Thomas R. Teehan
Senior Counsel

December 4, 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's[1] responses to data requests COMM 9-1 and COMM 10-3 issued by the Commission in the above-referenced proceeding and record requests issued by the Commission, the Division and TEC-RI at the November 4, 2009 evidentiary hearing 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/_____ December 4, 2009
Linda Samuelian Date

National Grid (NGrid) – Request for Change in Electric Distribution Rates
Docket No. 4065 - Service List as of 10/15/2009

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File original & nine (9) copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02889	Lmassaro@puc.state.ri.us Anault@puc.state.ri.us Plucarelli@puc.state.ri.us Nucci@puc.state.ri.us Sccamara@puc.state.ri.us	401-780-2107 401-941-1691

The Narragansett Electric Company d/b/a National Grid

Docket 4065

Discovery Log

As of: December 4, 2009

[C-denotes confidentiality is being sought]

Data Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
COMM 1-1	Filed	6/26/2009	O'Brien		Attachments COMM 1-1-3, 1-1-4, 1-1-5, 1-1-7, 1-1-8, 1-1-9 **BULK**
COMM 1-2	Filed	6/26/2009	O'Brien		Attachments COMM 1-2 A-D
COMM 1-3	Filed	6/26/2009	Dinkel		Attachments COMM 1-3 A-B **BULK**
COMM 1-4	Filed	6/26/2009	O'Brien		
COMM 1-5	Filed	7/22/2009	O'Brien/Dinkel		Attachments COMM 1-5 (1-3)
COMM 1-6	Filed	6/26/2009	Dinkel	C-attachment	Attachments COMM 1-6-1 & 1-6-2 **BULK**
COMM 1-7	Filed	6/26/2009	O'Brien		Attachment COMM 1-7
COMM 1-8	Filed	6/26/2009	Dinkel		Attachments COMM 1-8 (A-D) **BULK**
COMM 1-9	Filed	6/26/2009	Dinkel	C-attachment	Attahments COMM 1-9 (1-11) **BULK**
COMM 1-10	Filed	6/26/2009	Dinkel		Attachment COMM 1-10 (hard copy only) **BULK**
COMM 1-11	Filed	6/26/2009	O'Brien		
COMM 1-12	Filed	7/1/2009	Dinkel/Morrissey		Attachments COMM 1-12 (1-2)
COMM 1-13	Filed	6/26/2009	Dinkel		Attachment COMM 1-13
COMM 1-14	Filed	6/26/2009	Dinkel		Attachment COMM 1-14
COMM 1-15	Filed	6/26/2009	Dinkel		Attachment COMM 1-15
COMM 1-16	Filed	6/26/2009	O'Brien		Attachments COMM 1-16 (1-12)
COMM 1-17	Filed	7/6/2009	Pettigrew		
COMM 1-18	Filed	7/14/2009	Pettigrew		Attachments COMM 1-18-1, 1-18-2, 1-18-3, 1-18-4(a) - (d) **Bulk**
COMM 1-19	Filed	8/11/2009	O'Brien		Attachment COMM 1-19
COMM 1-20	Filed	6/26/2009	O'Brien		
COMM 1-21	Filed	6/26/2009	O'Brien		Attachments COMM 1-21 (1-4)
COMM 1-22	Filed	6/26/2009	O'Brien		Attachments COMM 1-22 (1-2)
COMM 1-23	Filed	6/26/2009	O'Brien		Attachments COMM 1-23 (1-2)
COMM 1-24	Filed	6/26/2009	O'Brien		Attachment COMM 1-24
COMM 1-25	Filed	6/26/2009	O'Brien		Attachments COMM 1-25 (1-14) **BULK**
COMM 1-25 (supp.)	Filed	8/11/2009	O'Brien		Attachments COMM 1-25 (1-3)
COMM 1-26	Filed	6/26/2009	O'Brien		Attachment COMM 1-26
COMM 1-27	Filed	8/18/2009	O'Brien		Attachments COMM 1-27 (1-3) **BULK**
COMM 1-28	Filed	7/6/2009	O'Brien		Attachment COMM 1-28
COMM 1-29	Filed	6/26/2009	O'Brien		
COMM 1-30	Filed	6/26/2009	O'Brien		
COMM 1-31	Filed	6/26/2009	King		
COMM 1-32	Filed	6/26/2009	O'Brien		Attachment COMM 1-32
COMM 1-33	Filed	6/26/2009	O'Brien		Attachment COMM 1-33 (1-3) **BULK**
COMM 1-34	Filed	6/26/2009	Dowd		Attachments COMM 1-34 (1-2) **BULK**
COMM 1-35	Filed	6/26/2009	Dowd		Attachment COMM 1-35 **BULK**
COMM 1-36	Filed	6/26/2009	Dowd		Attachment DIV 2-1 (electronic only)
COMM 1-37	Filed	6/26/2009	O'Brien		Attachment COMM 1-37
COMM 1-38	Filed	6/26/2009	O'Brien		Attachment COMM 1-38
COMM 1-39	Filed	8/18/2009	O'Brien		Attachment COMM 1-39
COMM 1-40	Filed	6/26/2009	Dowd		Attachment COMM 1-40
COMM 1-41	Filed	6/26/2009	Dowd		Attachment COMM 1-41
COMM 1-42	Filed	6/26/2009	Dowd		Attachment COMM 1-42
COMM 1-43	Filed	6/26/2009	Dowd		Attachment COMM 1-43
COMM 1-44	Filed	6/26/2009	Dowd		Attachment COMM 1-44
COMM 1-45	Filed	6/26/2009	O'Brien		Attachment COMM 1-45

The Narragansett Electric Company d/b/a National Grid					
Docket 4065					
Discovery Log					
As of: December 4, 2009					
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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	7/1/2009	Dowd		Attachment COMM 1-48
COMM 1-48 (Parts 2-5)	Filed	6/26/2009	O'Brien		
COMM 1-49	Filed	6/26/2009	O'Brien		Attachments COMM 1-49 (1-5)
COMM 1-50	Filed	6/26/2009	Dowd		Attachments COMM 1-50 (1-38) **BULK**
COMM 1-51	Filed	6/26/2009	Dowd		
COMM 1-52	Filed	6/26/2009	Dowd		Attachment COMM 1-52
COMM 1-53	Filed	6/26/2009	Dowd		Attachment COMM 1-53
COMM 1-54	Filed	6/26/2009	O'Brien		Attachments COMM 1-54 (1-2)
COMM 1-55	Filed	7/14/2009	O'Brien		Attachment COMM 1-55
COMM 1-56	Filed	6/26/2009	O'Brien		
COMM 1-57	Filed	6/26/2009	O'Brien		Attachment COMM 1-57
COMM 1-58	Filed	6/26/2009	O'Brien		Attachment DIV 3-11 (PDF and working excel)
COMM 1-58 (supp)	Filed	9/1/2009	O'Brien		Attachment COMM 1-58 (supp.)
COMM 1-59	Filed	6/26/2009	O'Brien		Attachment COMM 1-59
COMM 1-60	Filed	7/1/2009	O'Brien		Attachment COMM 1-60 (A-B)
COMM 1-61	Filed	6/26/2009	Dowd		
COMM 1-62	Filed	6/26/2009	O'Brien		Attachments COMM 1-62 (1-2)
COMM 1-63	Filed	8/11/2009	O'Brien		Attachments COMM 1-63 (A-F) A-C EXCEL FILES D & E **BULK** (hard copy only)
COMM 1-64	Filed	6/26/2009	O'Brien		Attachment COMM 1-64
COMM 1-65	Filed	6/26/2009	O'Brien		Attachments COMM 1-65
COMM 1-66	Filed	6/26/2009	O'Brien		Attachments COMM 1-66 (1-2)
COMM 1-67	Filed	6/26/2009	O'Brien		Attachments COMM 1-67 (1-3)
COMM 1-68	Filed	6/26/2009	Wynter		Attachment COMM 1-68
COMM 1-69	Filed	6/26/2009	Wynter		Attachment COMM 1-69
COMM 1-70	Filed	6/26/2009	Wynter		
COMM 1-71	Filed	6/26/2009	O'Brien		Attachments DIV 4-1 (1-2) **BULK**
COMM 1-72	Filed	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		

The Narragansett Electric Company d/b/a National Grid					
Docket 4065					
Discovery Log					
As of: December 4, 2009					
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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

The Narragansett Electric Company d/b/a National Grid
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Data Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
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 8-1	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 Herewith**	**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 Herewith**	**12/4/2009**	**O'Brien**		

The Narragansett Electric Company d/b/a National Grid

Docket 4065

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As of: December 4, 2009

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Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
DIV-1-1	Filed	6/26/2009	O'Brien		Attachment DIV 1-1
DIV-1-2	Filed	7/1/2009	O'Brien		Attachment DIV 1-2
DIV-1-3	Filed	7/1/2009	O'Brien		Attachment DIV 1-3
DIV 1-3 (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	7/6/2009	O'Brien		
DIV-3-2	Filed	8/18/2009	O'Brien		Attachments DIV 3-2 (1-4)
DIV-3-3	Filed	7/6/2009	O'Brien		Attachment DIV 3-3
DIV-3-4	Filed	8/18/2009	O'Brien		Attachment DIV 3-4
DIV-3-5	Filed	7/6/2009	O'Brien		
DIV-3-6	Filed	8/18/2009	O'Brien		Attachment DIV 3-6
DIV-3-7	Filed	8/3/2009	O'Brien		Attachment DIV 3-7
DIV-3-8 (Supp.)	Filed	8/3/2009	Morrissey		Attachment DIV 3-8 (Supp.)
DIV-3-9 (Supp.)	Filed	8/3/2009	Morrissey		Attachment DIV 3-9 (Supp.)
DIV-3-10	Filed	7/6/2009	Morrissey		Attachment DIV 3-10
DIV-3-11	Filed	7/6/2009	Morrissey		Attachment DIV 3-11 (PDF and working excel)
DIV-3-12	Filed	7/6/2009	O'Brien/Morrissey		Attachment DIV 3-12
DIV-3-13	Filed	7/6/2009	O'Brien/Morrissey		
DIV-3-14	Filed	7/6/2009	O'Brien/Morrissey		Attachment DIV 3-14
DIV-3-15	Filed	7/6/2009	Morrissey		Attachment DIV 3-15
DIV-3-16	Filed	7/6/2009	Pettigrew		

The Narragansett Electric Company d/b/a National Grid					
Docket 4065					
Discovery Log					
As of: December 4, 2009					
[C-denotes confidentiality is being sought]					
Information Request	**Status**	**Date Filed**	**Witness**	**CONFIDENTIAL**	**Attachments**
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		

The Narragansett Electric Company d/b/a National Grid

Docket 4065

Discovery Log

As of: December 4, 2009

[C-denotes confidentiality is being sought]

Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
DIV-6-23	Filed	7/14/2009	Tierney		
DIV-6-24	Filed	7/22/2009	Tierney		Attachment DIV 6-24
DIV-6-25	Filed	7/22/2009	Stout		Attachment DIV 6-25 (1-2)
DIV-6-26	Filed	8/20/2009	Tierney		
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

The Narragansett Electric Company d/b/a National Grid

Docket 4065

Discovery Log

As of: December 4, 2009

[C-denotes confidentiality is being sought]

Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
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		

The Narragansett Electric Company d/b/a National Grid
Docket 4065
Discovery Log
As of: December 4, 2009

[C-denotes confidentiality is being sought]

Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
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) **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
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) **BULK**
DIV-12-1	Filed	8/18/2009	O'Brien		Attachments DIV 12-1 (CD-ROM) **BULK**
DIV-12-2	Filed	8/11/2009	O'Brien		Attachment DIV 12-2 (1-2) **BULK**
DIV-12-3	Filed	8/18/2009	O'Brien		Attachments DIV 12-3 (CD-ROM) **BULK**
DIV-12-4	Filed	8/18/2009	O'Brien		Attachment DIV 12-4 (excel)
DIV-12-5	Filed	8/21/2009	King		Attachment 12-5
DIV-12-6	Filed	8/18/2009	O'Brien		Attachment 12-6 (excel) **BULK**
DIV-12-7	Filed	8/18/2009	O'Brien		Attachment 12-7
DIV-12-8	Filed	8/18/2009	O'Brien		
DIV-12-9	Filed	8/18/2009	O'Brien		
DIV-12-10	Filed	8/20/2009	O'Brien		
DIV-12-11	Filed	8/18/2009	O'Brien		
DIV-12-12	Filed	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		

The Narragansett Electric Company d/b/a National Grid

Docket 4065

Discovery Log

As of: December 4, 2009

[C-denotes confidentiality is being sought]

Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
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		

The Narragansett Electric Company d/b/a National Grid

Docket 4065

Discovery Log

As of: December 4, 2009

[C-denotes confidentiality is being sought]

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

The Narragansett Electric Company d/b/a National Grid

Docket 4065

Discovery Log

As of: December 4, 2009

[C-denotes confidentiality is being sought]

Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
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)

The Narragansett Electric Company d/b/a National Grid					
Docket 4065					
Discovery Log					
As of: December 4, 2009					
[C-denotes confidentiality is being sought]					
Information Request	**Status**	**Date Filed**	**Witness**	**CONFIDENTIAL**	**Attachments**
NAVY-1-1	Filed	6/29/2009			
NAVY-1-2	Filed	6/29/2009			
NAVY-1-3	Filed	6/29/2009			
NAVY-1-4	Filed	6/29/2009			
NAVY-2-1	Filed	7/22/2009	Gorman, Wynter, O'Brien		Excel attachments
NAVY-2-2	Filed	7/22/2009	Gorman, O'Brien		Excel attachments
NAVY-3-1	Filed	8/18/2009	Gorman		Attachment NAVY 3-1 (a)
NAVY-3-2	Filed	8/14/2009	Fields/Gorman		
NAVY-3-3	Filed	8/14/2009	Gorman		
NAVY-3-4	Filed	8/14/2009	Gorman		
NAVY-3-5 (a, b & e)	Filed	8/21/2009	Gorman		Attachments NAVY 3-5(b) (1-3)
NAVY-3-5 (c & d)	Filed	8/24/2009	O'Brien		Attachment NAVY 3-5© **BULK**
NAVY-3-6	Filed	8/14/2009	Gorman		
NAVY-3-7	Filed	8/18/2009	Gorman		Attachments NAVY 3-7 (1-2) Excel
NAVY-3-8	Filed	8/18/2009	Gorman		

The Narragansett Electric Company d/b/a National Grid
Docket 4065
Discovery Log
As of: December 4, 2009

[C-denotes confidentiality is being sought]

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

The Narragansett Electric Company d/b/a National Grid

Docket 4065

Discovery Log

As of: December 4, 2009

[C-denotes confidentiality is being sought]

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	Laflamme		Attachments RR-COMM-12
RR-COMM-13	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Tierney**		**Attachment RR-COMM-13**
RR-COMM-14	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Tierney**		
RR-COMM-15	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Tierney**		
RR-COMM-16	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Stout**		
RR-COMM-17	Nov. 5, 2009	Pending				
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	Pending				
RR-COMM-22	Nov. 5, 2009	Pending				
RR-COMM-23	Nov. 5, 2009	Pending				
RR-COMM-24	Nov. 5, 2009	Pending				
RR-COMM-25	Nov. 5, 2009	Pending				
RR-COMM-26	Nov. 5, 2009	Pending				
RR-COMM-27	Nov. 5, 2009	Pending				
RR-COMM-28	Nov. 5, 2009	Pending				
RR-COMM-29	Nov. 5, 2009	Pending				
RR-COMM-30	Nov. 5, 2009	Pending				
RR-COMM-31	Nov. 6, 2009	Pending				
RR-COMM-32	Nov. 6, 2009	Pending				
RR-COMM-33	Nov. 6, 2009	Pending				
RR-COMM-34	Nov. 6, 2009	Pending				
RR-COMM-35	Nov. 6, 2009	Pending				
RR-COMM-36	Nov. 6, 2009	Pending				
RR-COMM-37	Nov. 6, 2009	Pending				
RR-COMM-38	Nov. 6, 2009	Pending				
RR-COMM-39	Nov. 6, 2009	Pending				
RR-COMM-40	Nov. 6, 2009	Pending				
RR-COMM-41	Nov. 6, 2009	Pending				
RR-COMM-42	Nov. 12, 2009	Pending				
RR-COMM-43	Nov. 12, 2009	Pending				
RR-COMM-44	Nov. 12, 2009	Pending				
RR-COMM-45	Nov. 12, 2009	Pending				
RR-COMM-46	Nov. 13, 2009	Pending				
RR-COMM-47	Nov. 13, 2009	Pending				
RR-DIV-1	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Tierney**		
RR-DIV-2	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Tierney**		
RR-DIV-3	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Tierney**		
RR-DIV-4	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Tierney**		
RR-DIV-5	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Tierney**		
RR-DIV-6	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Tierney**		
RR-DIV-7	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Morrissey**		
RR-DIV-8	Nov. 6, 2009	Pending				
RR-DIV-9	Nov. 6, 2009	Pending				
RR-DIV-10	Nov. 6, 2009	Pending				
RR-DIV-11	Nov. 6, 2009	Pending				
RR-TEC-RI-1	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Tierney**		
RR-TEC-RI-2	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Stout**		
RR-TEC-RI-3	Nov. 4, 2009	**Filed Herewith**	12/04/09	**Tierney**		
RR-TEC-RI-4	Nov. 13, 2009	Pending				

Discovery Log Ends Here: December 4, 2009

Commission Data Request 9-1

Request:

As indicated by Dr. Tierney in both her written and oral testimony, please provide your estimation for the number of jobs to be created in Rhode Island by the distribution rate proposal (if approved) for the next 12 months.

a. Please break this data out by:

   1) the number of jobs directly created by National Grid, and
   2) the number of jobs indirectly created in the local economy.

b. Please indicate in which industries these jobs will be created.

c. Please indicate how many of these jobs are a result of the RDR plan and increased energy efficiency measures resulting from the RDR plan.

d. Please provide expected or average pay levels for the types of jobs listed based upon RI Department of Labor & Training data.

Response:

a. As discussed in Dr. Tierney's proposal, the Company's RDR Plan is designed to align better the Company's incentives with those of its customers in pursuing all cost-effective energy efficiency to help customers achieve savings in their electricity bills – the biggest portion of which, of course, is the commodity portion. In addition to achieving these significant consumer savings, the Company's RDR Plan is likely to create new jobs in Rhode Island that can help the State's economy in a time of economic difficulty.

   To illustrate the potential job increases from implementation of the Company's RDR Plan, we estimate the number of jobs created from the Company's "2009 to 2011 Energy Efficiency Procurement Plan" ("Plan").[1] As illustrated in Figure COMM-9-1, this Plan is anticipated to increase the amount of annual energy savings that result from the Company's energy efficiency activities, from 54,268 MWh in 2008 to 102,566 MWh in 2011. The Company's RDR Plan should be given partial credit for helping to create these direct and indirect jobs, because the Company considers its revenue-decoupling proposal to be an essential ingredient in the successful

[1] National Grid, 2009 to 2001 Energy Efficiency Procurement Plan, R.I. P.U.C. Docket 3932, September 2, 2008.

accomplishment of the energy efficiency Plan's objectives. As noted in Mr. King's testimony, the policy objectives driving the significant increases in energy efficiency over the period of this Plan have been embraced by the Company under the assumption that the Commission would approve ratemaking structures that make achievement of these goals consistent with the Company's financial interests.[2]

We have analyzed job impacts using the results of a recent study (the "Goodman Study") which estimated, in effect, the job-creation growth rates from the Company's energy efficiency programs over the period from 1990 to 2005.[3] The study's results were used to estimate the number of jobs created (in person years) based upon the lifetime energy savings created by these energy efficiency programs.[4] We multiplied these job-creation growth rates by the annual energy savings from the Company's energy efficiency programs over the period 2008 to 2011 in the Company's Energy Efficiency Procurement Plan. The results are reported in Table COMM-9-1.

Table COMM-9-1
Estimated Job Growth From National Grid Energy Efficiency Programs

	2008	**2009**	**2010**	**2011**	**Incre-mental Change in Jobs from 2008-2011**
Lifetime MWh Savings From Program Activities	636,784	893,011	1,084,987	1,272,891	-
Direct Employment Related to Efficiency	315	442	538	631	315
Indirect Employment Related to Efficiency	307	431	523	614	307
Total Direct and Indirect Employment Related to Efficiency	622	873	1061	1245	622
Direct Employment Related to Avoided Supply	-323	-453	-550	-646	-323
Net Jobs from Energy Efficiency Activity (Person Years)	300	420	511	599	299

Growth in the energy efficiency activity associated with the Company's Energy Efficiency Procurement Plan is anticipated to lead to incremental growth in direct and indirect employment by over 600 jobs as of 2011. These gains reflect increases of

[2] Pre-filed Testimony of Mr. Thomas King, page 22.
[3] Ian Goodman, National Grid's Energy Efficiency Programs: Benefits for Rhode Island's Economic Development and Environment, The Goodman Group, Ltd., July 28, 2006.
[4] "Lifetime energy savings" reflects the amount of energy that will be saved by an energy-saving activity over the multi-year period in which that activity reduces energy use. Based on the Goodman Study, we estimate the following job impact factors: an increase of 0.495 person years per lifetime GWh saved ("PY per GWh") in direct employment arising from energy efficiency activities; a loss of 0.507 PY per GWh from reduced activity in electricity supply; and a gain of 0.482 PY per GWh in indirect employment arising from increased consumer spending due to reductions in consumer's energy bills.

315 jobs arising from activities directly related to the Company's energy efficiency activities and an additional 307 jobs arising from the increase in spending made possible by the reductions in Rhode Island ratepayers' electricity bills created by the Company's energy efficiency programs.[5]

Some of these job gains may be offset by job losses due to the decrease in electricity supply. Based on figures from the Goodman Study, reduced electricity supply would lead to the loss of 323 jobs; assuming this level of job loss, net job growth would be roughly 300 jobs.

However, given the significant differences between current market conditions, and the long-run market conditions over the period of Goodman's study (1990 to 2005), estimates of job losses based on figures from Goodman's study likely overstate actual job losses in the near term in Rhode Island. Because power supply resources grew significantly from 1990 to 2005, the period of Goodman's study, his estimates of job losses reflect conditions that existed during that period - a time in the states which power-plant construction actually occurred. These conditions do not exist today; nor are they expected to exist over the next few years when the Company's energy efficiency programs will be implemented. Therefore, the assumption that adding energy efficiency programs will lead to lost jobs in power plant construction is likely to lead to overestimates of job losses in the state. Consequently, estimates of net job growth that fully reflect estimates of job reductions from energy efficiency based on figures from the Goodman Study are likely to be conservative.

b. Net job gains would be spread throughout various sectors of Rhode Island's economy. Based upon the Goodman study, Table COMM-9-2 (below) reports estimates of the number jobs created in each sector of Rhode Island's economy.[6] The net impact of the Company's energy efficiency programs varies across sectors. Certain sectors would experience net job growth, such as Manufacturing (Electrical and Non-electrical Equipment and Machinery) and Business Services and Government, which are each estimated to grow by over 150 jobs. However,

[5] This estimate is consistent with the level of job growth from energy efficiency investment from other studies. For example, using estimates from the Political Economy Research Institute ("PERI"), the increase in energy efficiency activity from the Company's Procurement Plan would create about 475 jobs (excluding job losses from reduced electricity supply). Center for American Progress ("CAP") and the PERI, "The Economic Benefits of Investing in Clean Energy: How the economic stimulus program and new legislation can boost U.S. economic growth and employment," June 2009.

[6] Estimates of sectors of the economy that would grow as a consequence of increased spending on energy efficiency may differ across studies depending upon assumptions about work categorization, the nature of and activities involved in utility programs, and underlying methodological approaches. For another example of the distribution of job gains arising from certain energy programs, *see* CAP and PERI, June 2009.

employment in other sectors may see small declines in employment, such as in the Construction and Transport, Utilities Agriculture and Mining sectors

Table COMM-9-2
Estimated Incremental Job Growth (2008-2011) From National Grid Energy Efficiency Programs By Sector in Which Job Changes Occur

	Inc'l Job Gains (Energy Efficiency & Indirect Job Gains		Inc'l Job Losses (Electricity Generation)		Net Inc'l Job Change	
	Number	Percent	Number	Percent	Number	Percent
Construction	63	10%	-104	32%	-41	-14%
Manufacturing of Electrical and Non-Electrical Equipment & Machinery	170	27%	-16	5%	154	51%
Other Manufacturing	31	5%	-29	9%	2	1%
Transport, Utilities, Agriculture & Mining	18	3%	-36	11%	-18	-6%
Wholesale & Retail Trade	94	15%	-45	14%	49	16%
Business Services and Government	246	39%	-92	28%	154	51%
Total	622		-323		299	

c. The estimates reported in the above discussions and figures reflect only activities related to the Company's energy efficiency activities. Neither National Grid nor Dr. Tierney has estimated the number of direct and indirect jobs that would be created and/or retained as a result of the Company's activities related to providing distribution service. Taking into account the RDR Plan's proposed capital investment to refurbish the distribution system, these jobs – whether retained or newly created – would likely be significant.

d. According to the Goodman study, average earnings associated with changes in the Company's energy efficiency spending are as follows:[7]

- $39,600 for direct jobs created related to energy efficiency;
- $44,200 for direct jobs lost related to supply avoided; and
- $34,400 for indirect employment arising from spending of energy savings.

[7] Estimated earnings for the period 1990 to 2005 are reported in real terms in 2005 dollars.

Commission Data Request 10-3

Request:

Recently, Narragansett Electric combined billing cycles for Rhode Island gas & electric customers. Please provide:

a. The date the combining of billing cycles took place.

b. The amount of the savings (in dollars) this consolidation of billing cycles achieved or is expected to achieve.

c. How this savings is allocated between the electric and gas operations.

d. Where in the company's current filing are the consolidation savings are reflected.

e. The amount of savings from this consolidation reflected in the current filing.

Response:

Please note that the Company has interpreted this data request to be related to the Company's efforts to combine meter reading for Rhode Island gas and electric customers and is therefore responding to the request in that manner.

a. The Company's initiative to combine meter reading for Rhode Island gas and electric customers went live on June 28, 2009.

b. As part of the identification of integration initiatives in connection with the National Grid/KeySpan transaction, National Grid concluded that the merger provided an opportunity to serve customers with more convenience and efficiency by combining gas and electric meter work. This applies to meter reading, field collections, meter installation, meter maintenance and troubleshooting. Therefore, savings related to combining meter reading cycles for gas and electric meter reading in Rhode Island are embedded in the overall $200 million steady state savings estimate of the National Grid/KeySpan merger transaction and were combined with total enterprise-wide savings associated with this initiative. Although savings at the individual state level were not discreetly estimated, the best estimate for savings from this initiative related to combining meter reading cycles for gas and electric meter reading in Rhode Island is approximately $295,000.

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

Commission Data Request 10-3 (continued)

c. As noted above, the savings associated with the meter reading initiative were combined with all other savings identified as part of the National Grid/KeySpan transaction (both electric and non-electric in nature) and were allocated to the individual National Grid subsidiaries, including the Company (to both the electric and gas businesses) as described on page 39 of the pre-filed testimony of Mr. O'Brien in connection with this proceeding, as follows:

> "…in order to maintain consistency throughout National Grid regulatory jurisdictions, National Grid has allocated synergies between the existing National Grid subsidiaries and the KeySpan existing subsidiaries consistent with its methodology and allocation percentages applied in other jurisdictions and used in this jurisdiction in Docket No. 3943 for the Gas Division to ensure no more or less than full allocation of net synergy savings is achieved. This methodology uses Transmission and Distribution ("T&D") revenues for each company to arrive at the allocation percentage for each company. The amount of estimated synergies and CTA is then multiplied by the percentage for each company to calculate each company's share of savings and costs to achieve the savings."

As shown on Schedule NG-RLO-3, page 2, column (b), line 15, the Company's share relative to its electric operations is 4%.

d. As indicated in the response to item b. above, the savings associated with combining meter reading cycles for gas and electric meter reading in Rhode Island is approximately $295,000. This savings amount was combined with all other savings attributable to the National Grid/KeySpan transaction (both electric and non-electric in nature), resulting in the enterprise-wide savings estimate of $200 million. As noted in the response to item c. above, this $200 million in savings was allocated the individual National Grid subsidiaries based on T&D revenues, with the Company's share equaling 4 percent.

The Company provided a credit of $6.2 million to customers in its cost of service, as shown on Schedule NG-RLO-2, page 1, line 31. This reflects the benefit to customers of the Company's 4 percent share of total annual steady state savings of $200 million, or $8.6 million, which are anticipated to be achieved in year 4 following the merger, as shown on Schedule NG-RLO-3, page 5, column (d), line 16, net of estimated synergy savings experienced during the calendar year 2008 test year of $2.4 million.

e. Please see the response to item d. above.

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

Commission Record Request 13

Request:

Please provide any studies that demonstrate job growth in Rhode Island associated with energy efficiency activities.

Response:

Please see the Company's response to Commission Data Request 9-1, as well as Attachment COMM-RR-13.

National Grid's Energy Efficiency Programs: Benefits for Rhode Island's Economic Development and Environment

Prepared for

National Grid USA

Prepared by

Ian Goodman
The Goodman Group, Ltd.

July 28, 2006

Executive Summary

This report examines National Grid's energy efficiency programs implemented 1990-2005 in Rhode Island. The impacts of these programs upon the state's electricity system, environment, and economy are summarized in Table 1 (page 2). These impacts were estimated using E^3AS (Energy, Economic, and Environmental Analysis System) software. E^3AS considers both the benefits and costs of energy alternatives. The Study Methodology section of this report (page 13) provides more detail as to the E^3AS software, and the underlying input-output model used to estimate economic development impacts.

The air emissions benefits estimated in this study are due to the decreased need for electricity generation. E^3AS computes these impacts based on the emission rates of power plants whose operation would be avoided. Specifically, the benefits reported are decreases in Carbon Dioxide (CO_2), Nitrogen Oxides (NO_x), Sulfur Dioxide (SO_2), and four other air emissions. National Grid's energy efficiency programs yield clear benefits in terms of improved air quality, making Rhode Island a more attractive place to live and work. In fact, the significant CO_2 emissions reductions (6,405 tons) associated with 1990-2005 energy efficiency programs are equivalent to almost half of Rhode Island's total annual CO_2 emissions.

Moreover, these impressive environmental benefits have been achieved while simultaneously reducing the state's overall cost of energy. Every dollar spent on energy efficiency during 1990-2005 has resulted in almost $1.85 in supply cost savings. These results are even more impressive when viewed in terms of spending by National Grid. The customers participating in efficiency programs have received substantial value in terms of reduced electricity bills, and they have directly contributed over 30% of the funds spent on efficiency. So every dollar spent by National Grid on energy efficiency during 1990-2005 has resulted in over $2.65 in estimated supply cost savings.

Respending of these energy cost savings has given rise to substantial employment and other economic development benefits for Rhode Island. For the 1990-2005 energy efficiency programs, the E^3AS model estimates that in-state employment has increased by 5,770 person-years (1 person-year = 1 full time job for 1 person for 1 year), with increased earnings of $169 million (2005$). The total state value-added from the programs (i.e. overall economic activity, including earnings, interest and profits) is estimated at $206 million (2005$).

The employment and other economic development benefits provided by efficiency programs are fairly small in the context of the overall Rhode Island economy. But even if they are not as dramatic as the air emissions benefits, these economic benefits are still quite significant. This report confirms that National Grid's 1990-2005 efficiency programs have been highly cost-effective. As a result, the state's economy is stronger and more efficient. And as was the

case for the air quality benefits, the economic benefits from National Grid's efficiency programs are making Rhode Island a more attractive place to live and work.

This study also confirms that spending on efficiency produces far more in-state economic benefits than a comparable amount of spending on electricity supply. This is not surprising, given that fuel costs account for such a large share of overall spending on supply. Rhode Island is dependent upon imported fuels (notably natural gas for electric generation) that must be transported over long distances from other regions and other countries. Spending on imported fuels produces little employment or other in-state economic activity. By contrast, spending on efficiency programs includes a large component of labor and other goods and services that are sourced locally.

In addition, this report includes a discussion of the impacts of the energy efficiency programs on individual industries (page 6). Tables 2 and 3 (pages 8 and 9) provide comparisons of jobs for efficiency programs versus jobs related to expenditures on electricity supply. The overall conclusion is that the quality of employment associated with efficiency is not significantly different than that associated with supply. As such, most of the economic and employment benefits estimated in this study stem from the respending effect associated with these highly cost-effective energy efficiency programs.

This report builds upon a similar study performed in 2001 that examined National Grid's efficiency programs implemented 1990-2000 in Rhode Island.[1] The results of the current study are consistent with the results of this earlier study. The principle difference is that the benefits estimated for energy efficiency are now substantially larger. This is mainly due to the three factors:

- With five more years of program implementation, the current study is evaluating a significantly larger cumulative amount of efficiency.
- Compared with the assumptions in the 2001 study, natural gas prices have been, and are expected to remain, much higher. So efficiency has become an even more cost-effective alternative to supply.
- Other recent changes (including the restructuring of electricity markets) have also resulted in higher avoided supply costs. This effect is small relative to that of higher gas prices, but it has further enhanced the cost-effectiveness of efficiency.

[1] Narragansett Electric's Energy Efficiency Programs: Benefits for Rhode Island's Economic Development and Environment, prepared for Narragansett Electric Company, prepared by Ian Goodman, The Goodman Group, Ltd., August 14, 2001.

Introduction

For more than fifteen years, National Grid[2] has been implementing large scale energy efficiency programs for Rhode Island electricity consumers. This report examines how these programs have impacted the state's economy and environment.

The efficiency measures installed in a given year will continue to reduce electricity consumption until they wear out and are replaced. Some efficiency measures have lifetimes greater than 20 years, while others last only a few years. On average, the measures installed by National Grid in Rhode Island since 1990 have lifetimes exceeding 14 years.

Thus, in the year 2006, Rhode Island electricity consumption is lower due to the cumulative effect of more than a decade of efficiency programs. Absent ongoing efforts to increase efficiency, these savings will decline as currently installed measures reach the end of their useful lives. Alternatively, if Rhode Island continues to invest in new efficiency measures, the current level of savings can be maintained and increased.

For National Grid's Rhode Island efficiency programs implemented over the sixteen year period 1990-2005, Table 1 (page 2) summarizes the impacts upon the state's economic development and environment. The results in the "All Program Years" column are the impacts for *all* years during which the measures installed 1990-2005 save electricity. The results in the "Average Program Year" column are the impacts for *all* years during which the measures installed in a *single average year* 1990-2005 save electricity.[3]

[2] This study includes the DSM (demand-side management) activities of Blackstone Valley Electric Company and Newport Electric Corporation prior to their purchase in 2000, and the DSM activities of Narragansett Electric Company, the name under which National Grid operated in Rhode Island until 2005.

[3] Stated another way, the results in the “Average Program Year Column” are calculated by dividing the results in the “All Program Years” column by 16 (the number of years during which programs have been implemented 1990-2005).

Table 1: Lifetime Impacts of Efficiency Programs Implemented 1990-2005

	All Program Years	Average Program Year
Electricity Savings		
Energy (GWh)	12,205	765
Demand (MW-year)	3,065	190
Value (Avoided Supply Cost 2005$ millions)	$983	$61
Avoided Emissions		
Carbon Dioxide: CO_2 (thousand tons)	6405	400
Nitrogen Oxides: NO_x (tons)	4460	280
Sulfur Dioxide: SO_2 (tons)	5360	335
Methane: CH_4 (tons)	160	10
Carbon Monoxide: CO (tons)	615	40
Total Suspended Particulate: TSP (tons)	695	45
Volatile Organic Compounds: VOC (tons)	80	5
Macro-economic indicators		
Employment (Person-Years)	5770	360
Earnings (2005$ millions)	$169	$11
Value-Added (2005$ millions)	$206	$13

Table 1 Notes:

1. All monetary results (value, earnings, and value-added) are reported in terms of real (year 2005 value) dollars. All other results are rounded to the nearest 5.
2. Energy: 1 GWh = 1,000 MWh = 1,000,000 kWh.
3. Energy and demand savings are reported at the power plant busbar and thus include the benefit of avoided transmission and distribution losses. Demand savings also include the benefit of avoided capacity reserve margin, and are reported in terms of reduction in annual summer peak.
4. Macro-economic indicators (employment, earnings, and value-added) are reported for the net effect of energy efficiency. As explained on page 7, these impacts are the sum of the following three components: (1) the *increase* in economic activity as a result of expenditures on efficiency programs, (2) the *decrease* in economic activity as a result of decreased expenditures on electricity supply, and (3) "*respending*", the *increase* in economic activity as consumers increase their spending for other goods and services (to the extent that efficiency programs reduce consumers' overall costs, these savings are available for other spending). Thus, the employment and earnings data in Table 1 is derived from the data for these three components (efficiency, supply, and respending) in Table 2 (page 8).
5. Employment: 1 person-year = 1 full time job for 1 person for 1 year.
6. Earnings: The compensation associated with this employment, as well as property income.
7. Value-added: The difference between the value of output (sales) and the cost of intermediate inputs (goods and services purchased from other businesses); stated another way, it represents the value that is added by the application of capital and labor in converting intermediate inputs to finished products. Summed across all industries, as it has been here, value-added is a measure of overall economic activity, which includes earnings (employee compensation), interest, and profits. It is equivalent to GDP (Gross Domestic Product) nationally.

Air Emissions Benefits

By reducing electricity consumption, efficiency programs reduce the need to operate existing power plants, as well as the need to build and operate new power plants. This will result in substantial air quality benefits. While the economic analysis model utilized does estimate reductions in air emissions associated with avoided electricity generation, it does not incorporate the economic benefits associated with these lower emissions (e.g., improvements in productivity and business competitiveness owing to lower costs for health care and pollution controls).

Absent efficiency programs, Rhode Island would suffer from reduced environmental quality and/or would have to undertake other costly measures to reduce emissions. Either way, electricity efficiency programs help to increase the efficiency of the overall economy and make the state a more attractive place to reside and operate businesses.

Typically, the three air emissions of greatest interest are NOx, SO_2, and CO_2, and that is true in this analysis as well. Certainly, the quantity of these three emissions exceed those of the other four reported above in Table 1.

The emissions reductions associated with electricity efficiency are most significant for CO_2. Over their lifetime, the efficiency measures installed 1990-2005 will avoid CO_2 emissions equivalent to almost half of Rhode Island's total annual CO_2 emissions, or more than all of Rhode Island's total annual CO_2 emissions specifically from either electric generation or transportation.[4]

Electricity efficiency programs have been a major ongoing activity in Rhode Island for more than fifteen years, and their cumulative contribution to reducing CO_2 emissions is quite impressive. Such programs have many benefits for the state, region, nation, and world. Moreover, it is clear that efficiency programs are a particularly effective and economical method of reducing carbon emissions.

By comparison, the effect of electricity efficiency programs upon NO_x emissions is substantial, but less so. Over their lifetime, the efficiency measures installed 1990-2005 avoid NO_x emissions equivalent to those of 325,000 automobiles used for one year (as compared to CO2, where the impact of DSM was equivalent to more than a million autos). But this difference is not surprising given that CO2 emissions are uncontrolled, while NO_x emissions from power

[4] The electricity grid and power plants throughout New England operate as part of an integrated system, with interconnections to neighboring states and Canada. Thus, it can not be assumed with certainty that electricity consumed in Rhode Island is generated within the state, or vice versa. But it is reasonable to assume that efficiency programs implemented in Rhode Island reduce the need for electricity generation within the state and elsewhere in New England, and that this in turn reduces the air emissions associated with supplying Rhode Island's electricity demand.

plants (especially new power plants) have been greatly reduced by a variety of technologies.[5]

For SO_2, the emissions reductions associated with DSM are quite sizable in the context of Rhode Island. Over their lifetime, the efficiency measures installed 1990-2005 avoid SO_2 emissions equivalent to more than Rhode Island's total annual SO_2 emissions. This large impact stems from two factors. First, to a far greater extent than for other emissions, electricity generation is the predominant source of SO_2. Second, the emissions reductions from DSM are being compared with actual Rhode Island SO_2 emissions which are now quite low. The existing power plants within the state are mostly gas-fired, and natural gas contains very little sulfur.

But when viewed in a wider context, the value of the SO_2 emissions reductions from Rhode Island DSM is not as significant. SO_2 emissions elsewhere in New England (and nationally) are substantially higher due to coal- and oil-fired generation, and these fuels contain more sulfur than natural gas.[6]

For other emissions, the impact of efficiency programs is less noticeable. For CH_4 (methane), CO, TSP, and VOC, the reductions associated with DSM are small relative to total emissions.

In summary, the emissions reduction benefits associated with electricity efficiency programs are quite significant overall, especially since they are attained at a negative cost. Unlike many other emissions control strategies, efficiency programs reduce, rather than increase, the costs of supplying electricity and other goods sold in the marketplace. For the programs implemented to date, these benefits have been most impressive for CO_2, significant for NO_x, and less so for other emissions.

For future efficiency programs, the emissions reduction benefits will be smaller (per kWh saved) than historically, since the generation avoided will be from new very clean plants, rather than existing facilities with much higher emissions rates.[7] Still, as long as New England continues to rely upon fossil fueled

[5] To be conservative, the analysis in this study has assumed that the small amount of NO_x emissions from relatively new gas fired combined cycle plants are offset, rather than the more significant quantities associated with older, less-efficient plants.

[6] There is a national open market for the trading of SO_2 allowances. While this might provide a basis for quantifying the value of the SO_2 emissions reductions associated with DSM, this national value is quite low since it is dominated by the relatively low cost of mitigating coal-generated SO_2 emissions in other regions. Therefore, while it may be possible to quantify the SO_2 reduction benefit based on the national allowances market, this quantification would understate the value of SO_2 reduction in Rhode Island.

[7] Relative to older existing plants (mostly steam turbines fueled with oil, coal, and natural gas), new and recently added power plants have very low emissions owing to their high efficiency (combined cycle plants require less fuel per kWh produced), and their reliance on natural gas and advanced pollution control technology (lower emissions per Btu of fuel burned).

generation, efficiency programs will remain an effective way to reduce CO_2 emissions.[8]

Economic Development Benefits

In comparing the economic development impacts of energy alternatives, it is important to consider the overall costs of the alternatives. Notably, when efficiency programs lower consumers' energy costs (i.e., efficiency is less expensive than the avoided electricity supply costs), consumers have more money to spend upon other (non-energy related) activities. Spending on these other activities is typically more beneficial to the economy than spending on energy-related activities. In numerous previous studies, this respending of customer cost savings typically accounted for much of the total economic development benefit associated with efficiency programs.

Cost-effective energy efficiency reduces the cost of living and operating businesses and thus promotes economic development in Rhode Island. It increases the efficiency of the overall economy and makes the state a more attractive place for residents and businesses.

Consistent with numerous previous studies for Rhode Island and other jurisdictions, this analysis has also found that spending on efficiency produces more benefits than a comparable amount of total spending upon electricity supply. The simple explanation is that electricity supply includes a large fuel cost component, but spending upon fuels that are produced outside of the state contributes little to the local economy. For the non-fuel components of electricity supply costs (building and operating power plants and power lines), the overall benefits to the Rhode Island economy (per dollar of spending) are almost as large as those for efficiency programs.

The efficiency programs implemented 1990-2005 have benefited the Rhode Island economy. They are estimated to increase macro-economic indicators such as employment, earnings, and value-added. However, in contrast with emissions, the overall improvement is fairly small in the context of the overall state economy.

On the other hand, the economic benefits estimated in this study likely understate the total impacts of efficiency programs. As noted above, absent efficiency programs, Rhode Island would suffer from reduced environmental quality and/or would have to undertake other costly measures to reduce emissions.

[8] All fossil fuels contain carbon, and there is no currently widely implemented method to prevent this carbon from being released to the atmosphere when such fuels are combusted.

Also, from year 2000 onward, electricity supply costs have increased substantially, owing in large part to dramatically higher natural gas prices. As a result, electricity avoided costs have proven to be greater than was anticipated. And while the evolution of energy markets continues to be highly uncertain, it is now generally expected that gas prices and electricity avoided costs will remain above the levels experienced during the 1990s.

With today's much higher avoided costs, Rhode Island electricity consumers are reaping even larger than expected benefits in terms of electricity cost savings. Electricity efficiency is helping to shelter the state from the adverse impacts of increased fuel and other supply costs, and these enhanced benefits are expected to continue into the long term future.

The energy efficiency programs implemented 1990-2005 were highly cost-effective. On average, each kilowatthour of energy savings is estimated to avoid 8.2¢ in supply costs (for generation, transmission, and distribution); however, it has cost National Grid and its customers only 4.4¢ per kilowatthour to achieve these energy savings.[9] Thus, every dollar spent on energy efficiency is estimated to yield almost $1.85 in supply cost savings.

The costs for efficiency programs reported above consider both expenses paid by National Grid and those borne by the customers participating in the programs. Program participants have received substantial value in terms of reduced electricity bills, and they have directly contributed, on average, over 30% of the overall installation costs of their energy efficiency projects.[10] Considering only the utility's share of these expenses, it has cost National Grid just 3.1¢ per kilowatthour to achieve these energy savings. Thus, every dollar spent by the utility on energy efficiency during 1990-2005 has resulted in over $2.65 in estimated supply cost savings.

Impacts Upon Individual Industries and Types and Location of Employment

As reported above, the energy efficiency programs implemented 1990-2005 are estimated to have increased Rhode Island employment, earnings, and value-added. However, even if the overall impact is positive, it is relevant to explore whether certain industries have been advantaged or disadvantaged as a result, and what this might imply for types of employment.

[9] Costs are expressed in real (year 2005 value) dollars, levelized at the 1.88% real discount rate specified in National Grid's February 2006 avoided cost data.

[10] Customer willingness to contribute to the costs of their energy efficiency projects indicates that (a) customers are receiving the same (or greater) energy services than they would have received with the baseline technologies; (b) that they likely value the benefits associated with energy efficiency programs; and (c) that they realize significant additional net benefits in terms of improved comfort and amenities (e.g., new high quality appliances).

The economic development impacts estimated in this report are the sum of the following three components: (1) the *increase* in economic activity as a result of expenditures on efficiency programs;[11] (2) the *decrease* in economic activity as a result of decreased expenditures on electricity supply; and (3) *"respending,"* the *increase* in economic activity as consumers *increase* their spending for other goods and services (to the extent that efficiency programs reduce consumers' overall costs, these savings are available for other spending).

For Rhode Island electricity efficiency programs implemented 1990-2005, the employment associated with components (1) and (2) are roughly similar. In other words, the jobs gained by increased spending on efficiency are offset by the jobs lost owing to lower spending on supply. As shown in Table 2, energy efficiency gives rise to more than twice as much employment per dollar spent than does supply. Rhode Island efficiency programs have been highly cost-effective, such that a dollar of spending on efficiency avoids approximately two dollars of spending on supply.[12]

As it happens, a smaller amount of spending on more labor intensive efficiency yields a similar amount of overall employment as does a larger amount of spending on less labor intensive supply. However, since efficiency has cost less than avoided supply, there is still a net increase in overall employment, as a result of the respending of these cost savings [component (3) above].[13]

[11] Efficiency expenditures include direct utility costs and evaluation, plus customer contributions.

[12] As discussed on page 6, each dollar of efficiency spending avoids almost $1.85 in supply costs (computed in terms of real levelized costs at a real discount rate of 1.88%). When computed on the basis of real costs at a zero discount rate (not levelized), efficiency is even more cost-effective; each dollar of efficiency spending avoids $2.12 in supply costs. The economic benefits estimated in this study (for employment, earnings, and value-added) are based on real (year 2005 non-levelized) costs. This is appropriate for an analysis involving non-monetary indicators such as number of jobs.

[13] Specifically, the data (reported in Table 2) for direct jobs from efficiency (6070) – direct jobs from avoided supply (6200) + respending jobs (5900) = net jobs from efficiency (5770), as reported in Table 1 (page 2, employment for all program years). Likewise, the data reported in Table 2 for earnings (240-274+203) = net earnings from efficiency ($169 million), as shown in Table 1. Table 2 does not provide data for value-added, but the results for this indicator in Table 1 are based on the same type of computation as for jobs and earnings.

Table 2: Jobs and Earnings for Efficiency Programs and Avoided Supply

		Efficiency	Supply
Direct Expenditures (million $)		$464	$983
Direct Employment:	Jobs	6070	6200
	Earnings (million $)	$240	$274
	Earnings per job	$ 39,600	$ 44,200
	Jobs per million $ expended	13.1	6.3
	Earnings per million $ expended	$517,500	$278,800

Respending (million $) = Supply ($983) – Efficiency ($464)		$519
Respending Employment:	Jobs	5900
	Earnings (million $)	$203
	Earnings per job	$34,400
	Jobs per million $ expended	11.4
	Earnings per million $ expended	$391,000

Table 2 Notes:

1. All monetary results (expenditures and earnings) are reported in terms of real (year 2005 value) dollars.
2. Results for earnings per job and earning per million $ expended are rounded to the nearest $100. Results for number of jobs are rounded to the nearest 5.
3. Employment: 1 person-year = 1 full time job for 1 person for 1 year.
4. Earnings: The compensation associated with this employment, as well as property income.

The economic analysis software utilized in preparation of this report provides detailed estimates of which industries within the Rhode Island economy are affected by spending on (1) efficiency and (2) supply. For reasons that will be discussed below, the software does not provide such detailed estimates for (3) respending. Table 3 presents results reported in terms of jobs per million $ of expenditures, and as a proportion of total jobs.

Table 3: Jobs by Industry Grouping for Efficiency Programs and Avoided Supply

Industry Grouping	Jobs per million $ (year 2005 $) Efficiency	Supply
Construction	1.4	2.0
Manufacturing of Electrical and Non-Electrical Equipment & Machinery	3.5	0.3
Other Manufacturing	0.7	0.6
Transport, Utilities, Agriculture & Mining	0.4	0.7
Wholesale & Retail Trade	2.0	0.9
Business Services and Government	5.1	1.8
TOTAL	13.1	6.3

Industry Grouping	Proportion of total jobs Efficiency	Supply
Construction	10%	32%
Manufacturing of Electrical and Non-Electrical Equipment & Machinery	27%	5%
Other Manufacturing	5%	9%
Transport, Utilities, Agriculture & Mining	3%	11%
Wholesale & Retail Trade	15%	14%
Business Services and Government	39%	28%
TOTAL	100%	100%

The pattern of jobs from efficiency and avoided supply are roughly similar in many areas, but there are some notable differences. In interpreting the data, it is useful to remember that these are for employment in Rhode Island, and they take into account whether goods and services will be supplied in-state or outside. For there to be a large impact in the above data, it is necessary both for the activity to require substantial amounts of inputs from the industries in question, but also for the industries to be located in-state.

Rhode Island is situated within a very compact geographic area. The state's economy and labor force are closely linked with those of neighboring states (especially Massachusetts). Some of the economic activity related to Rhode Island efficiency programs and avoided supply will occur in neighboring states, and the study analysis has been structured to reflect this.

National Grid's operations in Rhode Island are part of a tightly integrated regional electricity system. Electricity consumed in state is not necessarily generated there; likewise, power plants in Rhode Island may be used to supply customers

elsewhere. But for the purposes of this study, it has been assumed that all of the avoided supply would have been located in Rhode Island.

The data in Table 3 for proportion of total jobs should be viewed in the context that these results are calculated as a percentage of a total jobs and add to 100% (although may not appear to owing to rounding). Thus, if there is a large concentration of jobs in one category, this will help to reduce the percentage of the total assigned to other categories

Finally, as noted above, the total number of jobs from the efficiency programs implemented 1990-2005 and avoided supply are similar (prior to considering additional jobs from respending). Thus, it is possible to evaluate whether efficiency programs will result in a shift of employment from one industry to another by comparing the figures in Table 3 for proportion of total jobs. For example, relative to supply, efficiency has a much higher percentage of jobs associated with manufacturing of electrical and non-electrical equipment and machinery. This indicates potential job gains in this industry as a result of efficiency. Conversely, supply has a higher share of constructions jobs, indicating potential job losses.

Two factors help to explain why supply has much more construction than efficiency. First, avoided supply includes operation of power plants; in the economic analysis software underlying this report, maintenance work has been assigned to the construction sector (as opposed to utilities).[14]

Second, avoided supply includes building new power plants and T&D (transmission and distribution) facilities. T&D is especially construction intensive since it involves so much on-site work, as opposed to power plants and efficiency, where much of the cost is for manufactured equipment and business services (such as design and management).

However, some of the apparent differences between efficiency and supply in this regard may be overstated and a function of how expenditures were assigned to specific activities. In other words, some of what has been assigned to construction for supply may actually be business services (such as design and engineering), and some of what has been assigned to business services for efficiency may actually be construction.

As mentioned above, efficiency involves much more manufacturing than does supply, specifically for electrical and non-electrical equipment and machinery. This is not at all surprising. Basically, this is the equipment that uses electricity,

[14] The aggregate utility category in the input-output model is not representative of the very specific supply-side and demand-side activities modeled in the analysis software. Thus, supply and efficiency are modeled as if they were outsourced to entities that could provide the relevant goods and services (such as accounting and construction), even if in fact they would be performed in-house by utility personnel.

and that controls and regulates its use. Much of the cost of efficiency is for equipment that uses electricity more efficiently than it would be by baseline technology (such as high efficiency chillers) or for equipment that facilitates greater efficiency in electricity use by other equipment (such as energy management systems).

Relative to efficiency, supply involves more utilities. This relates to the large supply-side expenditures for natural gas to fuel power plants, which were assumed to give rise to activity in the companies responsible for delivering this fuel. Meanwhile, efficiency results in significantly more activity in business services than does supply. This reflects the heavy reliance of efficiency upon professional services (design, legal, and management), but may also represent some judgments made as to whether certain activities lay within the construction sector, or were outsourced to business services.

Having now considered in great detail how specific industries are affected by expenditures on efficiency and avoided supply, none of the differences between energy efficiency and avoided supply would appear to be of much concern in the context of the overall Rhode Island economy. It does not seem that the employment associated with efficiency is dramatically different from that associated with supply in terms of the types of industries and jobs affected, or the "quality" of those jobs. To the extent that supply-side activities give rise to high wage employment, efficiency would seem to be similar both in terms of the types of jobs and compensation levels.

Moreover, for both energy efficiency and avoided supply, most jobs relate to goods and services (notably construction, services, government, and trade) that are typically sourced either in-state or near-by. So there is relatively little uncertainty as to whether Rhode Island will benefit from these jobs.[15]

As noted earlier, Rhode Island electricity efficiency programs implemented 1990-2005 have been highly cost-effective, giving rise to substantial employment from respending of these energy cost savings. In contrast to the employment associated with efficiency and supply, it would be somewhat arbitrary to attempt to characterize the specific industries that will be affected by respending, especially since most of it is assumed to be by Commercial and Industrial (C&I) customers.[16]

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[15] By contrast, manufactured goods may be sourced nationally or even internationally. So it is meaningful that this study estimates that efficiency programs have significant impacts in terms of Rhode Island manufacturing. This indicates that the state has in recent years produced electrical and other equipment that is similar to that used in efficiency programs. Thus, businesses in the state could be suppliers of the specific equipment utilized in these programs.

[16] The C&I sector accounts for the majority of National Grid's total sales and efficiency spending. For simplicity, this study has assumed that respending (the net benefits of efficiency, i.e. reduced supply costs minus the cost of efficiency [including customer contributions]) will be allocated to customer groupings in proportion to the pattern of efficiency spending (including customer

(continued on next page)

With residential customers, it is reasonable to assume that they will respend their electricity cost savings similarly to how they generally spend money: on a wide mix of consumer goods and services, with some assigned to savings. And because much of consumer spending goes to local businesses (such as restaurants), it produces a substantial amount of in-state jobs per dollar.

Relative to residential customers, it is much harder to know what effect electricity cost savings will have on C&I customers and where respending will be directed. Some may result in increased profits, and these profits will flow to business owners, who may be in-state or outside. Some may result in lower prices for what the C&I customers are producing, and the benefits of these lower prices will flow to both the in-state and other purchasers of these products.

Of course, if the C&I customers lower their prices, they might be able to sell more of whatever they are producing. And this could lead to increased production either in-state or outside to satisfy the increased demand. And the C&I customers might make investments to upgrade and expand their facilities (in-state and outside), to satisfy increased demand (possibly from lower prices) or in pursuit of other corporate goals.

The description above deals with for-profit businesses, and the C&I sector also includes government (public sector entities), and institutions (such as universities) and other non-profits. But in broad terms, the description above does capture the range of how any C&I customer might react to changes in electricity costs (e.g., government could react to lower costs by expanding services, reducing debt, or by reducing taxes).

In advance (or even after the fact), it is difficult to know how C&I customers react to changes in electricity costs. There are economic models that attempt to make such determinations, but they are considerably more expensive (and complicated) to use than the methodologies that have been employed in preparing this report. The economic analysis software utilized in this study calculates the economic developments impacts for respending by C&I customers based on multipliers for capital spending (new plant and equipment). The multipliers for such spending are intermediate between the results for various assumptions regarding the possible impacts of such respending, and as such appear reasonable (and likely conservative).

Stepping back from all these details, both economic theory and commonsense indicate that lowering the cost of living and operating businesses (without an offsetting loss of amenities) will encourage economic development. Rhode Island is operating in a regional, national, North American, and global economy.

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contributions and evaluation). Thus, overall respending by residential customers is smaller than that of C&I customers.

DSM helps to make the state a more attractive place to live and work, and this will help to make the state more prosperous.

Study Methodology

The E^3AS Software

The economic development and air emissions impacts provided in this Report were estimated using the E^3AS (Energy, Economic, and Environmental Analysis System) software. E^3AS was developed by TGG (The Goodman Group, Ltd.) on behalf of the US EPA and is available to assist government agencies in evaluating the economic and environmental impacts of energy supply and efficiency programs. National Grid retained TGG to perform the E^3AS model analysis for this report.

The E^3AS software is designed to consider both the benefits and costs of energy alternatives. To estimate economic development impacts, the E^3AS software uses an input-output model. Input-output models generate regional economic impact estimates by first tracing the industries involved in a study region throughout successive rounds of supply linkages. At each step, they trace the portion of the inputs required from each industry which are supplied locally (within the regional economy being modeled).

For example, the impacts of Rhode Island lighting equipment purchases are not only based on the effects upon in-state lighting product manufacturers, but also include the effects on other in-state industries (e.g., fabricated metals) supplying in-state lighting manufacturers. Total impacts also include the effects of expenditures by households and governments as they spend the personal income and taxes derived from in-state businesses (in the example above, the businesses supplying lighting equipment and inputs to the lighting equipment suppliers).

The E^3AS software incorporates input-output multipliers for a wide variety of energy supply and efficiency technologies, e.g., employment generated per dollar spent on commercial lighting fixtures. The results in this report were developed using the Rhode Island-specific version of E^3AS, which contains multipliers estimated using the Rhode Island version of the IMPLAN input-output model. The IMPLAN model was developed at the US Forest Service and University of Minnesota and is now maintained by Minnesota IMPLAN Group.

In order to develop the input-output multipliers in E^3AS, the total expenditures upon each type of energy efficiency and supply technology had to be disaggregated into expenditures upon each of the 528 industries represented in

the IMPLAN model.[17] The data used to perform this translation for each activity is called a bill of goods (BOG). The BOG data utilized in E^3AS were developed by TGG in an extensive research effort commencing in 1992.

For efficiency technologies, BOG data were principally derived from Massachusetts Electric[18] accounting records which incorporated all aspects of costs (program administration, overhead, labor, and consulting services, as well as materials and equipment). For electricity supply technologies, BOG data were largely based on (1) engineering studies performed by Oak Ridge National Laboratories for inclusion in the U.S. Department of Energy (DOE), Energy Economic Database, (2) utility accounting records, and (3) Electric Power Research Institute (EPRI) Technology Assessment Guide (TAG) data.

For energy efficiency and supply, the E^3AS model reports employment for each of 40 industry classifications. These classifications were developed by TGG as groupings of the 528 industries in the IMPLAN input-output model. To facilitate quick review by readers, in Table 3 above, results for the E^3AS model's 40 industries have been further aggregated into six classifications.

The air emissions impacts provided in this report are those avoided by efficiency programs owing to the decreased need for electricity generation.

Inputs to The E^3AS Software

In order to use the E^3AS software to produce results for this report, various input data were required for 1990-2005 Rhode Island efficiency programs and the electricity supply that will be avoided by these programs.

Efficiency Programs

Data on efficiency programs was provided by National Grid personnel, derived from previously prepared reports. The E^3AS software is designed to evaluate efficiency programs; it is not set up to consider load management programs such

[17] Even with this level of detail, it should be understood that the study analysis involves some degree of approximation. Notably, data (such as for the portion of goods and service supplied in-state and elsewhere) are based on the 528 industry categories, rather than each individual type of input that is utilized in efficiency and avoided supply. So it is possible that the study analysis will under- or overstate the job (and other) impacts for specific types of inputs for specific activities. But any such errors will tend to average out across the whole set of activities being analyzed.

[18] This is the name under which National Grid previously operated in that state.

as interuptibles.[19] Thus, the costs of load management programs were excluded from the data inputs to the E^{3}AS software.

The E^{3}AS software is designed to consider the expenditures associated with efficiency programs, regardless of who bears the costs. Thus, the input data utilized included both expenditures by utilities and customer contributions. On the other hand, costs associated with utility performance incentives were excluded from the input data.[20]

Finally, to facilitate a more precise modeling of efficiency technologies, the E^{3}AS software allows users to specify input data for a variety of technologies (e.g. commercial lighting, residential water heating). National Grid Staff and TGG collaborated to assign total efficiency expenditures into the E^{3}AS technology categories.

Avoided Electricity Supply

The E^{3}AS software does not incorporate a dispatch or system expansion model. Thus, the user must provide the E^{3}AS input data regarding how efficiency programs will reduce the need for electricity supply. As was the case for efficiency, the E^{3}AS software allows users to specify input data for a variety of supply expenditures (e.g. existing oil/gas steam plant non-fuel O&M, or new combined cycle with SCR capital cost).

The starting point for preparing E^{3}AS input data were the energy and capacity savings data reported by National Grid. These were adjusted to exclude the savings associated with load management. TGG then developed the following assumptions regarding avoided electricity supply based upon recent avoided cost studies.[21] The assumptions selected were intended to be reasonable, but somewhat conservative (i.e., they understate the benefits of efficiency programs).

The efficiency program energy and capacity savings provided by National Grid were grossed up by TGG to account for avoided line losses of 7% for energy and 11-12% for capacity. These loss factor assumptions were developed by TGG

[19] Efficiency programs are typically designed to provide customers with the same (or greater) energy services [e.g., motive power] than they would have received with the baseline technologies. By contrast, load management typically involves a reduction in energy services to the customer, and this loss of services can have economic impacts that are difficult to estimate. For example, an interruptible program for industrial customers could result in lost production. Thus, the E^{3}AS software was not designed to evaluate load management programs.

[20] From the perspective of economic impact modeling, such incentive payments could be considered as a transfer payment (from utility customers to shareholders), rather than a resource cost.

[21] Avoided Energy Supply Costs in New England, ICF Consulting, December 23, 2005 and August 21, 2003; Avoided Energy-Supply Costs For Demand-Side Management Screening in Massachusetts, Resource Insight and Synapse Energy Economics, July 7, 1999.

based upon avoided cost data and other information provided by National Grid. TGG then further grossed up capacity savings by 17-18% to account for avoided reserve margin.

The efficiency programs were estimated to avoid the operation of existing generating units from 1990 through 2001. These avoided units were assumed to be steam plants, with a heat rate averaging 11,000 Btu/kWh and a fuel mix shifting from 80% residual oil and 20% natural gas in 1990, to 50% oil/50% gas in 1998 and subsequent years.[22] Fuel cost and variable O&M were based upon US Department of Energy historical data for New England power plants and the 1999 avoided cost study assumptions.

Starting in 2002, efficiency programs were deemed to have avoided the construction and operation of new gas-fired combined cycle units equipped with SCR. Capital and operating cost (fuel, fixed and variable O&M) and heat rate were based upon the 2003 and 2005 avoided cost study assumptions; the E^3AS default data for these factors were overridden.

For existing units, the E^3AS software default values for emission rates (specified in pounds per MMBtu) were utilized. For new combined cycle plants, the E^3AS software default values were used for CO_2 (for which there is no currently widely implemented control technology). For all other emissions, the software default values were overridden and a zero emissions rate was assumed.[23]

Finally, efficiency programs were also assumed to reduce T&D (transmission and distribution) capital investments based upon the avoided cost values provided by National Grid.

Modeling Assumptions

1) Location of avoided supply
For the purposes of this study, it has been assumed that all of the avoided supply would have been located in Rhode Island.

This is a conservative assumption that will tend to substantially overstate the in-state economic impacts associated with supply. In reality, a large portion of avoided supply would likely have been located in neighboring states. As such,

[22] Data provided by the authors of the 1999 avoided cost study indicated that some of the avoidable supply from existing units was coal-fired. Nonetheless to be conservative, it was assumed that all of the avoided supply from existing units was oil and gas-fired (which have lower emissions than coal).

[23] Emissions rates for new plants continue to decline as technology improves and regulators require lower emissions. Also, for some emissions (notably NO_x), there are requirements for new plants to obtain pollution allowances and/or offsets. Nonetheless, the zero emission rates selected should be viewed as conservative.

this study has significantly understated the net benefits of efficiency, since many of the avoided supply jobs would have been elsewhere in New England, rather than in Rhode Island.

2) Regional interaction of energy efficiency programs.
Over the last two decades, Rhode Island has also benefited from the economic activity associated with efficiency programs implemented in other states (especially Massachusetts). More specifically, it can be assumed that Rhode Island residents and businesses have provided a significant portion of the labor and other inputs utilized in the efficiency programs conducted in nearby areas, and particularly in National Grid's Massachusetts service territory.

However, this study looks only at the efficiency programs previously implemented within Rhode Island. So the impacts estimated in this study understate the total economic and air quality benefits for the state from the overall regional (as well as national and international) spending on efficiency programs.[24] And to the extent that spending on efficiency continues in neighboring states (as well as nationally and internationally), Rhode Island will continue to share in the resulting ongoing economic and environmental benefits.

[24] To be fair, any expanded analysis that credited Rhode Island for economic activity gained supplying inputs to efficiency programs in other states should also consider activity lost if this avoids in-state power plants being used to supply electricity to other states. However, given the assumption in this study that all supply avoided by Rhode Island efficiency programs would be in-state, this study has effectively assumed that in-state generation is being used for in-state load. Thus, to the extent that efficiency programs in other states would reduce electricity generation, the assumptions in this study would indicate that these reductions (and any assumed reduction in economic activity) would take place outside Rhode Island. And such a scenario is plausible, given that Rhode Island is typically a net importer in terms of electricity supply (i.e., the state's share of regional consumption is larger than its share of regional generation).

Commission Record Request 14

Request:

Please provide an update to Schedule NG-SFT-2, to the extent applicable.

Response:

Based upon a limited view of Commission dockets and other documents, information on revenue decoupling in Schedule NG-SFT-2 of Dr. Tierney's prefiled testimony should be amended as follows:

> Minnesota's 2007 Next Generation Energy Act [Minn. Laws 2007, Chapter 136] requires that the Minnesota Public Utilities Commission establish criteria and standards for decoupling and allows one or more rate-regulated utilities to participate in a decoupling pilot program. In June 2009, the PUC issued an Order adopting Criteria and Standards to be utilized in pilot proposals for revenue decoupling (Docket No. E,G-999/CI-08-132, Issue date June 19, 2009). All utilities are to file non-binding notices of intent as to their plans for filing a decoupling pilot by June 1, 2010 with all pilot proposals filed by December 30, 2011.
>
> Source: American Council for an Energy-Efficient Economy, State Energy Policy Database, accessed on November 22, 2009, http://www.aceee.org/energy/state/minnesota/mn_utility.htm#decoupling.

Prepared by or under the supervision of: Susan F. Tierney

Commission Record Request 15

Request:

Regarding the eight states ranked above Rhode Island in energy efficiency according to the scorecard of the American Council for an Energy Efficient Economy, how many have adopted revenue decoupling?

Response:

According to American Council for an Energy Efficiency Economy ("ACEEE"), Rhode Island ranked ninth in the country in the "adoption and implementation of energy efficiency policies and programs."[1] The eight states that are ranked above Rhode Island in the ACEEE's 2009 Scorecard are, in order: California, Massachusetts, Connecticut, Oregon, New York, Vermont, Washington, and Minnesota. Of these eight states:

- Three currently have regulatory or legislative requirements that all utilities implement revenue decoupling (California, Massachusetts, and New York),[2]
- Two have approved revenue decoupling as an element of specific utility rates (Connecticut and Oregon),[3] and
- One has approved legislation supportive of revenue decoupling (Minnesota).[4]

Thus, six of the eight states ranked above Rhode Island have implemented or are supportive of revenue decoupling. Further, the two states tied for eleventh place include a state that has implemented revenue decoupling in all electric utilities (Maryland) and a state that has recently approved revenue decoupling as a part of a broader settlement related to energy efficiency (Wisconsin).

Thus, of the twelve highest ranked states on ACEEE's energy efficiency scorecard, Rhode Island is one of only three states that has not yet supported revenue decoupling.

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[1] Maggie Eldridge, Bill Prindle, Dan York and Steve Nadel, "The State Energy Efficiency Scorecard for 2009," Report Number E097, ACEEE, October 2009.

[2] Three electric utilities in California (Pacific Gas & Electric, Southern California Edison, and San Diego Gas & Electric) and two in New York (Consolidated Edison and Orange & Rockland) currently have revenue decoupling. See Exhibit NG-SFT-3. Both Massachusetts and New York have regulatory orders that require electric and natural gas distribution companies to adopt revenue decoupling as part of their next rate case filing.

[3] United Illuminating in Connecticut, and Portland General Electric in Oregon currently have revenue decoupling. See Exhibit NG-SFT-3.

[4] The Minnesota legislature enacted law (Section 216B.2412) requiring the Public Utility Commission to establish criteria and standards for decoupling and authorizing regulated utilities to undertake pilot revenue decoupling programs.

Commission Record Request 16

Request:

Has the Company always been able to achieve the maximum level of incentive earnings on its demand side management programs in recent years, both on the kilowatt-hour savings portion and the metric portion? For years in which the Company did not earn the maximum incentive, please provide an explanation as to why, in the Company's opinion, it did not do so.

Response:

The maximum level of incentive earnings on the kilowatt-hour savings portion, as stated by the Company in its annual Energy Efficiency Program Plans, is 125% of the target incentive amount for energy savings.[1] In general, since 2004, the Company has not achieved this maximum level of incentive earnings because it has focused on meeting savings goals *within spending budgets*. It is difficult to achieve 125% savings goal while staying on budget.

The maximum level of the incentive earnings on the metric portion requires achievement of 100% of the target. Since 2004, the Company has not achieved this maximum level of incentive earnings because of various factors related to specific performance metrics. Specifically, in 2004, the Company achieved 98% of its overall target energy savings goal, while spending 85% of the implementation budget.[2] Spending and savings were below target levels for the year, in particular, because Large Commercial and Industrial programs (LC&I) achieved only 77% of the annual energy savings sector goal and spent only 70% of its spending budget. The Company did not achieve the LC&I performance metric target for signing four high performance school contracts. The Company signed one contract and earned $0 of a possible $15,000 dollars for that metric.

In 2005,[3] the Company achieved 112% of its overall target energy savings goal while spending 96% of its implementation budget. The Company did not achieve the LC&I performance metric target for signing three high performance school contracts. It signed one contract and earned $10,000 of a possible $15,000 for that metric.

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[1] Source: Rhode Island Public Utility Commission Docket 4000 – The Narragansett Electric Company d/b/a National Grid Energy Efficiency Program Plan for 2009 Report and Order, Approved December 23, 2008, Attachment A, page 49.
[2] Source: Revised 2004 DSM Year-End Report for the Narragansett Electric Company, May 20, 2005.
[3] Source: Revised 2005 DSM Year-End Report for the Narragansett Electric Company, May 31, 2006.

In 2006,[4] the Company achieved 111% of its overall target energy savings goal while spending 108% if its implementation budget. The Company did not achieve the LC&I performance metric target for signing three high performance school contracts. The Company signed 0 contracts and earned $0 of a possible $20,000. LC&I also did not achieve the performance metric target for creating 12 project applications for benchmarking services. The Company signed 8 contracts and earned $13,400 of a possible $20,000.

In 2007,[5] the Company achieved 102% of its overall target energy savings goal while spending 103% of its implementation budget. The Company did not achieve the LC&I performance metric target for signing three high performance school contracts. The Company signed two contracts and earned $15,000 of a possible $20,000. The Company also did not achieve the LC&I performance metric target for achieving MWh savings in subprograms other than prescriptive lighting. The Company saved 2,857 MWh of the targeted 4,490 MWh and earned $0 of a possible $20,000.

In 2008,[6] the Company achieved 111% of its overall target energy savings goal while spending 106% of its implementation budget. The Company did not achieve the LC&I performance metric target for signing four high performance school contracts. The Company signed two contracts and earned $10,000 of a possible $20,000.

[4] Source: Revised 2006 DSM Year-End Report for the Narragansett Electric Company, May 1, 2007.
[5] Source: Revised 2007 DSM Year-End Report for the Narragansett Electric Company, May 1, 2008.
[6] Source: Revised 2008 DSM Year-End Report for the Narragansett Electric Company, May 1, 2009.

Division Record Request 1

Request:

Would you agree that the New York Public Service Commission does not permit annual recovery of future capital costs in Consolidated Edison's and Orange and Rockland's revenue decoupling mechanism?

Response:

The statement regarding Consolidated Edison's ("ConEd") and Orange and Rockland's ("O&R") revenue decoupling mechanism is incorrect. Both ConEd and O&R have ratemaking mechanisms that allow some form of revenue recovery for the future capital costs.

Rates for O&R are currently set through a three-year rate plan in which rates reflect forecasted capital costs for plant in service. In the period since the New York Public Service Commission last approved ConEd's rates in March 2008, ConEd's current rates now reflect capital expenditures through the 2009 rate year. In prior periods, ConEd's rates – like those of O&R – were based upon a three-year rate plan that reflected forecast capital expenditures over the three-year period.

Prepared by or under the supervision of: Susan F. Tierney

Division Record Request 2

Request:

For Maryland and New York, would you agree that the commissions do not permit annual recovery of inflation as part of the revenue decoupling mechanisms of the electric utilities in those states?

Response:

The ratemaking mechanisms used in Maryland and New York do not include an explicit or separate ratemaking mechanism to adjust rates over time in a way that captures the effect of actual changes in the level of inflation, such as the Net Inflation Adjustment that has been proposed by the Company as part of the RDR Plan. That said, rates for the regulated electric distribution utilities in New York that have revenue decoupling do, however, reflect the New York Public Service Commission's policy that builds into base rates for future years a revenue allowance to capture the impact of inflation on the cost of service. This provides for inflation through inclusion in base rates through the initial rate year for Consolidated Edison and throughout the three-year rate plan for Orange & Rockland.

Prepared by or under the supervision of: Susan F. Tierney

Division Record Request 3

Request:

Please confirm that the capital expenditures contained in the Company's November RDR Plan filing for the months of October, November, and December are capital expenditures that are placed into service as of those time periods.

Response:

The Company's annual November RDR Plan filing will include and reflect actual capital expenditures from January 1 through the most recent month available at the time of the filing and estimated capital expenditures for the remainder of the year through December. Both actual and estimated capital expenditures will reflect expenditures associated with plant to be placed into service in those months.

Prepared by or under the supervision of: Susan F. Tierney

Division Record Request 4

Request:

What other states have a mechanism similar to or identical to that described on Page 94 of 97 of your testimony regarding a notice to a commission of a plus or minus 10 percent adjustment?

Response:

The Company's RDR Plan requires that the Company "notify the Commission if (1) the difference between the year-to-date actual revenue and the year-to-date ATR is 10 percent above or below the actual ATR, and (2) the Company does not anticipate that the discrepancy will fall below the 10-percent threshold in coming months."[1] Neither the Company nor Dr. Tierney is aware of any revenue decoupling mechanisms that includes a mechanism identical to the one proposed by the Company for notification of the Commission in the event of potentially large adjustments.

Other utility revenue decoupling mechanisms use various approaches to addressing the potential for large RDM adjustments. Revenue decoupling for two New York utilities include mechanisms for interim rate adjustments. Rates for Orange & Rockland are normally adjusted annually, but, if the reconciliation between monthly actual and allowed revenues exceeds $3 million, then an interim rate adjustment is made. Rates for Consolidated Edison, which are normally adjusted bi-annually, also include a mechanism for interim rate adjustments if monthly deferrals exceed $10 million.

Other utilities avoid the potential risk of large RDM rate adjustments by adjusting rates monthly rather than annually. For example, all utilities in Maryland (Baltimore Gas & Electric, Delmarva Power, and PEPCO) utilize monthly adjustments.

In the Massachusetts' Department of Public Utilities' 11-30-09 order on National Grid's proposed revenue decoupling plan for Massachusetts Electric Company and Nantucket Electric Company, the Department ordered that there be a 3% cap on the amount of revenues that may be reconciled in any period. In other words, there is a limit – equal to plus or minus 3 percent of distribution revenues – on the amount of revenues to be reconciled in an annual revenue-decoupling reconciliation with the portion of the revenues that exceed the 3% cap being deferred for recovery until the next year with carrying charges.

[1] Prefiled Testimony of Susan F. Tierney, p. 95.

Division Record Request 5

Request:

Please provide Figure NG-SFT-6 revised to reflect capital expenditures and inflation. If this is provided in a response to a data request, please provide the data request number.

Response:

Figure NG-SFT-6 of Dr. Tierney's prefiled testimony compares monthly customer bills for commodity service with those for distribution service assuming that the Company had implemented a revenue decoupling mechanism for the period 2003 to 2008. Figure DIV-5-1, below, makes a similar comparison with two changes from the approach used in Figure NG-SFT-6.

- First, rates per kWh are reported instead of monthly bills;[1] this is a technical change and still allows for an apples-to-apples comparison between Figure DIV-5-1 and Figure NG-SFT-6.

- Second, in Figure DIV-5-1, unlike the original figure, rates include not only the effects of revenue decoupling (as shown in Figure NG-SFT-6), but also those relating to the Inflation Adjustment, the Cumulative Cap Ex Adjustment, and the Current Year Cap Ex Adjustment, consistent with the Company's RDR Plan.

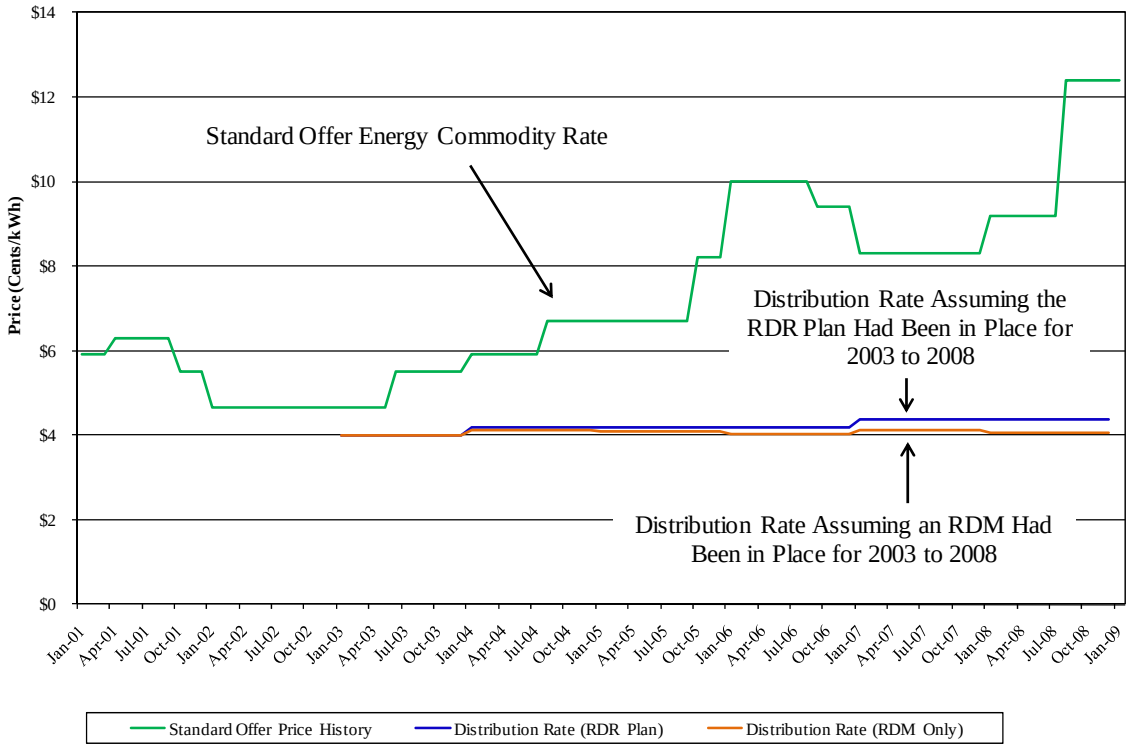
In this Figure DIV-5-1, rates under the RDR Plan are calculated assuming: (1) actual historical values for the Gross Domestic Product Price Index ("GDP-PI"),[2] less the 0.5 percent productivity offset; (2) actual historical values for the Company's capital expenditures over the period 2003 to 2008; (3) a pre-tax return on rate base of 11.84 percent; and (4) a depreciation rate of 3.34 percent.[3]

Figure DIV-5-1 shows that, based on the hypothetical analysis of what the Company rates would have looked like, had the proposed RDR Plan been in effect over the period 2003 to 2008 (with 2002 test year), the addition of the Inflation and Cap Ex Adjustments would have led to relatively small increases in distribution rates. For example, distribution rates for

[1] Because Figure NG-SFT6 was calculated assuming *fixed* sales per month, Figure DIV-5-1 and a similar figure that reported monthly bills (assuming fixed monthly sales) convey the same information about the relative differences between distribution rates with and without the Inflation and Cap Ex Adjustments and between distribution rates (under various ratemaking plans) and commodity rates.
[2] The baseline for operations and maintenance spending was expenditures in 2003, rather than spending in 2002, the assumed test year for the hypothetical analysis. Because 2003 operations and maintenance costs are likely greater than 2002 costs, this likely overstates the inflation adjustments if 2002 costs were used.
[3] The calculations do not reflect a deferred tax reserve.

residential (A-16) customers in 2008, the sixth year of the hypothetical RDR Plan, would be 4.38 cents per kWh, compared to rates of 4.07 cents per kWh under revenue decupling alone. Thus, the addition of the Inflation and Cap Ex Adjustments resulted in an increase of 0.31 cents per kWh with rates rising by 9 percent from a rate of 4.00 cents per kWh in 2003. These increases are small in comparison to changes in commodity rates over this period. For example, standard offer commodity rates rose by 166 percent over this same period – from 4.66 cents per kWh in 2003 to 12.40 cents per kWh in 2008. In light of the fact that the RDR Plan is designed to support the deployment of energy-efficiency steps that would help the customer reduce its energy use, purchase fewer kWh in total, and avoid the entire electricity rates for the saved electricity, these small increases in distribution rates would be offset by the much-larger savings in the size of the total bill for the average customer.

Figure DIV-5-1
National Grid Retail Unbundled Electric Service for
Residential Customer in Rhode Island:
Comparison of Monthly Distribution and Standard Offer Service Rates



Division Record Request 6

Request:

Please provide the total budget for the Company's demand side management programs for 2008, 2009, and 2010, including shareholder incentive and any commitments that are set forth in the annual reports for the electric energy efficiency programs for those years.

Response:

The total budget for the Company's demand side management programs for 2008, 2009, and 2010, including shareholder incentive and any commitments are as follows:

2008 Plan:[1]	$21,015,200
2009 Plan:[2]	$32,371,200
2010 Proposed Plan:[3]	$43,947,700

[1] Source: Rhode Island Public Utility Commission Docket 3892 – The Narragansett Electric Company d/b/a National Grid Energy Efficiency Program Plan for 2009 Report and Order, Approved December 20, 2007. Appendix A, page 103.
[2] Source: Rhode Island Public Utility Commission Docket 4000 – The Narragansett Electric Company d/b/a National Grid Energy Efficiency Program Plan for 2009 Report and Order, Approved December 23, 2008. Attachment A, page 148.
[3] Source: Rhode Island Public Utility Commission Docket 4116 – The Narragansett Electric Company d/b/a National Grid Energy Efficiency Program Plan for 2010, page 148.

Prepared by or under the supervision of: Timothy Stout

Division Record Request 7

Request:

Does the Company agree that the actual DSM savings for 2008 were fully incorporated into the meter load data used to estimate load forecasting models?

Response:

Yes. The load forecasting models were estimated using actual, metered load data collected through December 2008, which includes all actual DSM savings achieved by the Company through 2008. Because these savings are embedded in the kWh sales data used to run the models, the resulting sales forecast for 2010 reflects only the historical level of savings achieved through the energy efficiency programs. Savings incremental to the levels achieved through 2008 would not be reflected in the forecasted kWh sales because those incremental savings have not occurred in the past. To account for the incremental DSM savings that will be achieved on a going forward basis because of ramped up programs, the Company calculated the difference between the total DSM savings forecast to occur in 2010 and the actual DSM savings occurring in 2008. The difference totaled 29 gWh or 0.4 percent of total gWh sales. This amount was then subtracted from the sales forecast results for 2010 to reflect the incremental level of energy efficiency savings achieved in 2009 and 2010.

Although the Company will continue to experience reductions in sales *after 2010* as a result of its approved energy efficiency programs, reductions in sales volumes occurring after 2010 *are not* reflected in the sales forecast.

Prepared by or under the supervision of: Alfred P. Morrissey

TEC-RI Record Request 1

Request:

Please provide the analysis based upon the study contained in Schedule NG-SFT-R-3 of Dr. Tierney's rebuttal testimony in which Dr. Tierney examined the underlying distribution-only company data to determine the impact of revenue decoupling reconciliations on distribution rates.

Response:

Schedule NG-SFT-R-3 of Dr. Tierney's rebuttal testimony is a study authored by Pamela Lesh entitled "Rate Impacts and Key Design Elements of Gas and Electric Utility Decoupling: A Comprehensive Review."[1] This study provides data on adjustments associated with utility decoupling mechanisms. Figures TEC-RI-1 and TEC-RI-2 below summarize in a more detailed and disaggregated fashion the data on the decoupling rate adjustment reported in the Lesh report, where the decoupling rate adjustment reflects annual decoupling adjustments relative to total customer rates. Figure TEC-RI-1 summarizes revenue decoupling adjustments for both electric and natural gas utilities, while Figure TEC-R-2 summarizes residential, non-residential and general (uniform) adjustments for electric utilities.

The figures illustrate that revenue decoupling adjustments have generally been small relative to customers' total electricity rates. For electric utilities, annual decoupling adjustments have never exceeded three percent, and, in more than two-thirds of cases (34 of 50) have been less than plus or minus one percent. The figures also illustrate that decoupling leads to positive and negative adjustments to rates, despite the inclusion of mechanisms to adjust total allowed revenues. For example, while decoupling led to a positive rate adjustment in 31 of 50 periods examined, rates declined in 19, or nearly 40 percent, of these periods.

[1] Pamela Lesh, "Rate Impacts and Key Design Elements of Gas and Electric Utility Decoupling: A Comprehensive Review," June 30, 2009, at http://www.raponline.org/Pubs/Lesh-CompReviewDecouplingInfoElecandGas-30June09.pdf.

Figure TEC-RI-1
Decoupling Rate Adjustments
Electric and Gas Utilities

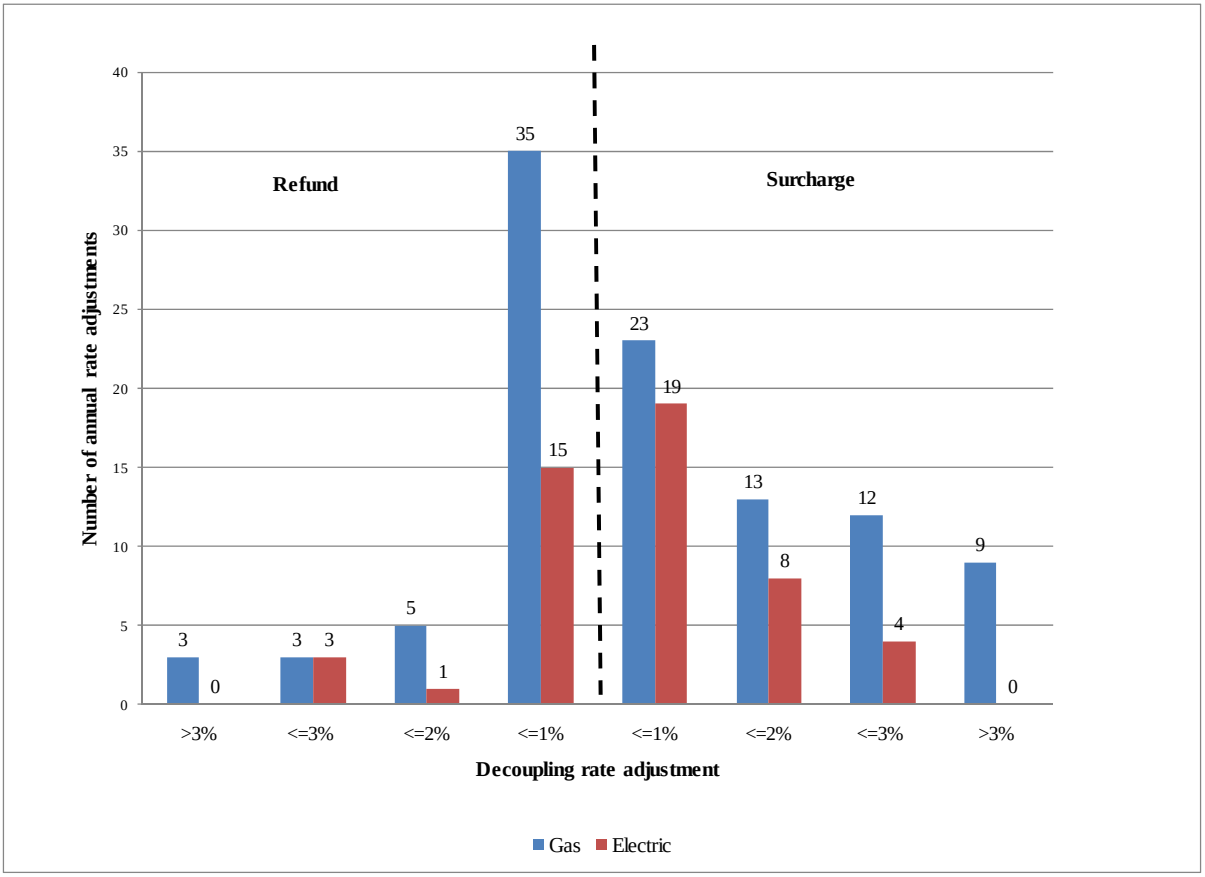
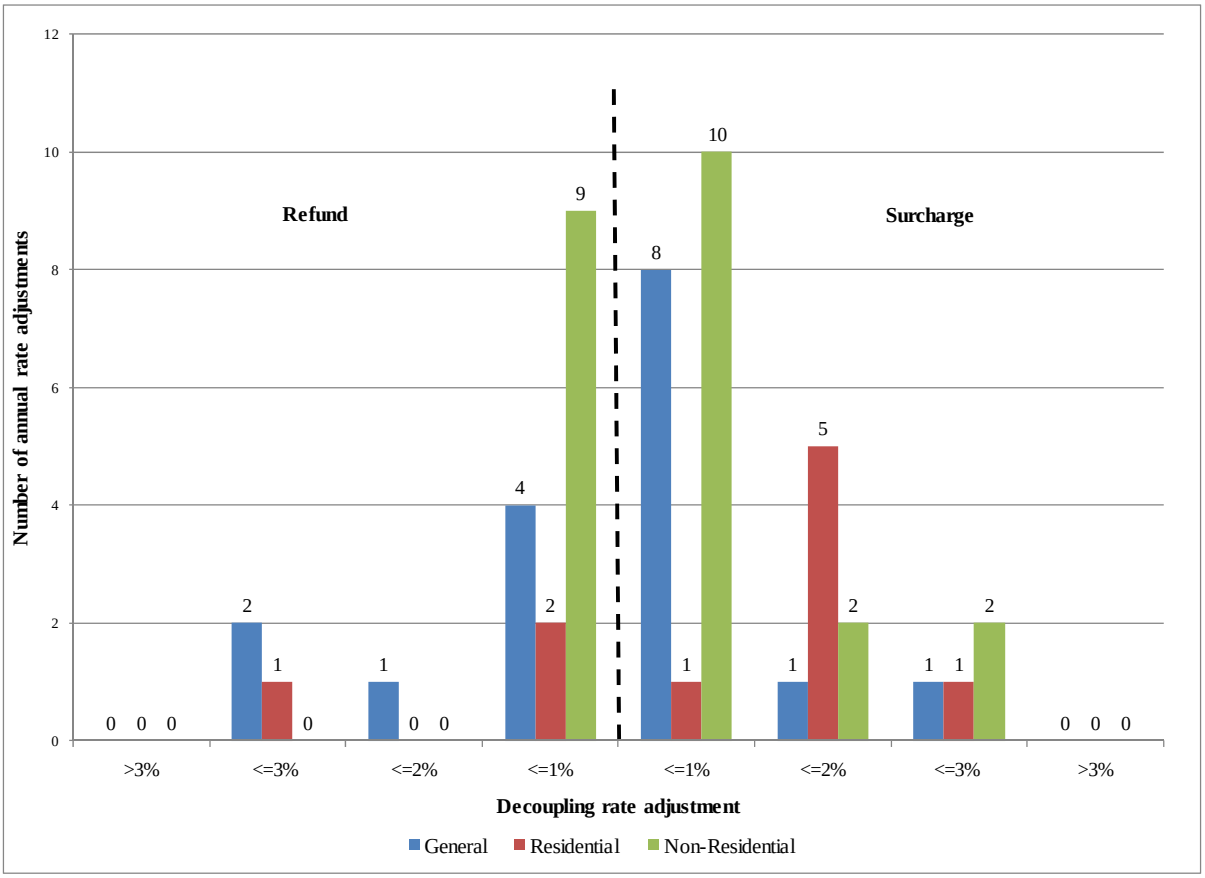


Figure TEC-RI-2
Decoupling Rate Adjustments
Electric Utilities



TEC-RI Record Request 2

Request:

Please provide the financial incentive for National Grid for its energy efficiency programs this year.

Response:

National Grid's target performance incentive for its 2009 electric energy efficiency programs in 2009 is $1,035,943, which includes $150,000 related to performance metrics and $885,943 for achieving savings goals[1].

[1] Source: Rhode Island Public Utility Commission Docket 4000 – The Narragansett Electric Company d/b/a National Grid Energy Efficiency Program Plan for 2009 Report and Order, Approved December 23, 2008. Attachment A, page 155.

TEC-RI Record Request 3

Request:

Is the actual revenue portion of the reconciliation that would be performed under the [RDR Plan] proposal that you're making received revenue or is it billings?

Response:

Actual revenue to be reflected in the RDR Plan reconciliation will be billed revenue, similar to the Company's other reconciliations, which include revenue subject to reconciliation.

Prepared by or under the supervision of: Susan F. Tierney