

December 11, 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 and Record Requests**

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Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's<sup>1</sup> responses to data request COMM 11-3 (Revised) issued by the Commission in the above-referenced proceeding, as well as the Company's response to record requests issued by the Commission, the Division and TEC-RI during the evidentiary hearings. Attached is a listing of the data requests and record requests issued to date and designating the responses included in this filing in bold.

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

Very truly yours,



Thomas R. Teehan

Enclosures

cc:     Docket 4065 Service List

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

December 11, 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  
Motion for Protective Treatment**

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of National Grid's<sup>1</sup> Motion for Protective Treatment concerning the Company's response to the RR-COMM-19, which is filed today in the above-referenced proceeding under separate cover. The Company is requesting confidential treatment for the response to RR-COMM-19 as permitted by Commission Rule 1.2(g) and R.I.G.L. § 38-2-2(4)(i)(B).

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

Very truly yours,



Thomas R. Teehan

Enclosures

cc: Docket 4065 Service List

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

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**RHODE ISLAND PUBLIC UTILITIES COMMISSION**

_____	)	
National Grid	)	
Application to Change Rate Schedules	)	Docket 4065
_____	)	

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

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

**I. BACKGROUND**

On Friday, December 11, 2009, the Company filed responses to record requests issued by the Rhode Island Public Utilities Commission (the “Commission”) in the above-referenced proceeding concerning the Company’s application for a change in base rates. In the record requests, the Commission requested confidential information relating to a pending litigation matter in response to data request RR-COMM-19. For the reasons stated below, the Company requests that the confidential information be protected from public disclosure.

**II. LEGAL STANDARD**

The Commission’s Rule 1.2(g) provides that access to public records shall be granted in accordance with the Access to Public Records Act (“APRA”), R.I.G.L.

§38-2-1, *et seq.* Under APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a “public record,” unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I.G.L. §38-2-2(4). Therefore, to the extent that information provided to the Commission falls within one of the designated exceptions to the public records law, the Commission has the authority under the terms of APRA to deem such information to be confidential and to protect that information from public disclosure.

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

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

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

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

such protection outweighs the public interest inherent in disclosure of information pending before regulatory agencies.

### **III. BASIS FOR CONFIDENTIALITY**

National Grid seeks protection from public disclosure of the confidential information provided in response to Record Request RR-COMM-19. The litigation matter referenced in that response is subject to settlement negotiations. If this information were disclosed on the public record, the Company's ability to negotiate favorable settlement terms could be impaired. In addition, both the Company's ability to limit its exposure in legal actions and the privacy interest of individuals or business entities with which the Company may settle would be harmed. Public disclosure of this information would be commercially harmful to National Grid and its customers because potential litigants would gain information regarding the Company's settlement strategies. This could have the effect of increasing costs to the Company in the future.

Consistent with the standard for confidentiality established under Rhode Island law, the nature and identity of the legal action is information that would customarily not be released to the public. The Company is under no obligation in any other forum to disclose the information and, as is customary in relation to any type of legal settlement, the Company would not ordinarily release the information in a public forum because of the detrimental impact that such a release would have its business interests and the costs of doing business. In addition, the Company has provided all other information in the response for the public record and to assist in the Commission's evaluation of the Company's proposals in this case. Accordingly, in this case, the need to ensure that settlement negotiations associated with this particular legal action are not impaired

outweighs the general public interest inherent in disclosure of information pending before regulatory agencies.

## **V. CONCLUSION**

Detailed information provided in the response to RR-COMM-19 is confidential, commercially sensitive and proprietary. Disclosure of this information on the public record would be detrimental to the public interest in that it would negatively affect the Company's bargaining position in future employee negotiations and the Company's ability to minimize the cost of those services. Accordingly, the Company requests that the Commission protect the information submitted in response to RR-COMM-19.

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

Respectfully submitted,

**NATIONAL GRID**

By its attorneys,



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Thomas R. Teehan, Esq.  
National Grid  
280 Melrose Street  
Providence, RI 02907  
(401) 784-7667



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Cheryl M. Kimball, Esq. (RI #6458)  
Keegan Werlin LLP  
265 Franklin Street  
Boston, Massachusetts 02110  
(617) 951-1400

Dated: December 11, 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/  
Karen Horan

December 11, 2009  
Date

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

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	<a href="mailto:Anault@puc.state.ri.us">Anault@puc.state.ri.us</a>	401-941-1691
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The Narragansett Electric Company d/b/a National Grid					
Docket 4065					
Discovery Log					
As of: December 11, 2009					
[C-denotes confidentiality is being sought]					
Data Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
COMM 1-1	Filed	6/26/2009	O'Brien		Attachments COMM 1-1-3, 1-1-4, 1-1-5, 1-1-7, 1-1-8, 1-1-9 <b>BULK</b>
COMM 1-2	Filed	6/26/2009	O'Brien		Attachments COMM 1-2 A-D
COMM 1-3	Filed	6/26/2009	Dinkel		Attachments COMM 1-3 A-B <b>BULK</b>
COMM 1-4	Filed	6/26/2009	O'Brien		
COMM 1-5	Filed	7/22/2009	O'Brien/Dinkel		Attachments COMM 1-5 (1-3)
COMM 1-6	Filed	6/26/2009	Dinkel	C-attachment	Attachments COMM 1-6-1 & 1-6-2 <b>BULK</b>
COMM 1-7	Filed	6/26/2009	O'Brien		Attachment COMM 1-7
COMM 1-8	Filed	6/26/2009	Dinkel		Attachments COMM 1-8 (A-D) <b>BULK</b>
COMM 1-9	Filed	6/26/2009	Dinkel	C-attachment	Attachments COMM 1-9 (1-11) <b>BULK</b>
COMM 1-10	Filed	6/26/2009	Dinkel		Attachment COMM 1-10 (hard copy only) <b>BULK</b>
COMM 1-11	Filed	6/26/2009	O'Brien		
COMM 1-12	Filed	7/1/2009	Dinkel/Morrissey		Attachments COMM 1-12 (1-2)
COMM 1-13	Filed	6/26/2009	Dinkel		Attachment COMM 1-13
COMM 1-14	Filed	6/26/2009	Dinkel		Attachment COMM 1-14
COMM 1-15	Filed	6/26/2009	Dinkel		Attachment COMM 1-15
COMM 1-16	Filed	6/26/2009	O'Brien		Attachments COMM 1-16 (1-12)
COMM 1-17	Filed	7/6/2009	Pettigrew		
COMM 1-18	Filed	7/14/2009	Pettigrew		Attachments COMM 1-18-1, 1-18-2, 1-18-3, 1-18-4(a) - (d) <b>Bulk</b>
COMM 1-19	Filed	8/11/2009	O'Brien		Attachment COMM 1-19
COMM 1-20	Filed	6/26/2009	O'Brien		
COMM 1-21	Filed	6/26/2009	O'Brien		Attachments COMM 1-21 (1-4)
COMM 1-22	Filed	6/26/2009	O'Brien		Attachments COMM 1-22 (1-2)
COMM 1-23	Filed	6/26/2009	O'Brien		Attachments COMM 1-23 (1-2)
COMM 1-24	Filed	Filed	O'Brien		Attachment COMM 1-24
COMM 1-25	Filed	6/26/2009	O'Brien		Attachments COMM 1-25 (1-14) <b>BULK</b>
COMM 1-25 (supp.)	Filed	8/11/2009	O'Brien		Attachments COMM 1-25 (1-3)
COMM 1-26	Filed	6/26/2009	O'Brien		Attachment COMM 1-26
COMM 1-27	Filed	8/18/2009	O'Brien		Attachments COMM 1-27 (1-3) <b>BULK</b>
COMM 1-28	Filed	7/6/2009	O'Brien		Attachment COMM 1-28
COMM 1-29	Filed	6/26/2009	O'Brien		
COMM 1-30	Filed	Filed	O'Brien		
COMM 1-31	Filed	6/26/2009	King		
COMM 1-32	Filed	Filed	O'Brien		Attachment COMM 1-32
COMM 1-33	Filed	6/26/2009	O'Brien		Attachment COMM 1-33 (1-3) <b>BULK</b>
COMM 1-34	Filed	Filed	Dowd		Attachments COMM 1-34 (1-2) <b>BULK</b>
COMM 1-35	Filed	Filed	Dowd		Attachment COMM 1-35 <b>BULK</b>
COMM 1-36	Filed	Filed	Dowd		Attachment DIV 2-1 (electronic only)
COMM 1-37	Filed	Filed	O'Brien		Attachment COMM 1-37
COMM 1-38	Filed	6/26/2009	O'Brien		Attachment COMM 1-38
COMM 1-39	Filed	Filed	O'Brien		Attachment COMM 1-39
COMM 1-40	Filed	6/26/2009	Dowd		Attachment COMM 1-40
COMM 1-41	Filed	Filed	Dowd		Attachment COMM 1-41
COMM 1-42	Filed	Filed	Dowd		Attachment COMM 1-42
COMM 1-43	Filed	Filed	Dowd		Attachment COMM 1-43
COMM 1-44	Filed	6/26/2009	Dowd		Attachment COMM 1-44
COMM 1-45	Filed	Filed	O'Brien		Attachment COMM 1-45
COMM 1-46	Filed	Filed	Dowd		
COMM 1-47	Filed	Filed	Dowd		Attachments COMM 1-47 (1-3) <b>BULK</b>
COMM 1-48 (Part 1)	Filed	6/26/2009	Dowd		Attachment COMM 1-48

The Narragansett Electric Company d/b/a National Grid					
Docket 4065					
Discovery Log					
As of: December 11, 2009					
[C-denotes confidentiality is being sought]					
Data Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
COMM 1-48 (Parts 2-5)	Filed	6/26/2009	O'Brien		
COMM 1-49	COMM 1-49	COMM 1-49	O'Brien		Attachments COMM 1-49 (1-5)
COMM 1-50	Filed	6/26/2009	Dowd		Attachments COMM 1-50 (1-38) <b>BULK</b>
COMM 1-51	Filed	6/26/2009	Dowd		
COMM 1-52	Filed	6/26/2009	Dowd		Attachment COMM 1-52
COMM 1-53	Filed	6/26/2009	Dowd		Attachment COMM 1-53
COMM 1-54	Filed	6/26/2009	O'Brien		Attachments COMM 1-54 (1-2)
COMM 1-55	Filed	7/14/2009	O'Brien		Attachment COMM 1-55
COMM 1-56	Filed	6/26/2009	O'Brien		
COMM 1-57	Filed	6/26/2009	O'Brien		Attachment COMM 1-57
COMM 1-58	Filed	6/26/2009	O'Brien		Attachment DIV 3-11 (PDF and working excel)
COMM 1-58 (supp)	Filed	Filed	O'Brien		Attachment COMM 1-58 (supp.)
COMM 1-59	Filed	6/26/2009	O'Brien		Attachment COMM 1-59
COMM 1-60	Filed	Filed	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)
					Attachments COMM 1-63 (A-F) A-C EXCEL FILES D & E <b>BULK</b> (hard copy only)
COMM 1-63	Filed	8/11/2009	O'Brien		
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		
					Attachments DIV 4-1 (1-2) <b>BULK</b>
COMM 1-71	Filed	6/26/2009	O'Brien		
COMM 1-72	Filed	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
					Attachments COMM 1-90 (1-2) <b>BULK</b>
COMM 1-90	Filed	7/6/2009	O'Brien		
					Attachment DIV 4-21 (1-2) <b>BULK</b>
COMM 1-91	Filed	6/26/2009	O'Brien		
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		
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 1-102 (supp)	Filed	10/23/2009	Gorman		Attachment COMM 1-102 (supp)
COMM 1-103	Filed	6/26/2009	Wynter		
COMM 1-104	Filed	6/26/2009	Wynter		

The Narragansett Electric Company d/b/a National Grid					
Docket 4065					
Discovery Log					
As of: December 11, 2009					
[C-denotes confidentiality is being sought]					
Data Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
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 2-12	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	8/24/2009	Dowd		
COMM 2-23	Filed	8/27/2009	Wynter		
COMM 2-24	Filed	8/18/2009	O'Brien		Attachment COMM 2-24
COMM 2-25	Filed	8/24/2009	O'Brien		
COMM 2-26	Filed	8/18/2009	O'Brien		
COMM 2-27	Filed	8/27/2009	O'Brien	C-attachment	Attachment COMM 2-27
COMM 2-27 (supp.)	Filed	9/30/2009	O'Brien	C-attachment	Attachments COMM 2-27 (1-2)
COMM 2-28	Filed	8/14/2009	Wynter		
COMM 2-29	Filed	8/14/2009	Wynter		
COMM 2-30	Filed	8/14/2009	O'Brien		
COMM 2-31	Filed	8/14/2009	O'Brien		
COMM 2-32	Filed	8/18/2009	O'Brien		
COMM 2-33	Filed	8/18/2009	O'Brien		
COMM 2-34	Filed	8/14/2009	Gorman		
COMM 2-35	Filed	8/14/2009	Gorman		
COMM 2-36	Filed	8/24/2009	Wynter		
COMM 2-37	Filed	8/14/2009	Wynter		
COMM 2-38	Filed	8/14/2009	Wynter		
COMM 2-39	Filed	8/27/2009	Wynter		
COMM 2-40	Filed	8/20/2009	O'Brien		Attachments COMM 2-40 (1-2) BULK
COMM 2-41	Filed	8/24/2009	Pettigrew		Attachments COMM 2-41 (1-2)
COMM 2-42	Filed	8/18/2009	O'Brien		Attachment COMM 2-42
COMM 2-43	Filed	8/24/2009	O'Brien		Attachment COMM 2-43
COMM 2-44	Filed	8/14/2009	Gorman		
COMM 2-45	Filed	8/14/2009	Wynter		
COMM 2-46	Filed	8/14/2009	Wynter		
COMM 2-47	Filed	8/14/2009	Wynter		
COMM 2-48	Filed	8/14/2009	Wynter		
COMM 2-49	Filed	8/14/2009	Wynter		Attachment COMM 2-49
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	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	Filed	9/1/2009	Pettigrew		Attachment COMM 3-1
COMM 3-2	Filed	9/1/2009	Wynter		Attachment COMM 3-2

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COMM 3-3	Filed	9/1/2009	Wynter		
COMM 3-4	Pending				
COMM 3-5	Filed	9/1/2009	Legal Dept.		Attachments COMM 3-5 (1-11)
COMM 3-6	Filed	9/10/2009	O'Brien		<b>BULK</b> Attachment COMM 3-6
COMM 4-1	Filed	9/30/2009	Dowd		Attachments COMM 4-1 (1-2)
COMM 4-2	Filed	9/30/2009	Gorman		
COMM 4-2 (supp)	Filed	10/30/2009	Gorman		
COMM 4-3	Filed	10/30/2009	Gorman		
COMM 4-4	Filed	10/30/2009	Dowd	C-attachment	Attachment COMM 7-2 (Redacted)
COMM 4-5	Filed	9/30/2009	Wynter		
COMM 4-6	Filed	9/30/2009	Wynter		
COMM 4-7	Filed	9/30/2009	O'Brien		Attachments COMM 4-7 (1-2)
COMM 4-8	Filed	9/30/2009	Wynter		Attachments COMM 4-8
COMM 5-1	Filed	9/30/2009	Wynter		Attachment COMM 5-1
COMM 5-2	Filed	9/30/2009	Wynter		
COMM 5-3	Filed	9/30/2009	Wynter		
COMM 5-4	Filed	9/30/2009	O'Brien		Attachment COMM 5-4
COMM 5-5	Filed	10/23/2009	Wynter		Attachment COMM 5-5
COMM 5-6	Filed	10/23/2009	Gorman		Attachment COMM 5-6
COMM 5-7	Filed	9/30/2009	Wynter		
COMM 6-1	Filed	9/30/2009	O'Brien		
COMM 7-1	Filed	10/30/2009	Wynter		
COMM 7-2	Filed	10/30/2009	Wynter		Attachments 7-2 (1-3) BULK
COMM 7-3	Filed	10/30/2009	Wynter		Attachments 7-3 (1-7)
COMM 7-4	Filed	10/30/2009	Cannell		Attachment COMM 7-4
COMM 7-5	Filed	10/30/2009	Cannell		Attachment COMM 7-5
COMM 7-6	Filed	10/30/2009	Pettigrew		
COMM 7-7	Filed	10/30/2009	Pettigrew		
COMM 7-8	Filed	10/30/2009	Pettigrew		
COMM 7-9	Filed	10/30/2009	Pettigrew		
COMM 7-10	Filed	10/30/2009	Pettigrew		
COMM 7-11	Filed	10/30/2009	Pettigrew		
COMM 7-12	Filed	10/30/2009	Pettigrew		
COMM 7-13	Filed	10/30/2009	Pettigrew		
COMM 7-14	Filed	10/30/2009	Pettigrew		
COMM 7-15	Filed	10/30/2009	O'Brien	C-response	
COMM 7-16	Filed	10/30/2009	Pettigrew		
COMM 7-17	Filed	10/30/2009	Dowd		
COMM 7-18	Filed	10/30/2009	O'Brien		Attachment COMM 7-18
COMM 7-19	Filed	10/30/2009	O'Brien		Attachment COMM 7-19
COMM 7-20	Filed	10/30/2009	Dowd		Attachment COMM 7-20
COMM 7-21	Filed	10/30/2009	O'Brien		
COMM 7-22	Filed	10/30/2009	Dowd		Attachment COMM 7-22
COMM 7-23	Filed	10/30/2009	Wynter		
COMM 7-24	Filed	10/30/2009	O'Brien		
COMM 8-1	Filed	10/30/2009	Wynter		Attachment COMM 8-1
COMM 8-2	Filed	10/30/2009	O'Brien		Attachment COMM 8-2
COMM 8-3	Filed	10/30/2009	O'Brien		
COMM 8-4	Filed	10/30/2009	O'Brien		Attachment COMM 8-4
COMM 9-1	Filed	12/4/2009	Tierney/Stout		
COMM 10-1	Filed	12/2/2009	Dinkel		
COMM 10-2	Filed	12/2/2009	Gorman		
COMM 10-3	Filed	12/4/2009	O'Brien		
COMM 11-1	Pending				
COMM 11-2	Filed	12/7/2009	Pettigrew		
COMM 11-3	Filed	12/7/2009	O'Brien		
<b>COMM 11-3 (Revised)</b>	<b>Filed Herewith</b>	<b>12/11/2009</b>	<b>O'Brien</b>		
COMM 12-1	Pending				

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COMM 12-2	Pending				
COMM 12-3	Pending				
COMM 12-4	Pending				
COMM 12-5	Pending				
COMM 12-6	Pending				
COMM 12-7	Pending				
COMM 12-8	Pending				
COMM 12-9	Pending				
COMM 12-10	Pending				
COMM 12-11	Pending				
COMM 12-12	Pending				
COMM 12-13	Pending				

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DIV-1-1	Filed	6/26/2009	O'Brien		Attachment DIV 1-1
DIV-1-2	Filed	7/1/2009	O'Brien		Attachment DIV 1-2
DIV-1-3	Filed	7/1/2009	O'Brien		Attachment DIV 1-3
DIV 1-3 (Supp.)	Filed	9/1/2009	O'Brien		Attachments DIV 1-3 (Corrected) and (Supp.)
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-1-10 (Supp.)	Filed	9/1/2009	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	Filed	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	Filed	O'Brien		Attachment DIV 1-29
DIV-1-30	Filed	7/1/2009	O'Brien		
DIV-1-31	Filed	Filed	O'Brien		Attachment DIV 1-31
DIV-1-32	Filed	6/26/2009	O'Brien		Attachment DIV 1-32
DIV 1-32 (Supp.)	Filed	Filed	O'Brien		Attachment DIV 1-32 (Supp.)
DIV-1-33	Filed	Filed	O'Brien		Attachment DIV 1-33
DIV-1-34	Filed	Filed	O'Brien		
Filed					
DIV-2-1	Filed	7/1/2009	Gorman	C-attachment	Attachment DIV 2-1 (electronic only)
DIV-2-2	Filed	Filed	Gorman		
DIV-2-3	Filed	6/26/2009	Gorman		
DIV-2-4	Filed	Filed	Gorman		Attachment DIV 2-4
DIV-2-5	Filed	Filed	Gorman		
DIV-2-6	Filed	Filed	Gorman		
DIV-2-7	Filed	6/26/2009	Gorman		
DIV-2-8	Filed	Filed	Gorman		
DIV-2-9	Filed	Filed	Gorman		
DIV-2-10	Filed	Filed	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	6/26/2009	O'Brien		
DIV-3-2	Filed	6/26/2009	O'Brien		Attachments DIV 3-2 (1-4)
DIV-3-3	Filed	6/26/2009	O'Brien		Attachment DIV 3-3
DIV-3-4	Filed	6/26/2009	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	Filed	Morrissey		Attachment DIV 3-10
DIV-3-11	Filed		Morrissey		Attachment DIV 3-11 (PDF and working excel)
DIV-3-12	Filed	6/26/2009	O'Brien/Morrissey		Attachment DIV 3-12



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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		
DIV-3-22	Filed	8/18/2009	O'Brien/Dowd		
DIV-4-1	Filed	7/6/2009	Moul		Attachments DIV 4-1 (1-2)
DIV-4-2	Filed	7/6/2009	Dinkel		<b>BULK</b>
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 (1-4)
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)
DIV-4-22	Filed	7/6/2009	Moul		<b>BULK</b>
DIV-4-23	Filed	7/6/2009	Dinkel		Attachment DIV 4-22 (1-2)
DIV-4-24	Filed	7/6/2009	Moul		Attachment DIV 4-23
DIV-4-25	Filed	7/6/2009	Moul		
DIV-4-26	Filed	7/6/2009	Moul		
DIV-4-27	Filed	7/6/2009	Moul		Attachment DIV 4-27
DIV-5-A	Filed	7/22/2009	Wynter	<b>C-attachments</b>	Attachments DIV 5-A (1-3)
DIV-5-B	Filed	7/22/2009	Wynter		Attachment DIV 5-B
DIV-5-C	Filed	7/22/2009	Wynter		Attachment DIV 5-C
DIV-6-1	Filed	7/14/2009	Tierney		
DIV-6-2	Filed	7/14/2009	Tierney		
DIV-6-3	Filed	7/14/2009	Tierney		
DIV-6-4	Filed	7/14/2009	Tierney		
DIV-6-5	Filed	7/14/2009	Tierney		
DIV-6-6	Filed	7/14/2009	Tierney		Attachment DIV 6-6 <b>BULK</b>
DIV-6-7	Filed	8/21/2009	Pettigrew		
DIV-6-7 (Supp.)	Filed	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		

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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		
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		

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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		
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
					Attachment DIV 10-5 (1-4) EXCEL files <b>BULK</b>
DIV-10-5	Filed	8/11/2009	Gorman		
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		

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

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DIV-12-13	Filed	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) <b>BULK</b>
DIV-14-2	Filed	8/18/2009	Pettigrew		Attachment DIV 14-2
DIV-14-3	Filed	8/18/2009	Pettigrew		
DIV-14-4	Filed	8/18/2009	Pettigrew		
DIV-14-5	Filed	8/18/2009	Pettigrew		Attachment DIV 14-5
DIV-14-6	Filed	8/18/2009	Pettigrew		Attachment DIV 14-6
DIV-14-7	Filed	8/18/2009	Pettigrew		
DIV-14-8	Filed	8/18/2009	Pettigrew		
DIV-14-9	Filed	8/18/2009	Pettigrew		
DIV-14-10	Filed	8/18/2009	Pettigrew		
DIV-14-11	Filed	8/18/2009	Pettigrew		Attachments DIV 14-11 (1-8) <b>BULK</b>
DIV-14-12	Filed	8/18/2009	Pettigrew		Attachments DIV 14-12 (1-2) <b>BULK</b>
DIV-14-13	Filed	8/18/2009	Pettigrew		
DIV-14-14	Filed	8/18/2009	Pettigrew		
DIV-14-15	Filed	8/27/2009	Pettigrew		
DIV-14-16	Filed	8/18/2009	Pettigrew		
DIV-14-17	Filed	8/18/2009	Pettigrew		
DIV-14-18	Filed	8/18/2009	Pettigrew		Attachment DIV 14-18
DIV-14-19	Filed	8/18/2009	Pettigrew		Attachment DIV 14-19
DIV-14-20	Filed	8/18/2009	Pettigrew		
DIV-14-21	Filed	8/18/2009	Pettigrew		Attachment DIV 14-21
DIV-14-22	Filed	8/18/2009	Pettigrew		
DIV-14-23	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) <b>BULK</b>
DIV-16-10	Filed	8/11/2009	Fields		
DIV-16-11	Filed	8/11/2009	Fields		

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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	8/24/2009	Pettigrew		Attachment DIV 17-3(c)
DIV-17-4	Filed	8/24/2009	Pettigrew		
DIV-17-5	Filed	8/24/2009	O'Brien		Attachment DIV 17-5(b)
DIV-17-6	Filed	8/18/2009	Wynter		
DIV-17-7	Filed	8/20/2009	Dowd		
DIV-17-8	Filed	8/24/2009	O'Brien		
DIV-17-9	Filed	8/20/2009	Dowd		
DIV-17-10	Filed	8/24/2009	O'Brien		
DIV-17-11	Filed	8/24/2009	O'Brien		Attachment DIV 17-11
DIV-17-12	Filed	8/14/2009	Gorman		
DIV-17-13	Filed	8/14/2009	Gorman		
DIV-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) <b>BULK</b>
DIV-19-2	Filed	8/21/2009	O'Brien		Attachments DIV 19-1 (1-3) <b>BULK</b>
DIV-20-1	Filed	8/27/2009	Gorman		Attachment DIV 20-1
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	Filed	8/27/2009	Gorman		Attachment DIV 20-5
DIV-20-6	Filed	9/1/2009	Gorman		Attachments DIV 20-6 (1-6) <b>BULK</b>
DIV-21-1	Filed	8/24/2009	O'Brien		Attachment DIV 21-1
DIV-21-2	Filed	8/27/2009	O'Brien		Attachment DIV 21-2
DIV-21-3	Filed	8/21/2009	O'Brien		
DIV-21-4	Filed	8/21/2009	Gorman		
DIV-21-4 (Supp.)	Filed	9/1/2009	Gorman		
DIV-21-5	Filed	8/24/2009	O'Brien		
DIV-22-1	Filed	9/1/2009	Pettigrew		
DIV-22-2	Filed	9/1/109	Pettigrew		Attachments DIV 22-2 (1-2)
DIV-22-3	Filed	8/27/2009	O'Brien		Attachments DIV 22-3 (1-3)
DIV-22-4	Filed	9/1/2009	Pettigrew	<b>C-attachment</b>	Attachment DIV 22-4 <b>BULK</b>
DIV-22-5	Filed	9/1/2009	Pettigrew		
DIV-22-6	Filed	8/27/2009	O'Brien		Attachment DIV 22-6
DIV-22-7	Filed	8/27/2009	O'Brien		Attachment DIV 22-7 (a-b)
DIV-23-1(A)	Filed	9/1/2009	O'Brien		
DIV-23-1(B)	Filed	9/1/2009	Gorman		Attachment DIV 23-1(B)

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DIV-23-2	Filed	9/1/2009	O'Brien		
DIV-23-3	Filed	9/1/2009	O'Brien		
DIV-23-4	Filed	9/1/2009	Gorman		
DIV-23-5	Filed	9/1/2009	O'Brien		Attachment DIV 23-5
DIV-23-6	Filed	9/1/2009	O'Brien		Attachment DIV 23-6
DIV-24-1	Filed	9/30/2009	Wynter		Attachment DIV 24-1 <b>BULK</b>
DIV-24-2	Filed	9/30/2009	Wynter		
DIV-24-3	Filed	9/10/2009	Wynter		
DIV-24-4	Filed	9/10/2009	Wynter		
DIV-24-5	Filed	9/10/2009	Wynter		
DIV-24-6	Filed	9/10/2009	Wynter		
DIV-24-7	Filed	9/30/2009	Wynter		Attachment DIV 24-7
DIV-25-1	Filed	9/30/2009	Wynter		Attachment DIV 25-1
DIV-26-1	Filed	9/30/2009	Wynter		Attachment DIV 26-1 (excel)
DIV-26-2	Filed	9/30/2009	Wynter		Attachment DIV 26-2
DIV-27-1	Filed	10/23/2009	O'Brien		Attachments DIV 27-1 (1-7) <b>BULK</b>
DIV-27-2	Filed	10/23/2009	O'Brien		Attachments DIV 27-2 (1-3)
DIV-27-3	Filed	10/23/2009	O'Brien		Attachments DIV 27-3
DIV-27-4	Filed	10/23/2009	O'Brien		
DIV-27-5	Filed	10/23/2009	Pettigrew		
DIV-27-6	Filed	10/23/2009	O'Brien		Attachment DIV 27-6
DIV-27-7	Filed	10/23/2009	O'Brien		
DIV-27-8	Filed	10/23/2009	O'Brien		
DIV-28-1	Filed	10/30/2009	Pettigrew		Attachment DIV 28-1
DIV-28-2	Filed	10/23/2009	O'Brien		
DIV-28-3	Filed	10/30/2009	Pettigrew		Attachment DIV 28-3
DIV-29-1	Filed	10/23/2009	Gorman		
DIV-29-2	Filed	10/23/2009	Gorman		
DIV-29-3	Filed	10/23/2009	Gorman		Attachment DIV 29-3
DIV-30-1	Filed	10/23/2009	O'Brien		Attachment DIV 30-1
DIV-30-2	Filed	10/23/2009	O'Brien		
DIV-31-1	Filed	10/23/2009	Moul		Attachment DIV 31-1
DIV-31-2	Filed	10/30/2009	Tierney		
DIV-31-3	Filed	10/30/2009	Tierney		
DIV-31-4	Filed	10/23/2009	Moul		
DIV-31-5	Filed	10/30/2009	Tierney		
DIV-31-6	Filed	10/30/2009	Tierney		
DIV-31-7	Filed	10/23/2009	Moul		
DIV-31-8	Filed	10/23/2009	Moul		Attachment DIV 31-8 EXCEL
DIV-31-9	Filed	10/23/2009	Moul		Attachment DIV 31-9 <b>BULK</b>
DIV-31-10	Filed	10/23/2009	Cannell		Attachment DIV 31-10
DIV-31-11	Filed	10/23/2009	Cannell		Attachment DIV 31-11
DIV-31-12	Filed	10/23/2009	Cannell		
DIV-31-13	Filed	10/23/2009	Moul		
DIV-31-14	Filed	10/23/2009	Moul		
DIV-32-1	Filed	10/30/2009	Tierney		Attachment DIV 32-1 (Excel)

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NAVY-1-1	Filed	6/29/2009			
NAVY-1-2	Filed	6/29/2009			
NAVY-1-3	Filed	6/29/2009			
NAVY-1-4	Filed	6/29/2009			
NAVY-2-1	Filed	7/22/2009	Gorman, Wynter, O'Brien		Excel attachments
NAVY-2-2	Filed	7/22/2009	Gorman, O'Brien		Excel attachments
NAVY-3-1	Filed	8/18/2009	Gorman		Attachment NAVY 3-1 (a)
NAVY-3-2	Filed	8/14/2009	Fields/Gorman		
NAVY-3-3	Filed	8/14/2009	Gorman		
NAVY-3-4	Filed	8/14/2009	Gorman		
NAVY-3-5 (a, b & e)	Filed	6/29/2009	Gorman		Attachments NAVY 3-5(b) (1-3)
NAVY-3-5 (c & d)	Filed	6/29/2009	O'Brien		Attachment NAVY 3-5© <b>BULK</b>
NAVY-3-6	Filed	6/29/2009	Gorman		
NAVY-3-7	Filed	6/29/2009	Gorman		Attachments NAVY 3-7 (1-2) Excel
NAVY-3-8	Filed	8/18/2009	Gorman		



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GWC-1-1	Filed	8/27/2009	Gorman		
GWC-1-2	Filed	8/27/2009	Gorman		Attachment GWC 1-2
GWC-1-3	Filed	8/27/2009	Gorman		Attachment GWC 1-3
GWC-1-4	Filed	8/27/2009	Gorman		
GWC-1-5	Filed	8/27/2009	Gorman		

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TEC-RI-1-1	Pending				

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	RR-COMM-1	Nov. 3, 2009	Filed	12/02/09	Dowd		Attachment RR-COMM-1
	RR-COMM-2	Nov. 3, 2009	Filed	12/02/09	Pettigrew		
	RR-COMM-3	Nov. 3, 2009	Filed	12/02/09	Pettigrew		
	RR-COMM-4	Nov. 3, 2009	Filed	12/02/09	Pettigrew		
	<b>RR-COMM-5</b>	<b>Nov. 3, 2009</b>	<b>Filed Herewith</b>	<b>12/11/09</b>	<b>Pettigrew</b>		
	RR-COMM-6	Nov. 3, 2009	Filed	12/02/09	O'Brien		
	RR-COMM-7	Nov. 3, 2009	Pending				
	RR-COMM-8	Nov. 3, 2009	Filed	12/02/09	Pettigrew		Attachment RR-COMM-8
	RR-COMM-9	Nov. 3, 2009	Filed	12/02/09	Pettigrew		
	RR-COMM-10	Nov. 3, 2009	Filed	12/02/09	Pettigrew		
	RR-COMM-11	Nov. 3, 2009	Filed	12/02/09	Pettigrew		
	RR-COMM-12	Nov. 4, 2009	Filed	12/01/09	Laflamme		Attachments RR-COMM-12
	RR-COMM-13	Nov. 4, 2009	Filed	12/04/09	Tierney		Attachment RR-COMM-13
	RR-COMM-14	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-COMM-15	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-COMM-16	Nov. 4, 2009	Filed	12/04/09	Stout		
	RR-COMM-17	Nov. 5, 2009	Filed	12/04/09	O'Brien		
	RR-COMM-18	Nov. 5, 2009	Pending				
	<b>RR-COMM-19</b>	<b>Nov. 5, 2009</b>	<b>Filed Herewith</b>	<b>12/11/09</b>	<b>Pettigrew</b>	<b>C-Response</b>	
	RR-COMM-20	Nov. 5, 2009	Pending				
	RR-COMM-21	Nov. 5, 2009	Filed	12/04/09	O'Brien		
	RR-COMM-22	Nov. 5, 2009	Filed	12/04/09	O'Brien	<b>C-Attachment</b>	Attachment RR-COMM-22
	RR-COMM-23	Nov. 5, 2009	Filed	12/04/09	O'Brien		
	RR-COMM-24	Nov. 5, 2009	Filed	12/07/09	O'Brien		Attachment RR-COMM-24
	RR-COMM-25	Nov. 5, 2009	Filed	12/04/09	O'Brien		
	<b>RR-COMM-26</b>	<b>Nov. 5, 2009</b>	<b>Filed Herewith</b>	<b>12/11/09</b>	<b>Pettigrew</b>		
	RR-COMM-27	Nov. 5, 2009	Pending				
	RR-COMM-28	Nov. 5, 2009	Filed	12/04/09	Dowd		
	RR-COMM-29	Nov. 5, 2009	Filed	12/04/09	Dowd		
	RR-COMM-30	Nov. 5, 2009	Filed	12/04/09	O'Brien		
	RR-COMM-31	Nov. 6, 2009	Filed	12/07/09	Wynter		
	<b>RR-COMM-32</b>	<b>Nov. 6, 2009</b>	<b>Filed Herewith</b>	<b>12/11/09</b>	<b>Wynter</b>		
	RR-COMM-33	Nov. 6, 2009	Filed	12/07/09	Wynter		
	RR-COMM-34	Nov. 6, 2009	Pending				
	RR-COMM-35	Nov. 6, 2009	Filed	12/07/09	Wynter		Attachment RR-COMM-35
	RR-COMM-36	Nov. 6, 2009	Filed	12/07/09	Wynter		
	RR-COMM-37	Nov. 6, 2009	Filed	12/07/09	Wynter		
	RR-COMM-38	Nov. 6, 2009	Filed	12/07/09	Wynter		
	RR-COMM-39	Nov. 6, 2009	Pending				
	RR-COMM-40	Nov. 6, 2009	Filed	12/07/09	Wynter		
	RR-COMM-41	Nov. 6, 2009	Pending				
	RR-COMM-42	Nov. 12, 2009	Filed	12/07/09	Dinkel		
	RR-COMM-43	Nov. 12, 2009	Filed	12/07/09	Dinkel		
	RR-COMM-44	Nov. 12, 2009	Filed	12/07/09	Dinkel		
	RR-COMM-45	Nov. 12, 2009	Pending				
	RR-COMM-46	Nov. 13, 2009	Filed	12/07/09	Gorman		
	RR-COMM-47	Nov. 13, 2009	Filed	12/07/09	Gorman		
	RR-COMM-48	Nov. 23, 2009	Filed	12/07/09	O'Brien		
	RR-COMM-49	Nov. 23, 2009	Pending				
	<b>RR-COMM-50</b>	<b>Nov. 23, 2009</b>	<b>Filed Herewith</b>	<b>12/11/09</b>	<b>O'Brien</b>		
	RR-COMM-51	Nov. 23, 2009	Pending				
	RR-DIV-1	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-DIV-2	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-DIV-3	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-DIV-4	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-DIV-5	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-DIV-6	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-DIV-7	Nov. 4, 2009	Filed	12/04/09	Morrissey		
	RR-DIV-8	Nov. 6, 2009	Pending				
	RR-DIV-9	Nov. 6, 2009	Filed	12/07/09	Wynter		
	<b>RR-DIV-10</b>	<b>Nov. 6, 2009</b>	<b>Filed Herewith</b>	<b>12/11/09</b>	<b>Wynter</b>		Attachment RR-DIV-10
	RR-DIV-11	Nov. 6, 2009	Filed	12/07/09	Wynter		
	RR-TEC-RI-1	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-TEC-RI-2	Nov. 4, 2009	Filed	12/04/09	Stout		
	RR-TEC-RI-3	Nov. 4, 2009	Filed	12/04/09	Tierney		

	The Narragansett Electric Company d/b/a National Grid					
	Docket 4065					
	Discovery Log					
	As of: December 11, 2009					
	[C-denotes confidentiality is being sought]					
	<b>Record Request</b>	<b>Hearing Date</b>	<b>Status</b>	<b>Date Filed</b>	<b>Witness</b>	<b>CONFIDENTIAL</b>
	RR-TEC-RI-4	Nov. 13, 2009	Filed Herewith	12/11/09	Gorman	Attachment RR-TEC-RI-4
	Discovery Log Ends Here: December 11, 2009					

Commission Data Request 11-3 (Revised)

Request:

For each of the last 3 years, please provide for each rate class A-16, A-60, C-06, G-32 and G-62 the following:

- a. Revenue for the class
- b. Net write-offs for the class
- c. Write-offs as a percentage of revenue for the class (b. divided by a.)

Response:

Please note there were no bad-debt write-offs in the G-62 class in the past three years.

- (a) The revenue for the A-16, A-60, C-06, G-02 and G-32 rate classes are as follows:

Rate Class	2006	2007	2008
A-16	\$ 389,631,377	\$407,600,410	\$ 500,715,283
A-60	\$ 55,858,247	\$ 26,466,574	\$ 30,151,634
C-06	\$ 83,681,912	\$ 81,509,754	\$ 99,669,416
G-02	\$ 176,578,010	\$167,392,652	\$ 207,529,354
G-32	\$ 212,563,194	\$192,923,001	\$ 238,465,220

- (b) The net write-offs for the A-16, A-60, C-06, G-02 and G-32 rate classes are as follows and can be found in Workpaper NG-RLO-24:

Rate Class	2006	2007	2008
A-16	\$ 7,247,149	\$ 7,781,147	\$ 8,389,763
A-60	\$ 1,744,505	\$ 1,902,152	\$ 1,345,403
C-06	\$ 701,443	\$ 512,590	\$ 943,357
G-02	\$ 452,793	\$ 545,196	\$ 968,160
G-32	\$ 235,685	\$ 246,422	\$ 762,007

- (c) The write-offs as a percentage of revenue for each rate classes are as follows:

Rate Class	2006	2007	2008
A-16	1.74%	1.97%	1.68%
A-60	4.37%	5.17%	4.46%
C-06	0.83%	0.33%	0.95%
G-02	0.26%	0.32%	0.47%
G-32	0.11%	0.20%	0.32%

Commission Record Request No. 5

Request:

Has the Company had disputes with Verizon in relation to the replacement of utility poles? And if so, how were these disputes resolved?

Response:

National Grid generally has not experienced “disputes” with Verizon regarding the need for pole replacements. Occasionally, either Verizon or the Company will question the need for replacement of a specific pole(s). However, these inquiries are generally resolved without controversy.

National Grid has experienced occasions where Verizon has been late in starting (or completing) pole sets within the time period required by National Grid or its customers. If a substantial delay arises in a critical schedule, National Grid will first communicate with Verizon through established communication channels. If these efforts do not produce the needed result, National Grid will send Verizon a “Notice of Default” (e.g., default to a specific contractual obligation), which either spurs Verizon into action or, after the specified cure period has elapsed, allows National Grid to proceed to move ahead with the required pole replacement(s) in designated Verizon pole set areas. It should be noted that these occurrences are infrequent. For example, the Company is aware of only two such cases in Rhode Island during 2009.

**REDACTED RESPONSE**

Commission Record Request No. 19

Request:

Regarding the accident for which the Company accrued a \$2.5 million reserve during the test year as part of Injuries & Damages, has the Company done anything as a result of the accident to improve its safety, safety methods, or implemented any processes that would prevent this type of accident from occurring again? If so, what steps were taken and have those steps resulted in a successful outcome?

Response:

During 2008, the Company increased its reserve by a total of \$2.5 million. Of that total reserve increase, \$2.25 million resulted from an increase in the reserve relating to one personal injury accident involving [REDACTED]. The circumstances under which the accident occurred were related more to [REDACTED]. Following the incident, the Company initiated a public awareness program warning of the dangers of overhead power lines. This public awareness program was implemented not only in Rhode Island, but also in Massachusetts, New Hampshire and New York, the operating areas of the Company's distribution company affiliates.

As this is an ongoing litigation matter, the Company is requesting confidential treatment for this response pursuant to Commission Rule 1.2(g).

Commission Record Request No. 26

Request:

Referencing Workpaper NG-RLO-28, Page 3 of 8, relating to capital associated with outdoor lighting, please explain the cause of the increase in the forecast from 2009 to 2010.

Response:

The increase in the outdoor lighting forecast from 2009 to 2010 is mainly due to the start of a program to strategically replace mercury vapor outdoor lighting equipment with predetermined high pressure sodium or metal halide technology. Approximately \$1M is in the 2010 plan for this program. The mercury vapor program increase is netted down by the completion of the Series Street Light replacement in Newport in 2009.



Commission Record Request No. 32

Request:

Referencing the Company's monthly report in Docket 1725 submitted October 15, 2009 (Division Hearing Exhibit 23), of the 20,000 terminations identified in that report for the period April 2008 through March 2009, what is the percentage of these terminations to the total number of field visits over the same period?

Response:

For the 12-month period April 1, 2008 – March 31, 2009, the data is as follows:

		<b>Total</b>
<b>1</b>	<b>Residential Terminations (Oct09 DKT 1725)</b>	<b>20,721</b>
<b>2</b>	<b>Residential SONP Field Orders (DIV 8-20)</b>	<b>41,702</b>
	<b>% (1 / 2)</b>	<b>49.7%</b>

Commission Record Request No. 50

Request:

Identify whether the Service Company makes a profit on the services it provides to subsidiaries.

Response:

The Narragansett Electric Company (the Company) receives services from two primary service companies, National Grid USA Service Co, Inc. (NG-USA Service Co), and National Grid Corporate Services LLC, (Corporate Services), which was formerly known as KeySpan Corporate Services LLC. The service companies provide these services at cost and are allowed to earn a regulated return on equity that is allocated ratably among the recipient affiliated companies, including the Company.

In January 2001, NG-USA Service Co. was authorized by the Securities Exchange Commission (SEC) to earn a rate of return equal to 10.50% of contributed common equity. NG-USA Service Co's contributed common equity since that time has been \$5,000,000.

In July 2005, the cost of service contained in the service agreements of Corporate Services was approved by the SEC. The cost of service language contained in the service agreements was originally filed with the SEC in 2000 when KeySpan sought SEC approval of a proposed merger with Eastern Enterprises. The approved cost of service permitted Corporate Services to recover all costs of doing business including an opportunity to earn reasonable rate of return on equity. A reasonable rate of return was determined to be the rate associated with the highest rate on its promissory notes outstanding, which is currently set at an after-tax rate of 7.25%.

Division Record Request No. 10

Request:

Referencing the Company's monthly report in Docket 1725 submitted August 25, 2009, for customers who are in a non-protected current step plan and have a back balance in excess of \$3,000, and have negotiated and broken payment plans at least three times, please identify whether the customer has claimed protection at any point along the collection process.

Response:

Please see Attachment RR-DIV-10, which identifies the accounts in question. An additional column entitled "Claimed Protection" has been added to the spreadsheet. The account index numbers from the original 8/25/09 request have been maintained here to enable cross-referencing.

## STANDARD CLASS CUSTOMERS

Account	60 day	90 day	120 day	360 day	Total	Plans Negotiated	Plans Broken	Current Step Plan	Current Payment Agreement	Termination Date	Claimed Protection
1	\$390.29	\$408.46	\$4,155.91	\$12,161.08	\$17,115.74	7	7	PLAN-STEP-N03	NO	YES	YES
4	\$95.84	\$631.69	\$2,126.71	\$10,173.14	\$13,027.38	7	7	PLAN-STEP-N03	NO	YES	NO
5	\$257.51	\$421.97	\$3,593.90	\$5,149.61	\$9,422.99	7	7	PLAN-STEP-N03	NO	YES	YES
8	\$4,985.39	\$183.01	\$147.33	\$3,329.01	\$8,644.74	3	3	PLAN-STEP-NON-PROTECTED	NO	YES	NO
19		\$331.00	\$2,640.63	\$3,654.09	\$6,625.72	5	4	PLAN-STEP-NON-PROTECTED	YES	YES	NO
25	\$168.49		\$835.82	\$4,679.17	\$5,683.48	8	8	PLAN-STEP-N03	NO	YES	YES
27	\$153.01	\$167.02	\$1,487.51	\$3,773.58	\$5,581.12	3	3	PLAN-STEP-N03	NO	YES	YES
28	\$125.90	\$221.41	\$1,854.49	\$3,362.03	\$5,563.83	4	4	PLAN-STEP-N03	NO	YES	NO
30	\$177.00	\$177.00	\$1,595.96	\$3,436.31	\$5,386.27	5	4	PLAN-STEP-NON-PROTECTED	YES	YES	NO
34	\$176.37	\$196.20	\$2,323.02	\$2,483.42	\$5,179.01	4	4	PLAN-STEP-N03	NO	YES	NO
49	\$393.09	\$649.12	\$3,501.32		\$4,543.53	3	3	PLAN-STEP-N04	NO	YES	YES
57	\$322.08	\$15.00	\$2,168.63	\$1,878.70	\$4,384.41	6	5	PLAN-STEP-N03	YES	YES	NO
59	\$182.38	\$257.98	\$1,847.21	\$2,086.06	\$4,373.63	10	9	PLAN-STEP-N03	YES	YES	NO
61	\$39.74	\$72.32	\$1,007.12	\$3,246.17	\$4,365.35	10	10	PLAN-STEP-N04	NO	YES	YES
62	\$596.86	\$323.15	\$3,407.29		\$4,327.30	4	3	PLAN-STEP-NON-PROTECTED	YES	YES	YES
69	\$255.68	\$364.34	\$2,629.25	\$977.12	\$4,226.39	5	4	PLAN-STEP-NON-PROTECTED	YES	YES	YES
74	\$483.60	\$337.30	\$3,210.45	\$30.00	\$4,061.35	8	8	PLAN-STEP-N03	NO	YES	NO
76	\$246.00	\$266.44	\$2,723.95	\$800.89	\$4,037.28	7	7	PLAN-STEP-N03	NO	YES	NO
79	\$87.53	\$107.37	\$1,234.72	\$2,566.46	\$3,996.08	8	8	PLAN-STEP-N03	NO	YES	YES
84	\$457.77	\$850.86	\$2,527.85		\$3,836.48	4	4	PLAN-STEP-N03	NO	YES	NO
90	\$214.48	\$264.44	\$2,592.26	\$698.97	\$3,770.15	4	3	PLAN-STEP-NON-PROTECTED	YES	YES	NO
93	\$123.65	\$144.42	\$1,780.45	\$1,707.07	\$3,755.59	8	8	PLAN-STEP-N03	NO	YES	NO
94	\$349.72	\$331.00	\$3,038.10		\$3,718.82	6	6	PLAN-STEP-N03	NO	YES	YES
95	\$117.00	\$117.00	\$874.38	\$2,605.16	\$3,713.54	4	3	PLAN-STEP-NON-PROTECTED	YES	YES	NO
96	\$277.33	\$251.54	\$2,620.49	\$539.67	\$3,689.03	6	6	PLAN-STEP-NON-PROTECTED	NO	YES	NO
97	\$130.89	\$134.27	\$1,482.11	\$1,936.28	\$3,683.55	5	4	PLAN-STEP-NON-PROTECTED	YES	YES	NO
101	\$198.51	\$261.86	\$3,159.24		\$3,619.61	4	3	PLAN-STEP-N03	YES	YES	YES
103	\$320.00	\$320.00	\$2,375.18	\$581.10	\$3,596.28	5	4	PLAN-STEP-NON-PROTECTED	YES	YES	NO
104	\$3,586.29				\$3,586.29	4	3	PLAN-STEP-N03	YES	YES	YES
105	\$271.00	\$243.07	\$2,088.63	\$969.75	\$3,572.45	7	6	PLAN-STEP-N03	YES	YES	NO
109	\$8.41	\$5.95	\$716.97	\$2,814.15	\$3,545.48	6	6	PLAN-STEP-NON-PROTECTED	NO	YES	YES
114	\$246.30	\$371.57	\$2,464.62	\$404.75	\$3,487.24	3	3	PLAN-STEP-N03	NO	YES	YES
117	\$171.61	\$178.54	\$1,149.46	\$1,954.99	\$3,454.60	10	9	PLAN-STEP-N03	YES	YES	NO
122	\$122.28	\$127.36	\$1,190.47	\$1,967.74	\$3,407.85	10	10	PLAN-STEP-N03	NO	YES	NO
124	\$216.27		\$1,460.49	\$1,677.75	\$3,354.51	10	10	PLAN-STEP-N03	NO	YES	NO
125	\$51.78	\$140.00	\$1,241.71	\$1,915.79	\$3,349.28	6	6	PLAN-STEP-N03	NO	YES	NO
127	\$145.03	\$167.48	\$1,369.94	\$1,652.04	\$3,334.49	6	6	PLAN-STEP-N03	NO	YES	YES
131	\$117.84	\$123.49	\$1,641.31	\$1,358.30	\$3,240.94	10	10	PLAN-STEP-N03	NO	YES	YES
133		\$119.00	\$899.25	\$2,186.58	\$3,204.83	13	13	PLAN-STEP-N03	NO	YES	NO
139	\$172.05	\$159.32	\$1,782.18	\$1,042.84	\$3,156.39	9	8	PLAN-STEP-N03	YES	YES	NO
143	\$322.38	\$502.97	\$2,320.41		\$3,145.76	8	7	PLAN-STEP-N03	YES	YES	NO
149	\$58.04	\$86.77	\$891.75	\$2,041.30	\$3,077.86	6	6	PLAN-STEP-N03	NO	YES	NO
157	\$81.80	\$70.48	\$878.45	\$2,013.54	\$3,044.27	7	6	PLAN-STEP-N03	YES	YES	NO
160	\$263.52	\$287.19	\$2,450.64	\$10.00	\$3,011.35	4	3	PLAN-STEP-N03	YES	YES	YES
	<b>\$17,160.71</b>	<b>\$10,389.36</b>	<b>\$85,487.56</b>	<b>\$93,864.61</b>	<b>\$206,902.24</b>						

Account	60 day	90 day	120 day	360 day	Total	Plans Negotiated	Plans Broken	Current Step Plan	Current Payment Agreement	Termination Date	Claimed Protection
127	\$31.44	\$563.15	\$3,826.76	\$140.67	\$4,562.02	3	3	PLAN-STEP-NON-PROTECTED	NO	YES	YES
147	\$128.11	\$165.17	\$1,533.15	\$128.16	\$4,344.59	5	5	PLAN-STEP-N03	NO	YES	YES
215	\$105.00	\$64.81	\$745.82	\$2,868.06	\$3,783.69	4	3	PLAN-STEP-NON-PROTECTED	YES	YES	YES
227	\$349.72	\$331.00	\$3,038.10		\$3,718.82	6	6	PLAN-STEP-N03	NO	YES	YES
239	\$215.26	\$242.92	\$2,316.25	\$864.99	\$3,639.42	3	3	PLAN-STEP-N03	NO	YES	YES
356	\$208.97	\$226.33	\$2,454.70	\$307.07	\$3,197.07	3	3	PLAN-STEP-N03	NO	YES	YES
405	\$77.25	\$37.35	\$929.92	\$2,005.02	\$3,049.54	5	5	PLAN-STEP-N03	NO	YES	YES
410	\$140.42	\$129.81	\$1,828.80	\$937.83	\$3,036.86	4	4	PLAN-STEP-N03	NO	YES	YES
415	\$157.42	\$167.60	\$1,446.11	\$1,248.34	\$3,019.47	3	3	PLAN-STEP-N03	NO	YES	YES
	<b>\$1,413.59</b>	<b>\$1,928.14</b>	<b>\$18,119.61</b>	<b>\$10,890.14</b>	<b>\$32,351.48</b>						

TEC-RI Record Request No. 4

Request:

Please identify the bill impacts for the 14 customers in the existing G-62 class (on an individual customer basis) that would occur under the Company's proposed rates for Rate B-32/G-32. Include impacts for distribution and transmission. Referring to the Company's typical bill analysis in Schedule NG-HSG-9, please provide the distribution of the existing B-32/G-32 customers relative to the bill impacts indicated on each page of the Rate G-32 bill impacts tables.

Response:

Rather than provide the bill impact information in a format similar to the typical bill schedules contained in Schedule NG-HSG-9, the Company has calculated the annual bill impact for each customer in Rate Classes B-32 and G-32 on a total bill basis<sup>1</sup> and summarized that information in the table below:

<b>Percent Change</b>	<b>No. of Customers</b>	<b>Percent of Class</b>	<b>Cumulative Percentage</b>
Greater than (2%)	2	0%	0%
(2%) to 0%	106	10%	10%
0% to 2%	335	33%	43%
2% to 4%	255	25%	68%
4% to 6%	131	13%	81%
6% to 8%	58	6%	87%
8% to 10%	29	3%	90%
Greater than 10%	98	10%	100%
Total	1,014	100%	

Attachment 1, pages 1 through 3, shows the bill impacts resulting from the proposed distribution charges, the proposed transmission charge and the combined distribution and transmission charges, respectively, on an individual customer basis for the G-62 and B-62 customers based on actual usage for the twelve months ending November 2009. For comparative purposes, the same bill impact information for rate classes A-16, C-06, G-02 and G-32, based on a typical customer usage for each class, is shown in a separate table beneath each B-62/G-62 bill impact table.

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<sup>1</sup> The total bill calculation includes all retail delivery charges plus the current Standard Offer charge of 9.2¢ per kWh.

Annual Bill Impacts Based Upon Proposed Distribution Charges (Distribution Component Only)

Rate B-62/G-62 Customers

Customer Number	Maximum Monthly Billing Demand	Average Monthly kWh Usage	Total Current Distribution Charges	Total Proposed Distribution Charges	Distribution Charges Increase/ (Decrease) \$	% Change
1	1,744.4	140,765	\$233,364.66	\$35,739.76	(\$197,624.90)	-84.7%
2	8,443.4	3,854,662	\$358,019.72	\$557,648.78	\$199,629.06	55.8%
3	3,427.2	1,088,417	\$266,267.26	\$182,035.68	(\$84,231.58)	-31.6%
4	13,960.0	5,912,223	\$440,959.19	\$852,684.85	\$411,725.66	93.4%
5	5,736.6	2,509,836	\$300,027.68	\$360,783.18	\$60,755.51	20.2%
6	7,288.0	3,070,992	\$363,766.10	\$494,642.83	\$130,876.74	36.0%
7	6,660.0	597,500	\$331,265.18	\$201,958.77	(\$129,306.41)	-39.0%
8	4,072.0	1,657,969	\$286,984.80	\$266,325.62	(\$20,659.19)	-7.2%
9	9,424.8	2,825,635	\$363,494.37	\$475,880.82	\$112,386.45	30.9%
10	3,456.0	1,119,750	\$264,800.76	\$183,621.02	(\$81,179.73)	-30.7%
11	4,082.4	1,021,800	\$280,747.21	\$190,768.15	(\$89,979.06)	-32.0%
12	21,732.0	8,458,025	\$712,814.85	\$1,615,976.22	\$903,161.37	126.7%
13	19,740.0	8,766,419	\$551,509.74	\$1,257,156.93	\$705,647.19	127.9%
14	9,914.4	4,388,598	\$382,281.59	\$637,128.27	\$254,846.68	66.7%

For comparative purposes:

Rate Class	Maximum Monthly Billing Demand	Average Monthly kWh Usage	Total Current Distribution Charges	Total Proposed Distribution Charges	Distribution Charges Increase/ (Decrease) \$	% Change
A-16		500	\$20.45	\$27.60	\$7.15	35%
C-06		1,000	\$44.00	\$53.99	\$9.99	23%
G-02	75	26,250	\$538.20	\$685.64	\$147.44	27%
G-32	500	175,000	\$2,903.31	\$3,333.33	\$430.02	15%

Annual Bill Impacts Based Upon Proposed Transmission Charges (Transmission Component Only)

Rate B-62/G-62 Customers

Customer Number	Maximum Monthly Billing Demand	Average Monthly kWh Usage	Total Current Transmission Charges	Total Proposed Transmission Charges	Transmission Charges Increase/ (Decrease) \$	% Change
1	1,744.4	140,765	\$29,699.57	\$28,142.45	(\$1,557.12)	-5.2%
2	8,443.4	3,854,662	\$616,516.82	\$491,225.06	(\$125,291.77)	-20.3%
3	3,427.2	1,088,417	\$188,817.67	\$162,874.87	(\$25,942.80)	-13.7%
4	13,960.0	5,912,223	\$945,903.05	\$753,923.78	(\$191,979.27)	-20.3%
5	5,736.6	2,509,836	\$398,330.56	\$314,769.95	(\$83,560.61)	-21.0%
6	7,288.0	3,070,992	\$498,060.07	\$402,648.34	(\$95,411.73)	-19.2%
7	6,660.0	597,500	\$175,201.20	\$206,770.50	\$31,569.30	18.0%
8	4,072.0	1,657,969	\$266,996.19	\$214,270.77	(\$52,725.42)	-19.7%
9	9,424.8	2,825,635	\$506,301.98	\$424,359.60	(\$81,942.39)	-16.2%
10	3,456.0	1,119,750	\$191,742.00	\$163,444.41	(\$28,297.59)	-14.8%
11	4,082.4	1,021,800	\$191,307.06	\$175,945.61	(\$15,361.45)	-8.0%
12	21,732.0	8,458,025	\$1,310,451.61	\$1,007,973.13	(\$302,478.48)	-23.1%
13	19740	8766418.667	\$1,399,370.22	\$1,112,675.28	(\$286,694.94)	-20.5%
14	9914.4	4388598.167	\$704,091.40	\$562,838.22	(\$141,253.19)	-20.1%

For comparative purposes:

Rate Class	Maximum Monthly Billing Demand	Average Monthly kWh Usage	Total Current Transmission Charges	Total Proposed Transmission Charges	Transmission Charges Increase/ (Decrease) \$	% Change
A-16		500	\$7.81	\$8.49	\$0.68	9%
C-06		1,000	\$16.67	\$17.08	\$0.41	2%
G-02	75	26,250	\$385.76	\$377.15	(\$8.61)	-2%
G-32	500	175,000	\$2,601.04	\$2,319.53	(\$281.51)	-11%



Annual Bill Impacts Based Upon Proposed Distribution & Transmission Charges (T&D Components Only)  
Rate B-62/G-62 Customers

Customer Number	Maximum Monthly Billing Demand	Average Monthly kWh Usage	Total Current T&D Charges	Total Proposed T&D Charges	T&D Charges Increase/ (Decrease) \$	% Change
1	1,744.4	140,765	\$263,064.23	\$63,882.20	(\$199,182.03)	-75.7%
2	8,443.4	3,854,662	\$974,536.55	\$1,048,873.84	\$74,337.29	7.6%
3	3,427.2	1,088,417	\$455,084.93	\$344,910.55	(\$110,174.38)	-24.2%
4	13,960.0	5,912,223	\$1,386,862.24	\$1,606,608.63	\$219,746.39	15.8%
5	5,736.6	2,509,836	\$698,358.24	\$675,553.13	(\$22,805.10)	-3.3%
6	7,288.0	3,070,992	\$861,826.16	\$897,291.17	\$35,465.01	4.1%
7	6,660.0	597,500	\$506,466.38	\$408,729.27	(\$97,737.11)	-19.3%
8	4,072.0	1,657,969	\$553,980.99	\$480,596.39	(\$73,384.61)	-13.2%
9	9,424.8	2,825,635	\$869,796.35	\$900,240.41	\$30,444.06	3.5%
10	3,456.0	1,119,750	\$456,542.76	\$347,065.43	(\$109,477.32)	-24.0%
11	4,082.4	1,021,800	\$472,054.27	\$366,713.76	(\$105,340.52)	-22.3%
12	21,732.0	8,458,025	\$2,023,266.46	\$2,623,949.35	\$600,682.89	29.7%
13	19,740.0	8,766,419	\$1,950,879.96	\$2,369,832.21	\$418,952.25	21.5%
14	9,914.4	4,388,598	\$1,086,372.99	\$1,199,966.48	\$113,593.49	10.5%

For comparative purposes:

Rate Class	Maximum Monthly Billing Demand	Average Monthly kWh Usage	Total Current T&D Charges	Total Proposed T&D Charges	T&D Charges Increase/ (Decrease) \$	% Change
A-16		500	\$28.26	\$36.09	\$7.83	28%
C-06		1,000	\$60.67	\$71.07	\$10.40	17%
G-02	75	26,250	\$923.96	\$1,062.79	\$138.83	15%
G-32	500	175,000	\$5,504.35	\$5,652.86	\$148.51	3%