schedule NG-HSG-1, page 5, line 104. Adjustments made to remove net synergy savings are reflected as a separate line item on Schedule NG-HSG-1, page 6, line 125.

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

The Narragansett Electric Company d/b/a National Grid
Operating & Maintenance Accounts
Calculation of Rate Year Expenses

				Known & Measurable Adjustments (NG-RLO-2, Page 2, Column (b) and (c)														
		[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	[11]	[12]	[13]	[14]	[15]	[16]	[17]
Line #	Description	Reg Account	12 Months Ended December 31, 2008	Transmission Wheeling	IFA Reimbursement	IFA Charges Reimbursed	DSM	CTA	Storm Costs	Adjust Uncollect to Write Offs	Reclass to Commodity Uncollect	CWC on Commodity Expense	Reclass of Commodity Admin Costs	Reg Comm Expense	General Advertising	Ice Storm Reclass	Contribution Allowed in Ratemaking	Sub-Total O&M Exp Before Pro Forma Adj
	Expense to be allocated																	
1	Borderline Sales		37,947															37,947
2	O&M Expenses																	-
3	Steam Power Generation Expenses-O&M																	-
4	Operate Steam Power Generation		-	-		-	-	-	-									-
5	Maint Steam Power Generation		-	-		-	-	-	-									-
6	Subtotal Steam Power Generation Expenses-O&M		-	-		-	-	-	-									-
7																		
8	Other Power Generation Expenses-O&M																	
9	Other Power Generation-MiscExp	549000	271	-		-	-	-	-									271
10	Operate Other Power Generation		271	-	-	-	-	-	-	-	-	-	-	-	-	-	-	271
11	Maint Other Power Generation		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Other Power Supply Expenses		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Subtotal Other Power Generation Expenses-O&M		271	-	-	-	-	-	-	-	-	-	-	-	-	-	-	271
14																		
15	Hydro Power Generation Expenses-O&M																	
16	Operate Hydro Power Generation		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Maint Hydro Power Generation		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Subtotal Hydro Power Generation Expenses-O&M		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19																		
20	Transmission Expenses-O&M																	
21	Trans Oper-Supervision & Eng	560000	33,907			(33,907)												-
22	Trans Oper-Load Dispatching	561000	1,080,346			(1,080,346)												-
23	Schd, Sys Cntrl & Dispatch Srv	561400	4,419,734	(4,419,734)														-
24	Reliab, Plan & Standards Dev	561500	52,385			(52,385)												-
25	Trans Oper-Substations	562000	466,384			(466,384)												-
26	Trans Oper-Overhead Lines	563000	71,916			(71,916)												-
27	Trans Oper-Underground Lines	564000	19,293			(19,293)												-
28	Trans Oper-Wheeling	565000	59,320,697	(59,320,697)														-
29	Elec Rev Wheeling-Elim	565035	25,659,157	(25,659,157)														-
30	Sale for Resale-Tran CR-Elim	565037	(38,882,752)		38,882,752													-
31	Trans Oper-Misc Expenses	566000	524,306			(524,306)												-
32	Trans Oper-Rents	567000	19,000			(19,000)												-
33	Oper Transmission Facilities		52,784,373	(89,399,588)	38,882,752	(2,267,537)	-	-	-	-	-	-	-	-	-	-	-	-
34	Trans Maint-Supervision & Eng	568000	235,248			(235,248)												-
35	T Maint of Computer Hardware	569100	24,601			(24,601)												-
36	T Maint of Computer Software	569200	27,618			(27,618)												-
37	T Maint of Communication Equip	569300	8,956			(8,956)												-
38	Trans Maint-Substations	570000	933,790			(933,790)												-
39	Trans Maint-Substation-Trouble	570010	503,445			(503,445)												-
40	Trans Maint-Overhead Lines	571000	223,687			(223,687)												-
41	Trans Maint-Switch-Unplanned	571010	32,796			(32,796)												-
42	Trans Maint-Right of Way	571020	388,837			(388,837)												-
43	Trans Maint-Underground Lines	572000	73,267			(73,267)												-
44	Trans Maint-Misc Expenses	573000	(411,814)			411,814												-
45	Maint Transmission Facilities		2,040,431	-	-	(2,040,431)	-	-	-	-	-	-	-	-	-	-	-	-
46	Subtotal Transmission Expenses-O&M		54,824,804	(89,399,588)	38,882,752	(4,307,968)	-	-	-	-	-	-	-	-	-	-	-	-
47																		
48	Distribution Expenses-O&M																	
49	Dist Oper-Supervision & Eng	580000	1,214,774						116,886									1,331,660
50	Dist Oper-Load Dispatching	581000	2,144,144															2,144,144
51	Dist Oper-Substations	582000	3,062,633					(18,571)										3,044,062
52	Dist Oper-Overhead Lines	583000	5,095,785															5,095,785
53	Dist Oper-Underground Lines	584000	1,750,672															1,750,672
54	Dist Oper-Outdoor Lighting	585000	483,557															483,557
55	Dist Oper-Electric Meters	586000	2,596,836															2,596,836
56	Dist Oper-Customer Installation	587000	1,432,144															1,432,144
57	Dist Oper-Misc Expenses	588000	10,642,693					(510,715)								(185,743)		9,946,235
58	Dist Oper-Rents	589000	18,579															18,579
59	Rents-Building-Dist-Elim	589001	87,554															87,554
60	Rents-Equip-Dist-Elim	589002	1,200															1,200
61	Operate Dist Facilities		28,530,571	-	-	-	-	(529,286)	116,886	-	-	-	-	-	-	(185,743)	-	27,932,428
62	Dist Maint-Supervision & Eng	590000	41,343															41,343
63	Dist Maint-Structures	591000	23,666															23,666
64	Dist Maint-Substations	592000	2,245,055															2,245,055
65	Dist Maint-Substations-Trouble	592010	901,906															901,906
66	Dist Maint-Overhead Lines	593000	9,230,202															9,230,202
67	Dist Maint-OH Lines-Trouble	593010	190,467															190,467
68	Dist Maint-OH Lines-Veg Mgmt	593020	6,546,589						212,052									6,758,641
69	Dist Maint-Underground Lines	594000	1,069,780															1,069,780
70	Dist Maint-Line Transformers	595000	247,381															247,381
71	Dist Maint-Outdoor Lighting	596000	1,564,051															1,564,051
72	Dist Maint-Electric Meters	597000	305,587															305,587
73	Dist Maint-Misc Distr Plant	598000	196															196
74	Maint Distribution Facilities		22,366,223	-	-	-	-	-	212,052	-	-	-	-	-	-	-	-	22,578,275
75	Subtotal Distribution Expenses-O&M		50,896,794	-	-	-	-	(529,286)	328,938	-	-	-	-	-	-	(185,743)	-	50,510,703

The Narragansett Electric Company d/b/a National Grid
Operating & Maintenance Accounts
Calculation of Rate Year Expenses

			Pro forma adjustments (NG-RLO 4 and detail pages)																			Total
		[1]	[18]	[19]	[20]	[21]	[22]	[23]	[24]	[25]	[26]	[27]	[28]	[29]	[30]	[31]	[32]	[33]	[34]	[35]	[36]	[37]
Line #	Description	Reg Account	S&W	Medical & Dental	Group Ins	Pension	FAS 106	Employee Thrift Plan	IS Leasing	Rents	Contract Minimum Staffing	Consumer Advocates	Postage Expense	Rate Case Expense Amort	Inflation	Seasonal Employees	Uncollect Mitigation	Economic Develop	Vegetation Manage	Inspection & Mainten	Uncollect Expense	Pro Forma O&M Expenses
	Expense to be allocated										900,321											
1	Borderline Sales																					37,947
2	O&M Expenses																					
3	Steam Power Generation Expenses-O&M																					
4	Operate Steam Power Generation																					-
5	Maint Steam Power Generation																					-
6	Subtotal Steam Power Generation Expenses-O&M																					-
7																						
8	Other Power Generation Expenses-O&M																					
9	Other Power Generation-MiscExp	549000	21																			292
10	Operate Other Power Generation		21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	292
11	Maint Other Power Generation		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	Other Power Supply Expenses		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Subtotal Other Power Generation Expenses-O&M		21	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	292
14																						
15	Hydro Power Generation Expenses-O&M																					
16	Operate Hydro Power Generation		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Maint Hydro Power Generation		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Subtotal Hydro Power Generation Expenses-O&M		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19																						
20	Transmission Expenses-O&M																					
21	Trans Oper-Supervision & Eng	560000																				-
22	Trans Oper-Load Dispatching	561000																				-
23	Schd, Sys Cntrl & Dispatch Srv	561400																				-
24	Reliab, Plan & Standards Dev	561500																				-
25	Trans Oper-Substations	562000																				-
26	Trans Oper-Overhead Lines	563000																				-
27	Trans Oper-Underground Lines	564000																				-
28	Trans Oper-Wheeling	565000																				-
29	Elec Rev Wheeling-Elim	565035																				-
30	Sale for Resale-Tran CR-Elim	565037																				-
31	Trans Oper-Misc Expenses	566000																				-
32	Trans Oper-Rents	567000																				-
33	Oper Transmission Facilities		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
34	Trans Maint-Supervision & Eng	568000																				
35	T Maint of Computer Hardware	569100																				-
36	T Maint of Computer Software	569200																				-
37	T Maint of Communication Equip	569300																				-
38	Trans Maint-Substations	570000																				-
39	Trans Maint-Substation-Trouble	570010																				-
40	Trans Maint-Overhead Lines	571000																				-
41	Trans Maint-Switch-Unplanned	571010																				-
42	Trans Maint-Right of Way	571020																				-
43	Trans Maint-Underground Lines	572000																				-
44	Trans Maint-Misc Expenses	573000																				-
45	Maint Transmission Facilities		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
46	Subtotal Transmission Expenses-O&M		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
47																						
48	Distribution Expenses-O&M																					
49	Dist Oper-Supervision & Eng	580000	98,233								50,886				285							1,481,064
50	Dist Oper-Load Dispatching	581000	149,055								77,213				1,646							2,372,058
51	Dist Oper-Substations	582000	74,158								38,415				17,688							3,174,323
52	Dist Oper-Overhead Lines	583000	125,025								64,765				29,512							5,315,086
53	Dist Oper-Underground Lines	584000	59,515								30,829				8,291							1,849,307
54	Dist Oper-Outdoor Lighting	585000	29,758								15,415				804							529,534
55	Dist Oper-Electric Meters	586000	158,502								82,106				4,463							2,841,907
56	Dist Oper-Customer Installation	587000	88,787								45,993				2,308							1,569,232
57	Dist Oper-Misc Expenses	588000	435,612								225,653				34,895					1,852,903		12,495,299
58	Dist Oper-Rents	589000	1,059								549				158							20,345
59	Rents-Building-Dist-Elim	589001													747							88,301
60	Rents-Equip-Dist-Elim	589002													10							1,210
61	Operate Dist Facilities		1,219,704	-	-	-	-	-	-	-	631,824	-	-	-	100,807	-	-	-	-	1,852,903	-	31,737,666
62	Dist Maint-Supervision & Eng	590000													234							41,577
63	Dist Maint-Structures	591000	1,026								532				87							25,311
64	Dist Maint-Substations	592000	85,948								44,522				9,558							2,385,084
65	Dist Maint-Substations-Trouble	592010	26,513								13,734				4,734							946,887
66	Dist Maint-Overhead Lines	593000	317,262								164,346				40,617							9,752,427
67	Dist Maint-OH Lines-Trouble	593010	3,654								1,893				96							196,111
68	Dist Maint-OH Lines-Veg Mgmt	593020	2,829								1,466				4,420				1,985,323			8,752,678
69	Dist Maint-Underground Lines	594000	11,779								6,102				7,810							1,095,470
70	Dist Maint-Line Transformers	595000	9,328								4,832				1,069							262,610
71	Dist Maint-Outdoor Lighting	596000	52,999								27,454				7,426							1,651,930
72	Dist Maint-Electric Meters	597000	6,982								3,617				1,827							318,013
73	Dist Maint-Misc Distr Plant	598000													2							198
74	Maint Distribution Facilities		518,321	-	-	-	-	-	-	-	268,497	-	-	-	77,881	-	-	-	1,985,323	-	-	25,428,297
75	Subtotal Distribution Expenses-O&M		1,738,025	-	-	-	-	-	-	-	900,321	-	-	-	178,688	-	-	-	1,985,323	1,852,903	-	57,165,963

The Narragansett Electric Company d/b/a National Grid
Operating & Maintenance Accounts
Calculation of Rate Year Expenses

Line #	Description	Reg Account	[1] 12 Months Ended December 31, 2008	Known & Measurable Adjustments (NG-RLO-2, Page 2, Column (b) and (c)) [3] Transmission Wheeling	[4] IFA Reimbursement	[5] IFA Charges Reimbursed	[6] DSM	[7] CTA	[8] Storm Costs	[9] Adjust Uncollect to Write Offs	[10] Reclass to Commodity Uncollect	[11] CWC on Commodity Expense	[12] Reclass of Commodity Admin Costs	[13] Reg Comm Expense	[14] General Advertising	[15] Ice Storm Reclass	[16] Contribution Allowed in Ratemaking	[17] Sub-Total O&M Exp Before Pro Forma Adj
76																		
77	Customer Expenses-O&M																	
78	Cust Acct-Supervision	901000	1,126,914					(344)								(1,466)		1,125,104
79	Cust Acct-Meter Reading Exp	902000	1,211,647															1,211,647
80	Cust Records & Collection	903000	10,704,988					(802)										10,704,186
81	Uncollectible Accounts	904000	12,748,167							(7,861,885)	(527,517)							4,358,765
82	Commodity Costs Tracker										527,517	1,688,117	32,900					2,248,534
83	Remove Commodity Cost Tracker Costs										(527,517)	(1,688,117)	(32,900)					(2,248,534)
84	Cust Acct-Misc Expenses	905000	1,021,581					(175)										1,021,406
85	Customer Accts Oper Exp-Elec		26,813,297	-	-	-	-	(1,321)	-	(7,861,885)	(527,517)	-	-	-	-	(1,466)	-	18,421,108
86																		
87	Cust Service-Supervision	907000	82,193															82,193
88	Cust Assistance Expenses	908000	15,594,308				(14,286,213)											1,308,095
89	Info&Instruct Advertising Exp	909000	347,746															347,746
90	Cust Service-Misc Expenses	910000	2,379,969															2,379,969
91	Demo & Selling Expenses	912000	423															423
92	Sales-Misc Expenses	916000	212															212
93	Cust Service & Info Expenses		18,404,851	-	-	-	(14,286,213)	-	-	-	-	-	-	-	-	-	-	4,118,638
94																		
95	Administration Expenses-O&M																	
96	A&G-Salaries	920000	9,118,040			(420,751)		(14,122)					(95,925)			(105)		8,587,137
97	A&G-Office Supplies	921000	9,848,177			(462,453)		58,994					(32,900)					9,411,818
98	A&G-Outside Services Employed	923000	2,436,365			(115,483)		(436,032)										1,884,850
99	Property Insurance	924000	1,078,119			(50,434)												1,027,685
100	Injuries & Damages Insurance	925000	7,054,506			(351,174)		(166)								56		6,703,222
101	Employee Pensions & Benefits	926000	19,530,978			(953,372)		(2,747,832)					(72,960)			(38,810)		15,718,004
102	Regulatory Comm Expenses	928000	3,330,759			(154,654)								975,367				4,151,472
103	A&G-Institutional/Goodwill Adv	930110	508,532			(21,581)		(242,856)							(244,095)			0
104	A&G-Misc Expenses	930200	4,012,435			(185,533)												3,826,902
105	A&G-Research & Development	930210	128,069			(5,918)												122,151
106	A&G-Rents	931000	3,418,388			(164,060)		(118,457)										3,135,871
107	Airplane Rent Expense-Elim	931005	38,196			(1,017)												37,179
108	NE Share CSS Costs-Elim	931006	724,189			(34,737)												689,452
109	Contributions - Allowed for Ratemaking																548,593	548,593
110	A&G Operations Expense		61,226,753	-	-	(2,921,167)	-	(3,500,472)	-	-	-	-	(201,785)	975,367	(244,095)	(38,859)	548,593	55,844,335
111																		-
112	A&G Maint-General Plant-Elec	935000	256,704			(12,156)												244,548
113	Subtotal Administration Expenses-O&M		61,483,457	-	-	(2,933,323)	-	(3,500,472)	-	-	-	-	(201,785)	975,367	(244,095)	(38,859)	548,593	56,088,883
114																		
115	Total Purchased Power		37,947															37,947
116	Total Operation Expenses		187,760,116	(89,399,588)	38,882,752	(5,188,704)	(14,286,213)	(4,031,080)	116,886	(7,861,885)	(527,517)	-	(201,785)	975,367	(244,095)	(226,068)	548,593	106,316,779
117	Total Maintenance Expenses		24,663,358	-	-	(2,052,587)	-	-	212,052	-	-	-	-	-	-	-	-	22,822,823
118																		
119	O&M Expenses		212,461,421	(89,399,588)	38,882,752	(7,241,291)	(14,286,213)	(4,031,080)	328,938	(7,861,885)	(527,517)	-	(201,785)	975,367	(244,095)	(226,068)	548,593	129,177,549
120																		
121				NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2		NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2
122				Page 2	Page 2	Page 2	Page 2	Page 2	Page 2	Page 2	Page 2		Page 2	Page 2	Page 2	Page 2	Page 2	Page 2, Line 35
123																		Plus Borderline
124																		
125	Adjustment per NG-RLO-2, Page 2, Column (b)			(89,399,588)			(14,286,213)	(4,031,080)	328,938	(7,861,885)	(527,517)	-	(201,785)	975,367	(244,095)	(226,068)	548,593	(114,925,333)
126	Adjustment per NG-RLO-2, Page 2, Column (c)				38,882,752	(7,241,291)											-	31,641,461
127	Total Adjustments per NG-RLO-2, Columns (b) and (c)																	(83,283,872)
128																		
129																		
130																		
131																		
132																		
133	1/ Agrees to NG-HSG-1, Page 5, Line 104 (difference = rounding)																	
134																		
135																		
136																		
137																		

The Narragansett Electric Company d/b/a National Grid
Operating & Maintenance Accounts
Calculation of Rate Year Expenses

Line #	Description	Reg Account	[1]	Pro forma adjustments (NG-RLO 4 and detail pages) [18] S&W	[19] Medical & Dental	[20] Group Ins	[21] Pension	[22] FAS 106	[23] Employee Thrift Plan	[24] IS Leasing	[25] Rents	[26] Contract Minimum Staffing	[27] Consumer Advocates	[28] Postage Expense	[29] Rate Case Expense Amort	[30] Inflation	[31] Seasonal Employees	[32] Uncollect Mitigation	[33] Economic Develop	[34] Vegetation Manage	[35] Inspection & Mainten	[36] Uncollect Expense	Total [37] Pro Forma O&M Expenses
76																								
77	Customer Expenses-O&M																							
78	Cust Acct-Supervision	901000		70,289												1,969							1,197,361
79	Cust Acct-Meter Reading Exp	902000		69,400												2,909	342,100						1,626,056
80	Cust Records & Collection	903000		240,910										73,270		54,643		376,255					11,449,264
81	Uncollectible Accounts	904000														-						(57,549)	4,301,216
82	Commodity Costs Tracker																						2,248,534
83	Remove Commodity Cost Tracker Costs																						(2,248,534)
84	Cust Acct-Misc Expenses	905000		48,999												3,643							1,074,048
85	Customer Accts Oper Exp-Elec			429,599	-	-	-	-	-	-	-	-	-	73,270	-	63,163	342,100	376,255	-	-	-	(57,549)	19,647,946
86																							
87	Cust Service-Supervision	907000		6,161												15							88,369
88	Cust Assistance Expenses	908000		77,676									120,000			2,796							1,508,566
89	Info&Instruct Advertising Exp	909000														3,331							351,077
90	Cust Service-Misc Expenses	910000		65,737												14,558			1,000,000				3,460,264
91	Demo & Selling Expenses	912000														4							427
92	Sales-Misc Expenses	916000		16												0							228
93	Cust Service & Info Expenses			149,590	-	-	-	-	-	-	-	-	120,000	-	-	20,703	-	-	1,000,000	-	-	-	5,408,931
94																							
95	Administration Expenses-O&M																						
96	A&G-Salaries	920000		633,239												2,765							9,223,141
97	A&G-Office Supplies	921000		360												85,903							9,498,081
98	A&G-Outside Services Employed	923000														17,215							1,902,065
99	Property Insurance	924000														9,386							1,037,071
100	Injuries & Damages Insurance	925000		44,658												55,886							6,803,766
101	Employee Pensions & Benefits	926000		15,028	713,244	48,661	4,470,254	1,070,902	144,870			462,481	61,643			(14,144)	13,699				241,402		22,946,043
102	Regulatory Comm Expenses	928000		32,740											865,000	34,005							5,083,217
103	A&G-Institutional/Goodwill Adv	930110		2,518												(301)							2,217
104	A&G-Misc Expenses	930200		38,888												2,193							3,867,983
105	A&G-Research & Development	930210		1,796												901							124,848
106	A&G-Rents	931000								(412,103)	554,455					28,641							3,306,864
107	Airplane Rent Expense-Elim	931005														340							37,519
108	NE Share CSS Costs-Elim	931006														6,297							695,749
109	Contributions - Allowed for Ratemaking																						548,593
110	A&G Operations Expense			769,227	713,244	48,661	4,470,254	1,070,902	144,870	(412,103)	554,455	462,481	61,643	-	865,000	229,087	13,699	-	-	-	241,402	-	65,077,157
111																							
112	A&G Maint-General Plant-Elec	935000		5,667												1,556							251,771
113	Subtotal Administration Expenses-O&M			774,894	713,244	48,661	4,470,254	1,070,902	144,870	(412,103)	554,455	462,481	61,643	-	865,000	230,643	13,699	-	-	-	241,402	-	65,328,928
114																							
115	Total Purchased Power			-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	37,947
116	Total Operation Expenses			2,568,141	713,244	48,661	4,470,254	1,070,902	144,870	(412,103)	554,455	1,094,304	181,643	73,270	865,000	413,760	355,799	376,255	1,000,000	-	2,094,305	(57,549)	121,871,991
117	Total Maintenance Expenses			523,988	-	-	-	-	-	-	-	268,497	-	-	-	79,438	-	-	-	1,985,323	-	-	25,680,069
118																							
119	O&M Expenses			3,092,129	713,244	48,661	4,470,254	1,070,902	144,870	(412,103)	554,455	1,362,802	181,643	73,270	865,000	493,198	355,799	376,255	1,000,000	1,985,323	2,094,305	(57,549)	147,590,007
120																							
121				NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2	NG-RLO-2		
122				Page 5	Page 8	Page 9	Page 10	Page 11	Page 12	Page 13	Page 14	Page 15	Page 16	Page 17	Page 18	Page 19	Page 20	Page 21	Page 22	Page 23	Page 24	Page 25	147,590,007 1\
123																							
124																							
125	Adjustment per NG-RLO-2, Page 2, Column (b)			3,092,129	713,244	48,661	4,470,254	1,070,902	144,870	(412,103)	554,455	1,362,802	181,643	73,270	865,000	493,198	355,799	376,255	1,000,000	1,985,323	2,094,305		18,470,007
126	Adjustment per NG-RLO-2, Page 2, Column (c)																					(57,549)	(57,549)
127	Total Adjustments per NG-RLO-2, Columns (b) and (c)																						18,412,458
128																							
129				NG-RLO-2, Page 4, line 39																NG-RLO-1, Page 1, Line 11, Column h			37,947
130				NG-RLO-2, Page 4, line 43																NG-RLO-1, Page 1, Line 15, Column h			137,113,118
131																				NG-RLO-1, Page 1, Line 16, Column h			5,020,447
132																				NG-RLO-1, Page 1, Line 18, Column h			548,593
133	1/ Agrees to NG-HSG-1, Page 5, Line 104 (difference = rounding)																			NG-RLO-1, Page 1, Line 19, Column h			2,511,132
134																				NG-RLO-1, Page 1, Line 20, Column h			3,078,000
135																				Total			148,309,237
136																				Less NG-RLO-1, Page 1, Line 16, Column i			(719,231)
137																				Total (agrees to amount in line 119 above)			147,590,006

Division Data Request 17-3 (Revised)

Request:

Follow up to DIV 1-29, regarding Account 583:

(a) When did the new survey and inspection program begin?

(b) Do the survey and inspection program costs included in the cost of service include startup and planning costs?

(c) Please provide detail on the costs, by activity, included in the 2008 costs of the survey and inspection program.

(d) Are the costs of the survey and inspection program charged to the Company by the National Grid or KeySpan Service Companies?

(e) If the Service Companies charge for the survey and inspection program, please provide detail of these charges.

Response:

Please note that the Company's original response to DIV 17-3 (c) inadvertently did not provide the requested information. Item (c) below replaces the Company's original answer.

(c) Please see Attachment DIV 17-3 (c) which provides detail on the 2008 survey and inspection program costs, summarized by activity, cost category (expense type), and originating business unit.

Prepared by or under the supervision of: John Pettigrew

Narragansett Electric Company
Analysis of FERC 583 - Calendar 2008
NE Survey and Inspection Program
Charges Originating from National Grid Service Company

	Sum of Posted Jrnl $					Orig Bus Unit Descr		
Line	Project	Activity	Activity Descr	Expense T	Expense Type Descr	Narragansett Electric Company	National Grid USA Service Co.	Grand Total
1	X04782	DO1100	Perform Distribution Overhead	110	Contractors Services	(173,450)	2,233,960	2,060,510
2				200	Employee Expenses		2,692	2,692
3				300	Hardware		508	508
4				400	Other		337	337
5				A60	Supervision & Admin		3,395	3,395
6				A65	Service Co Operating Costs		115	115
7				M10	Materials Outside Vendor		876	876
8				M20	Materials From Inventory		0	0
9				M50	Materials Stores Handling		0	0
10				P15	Regular Pay Monthly		43,159	43,159
11				P30	Bonus & Misc Pay		3,479	3,479
12				P50	Time Not Worked		7,349	7,349
13				T10	Transportation		9,217	9,217
14	Grand Total					(173,450)	2,305,085	2,131,635

Division Data Request 17-4

Request:

Follow up to DIV 1-29, with regard to account 588:

a) Please describe this "program."

b) Please specify how this program is intended to improve customer satisfaction, reliability, and efficiency.

c) Please provide any analysis that demonstrated the costs and benefits of this program.

d) Was the cost of this program charged to the Company by the Service Companies in 2008 or directly incurred by the Company?

Response:

(a) As part of the Company's ongoing efforts to improve the effectiveness and efficiency of service to customers, Electricity Distribution Operations has formalized its current review of its work processes in a program to which it refers as "transformation".

(b) The Company's goal as part of the transformation effort is to realize its vision of becoming a first quartile performer in North America in safety, efficiency, reliability and customer satisfaction. The specific objectives of the transformation efforts are to:

- Identify best practices and establish common approaches to support an integrated operating model.
- Strive for operational excellence in customer service, reliability, safety, and efficiency.
- Develop asset strategies and regulatory support to enhance the long term sustainability of the Company's networks.
- Develop new approaches to planning the Company's networks and customer services.
- Create a high-performance culture.

Transformation is occurring in three phases:

Prepared by or under the supervision of: John Pettigrew

Division Data Request 17-4 (cont.)

Strategic Assessment, Design, and Implement Phase I (Strategic Assessment) began August 14, 2007 and concluded November 9, 2007. A Transition Phase (Planning & Mobilization) was initiated December 4, 2007 and was completed January 31, 2008. Phase II (Design) began February 4, 2008 and concluded May 30, 2008. Phase III (Implementation) kicked-off on June 2, 2008.

The initiation of the formal transformation efforts required necessary investments in people, processes, and technologies. Expenditures associated with the program included the following:

- Employee related costs for resources assigned both full and part time to transformation efforts. These costs would include base pay, overtime pay, benefits and overheads.
- Employee business expenses incurred for work done on behalf of transformation.
- Materials consumed or used for work performed by the team.
- Contractor costs for incremental resources sourced to assist in the review process and augment the internal employees already working on the team.
- Consultancy costs related to the engagement of third party consultants that provide specialized services and capabilities.
- Information Technology expenditures related to the enablement of specific process automation or delivery of new or improved capabilities within the solution portfolio.

(c) Please refer to the response to Division Data Request 11-32.

(d) Costs of the program in 2008 consist of charges incurred directly by the Company in the amount of $83,055 and charges allocated to the Company by the Service Company in the amount of $1,924,409.

Prepared by or under the supervision of: John Pettigrew

Division Data Request 17-5

Request:

Follow up to DIV 1-29, with regard to account 593:

a) Were the $1.9 million in storm costs excluded form the Company's projection of rate year costs?

b) Please describe in detail the $1.4 million in system reliability programs.

c) Please describe how the system reliability programs differed from how the Company had previously operated and maintained its system.

d) Were these system reliability programs developed and performed by Narragansett itself or by the Service Companies?

Response:

(a) The $1.9 million increase in Account 593 related to storm costs reflects storm costs that did not meet the eligibility requirements as incremental costs subject to reimbursement by (and hence transfer to) the Storm Fund. Therefore, unreimbursed storm costs remaining in the Company's operating expenses in the test year are included in the Company's revenue requirement calculation.

(b) Please see Attachment DIV 17-5 (b), which details the activities performed relating to system reliability programs for the years in question.

(c) Historically, distribution components have been addressed on a fix-on-fail basis with trees, animals, lightning, and deteriorated equipment being primary influences on reliable system performance. In addition, operating area specific and sponsored programs such as infrared inspections, feeder patrols, and padmount transformer inspections were performed on an ad hoc basis and not as a uniform program across the service area. This approach was reactive and repair-oriented and thus problems of an immediate nature were addressed.

The Reliability Enhancement Program (REP) was developed in 2006 to address reliability trending that was unfavorable. The REP program consists of four major initiatives:

Division Data Request 17-5 (cont.)

1. Feeder Hardening/Engineering Reliability Reviews
2. Incremental Asset Replacement
3. Incremental Vegetation Management
4. Inspection and Maintenance

In 2009, National Grid began development of the Inspection and Maintenance Strategy. The Inspection and Maintenance Strategy builds on the lessons learned from REP and develops a comprehensive program to drive a consistent approach in all states by implementing best practices, which once fully implemented, will replace Feeder Hardening and some of the distribution line asset replacement programs. The proposed approach focuses on a systematic inspection and maintenance schedule which is proactive, and establishes a work plan for assets based upon actual condition assessments.

Under the revised approach, the Company will take a more holistic approach to capital spending, in that capital investment will be informed and motivated by inspection data, field conditions and systematic repair and replacement schedules, rather than arising from performance failures or deficiencies. The key to the new inspection and maintenance program is that it is a systematic inspection of the distribution system on a five-year cycle with maintenance derived from those inspections. This cyclical inspection and maintenance program will play a significant role in maintaining a sustainable and reliable system as well as meeting regulatory requirements. The data compiled from field inspection is going to provide the Company with an accurate assessment of the condition of our assets, which will help optimize our budget, determine work priorities, and improve service quality to our customers. The inspection will also help National Grid capture other asset information and asset conditions as needed, which will be used for asset strategies or assets decision-making. The inspection and maintenance process is efficient as it introduces the use of a new computer-based handheld device that captures the field notes, which are entered by the inspector and synchronizes automatically into our work order system. The concepts contained within this program are consistent with accepted asset management principles.

(d) Over 90% of the $1.4M increase in the system reliability programs originated from The Narragansett Electric Company.

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

The Narragansett Electric Company
Summary of Selected Projects
Ferc 593 Activity

Line	Project Descr	Activity	Activity Descr	2007 Total	2008 Total	Change Total
1	OSD - NE VEGETATION CAPITAL	DM1000	Supv&Admin OH	77,112	107,543	30,431
2		DM1010	Perform Spot Tree Trim/Clear L	72,460	45,709	(26,751)
3		DM1205	Perform Right of Way Cleanup -	59,376	68,694	9,318
4		DM1210	Perform Trouble Maintenance Ve	31,336	33,124	1,789
5		DM1215	Perform Planned Cycle Trimming	1,870,940	2,320,860	449,920
6		DM1218	Cycle Trimming Police Protect	22,388	37,991	15,604
7		DM1220	Perform Hazardous Tree Removal	113,141	127,912	14,771
8		DM1225	Perform Distribution Right of	0	271	271
9		DM1230	Perform Off Road Feeder Trimmi	82	75,694	75,612
10		DM1235	Perform Interim Trimming - Dis	57,406	52,552	(4,854)
11		DM1240	Perform Tree Planting - Distri	792	3,283	2,491
12		DM1245	Perform Vendor Incentives - Di	4,401	4,779	378
13		DM1250	Perform Special Tree Trimming	62,813	17,745	(45,069)
14		DM1255	Perform 3rd Party Make Ready W	0	5,137	5,137
15	OSD - NE VEGETATION CAPITAL TOTALS			2,372,246	2,901,294	529,048
16	VEGETATION MGMT PROJECTS	DM1000	Supv&Admin OH	26,772	89,711	62,939
17		DM1221	Hazard Tree Off-Cycle	231,694	838,566	606,872
18		DM1222	Worst Performing Feeder Trimmg	12,780	0	(12,780)
19		DM1250	Perform Special Tree Trimming	106,039	244,465	138,427
20		DM1255	Perform 3rd Party Make Ready W	0	27,316	27,316
21	VEGETATION MGMT PROJECTS TOTALS			377,285	1,200,058	822,773
22	GRAND TOTAL			2,749,530	4,101,352	1,351,821

Division Data Request 17-8

Request:

How do the hourly costs booked by Narragansett employees in account 583 compare to the hourly costs reflected in Service Company charges to Narragansett in account 583.

Response:

The hourly labor costs charged in calendar year 2008 by Narragansett employees in Account 583 was $1.152 million. Service Company charges in calendar year 2008 to Narragansett in Account 583 were approximately $40,000.

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

Division Data Request 17-10

Request:

Please provide any benchmarking studies, responses to RFPs, or other evidence that the Service Company has performed services for the Company for lower cost than they could be provided directly by the Company or through other providers.

Response:

Please see the direct testimony and exhibits of Mr. Dowd for labor and benefits related benchmarking studies. Although the Company has prepared no such studies for non-labor related services, the Company believes that the total costs charged for services from the Service Company are lower than costs for those services from other providers because of the operations of the shared service organization.

National Grid operates in four state jurisdictions encompassing 12 regulated electric and gas entities and its wholesale transmission and generation businesses are regulated by FERC. The service company arrangement employed by National Grid provides economies of scale as service company shared services and operations departments support each of these jurisdictional entities with the same personnel and overheads, which are shared by all entities. Service company costs are billed out at cost, without a mark up, and are directly charged to each National Grid entity for work performed directly for that entity and are charged an allocated amount for shared costs based on cost causation billing pools. In addition, a large portion of service company costs are labor and payroll overheads. Finally, rigorous and disciplined procurement procedures are followed for outsourced products and services with the benefit of combining cross regional requirements into single strategic sourcing events. The result is greater efficiency in the sourcing process along with an increased level of competition and supplier efficiencies in supporting a considerably larger requirement.

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

Division Data Request 17-11

Request:

Please provide in an electronic worksheet the full amount, by FERC account, of Costs to Achieve the merger that were reflected in Narragansett's FERC Form 1 2007 and 2008 booked costs. Show separate columns for costs allocated or assigned from the Service Companies to Narragansett, costs assigned by any other NGrid affiliates, and costs directly incurred by Narragansett that are considered to be Costs to Achieve.

Response:

Please see Attachment DIV 17-11 for the requested information. It should be noted that the Costs to Achieve amount for 2008 reflects the corrected amount of $3,631,835 as provided in the response to Division Data Request 3-4, rather than the amount of $4,031,080 reflected in revenue requirement calculation on Schedule NG-RLO-2, page 2, line 14.

The Narragansett Electric Company
2007 Costs to Achieve Costs by FERC account

		Costs Allocated From:					
Line	Regulatory Acct	New England Power	Niagara Mohawk	Narragansett Gas	Narragansett Electric	NGUSA Service Co.	Grand Total
1	562000					3,703	3,703
2	566000					10	10
3	582000	97,060				43,525	140,585
4	586000				15,000		15,000
5	588000	35				3,755	3,790
6	920000					42,744	42,744
7	921000		539	124,476	129,956	919,152	1,174,123
8	923000				10355.95	885,441	895,797
9	925000					66	66
10	926000				1,340,963	595	1,341,558
11	931000					908	908
12	Grand Total	97,095	539	124,476	1,496,275	1,899,899	3,618,284

The Narragansett Electric Company
2008 Costs to Achieve Costs by FERC account

		Costs Allocated From:						Plus	Less	Total
Line	Regulatory Acct	National Grid USA	Narragansett Gas	Narragansett Electric	NGUSA Service Co.	KeySpan Corp. Services LLC	Grand Total	Adjustment (1)	Transmission (2)	CTA Adjustment
1	562000				19,123		19,123		(19,123)	-
2	566000				3		3		(3)	-
3	582000				45,195		45,195			45,195
4	588000				2,261		2,261			2,261
5	901000				344		344			344
6	903000				802		802			802
7	905000				175		175			175
8	920000				14,620	84	14,704			14,704
9	921000	(7,071)	82,512	2,500	(21,010)	41,461	98,392			98,392
10	923000	(36,349)			171,034	35,733	170,418	190,232		360,650
11	925000				166		166			166
12	926000		324,426	610,485	1,812,921		2,747,832			2,747,832
13	930110					242,856	242,856			242,856
14	931000				118,457		118,457			118,457
15	Grand Total	(43,420)	406,938	612,985	2,164,093	320,134	3,460,730	190,232	(19,127)	3,631,835

(1) Originated by KeySpan Corp. Services LLC
(2) Originated by National Grid USA Service Company, Inc.

Division Data Request 21-1

Request:

Please explain why the Large Customer Group is responsible for 42.7 percent of the "Estimated Standard Offer Service Related kWh Deliveries" on line 2, page 1 of Schedule NG-RLO-6, but is responsible for 46 percent of the "Total Commodity Revenue" on line 2 in Section 2, page 15 of Schedule NG-RLO-6. This suggests that the revenue per kWh paid by the Large Customer Group is higher than the revenue per kWh paid by the Small Customer Group.

Response:

The "Estimated Standard Offer Service Related kWh Deliveries" on line 2, page 1 of Schedule NG-RLO-6 are based on forecasted 2010 kilowatt hours deliveries and on the March 2009 ratio of Standard Offer and Last Resort kWh deliveries to total Company kWh deliveries. The "Total Commodity Revenue" on line 2, Section 2, page 15 of Schedule NG-RLO-6 is actual 2008 Standard Offer revenue. As shown on Attachment DIV 21-1, in 2008, the Large Customer Group was responsible for 46.6% of Standard Offer and Last Resort kWh deliveries.

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

The Narragansett Electric Company
2008 Standard Offer & Last Resort kWh by Rate Class

	Standard Offer Total	Last Resort Total	Standard Offer & Last Resort Total
A16	2,624,064,327	5,119,473	2,629,183,800
A60	178,136,403	400,754	178,537,157
B32	119,173	3,346,758	3,465,931
B62	35,182,386	-	35,182,386
C06	483,388,098	3,687,162	487,075,260
C08	1,601,341	1,100	1,602,441
E30	1,328,510	49,520	1,378,030
E40	2,755,514	-	2,755,514
G02	1,127,099,107	49,027,273	1,176,126,380
G32	1,205,249,538	148,179,221	1,353,428,759
G62	318,206,588	17,959,252	336,165,840
R02	2,951,789	1,562	2,953,351
S10	8,979,563	192,173	9,171,736
S14	5,136,807	1,741,338	6,878,145
T06	8,771,145	1,357,387	10,128,532
X01	-	-	-
Total	6,002,970,289	231,062,973	6,234,033,262
Large Customer	2,685,856,792	218,512,504	2,904,369,296
Small Customer	3,317,113,497	12,550,469	3,329,663,966
Total	6,002,970,289	231,062,973	6,234,033,262
Large Customer %	44.7%	94.6%	46.6%
Small Customer %	55.3%	5.4%	53.4%

Division Data Request 21-5

Request:

Please reconcile the "Commodity-related costs Tracker" amounts shown for each class on line 38, page 2 of Schedule NG-HSG-4 with "Total Standard Offer Administrative Costs" for the two customer groups shown on line 1 of page 1 of Schedule NG-RLO-6. Specifically, explain why the sum of the amounts for Residential, Small C&I and Lighting in Schedule NG-HSG-4 sum to $8,256,000 while the Small Customer Group amount in Schedule NG-RLO-6, page 1 is $7,661,160.

a. Please provide the data and calculations used to develop the "Commodity-related costs Tracker" amounts for each class on line 38, page 2 of Schedule NG-HSG-4.

Response:

The Commodity-related cost shown on line 38, page 2 of Schedule NG-HSG-4 is allocated to each rate class based on the percentage of Bad Debt Expense for each rate class to total Bad Debt Expense.

The Standard Offer Administrative cost shown on line 1, page 1 of Schedule NG-RLO-6 is based on separate allocations of each administrative cost to each rate class. Energy Supply Department Labor Costs, Procurement Support Costs, Ongoing Administrative Support Costs, Customer Communication & Rate Change Processing Costs, and Environmental Disclosure Label Costs are allocated to 50% to the Large Customer Group and 50% to the Small Customer Group. This cost is then allocated to each rate class based on the percentage of Commodity Revenue for each rate class to total Commodity Revenue for the customer group. Uncollectible accounts expense associated with commodity, which is based on an allocation of total uncollectible accounts expense calculated from the Company's financial statements between commodity and delivery, is allocated based on actual net charge-offs for each rate class as processed and reported in the Company's CSS system, which is intended to align with the manner by which the Company incurs this cost. Working Capital is allocated to each rate class based on the percentage of Commodity Revenue for each rate class to total Commodity Revenue.

Please note that the class allocations as developed in Schedule NG-RLO-6 are the costs upon which the proposed Commodity Cost Adjustment factors are based. The allocations of commodity related costs shown in Schedule NG-HSG-4, page 2, line 38 are used only to determine the constraints applied to the class revenue requirements.

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

Navy Data Request 3-5 (Supplemental)

Request:

Referring to Schedule NG-HSG-1, page 43 of the Company's filing:

(a) Please provide a detailed explanation of the Company's rationale for classifying the distribution plant costs in Accounts 364 – 367 as exclusively demand-related, with no customer component.

(b) Please provide copies of all prior orders and decisions of the Rhode Island Commission that support the Company's proposal to classify the distribution plant costs in Accounts 364 – 367 as exclusively demand-related, with no customer component.

(c) Please provide the total cost and actual size for each type of distribution facility included in the cost of service study under Accounts 364 – 368.

(d) Please provide the cost and size of the minimum sized unit for each type of distribution facility included in the cost of service study under Accounts 364 – 368.

(e) Please provide a copy of any minimum distribution system studies prepared by or for the Company for the purpose of classifying costs in Accounts 364 – 368 into demand and customer components, whether such studies were prepared for the current rate proceeding or for other purposes.

Response:

(c) Please see Attachment NAVY 3-5(c) for the total cost for each type of distribution facility included in the Accounts 364-368. All of the assets in the accounts reside in the Company's major location called Mass Plant. The assets in Mass Plant are separated by Utility Account, retirement unit, and town identification. The assets compose all of the distribution line, both underground and overhead and are less than 69KV. Each asset is not tracked by feeder, line number, or KV in the CPR.

(d) The Company is unable to provide the requested data because assets in Mass Plant accounts such as Accounts 364 – 368 are not tracked by feeder line number or by KV, as indicated in the response to (c) above.

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