

December 7, 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**

Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's¹ responses to data requests COMM 11-2 and COMM 11-3 issued by the Commission in the above-referenced proceeding and record requests issued by the Commission and the Division at the November 5, 2009, November 6, 2009, November 12, 2009, November 13, 2009, and the November 23, 2009 evidentiary hearings in the above-referenced proceeding. 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

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

Certificate of Service

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

 /S/
Linda Samuelian

December 7, 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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	mneal@lacapra.com	
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The Narragansett Electric Company d/b/a National Grid					
Docket 4065					
Discovery Log					
As of: December 7, 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	Attachments 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
COMM 1-45	Filed	6/26/2009	O'Brien		Attachment COMM 1-45

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Data Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
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	6/26/2009	Dowd		Attachment COMM 1-48
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) 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 1-58 (supp)	Filed	6/26/2009	O'Brien		Attachment COMM 1-58 (supp.)
COMM 1-59	Filed	6/26/2009	O'Brien		Attachment COMM 1-59
COMM 1-60	Filed	6/26/2009	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	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		
COMM 1-98	Filed	7/1/2009	Dowd		

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Data Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
COMM 1-99	Filed	6/26/2009	Gorman		Attachment COMM 1-99
COMM 1-100	Filed	7/1/2009	Gorman		
COMM 1-101	Filed	7/1/2009	Gorman		
COMM 1-102	Filed	6/26/2009	Gorman		Attachment COMM 1-102
COMM 1-102 (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		
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

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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	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
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) BULK
COMM 3-6	Filed	9/10/2009	O'Brien		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		

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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 Herewith	12/7/2009	Pettigrew		
COMM 11-3	Filed Herewith	12/7/2009	O'Brien		

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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	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 1-32 (Supp.)	Filed	9/1/2009	O'Brien		Attachment DIV 1-32 (Supp.)
DIV-1-33	Filed	6/26/2009	O'Brien		Attachment DIV 1-33
DIV-1-34	Filed	7/1/2009	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	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	6/26/2009	Morrissey		Attachment DIV 3-10
DIV-3-11	Filed	6/26/2009	Morrissey		Attachment DIV 3-11 (PDF and working excel)
DIV-3-12	Filed	6/26/2009	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		

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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) 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 (1-4)
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) 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 (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		
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		

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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		
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

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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
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	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) BULK
DIV-11-13	Filed	8/18/2009	Pettigrew		Attachment DIV 11-13
DIV-11-14	Filed	8/18/2009	Pettigrew		

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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) BULK
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) BULK hard copy only Attachment DIV-11-39 EXCEL file
DIV-11-39	Filed	8/11/2009	Pettigrew		
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) 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 Attachment 12-6 (excel)
DIV-12-6	Filed	8/18/2009	O'Brien		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	8/24/2009	O'Brien		
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		

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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		
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	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) 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	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		

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Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
DIV-17-9	Filed	8/20/2009	Dowd		
DIV-17-10	Filed	8/24/2009	O'Brien		
DIV-17-11	Filed	8/24/2009	O'Brien		Attachment DIV 17-11
DIV-17-12	Filed	8/14/2009	Gorman		
DIV-17-13	Filed	8/14/2009	Gorman		
DIV-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	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) BULK
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	C-attachment	Attachment DIV 22-4 BULK
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)
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 BULK
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) BULK
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		

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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 BULK
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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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	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© BULK
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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Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
GWC-1-1	Filed	8/27/2009	Gorman		
GWC-1-2	Filed	8/27/2009	Gorman		Attachment GWC 1-2
GWC-1-3	Filed	8/27/2009	Gorman		Attachment GWC 1-3
GWC-1-4	Filed	8/27/2009	Gorman		
GWC-1-5	Filed	8/27/2009	Gorman		

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Record Request	Hearing Date	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
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		
RR-COMM-5	Nov. 3, 2009	Pending				
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	Lafamme		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				
RR-COMM-19	Nov. 5, 2009	Pending				
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	C-Attachment	Attachment RR-COMM-22
RR-COMM-23	Nov. 5, 2009	Filed	12/04/09	O'Brien		
RR-COMM-24	Nov. 5, 2009	Filed Herewith	12/07/09	O'Brien		Attachment RR-COMM-24
RR-COMM-25	Nov. 5, 2009	Filed	12/04/09	O'Brien		
RR-COMM-26	Nov. 5, 2009	Pending				
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 Herewith	12/07/09	Wynter		
RR-COMM-32	Nov. 6, 2009	Pending				
RR-COMM-33	Nov. 6, 2009	Filed Herewith	12/07/09	Wynter		
RR-COMM-34	Nov. 6, 2009	Pending				
RR-COMM-35	Nov. 6, 2009	Filed Herewith	12/07/09	Wynter		Attachment RR-COMM-35
RR-COMM-36	Nov. 6, 2009	Filed Herewith	12/07/09	Wynter		
RR-COMM-37	Nov. 6, 2009	Filed Herewith	12/07/09	Wynter		
RR-COMM-38	Nov. 6, 2009	Filed Herewith	12/07/09	Wynter		
RR-COMM-39	Nov. 6, 2009	Pending				
RR-COMM-40	Nov. 6, 2009	Filed Herewith	12/07/09	Wynter		
RR-COMM-41	Nov. 6, 2009	Pending				
RR-COMM-42	Nov. 12, 2009	Filed Herewith	12/07/09	Dinkel		
RR-COMM-43	Nov. 12, 2009	Filed Herewith	12/07/09	Dinkel		
RR-COMM-44	Nov. 12, 2009	Filed Herewith	12/07/09	Dinkel		
RR-COMM-45	Nov. 12, 2009	Pending				
RR-COMM-46	Nov. 13, 2009	Filed Herewith	12/07/09	Gorman		
RR-COMM-47	Nov. 13, 2009	Filed Herewith	12/07/09	Gorman		
RR-COMM-48	Nov. 23, 2009	Filed Herewith	12/07/09	O'Brien		
RR-COMM-49	Nov. 23, 2009	Pending				
RR-COMM-50	Nov. 23, 2009	Pending				
RR-COMM-51	Nov. 23, 2009	Pending				
RR-DIV-1						
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 Herewith	12/07/09	Wynter		
RR-DIV-10	Nov. 6, 2009	Pending				
RR-DIV-11	Nov. 6, 2009	Filed Herewith	12/07/09	Wynter		
RR-TEC-RI-1						
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		

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Record Request	Hearing Date	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
RR-TEC-RI-4	Nov. 13, 2009	Pending				
Discovery Log Ends Here: December 7, 2009						

Commission Data Request 11-2

Request:

Please update the response to COMM 7-9 such that the data provided for CY 2009 is an estimate of the full year expenditures.

Response:

	CY 98 Actual	CY 99 Actual	CY 00 Actual	CY 01 Actual	CY 02 Actual	CY 03 Actual
OPEX - VM Total	\$2,934,079	\$2,920,212	\$3,538,731	\$3,760,232	\$3,459,932	\$3,575,283
	CY 04 Actual	CY 05 Actual	CY 06 Actual	CY 07 Actual	CY 08 Actual	CY 09 Estimated
OPEX - VM Total	\$3,300,059	\$3,456,070	\$4,925,870	\$6,687,265	\$7,037,576	\$8,602,774
	CY 10 Forecast	CY 11 Forecast	CY 12 Forecast	CY 13 Forecast	CY 14 Forecast	CY 15 Forecast
OPEX - VM Total	\$8,952,493	\$9,205,932	\$9,479,259	\$9,760,144	\$10,050,020	\$10,348,505

Commission Data Request 11-3

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:

Rate Class	2006	2007	2008
A-16	\$ 7,247,149	\$ 7,781,146	\$ 8,389,763
A-60	\$ 1,744,505	\$ 1,902,152	\$ 1,345,403
C-06	\$ 699,905	\$ 512,590	\$ 943,359
G-02	\$ 452,793	\$ 545,214	\$ 968,160
G-32	\$ 235,685	\$ 246,422	\$ 762,007

- (c) The writeoffs 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 24

Request:

Referencing Workpaper NG-RLO-19, Page 2 of 2, please provide a description of the IS Projects listed in this workpaper.

Response:

Please see Attachment RR-COMM-24 for the requested information.

IS Project Descriptions

Global Business Objects Consolidation (INVP#1151)

Initiative intended to achieve more efficient use and support of Business Objects software within Company IS environments.

CNI Upgrades (INVP#1644)

Control Center enhancements for LI Scada EMS, NY EMS Life Extension (Mainframe, HMI, and ICCP Replacements) LI CNI Direct Hardware Upgrades - Minor Works.

Security Enhancement Projects (INVP#0823)

Database monitoring and auditing Guardium solution to satisfy compliance with Sarbanes-Oxley (SOX) and Health Insurance Portability and Accountability Act (HIPAA).

Global IS Audit Remediation (INVP#1135)

Initiative to promptly remediate significant IS audit findings.

Data Storage Refresh (INVP#1646)

Initiative to replace and upgrade data storage equipment at end of planned life.

Video Conferencing (INVP#1400)

New video conferencing facilities/collaboration rooms in Strand, Reservoir Woods, Metrotech facilities.

T&D Communications Project (INVP#1647)

Project to replace Transmission and Distribution communications equipment and facilities.

Network Comms – Voice and Data Normals (INVP#1404)

Annual project for normal smaller-scale replacements of voice and data networking equipment at end of planned life and whose failure would lead to significant business disruptions.

Network Strategy – Other (INVP#1649)

Project intended to identify and install networking solutions that would modernize and standardize Company networks with enhanced performance and reliability at reduced cost.

Network Strategy Refresh (INVP#1650)

Larger-scale replacements and upgrades of voice and data network equipment at end of planned life.

Attachment to Commission Record Request 24 (continued)

Customer Insight and Analytics (INVP#1159)

Project that builds the foundational component to enable the existing business plan of enhancing the customer experience and fostering improved regulatory relationships to grow the business. This project is upgrading the existing KeySpan Unix/Oracle database server from Oracle 9i to the corporate standard Oracle 10g. It will enhance existing data extracts from CRIS, CAS, and Oynx and develop new data extracts from systems such as CSS, Advantage, iAvenue and Siebel.

Physical Contact Center Consolidation KeySpan Merger (INVP#1259B)

Project which will result in the decommissioning of the Waltham Contact Center. The customer calls previously handled in Waltham will be routed to either the Contact Centers in Metrotech or Northborough, or routed to an outsourced vendor partner. Requisite call processing technologies will be migrated to or installed new in Northborough. Call paths will be established to/from the vendor's location and desktop access will be provided to the CRIS II system.

Cascade Phase I (INVP#1363)

Project related to the purchase and implementation of a software package called Cascade, which will take a subset of AIMMS substation equipment data and allow for the assessment of the criticality, health and risk associated with these assets based on inputs from multiple other systems. This product is a tactical step toward doing true asset management, Risk & Criticality Based Maintenance (RCBM) and enabling Global Asset Management initiatives.

ACIS Target Pricing Model (INVP#1482)

Project related to implementing functional enhancements in the ACIS application to support the Alliance agreement for the Electric Distribution organization and to accommodate the "Target Pricing" initiative.

21st Century for Syracuse/Northborough (INVP#1588)

Project aimed at ensuring/increasing the effectiveness of the Syracuse and Northborough contact centers in terms of handling the increase in emergency calls during a significant storm outage situation. This project is an addition to the 21st Century Communication (TFCC) contract that would provide coverage on a 7x24x365 basis and can be enabled at a moment's notice or be invoked automatically whenever certain increased call levels are attained.

Attachment to Commission Record Request 24 (continued)

Remote Access to Digital Fault Recorders (INVP#1488)

Project to improve Protection Engineering's capability to retrieve transient fault records used in the analysis of Bulk Power System and Critical Transmission disturbances. This proposal includes 55 substations in New England and Upstate New York. The improved connectivity will allow Protection Engineering to retrieve fault records more efficiently, thereby enabling thorough analysis (meeting NERC Standard PRC -018 and NPCC A15 compliance criteria), as well as meeting the expectation of the Transmission Operating Committee to identify root causes of system mis-operations in order to improve transmission system reliability.

EBB Expansion (INVP#1173)

Project to enhance the existing Gas Transportation Electronic Bulletin Board (EBB) system to include New England and Rhode Island (currently includes only Long Island and New York City) as a tactical step in providing a common platform across US National Grid. The EBB system is a World Wide Web application that allows timely, clear communication between marketers and National Grid. The EBB application also notifies marketers of defaults, curtailments, system alerts and operational flow orders.

Smallworld GIS Upgrade (INVP#0953)

Project which upgrades the General Electric (GE) Smallworld Geographic Information System (GIS) application to a vendor supported version of the application. The current software version (3.1 SP 2) has been unsupported by the vendor since June 2002.

AIMMS Field Device Upgrade (INVP#0974)

Project which replaces outdated and failing PDAs with rugged handheld devices compatible with XP operating systems and allow the users to perform other inspections and field audits that are planned as part of the Cascade Phase II project.

Settlement Solution (INVP#1232)

Project which involves the documentation and potential consolidation of our wholesale/retail electric applications that manage reporting of usage to the NY and NE ISO.

Collections Performance Measurement and Management (INVP#1291)

Project which involves the development of common reports and metrics across all US territories and systems. Upon further review, a different approach is being pursued.

Collections Outbound Sourcing (IVR) (INVP#1292)

Project which automates outbound calling in-house (currently performed by vendors). Initial analysis and estimates do not support moving forward at this time.

Commission Record Request 31

Request:

Please provide the relevant details regarding payment plans negotiated, payment plans broken, field visits, and reason for size of balance due of the following customer accounts referenced in the Company's monthly report in Docket 1725 submitted August 25, 2009, Page 1 of 31:

- a. Account 1 (balance due of \$17,115.74);
- b. Account 4 (balance due of \$13,027.38);
- c. Account 5 (balance due of \$9,422.99).

Response:

- a. The following information pertains to Account 1:

- Seven payment plans were negotiated
- Seven payment plans were broken
- No field visits were made prior to termination

The reason for the size of balance due is that this customer had not made a payment since July 2006. Each time the customer's service was jeopardized for disconnection, the customer committed to a new payment agreement, which was later defaulted upon. On one occasion, the customer also delayed collection action by claiming medical protection, although subsequently failed to provide the necessary data to substantiate the claim.

- b. The following information pertains to Account 4:

- Seven payment plans negotiated
- Seven payment plans broken
- No field visits were made prior to termination

The reason for the size of the balance due is that the payments made by this customer since June 2007 were made with insufficient funds. Each time the customer faced collection action, the response was to establish a payment arrangement, which was followed by the remission of a bad check. Service was terminated October 1, 2009.

Commission Record Request 31 (cont'd)

c. The following information pertains to Account 5:

- Seven payment plans negotiated
- Seven payment plans broken
- One field visit made

The reason for the size of balance due was that this customer avoided termination by regularly scheduling payment arrangements and then claiming medical protection without providing the required documentation. One large payment was posted in October 2009, but the last payment prior to that was July 2007. On the field visit listed above, the field representative did not terminate service because the customer showed the representative a doctor's note.

Commission Record Request 33

Request:

Do any other National Grid electric affiliates have either a commodity or delivery bad debt true-up mechanism?

Response:

Yes. National Grid's electric affiliate in New Hampshire, Granite State Electric Company has a commodity bad debt true-up mechanism approved by the New Hampshire Public Utilities Commission in Docket DE 05-126. Also, on November 30, 2009, the Massachusetts Department of Public Utilities approved a commodity-related bad-debt true-up mechanism for Massachusetts Electric Company and Nantucket Electric Company in Docket No. D.P.U. 09-39.

Currently, the electric operations of Narragansett Gas Company do not have any recovery mechanism in place for commodity-related bad debt. However, the Commission has approved bad-debt recovery factor for commodity service for the gas operations, which is included in the Gas Adjustment Factor. In Docket No. 3463, the Commission approved a bad-debt factor of 2.46 percent and established a mechanism that allows the Company to recover 2.46 percent times annual commodity revenues each year to account for commodity-related bad-debt costs. The Commission recently approved the gas commodity bad-debt factor in Docket No. 4097 for GAF rates covering the period November 2009 through October 2010.

Commission Record Request 35

Request:

Please provide any information on metrics on the effectiveness of the consumer advocate program in New York, including, but not limited to, the history of the program, staffing levels, and outcomes identified since it has been in place.

Response:

The consumer-advocate positions are designed to protect public health and safety as it relates to the provision of electric and gas service. The following is a list of roles which the consumer advocates play:

- advocate for customers who utilize resources within National Grid and in the local community;\
- initiate and guide relationships with community agencies, other National Grid departments and customers;
- act as a liaison for programs and services offered by National Grid and by the agencies;
- provide training and education to national Grid employees regarding customer sensitivity and referral procedures for community based programs; and
- implement and coordinate the National Grid Outreach and Education plans.

The Upstate New York advocate program (through Niagara Mohawk Power Corporation) began in 1987 with a staff of three consumer advocates, which eventually increased to 11 advocates. Following a number of staffing changes, there are currently nine consumer advocates in upstate New York.

The Long Island Lighting Company's Consumer Advocacy Department was established in 1987 within the Office of Customer Affairs. The program began with one advocate in Suffolk County and a Nassau County advocate was added in 1988. By 1993, the department reached a complement of 10 advocates (six in Suffolk County and four in Nassau County) covering the entire service territory of Suffolk, Nassau and the Rockaways. Currently, there are two consumer advocates in Long Island.

As of this writing, National Grid employs 13 consumer advocates: nine advocates in Upstate New York serving 37 counties; two advocates in Downstate New York serving Queens, Staten Island and Brooklyn; and two on Long Island serving Nassau and Suffolk counties and the Far Rockaway.

Commission Record Request 35 (cont'd)

Success of the program is primarily measured by the outreach and education provided as well as the number of households served. Attachment RR-COMM-35 is a report that is maintained on a monthly basis to track activity surrounding the advocacy program, enabling the Company to measure sources of referrals and the types of customers being assisted.

2009 Fiscal Year-To-Date Totals

Activity	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Total
Number of Households Assisted	(1260)	(1118)	(1276)	(1084)	(1384)	(1091)	(1368)	(925)	(1208)	(1145)	(1125)	(1418)	(14402)
Limited/Non-English Speaking	5	20	9	9	10	12	9	7	6	4	7	8	106
Limited/Low Income	401	347	489	375	392	313	622	297	197	416	439	491	4779
Other	174	109	154	118	119	127	144	143	196	163	140	159	1746
Elderly & Disabled	680	642	624	582	863	639	593	478	809	562	539	760	7771
Category of Customer Issues													
Energy Usage Inquiries	63	57	59	45	160	72	98	77	52	150	136	135	1104
Medical Emergency	97	90	91	68	93	157	112	34	68	23	41	31	905
National Grid Policy	94	82	154	134	160	156	162	98	374	175	144	136	1869
Financial Hardship	1016	856	1043	808	1011	751	1008	614	637	785	723	1123	10375
Billing Issues	257	284	212	149	253	66	181	217	201	151	324	374	2669
Type of Assistance													
Financial Assis/Comm Agency	600	458	536	358	474	506	618	401	446	640	607	814	6458
National Grid Prog/Svcs	203	228	259	180	234	164	233	183	262	144	174	162	2426
Payment Agreements	222	236	186	122	254	87	173	114	88	129	140	78	1829
Other (Problem Resolution, Info., etc.)	331	302	393	430	470	451	377	226	415	297	299	412	4403
Collections Referral	94	18	8	24	69	9	44	62	70	127	9	23	557
In-Person Contacts													
Home Visits	45	41	37	40	38	23	30	22	14	16	30	19	355
Office Visits	4	0	2	0	3	2	9	3	1	2	4	3	33
O&E Activities													
O&E Dollars Spent	1878	391	119	278	1125	7375	4982	677	409	156	122	945	18457
Total Number Attending	2762	676	815	664	858	1983	2844	1807	663	976	583	929	15560
Outreach Activities	20	26	21	14	16	44	50	42	19	19	32	20	323
Inreach Activities													
Inreach Activities	30	5	12	17	11	5	6	3	3	5	34	5	136
Other Community Activities													
Agency Meetings	33	27	39	17	22	29	29	23	18	26	28	36	327
Board Meetings	15	8	10	8	7	14	6	8	11	11	8	10	116
Other Community Involvement	25	23	13	9	19	13	27	12	17	11	11	13	193
Source of Referrals													
Customer Contact Center	114	53	37	65	56	30	70	41	278	113	49	48	954
LIPA Referral	1	0	4	6	7	12	9	3	6	9	10	13	80
On Track	8	13	6	8	1	1	0	0	0	1	7	2	47
Special Project Accounts	13	8	5	5	21	43	41	3	74	5	4	7	229
Other Referral	61	53	73	59	114	216	83	118	76	70	51	70	1044
Self	241	181	198	226	163	200	203	179	177	185	221	260	2434
Field Reps	17	34	17	21	57	14	18	70	10	118	15	18	409
Collections/ NCO	19	37	50	27	25	23	14	14	60	11	16	32	328
Database Referral	291	211	229	173	246	149	210	238	184	252	262	386	2831
Agency	380	391	514	440	488	366	617	236	317	341	453	541	5084
In House	2	3	4	3	176	3	2	3	53	24	3	6	282
Medical	66	74	67	48	60	40	86	26	11	21	32	21	552

Commission Record Request 36

Request:

Please refer to the Company's response to Division Data Request 8-17 for the month of May 2009. Of the 14,949 delinquent accounts, 6,631 (sic - 6,361) payment plans were negotiated. What happens with the remaining accounts?

Response:

In May 2009, 14,949 accounts were on active payment plans at the end of the month and 6,361 payment plans were negotiated within the month of May. Because plans may default or be cancelled during the month, there is no guarantee that all 6,361 payment plans negotiated in May remained active at the end of May. Any active payment plans that were not negotiated in May were negotiated in months prior to May and have been maintained by the customers with their required installment payments.

Commission Record Request 37

Request:

In terms of the Company's goal of 41,000 field visits, if a Company representative went to a residence and the customer of record was either away at work or chose not to answer the door, or was otherwise occupied and could not answer the door, so the Company representative got no answer, does this event count as adding to the Company's 41,000 field visits goal? If no contact is made, would service then be terminated?

Response:

In the event that a collector is at a premise, and either no one was home or no one has answered the door, the customer is terminated if the Company has access to the meter (counts as a termination towards the SLA – *Service Level Agreement* – with the field). If the meter was not accessible, the collector would issue a CGI – *Can't Get In* – order, which also counts towards the SLA that the Company has in place with the field, but would not be considered an effective visit. Each of these scenarios would contribute toward the 41,000 field visit threshold.

Commission Record Request 38 (cont'd)

2009 through June

Residential Terminations	7,967
Residential Restorations	4,512
%	56.6%

Non-Residential Terminations	734
Non-Residential Restorations	379
%	51.6%

Total Terminations	8,701
Total Restorations	4,891
%	56.2%

Commission Record Request 40

Request:

Referencing the Company's response to Division Data Request 10-13, Attachment 2, Page 13 of 39, please:

- a. identify whether the Company is proposing to collect funds from Rhode Island ratepayers to support research or installation of remote disconnect devices; and
- b. identify whether the Company has sold any of its accounts receivable.

Response:

- a. The Company does not have plans at this time to install remote disconnect devices.
- b. The above question refers to the text in Attachment 2, Page 13 of 39 of "Sell debt after tertiary level". This does not imply selling active accounts receivable, but rather, selling charge offs that reached a tertiary stage (see response to Division Data Request 8-23). At this time, the economic conditions are such that this opportunity is not viable. To date, the Company has not engaged in this practice.

Commission Record Request 42

Request:

Please provide an explanation of the structure of dividend payments to shareholders since National Grid's acquisition of The Narragansett Electric Company. Which National Grid company are investors shareholders of? What have been the dividend payouts year by year on a per-share basis since the inception of National Grid's ownership?

Response:

When the Narragansett Electric Company pays dividends, it pays them to its immediate parent company National Grid USA. Since its acquisition by National Grid plc, the Narragansett Electric Company has paid only one dividend to National Grid USA in the amount of \$60 million in March 2007. Investors are shareholders of National Grid plc. National Grid plc has paid the following dividends to its shareholders over the period 2000 to 2009:

<u>Year</u>	<u>Dividends (\$/Share)</u>
2000	0.22
2001	0.22
2002	0.23
2003	0.27
2004	0.33
2005	0.44
2006	0.47
2007	0.55
2008	0.66
2009	0.55

Commission Record Request 43

Request:

What are the corporate actions that led to an equity percentage of 78 percent? Is this level of equity consistent with those of other companies owned by National Grid in the United States?

Response:

The Company's use of its internally generated cash to pay down debt and fund capital expenditures rather than pay dividends over the last several years has led to its current common equity ratio of 78 percent. This has been a fairly consistent practice among the National Grid legacy companies in the U.S., which has led to common-equity ratios significantly higher than 50 percent at most of these entities.

Commission Record Request 44

Request:

What is the capital structure of National Grid plc, with all adjustments made to account for cash assets, RAV, etc.? What percentage of National Grid plc operations are unregulated?

Response:

National Grid plc's capital structure as of March 31, 2009, determined in accordance with US GAAP and adjusted for cash assets and RAV is comprised of approximately 38 percent common equity and 62 percent debt. Only five percent of National Grid plc's operations are unregulated.

Commission Record Request 46

Request:

What is the total dollar amount of recovery that would be shifted to other classes if TEC-RI's proposal on the B-62/G-62 rate class is adopted? (Or conversely, how much more revenue is picked up from the 14 B-52/G-62 class with the Company's proposed rate design?)

Response:

The Company is proposing to combine Rate G62/B62 with Rate G32/B32. As a result of this proposal, and following the Company's revenue allocation mechanism under which no rate class received a distribution rate increase more than twice the system average, Rate G62/B62 customers would pay \$7,804,000 in distribution rates.

Under the TEC-RI proposal, as the Company understands it, Rate G62/B62 would remain a separate rate class. If the Company uses the same revenue allocation mechanism as described above, Rate G62/B62 customers would pay \$8,335,000 in distribution rates, an increase of \$531,000 over the Company's proposal.

Commission Record Request 47

Request:

What is the impact on customer charges for all other classes that would result from the implementation of a \$1.00 per month customer charge in the A-60 class?

Response:

A \$1.00 per month customer charge on A-60 customer bills would generate \$4.6 million annually. Some of the options to apply this revenue are:

- Reduce all other customer charges by approximately \$0.79 per month
- Reduce all other customer charges by approximately 6.4%

Commission Record Request 48

Request:

Demonstrate that savings from facilities consolidation are included in the merger savings calculation.

Response:

In RIPUC Docket No. 3943, Company Witnesses Feibelman and Levin estimated total annual synergies of \$200 million, based on the synergy savings from the integration of all regulated and unregulated activities of the combined National Grid/KeySpan companies. This is the same \$200 million of annual synergy savings that serves as the basis for the Company's synergy savings proposing in this proceeding. The Company's share of these steady state annual savings is 4 percent, as shown on Schedule NG-RLO-3, page 2, column (b), line 19. In this case, the Company has provided a credit of \$6.2 million to customers in its cost of service in this proceeding, as shown on Schedule NG-RLO-2, page 1, line 31. This credit reflects the benefit of the Company's 4 percent allocated share of annual steady state savings, as escalated for inflation, of approximately \$8.6 million, which are not anticipated to be fully achieved until Year 4 following the merger, as shown on Schedule NG-RLO-3, page 5, column (d), line 16. An estimated \$2.4 million of synergy savings was experienced during the calendar year 2008 test year, resulting in a net expense adjustment of \$6.2 million (\$8.6 million minus \$2.4 million).

As indicated in the pre-filed testimony of Company Witnesses Feibelman and Levin in Docket No. 3943 at page 8, the sources of synergy savings fell into a number of broad categories, one of which is "Optimization of office and operating facilities, transportation fleets, and material and supply inventory." This category of savings includes savings from facilities consolidations, which consists of the initiatives shown in the table below, with the Company's share amounting to 4 percent of those savings, as escalated for inflation:

Commission Record Request No. 48 (continued)

<u>Description</u>	<u>Total</u>
Facility Consolidation – Long Island, New York (1)	\$3,861
Facility Consolidation – New York City (1)	2,571
Facility Consolidation – Northeast Massachusetts (1)	(50)
Facility Consolidation – New England Warehousing	450
Facility Consolidation – Offices	6,474
Facility Consolidation – New York Upstate	<u>140</u>
Subtotal	<u>\$13,446</u>
Electric Control Centers Consolidation	2,532
Gas Control Centers Consolidation	<u>846</u>
Total	<u>\$16,824</u>

- (1) Certain amounts associated with these initiatives were excluded from the calculation of synergy savings in connection with the Rhode Island gas rate case (and subsequently the Rhode Island electric rate case utilizing the same methodology) as the initiatives, or portions of the initiatives, were already underway. Given the small dollar amount in relation to the total, the exclusion of these items has no impact on the total steady state synergy savings value of \$200 million annually.

Division Record Request 9

Request:

On what date did the Company commence outbound calls to standard residential accounts in 2008 for accounts 60 days in arrears?

Response:

Outbound calls to all accounts with an active disconnect notice commenced on August 1, 2008. Accounts with an active disconnect notice would have included those with balances due 60 days in arrears, but was not limited to these accounts.

Division Record Request 11

Request:

Regarding certification or affidavits for customers claiming elderly, handicap, or serious illness, please provide the following information:

- a. If there is a process in place to verify the claim of protected treatment, what is the process?
- b. If there is a process in place to notify the Division should the customer no longer qualify for protected treatment, what is the process?
- c. If there is a process in place to notify the Division should these customers default on a payment plan, what is the process?

Response:

a. The process in place to verify claims of protected treatment varies by the category:

(1) For elderly customers, the Company mails an application form for elderly protection, which requests pertinent information (i.e., date of birth, customer name, social security number and similar information). When the form is received by National Grid's Accounts Processing group, it is reviewed to ensure all required information has been provided (e.g., the form is complete, signed, birth date valid and similar). If so, the account is coded with the "Elderly" protected status.

(2) For medical customers, the Company mails a letter, including a medical form and an affidavit of medical condition. The Accounts Processing group verifies that both forms are properly completed and signed. If so, the account is coded with "Medical" protected status.

b. The process by which the Division is notified should these customers no longer qualify for protected treatment is as follows:

Credit & Collections facilitates the petition process for elderly, handicapped or serious illness customers that accumulate large arrears. A letter is sent to the customer advising them that they may be in danger of losing their protection as well as their service. If the Company does not receive a response from the customer, a field representative visits the home with an affidavit and advises the customer of their eligibility for termination. If the

Division Record Request 11 (cont'd)

Company does not receive a response from the customer, a petition packet is prepared for and sent to the Division. The Division sends a letter to the customer to contact them to negotiate terms. If the Division receives no response, they may approve termination of service. Upon receiving the Division's approval, the Company issues an order to have the service terminated.

c. The process by which the Division is notified of should these customers default on a payment plan is outlined below:

A weekly file is provided to the Division, including actions taken on accounts that were petitioned and resulted in mandated payment plans. Individual e-mail communication is sent for those customers that may have defaulted or paid on a mandated payment agreement resulting from a subsequent formal hearing.