

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**

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Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's<sup>1</sup> responses to record requests issued by the Commission at the November 5, 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

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

The Narragansett Electric Company d/b/a National Grid					
Docket 4065					
Discovery Log					
As of: 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 <b>BULK</b>
COMM 1-2	Filed	6/26/2009	O'Brien		Attachments COMM 1-2 A-D
COMM 1-3	Filed	6/26/2009	Dinkel		Attachments COMM 1-3 A-B <b>BULK</b>
COMM 1-4	Filed	6/26/2009	O'Brien		
COMM 1-5	Filed	7/22/2009	O'Brien/Dinkel		Attachments COMM 1-5 (1-3)
COMM 1-6	Filed	6/26/2009	Dinkel	C-attachment	Attachments COMM 1-6-1 & 1-6-2 <b>BULK</b>
COMM 1-7	Filed	6/26/2009	O'Brien		Attachment COMM 1-7
COMM 1-8	Filed	6/26/2009	Dinkel		Attachments COMM 1-8 (A-D) <b>BULK</b>
COMM 1-9	Filed	6/26/2009	Dinkel	C-attachment	Attachments COMM 1-9 (1-11) <b>BULK</b>
COMM 1-10	Filed	6/26/2009	Dinkel		Attachment COMM 1-10 (hard copy only) <b>BULK</b>
COMM 1-11	Filed	6/26/2009	O'Brien		
COMM 1-12	Filed	7/1/2009	Dinkel/Morrissey		Attachments COMM 1-12 (1-2)
COMM 1-13	Filed	6/26/2009	Dinkel		Attachment COMM 1-13
COMM 1-14	Filed	6/26/2009	Dinkel		Attachment COMM 1-14
COMM 1-15	Filed	6/26/2009	Dinkel		Attachment COMM 1-15
COMM 1-16	Filed	6/26/2009	O'Brien		Attachments COMM 1-16 (1-12)
COMM 1-17	Filed	7/6/2009	Pettigrew		
COMM 1-18	Filed	7/14/2009	Pettigrew		Attachments COMM 1-18-1, 1-18-2, 1-18-3, 1-18-4(a) - (d) <b>Bulk</b>
COMM 1-19	Filed	8/11/2009	O'Brien		Attachment COMM 1-19
COMM 1-20	Filed	6/26/2009	O'Brien		
COMM 1-21	Filed	6/26/2009	O'Brien		Attachments COMM 1-21 (1-4)
COMM 1-22	Filed	6/26/2009	O'Brien		Attachments COMM 1-22 (1-2)
COMM 1-23	Filed	6/26/2009	O'Brien		Attachments COMM 1-23 (1-2)
COMM 1-24	Filed	6/26/2009	O'Brien		Attachment COMM 1-24
COMM 1-25	Filed	6/26/2009	O'Brien		Attachments COMM 1-25 (1-14) <b>BULK</b>
COMM 1-25 (supp.)	Filed	8/11/2009	O'Brien		Attachments COMM 1-25 (1-3)
COMM 1-26	Filed	6/26/2009	O'Brien		Attachment COMM 1-26
COMM 1-27	Filed	8/18/2009	O'Brien		Attachments COMM 1-27 (1-3) <b>BULK</b>
COMM 1-28	Filed	7/6/2009	O'Brien		Attachment COMM 1-28
COMM 1-29	Filed	6/26/2009	O'Brien		
COMM 1-30	Filed	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) <b>BULK</b>
COMM 1-34	Filed	6/26/2009	Dowd		Attachments COMM 1-34 (1-2) <b>BULK</b>
COMM 1-35	Filed	6/26/2009	Dowd		Attachment COMM 1-35 <b>BULK</b>
COMM 1-36	Filed	6/26/2009	Dowd		Attachment DIV 2-1 (electronic only)
COMM 1-37	Filed	6/26/2009	O'Brien		Attachment COMM 1-37
COMM 1-38	Filed	6/26/2009	O'Brien		Attachment COMM 1-38
COMM 1-39	Filed	8/18/2009	O'Brien		Attachment COMM 1-39
COMM 1-40	Filed	6/26/2009	Dowd		Attachment COMM 1-40
COMM 1-41	Filed	6/26/2009	Dowd		Attachment COMM 1-41
COMM 1-42	Filed	6/26/2009	Dowd		Attachment COMM 1-42
COMM 1-43	Filed	6/26/2009	Dowd		Attachment COMM 1-43
COMM 1-44	Filed	6/26/2009	Dowd		Attachment COMM 1-44
COMM 1-45	Filed	6/26/2009	O'Brien		Attachment COMM 1-45

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Data Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
COMM 1-46	Filed	6/26/2009	Dowd		
COMM 1-47	Filed	6/26/2009	Dowd		Attachments COMM 1-47 (1-3) <b>BULK</b>
COMM 1-48 (Part 1)	Filed	6/26/2009	Dowd		Attachment COMM 1-48
COMM 1-48 (Parts 2-5)	Filed	6/26/2009	O'Brien		
COMM 1-49	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) <b>BULK</b>
COMM 1-51	Filed	6/26/2009	Dowd		
COMM 1-52	Filed	6/26/2009	Dowd		Attachment COMM 1-52
COMM 1-53	Filed	6/26/2009	Dowd		Attachment COMM 1-53
COMM 1-54	Filed	6/26/2009	O'Brien		Attachments COMM 1-54 (1-2)
COMM 1-55	Filed	7/14/2009	O'Brien		Attachment COMM 1-55
COMM 1-56	Filed	6/26/2009	O'Brien		
COMM 1-57	Filed	6/26/2009	O'Brien		Attachment COMM 1-57
COMM 1-58	Filed	6/26/2009	O'Brien		Attachment DIV 3-11 (PDF and working excel)
COMM 1-58 (supp)	Filed	6/26/2009	O'Brien		Attachment COMM 1-58 (supp.)
COMM 1-59	Filed	6/26/2009	O'Brien		Attachment COMM 1-59
COMM 1-60	Filed	6/26/2009	O'Brien		Attachment COMM 1-60 (A-B)
COMM 1-61	Filed	6/26/2009	Dowd		
COMM 1-62	Filed	6/26/2009	O'Brien		Attachments COMM 1-62 (1-2)
COMM 1-63	Filed	8/11/2009	O'Brien		Attachments COMM 1-63 (A-F) A-C EXCEL FILES D & E <b>BULK</b> (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) <b>BULK</b>
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) <b>BULK</b>
COMM 1-91	Filed	6/26/2009	O'Brien		Attachment DIV 4-21 (1-2) <b>BULK</b>
COMM 1-92	Filed	6/26/2009	O'Brien		Attachment COMM 1-92
COMM 1-93	Filed	6/26/2009	O'Brien		
COMM 1-94	Filed	6/26/2009	O'Brien		Attachment COMM 1-94
COMM 1-95	Filed	6/26/2009	O'Brien		Attachment COMM 1-95
COMM 1-96	Filed	6/26/2009	King		Attachment COMM 1-96
COMM 1-97	Filed	6/26/2009	O'Brien		
COMM 1-98	Filed	7/1/2009	Dowd		

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COMM 1-99	Filed	6/26/2009	Gorman		Attachment COMM 1-99
COMM 1-100	Filed	7/1/2009	Gorman		
COMM 1-101	Filed	7/1/2009	Gorman		
COMM 1-102	Filed	6/26/2009	Gorman		Attachment COMM 1-102
COMM 1-102 (supp)	Filed	10/23/2009	Gorman		Attachment COMM 1-102 (supp)
COMM 1-103	Filed	6/26/2009	Wynter		
COMM 1-104	Filed	6/26/2009	Wynter		
COMM 1-105	Filed	6/26/2009	O'Brien		
COMM 1-106	Filed	8/21/2009	O'Brien		
COMM 1-107	Filed	6/26/2009	O'Brien		Attachment COMM 1-107
COMM 1-108	Filed	6/26/2009	Wynter		Attachment COMM 1-108
COMM 1-109	Filed	6/26/2009	Dowd/Pettigrew		Attachment COMM 1-109
COMM 2-1	Filed	8/18/2009	Pettigrew		
COMM 2-2	Filed	8/18/2009	Pettigrew		
COMM 2-3	Filed	8/18/2009	Pettigrew		
COMM 2-4	Filed	8/14/2009	Stout		
COMM 2-5	Filed	8/18/2009	O'Brien		
COMM 2-6	Filed	8/18/2009	Tierney		
COMM 2-7	Filed	8/18/2009	Tierney		
COMM 2-8	Filed	8/18/2009	Tierney		
COMM 2-9	Filed	8/18/2009	Tierney		
COMM 2-10	Filed	8/14/2009	Stout		
COMM 2-12	Filed	8/18/2009	Tierney		
COMM 2-13	Filed	8/18/2009	Tierney		
COMM 2-14	Filed	8/14/2009	Morrissey		Attachment COMM 2-14
COMM 2-15	Filed	8/14/2009	Morrissey		Attachments COMM 2-15 (1-2)
COMM 2-16	Filed	8/18/2009	Morrissey/Stout		
COMM 2-17	Filed	8/18/2009	O'Brien	C-attachment	Attachment COMM 2-17
COMM 2-18	Filed	8/21/2009	Dowd		Attachment COMM 2-18 BULK
COMM 2-19	Filed	8/21/2009	Dowd		Attachment COMM 2-19 BULK
COMM 2-20	Filed	8/21/2009	Dowd		
COMM 2-21	Filed	8/21/2009	Dowd		
COMM 2-22	Filed	8/24/2009	Dowd		
COMM 2-23	Filed	8/27/2009	Wynter		
COMM 2-24	Filed	8/18/2009	O'Brien		Attachment COMM 2-24
COMM 2-25	Filed	8/24/2009	O'Brien		
COMM 2-26	Filed	8/18/2009	O'Brien		
COMM 2-27	Filed	8/27/2009	O'Brien	C-attachment	Attachment COMM 2-27
COMM 2-27 (supp.)	Filed	9/30/2009	O'Brien	C-attachment	Attachments COMM 2-27 (1-2)
COMM 2-28	Filed	8/14/2009	Wynter		
COMM 2-29	Filed	8/14/2009	Wynter		
COMM 2-30	Filed	8/14/2009	O'Brien		
COMM 2-31	Filed	8/14/2009	O'Brien		
COMM 2-32	Filed	8/18/2009	O'Brien		
COMM 2-33	Filed	8/18/2009	O'Brien		
COMM 2-34	Filed	8/14/2009	Gorman		
COMM 2-35	Filed	8/14/2009	Gorman		
COMM 2-36	Filed	8/24/2009	Wynter		
COMM 2-37	Filed	8/14/2009	Wynter		
COMM 2-38	Filed	8/14/2009	Wynter		
COMM 2-39	Filed	8/27/2009	Wynter		
COMM 2-40	Filed	8/20/2009	O'Brien		Attachments COMM 2-40 (1-2) BULK
COMM 2-41	Filed	8/24/2009	Pettigrew		Attachments COMM 2-41 (1-2)
COMM 2-42	Filed	8/18/2009	O'Brien		Attachment COMM 2-42
COMM 2-43	Filed	8/24/2009	O'Brien		Attachment COMM 2-43
COMM 2-44	Filed	8/14/2009	Gorman		
COMM 2-45	Filed	8/14/2009	Wynter		
COMM 2-46	Filed	8/14/2009	Wynter		
COMM 2-47	Filed	8/14/2009	Wynter		
COMM 2-48	Filed	8/14/2009	Wynter		
COMM 2-49	Filed	8/14/2009	Wynter		Attachment COMM 2-49

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COMM 2-50	Filed	8/14/2009	Wynter		
COMM 2-51	Filed	8/14/2009	Wynter		Attachment COMM 2-51
COMM 2-52	Filed	8/14/2009	Wynter		
COMM 2-53	Filed	8/14/2009	Wynter		
COMM 2-54	Filed	8/14/2009	Wynter		Attachment COMM 2-54 (1-2)
COMM 2-55	Filed	8/24/2009	O'Brien		
COMM 2-56	Filed	8/14/2009	Wynter		Attachment COMM 2-56 (1-2)
COMM 2-57	Filed	8/14/2009	Gorman		
COMM 2-58	Filed	8/14/2009	Gorman		
COMM 3-1	Filed	9/1/2009	Pettigrew		Attachment COMM 3-1
COMM 3-2	Filed	9/1/2009	Wynter		Attachment COMM 3-2
COMM 3-3	Filed	9/1/2009	Wynter		
COMM 3-4	Pending				
COMM 3-5	Filed	9/1/2009	Legal Dept.		Attachments COMM 3-5 (1-11) <b>BULK</b>
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	12/4/2009	Tierney/Stout		
	Filed				
COMM 10-1	Filed	12/2/2009	Dinkel		
COMM 10-2	Filed	12/2/2009	Gorman		
COMM 10-3	Filed	12/4/2009	O'Brien		

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

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DIV-3-17	Filed	7/6/2009	Pettigrew		
DIV-3-18	Filed	7/6/2009	Pettigrew		
DIV-3-19	Filed	8/21/2009	Pettigrew		
DIV-3-20	Filed	8/18/2009	Pettigrew		Attachment DIV 3-20
DIV-3-21	Filed	7/6/2009	Pettigrew		
DIV-3-22	Filed	8/18/2009	O'Brien/Dowd		
DIV-4-1	Filed	7/6/2009	Moul		Attachments DIV 4-1 (1-2) <b>BULK</b>
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
	Filed				Attachment DIV 4-21 (1-2)
DIV-4-21		7/6/2009	O'Brien		<b>BULK</b>
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	<b>C-attachments</b>	Attachments DIV 5-A (1-3)
DIV-5-B	Filed	7/22/2009	Wynter		Attachment DIV 5-B
DIV-5-C	Filed	7/22/2009	Wynter		Attachment DIV 5-C
DIV-6-1	Filed	7/14/2009	Tierney		
DIV-6-2	Filed	7/14/2009	Tierney		
DIV-6-3	Filed	7/14/2009	Tierney		
DIV-6-4	Filed	7/14/2009	Tierney		
DIV-6-5	Filed	7/14/2009	Tierney		
DIV-6-6	Filed	7/14/2009	Tierney		Attachment DIV 6-6 <b>BULK</b>
DIV-6-7	Filed	8/21/2009	Pettigrew		
DIV-6-7 (Supp.)	Filed	8/24/2009	Pettigrew		Attachment DIV 6-7 (Supplemental)
DIV-6-8	Filed	8/21/2009	Tierney		Attachment Div 6-8
DIV-6-9	Filed	7/14/2009	Tierney		
DIV-6-10	Filed	7/14/2009	Tierney		
DIV-6-11	Filed	7/14/2009	Tierney		
DIV-6-12	Filed	7/14/2009	Tierney		Attachments DIV 6-12 (a) and (d)
DIV-6-13 (a) - (d)	Filed	7/22/2009	Tierney		Attachment DIV 6-13
DIV0-6-13 (e)	Filed	8/21/2009	Tierney		
DIV-6-14	Filed	7/14/2009	Tierney		Attachment DIV 6-14 (hard copy only)
DIV-6-15 (a)	Filed	8/20/2009	Tierney		Attachment DIV 6-15(a)
DIV-6-15 (b) and (c)	Filed	7/22/2009	Tierney		
DIV-6-16	Filed	8/21/2009	Pettigrew		
DIV-6-17	Filed	7/14/2009	Tierney		Attachment DIV 6-17
DIV-6-18	Filed	7/14/2009	Tierney		Attachment DIV 6-18
DIV-6-19 (a) - (d) and (f)	Filed	7/22/2009	Tierney		Attachments DIV 6-19 and DIV 6-19-F (1-2)
DIV-6-19 (e)	Filed	8/21/2009	Tierney/O'Brien		
DIV-6-20	Filed	7/14/2009	Tierney		
DIV-6-21	Filed	7/14/2009	Tierney		
DIV-6-22	Filed	7/14/2009	Tierney		



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DIV-6-23	Filed	7/14/2009	Tierney		
DIV-6-24	Filed	7/22/2009	Tierney		Attachment DIV 6-24
DIV-6-25	Filed	7/22/2009	Stout		Attachment DIV 6-25 (1-2)
DIV-6-26	Filed	8/20/2009	Tierney		
DIV-6-27	Filed	7/14/2009	Tierney		Attachment DIV 6-27 (working excel included)
DIV-6-28	Filed	7/14/2009	Tierney		
DIV-6-29	Filed	7/14/2009	Tierney		
DIV-6-30	Filed	7/22/2009	Tierney		
DIV-6-31 (a) - (d) and (f)	Filed	7/22/2009	Tierney		
DIV-6-31 (e)	Filed	8/18/2009	Tierney		
DIV-6-32	Filed	8/18/2009	O'Brien		Attachment DIV 6-32
DIV-6-33	Filed	7/14/2009	Tierney		
DIV-6-34	Filed	7/22/2009	Tierney		Attachment DIV 6-34 (1-2)
DIV-6-35	Filed	7/14/2009	Tierney		Attachment DIV 6-35 (c) and (d)
DIV-6-36	Filed	7/14/2009	Gorman		
DIV-6-37	Filed	7/14/2009	Gorman		Attachment DIV 6-37(a)
DIV-6-38	Filed	7/14/2009	Tierney		
DIV-6-39	Filed	8/21/2009	Tierney		
DIV-7-1	Filed	8/3/2009	King		
DIV-7-2	Filed	7/22/2009	King/Pettigrew		
DIV-7-3	Filed	7/22/2009	King		
DIV-7-4	Filed	7/22/2009	Wynter		
DIV-7-5	Filed	8/20/2009	King		
DIV-7-6	Filed	7/22/2009	Wynter/Stout		Attachment DIV 7-6
DIV-7-7	Filed	7/22/2009	Fields		Attachment DIV 7-7 (a) (hard copy only) and (b)
DIV-7-8	Filed	8/18/2009	Dowd		
DIV-7-9	Filed	7/22/2009	Pettigrew		
DIV-7-10	Filed	7/22/2009	King		
DIV-7-11	Filed	7/22/2009	King		
DIV-7-12	Filed	7/22/2009	King		
DIV-7-13	Filed	7/22/2009	King		
DIV-7-14	Filed	8/18/2009	O'Brien		
DIV-7-15	Filed	7/22/2009	King		
DIV-7-16	Filed	7/22/2009	Gorman		
DIV-7-17	Filed	7/22/2009	Gorman		Attachment DIV 7-17
DIV-7-18	Filed	7/22/2009	Smithling		Attachment DIV 7-18
DIV-7-19	Filed	8/18/2009	Dowd		Attachment DIV 7-19 (b-c)
DIV-7-20	Filed	7/22/2009	King		
DIV-7-21	Filed	7/22/2009	King		
DIV-8-1	Filed	8/21/2009	Wynter		Attachment DIV 8-1
DIV-8-2	Filed	8/3/2009	Wynter		Attachment DIV 8-2
DIV-8-3	Filed	7/22/2009	Wynter		Attachment DIV 8-3 (hard copy only)
DIV-8-4	Filed	7/22/2009	Gorman		Attachment DIV 8-4 (excel)
DIV-8-5	Filed	7/22/2009	Wynter		Attachment DIV 8-5
DIV-8-6	Filed	8/3/2009	Wynter		
DIV-8-7 a-g (no d)	Filed	8/3/2009	Wynter		Attachments DIV 8-7 (a-g, no d)
DIV-8-7(d)	Filed	8/11/2009	Wynter		Att. DIV 8-7(d)
DIV-8-8	Filed	7/22/2009	Wynter		
DIV-8-9	Filed	8/3/2009	Wynter		Attachment DIV 8-9
DIV-8-10	Filed	8/18/2009	Wynter		Attachment DIV 8-10
DIV-8-11	Filed	7/22/2009	Wynter		
DIV-8-12	Filed	8/3/2009	Wynter		
DIV-8-13	Filed	8/3/2009	Wynter		
DIV-8-14	Filed	8/3/2009	Wynter		
DIV-8-15	Filed	8/3/2009	Wynter		
DIV-8-16	Filed	8/3/2009	Wynter		
DIV-8-17	Filed	8/18/2009	Wynter		Attachment DIV 8-17
DIV-8-18	Filed	8/3/2009	Wynter		Attachment DIV 8-18
DIV-8-19	Filed	8/3/2009	Wynter		Attachment DIV 8-19
DIV-8-20	Filed	8/20/2009	Wynter		Attachment DIV 8-20
DIV-8-21	Filed	8/3/2009	Wynter		
DIV-8-22	Filed	8/20/2009	Wynter		Attachment DIV 8-22
DIV-8-23	Filed	8/3/2009	Wynter		Attachment DIV 8-23

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DIV-8-24	Filed	8/3/2009	Wynter		
DIV-8-25	Filed	8/3/2009	Wynter		Attachments DIV 8-25 (a-i)
DIV-9-1	Filed	7/22/2009	Pettigrew		
DIV-9-2	Filed	7/22/2009	O'Brien		
DIV-9-3	Filed	7/22/2009	Gorman		
DIV-9-4	Filed	7/22/2009	Gorman		
DIV-9-5	Filed	7/22/2009	Gorman		
DIV-9-6	Filed	7/22/2009	Gorman		
DIV-9-7	Filed	7/22/2009	Gorman		
DIV-9-8	Filed	7/22/2009	Gorman		
DIV-9-9	Filed	7/22/2009	Gorman		
DIV-9-10	Filed	7/22/2009	Gorman		
DIV-9-11	Filed	7/22/2009	Gorman		
DIV-9-12	Filed	7/22/2009	Gorman		
DIV-9-13	Filed	7/22/2009	Gorman		
DIV-9-14	Filed	7/22/2009	Gorman		
DIV-9-15	Filed	7/22/2009	Gorman		
DIV-9-16	Filed	7/22/2009	Gorman		
DIV-9-17	Filed	7/22/2009	Gorman		
DIV-9-18	Filed	7/22/2009	Gorman		
DIV-9-19	Filed	7/22/2009	Gorman		
DIV-10-1	Filed	8/18/2009	Pettigrew/O'Brien		
DIV-10-2	Filed	8/21/2009	O'Brien		
DIV-10-3	Filed	7/22/2009	Gorman		Attachment DIV 10-3
DIV-10-4	Filed	7/22/2009	Gorman		Attachment DIV 10-4
DIV-10-5	Filed	8/11/2009	Gorman		Attachment DIV 10-5 (1-4) EXCEL files <b>BULK</b>
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) <b>BULK</b>
DIV-11-13	Filed	8/18/2009	Pettigrew		Attachment DIV 11-13
DIV-11-14	Filed	8/18/2009	Pettigrew		

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

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DIV-14-1	Filed	8/18/2009	Pettigrew		Attachments DIV 14-1 (1-8) <b>BULK</b>
DIV-14-2	Filed	8/18/2009	Pettigrew		Attachment DIV 14-2
DIV-14-3	Filed	8/18/2009	Pettigrew		
DIV-14-4	Filed	8/18/2009	Pettigrew		
DIV-14-5	Filed	8/18/2009	Pettigrew		Attachment DIV 14-5
DIV-14-6	Filed	8/18/2009	Pettigrew		Attachment DIV 14-6
DIV-14-7	Filed	8/18/2009	Pettigrew		
DIV-14-8	Filed	8/18/2009	Pettigrew		
DIV-14-9	Filed	8/18/2009	Pettigrew		
DIV-14-10	Filed	8/18/2009	Pettigrew		
DIV-14-11	Filed	8/18/2009	Pettigrew		Attachments DIV 14-11 (1-8) <b>BULK</b>
DIV-14-12	Filed	8/18/2009	Pettigrew		Attachments DIV 14-12 (1-2) <b>BULK</b>
DIV-14-13	Filed	8/18/2009	Pettigrew		
DIV-14-14	Filed	8/18/2009	Pettigrew		
DIV-14-15	Filed	8/27/2009	Pettigrew		
DIV-14-16	Filed	8/18/2009	Pettigrew		
DIV-14-17	Filed	8/18/2009	Pettigrew		
DIV-14-18	Filed	8/18/2009	Pettigrew		Attachment DIV 14-18
DIV-14-19	Filed	8/18/2009	Pettigrew		Attachment DIV 14-19
DIV-14-20	Filed	8/18/2009	Pettigrew		
DIV-14-21	Filed	8/18/2009	Pettigrew		Attachment DIV 14-21
DIV-14-22	Filed	8/18/2009	Pettigrew		
DIV-14-23	Filed	8/18/2009	Pettigrew		
DIV-14-24	Filed	8/18/2009	Pettigrew		
DIV-14-25	Filed	8/20/2009	Pettigrew		Attachment DIV 14-25
DIV-15-1	Filed	8/11/2009	Gorman		
DIV-15-2	Filed	8/11/2009	Gorman		Attachment DIV 15-2 (1-2)
DIV-15-3	Filed	8/14/2009	Fields		
DIV-15-4	Filed	8/11/2009	O'Brien		
DIV-16-1	Filed	8/11/2009	Fields		Attachment DIV 16-1
DIV-16-2	Filed	8/11/2009	Fields		
DIV-16-3	Filed	8/11/2009	Fields		Attachment DIV 16-3
DIV-16-4	Filed	8/11/2009	Fields		Attachment DIV 16-4
DIV-16-5	Filed	8/11/2009	Fields		
DIV-16-6	Filed	8/11/2009	Fields		
DIV-16-7	Filed	8/11/2009	Fields		
DIV-16-8	Filed	8/11/2009	Fields		
DIV-16-9	Filed	8/11/2009	Fields		Att. DIV 16-9 (1-5) <b>BULK</b>
DIV-16-10	Filed	8/11/2009	Fields		
DIV-16-11	Filed	8/11/2009	Fields		
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					
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Information Request	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
DIV-17-9	Filed	8/20/2009	Dowd		
DIV-17-10	Filed	8/24/2009	O'Brien		
DIV-17-11	Filed	8/24/2009	O'Brien		Attachment DIV 17-11
DIV-17-12	Filed	8/14/2009	Gorman		
DIV-17-13	Filed	8/14/2009	Gorman		
DIV-18-1	Filed	8/11/2009	Gorman		Attachment DIV 18-1
DIV-18-2	Filed	8/14/2009	Gorman		
DIV-18-3	Filed	8/11/2009	Gorman		
DIV-18-4	Filed	8/11/2009	Gorman		
DIV-18-5	Filed	8/14/2009	Pettigrew		
DIV-19-1	Filed	8/21/2009	Teehan		Attachments DIV 19-1 (1-2) <b>BULK</b>
DIV-19-2	Filed	8/21/2009	O'Brien		Attachments DIV 19-1 (1-3) <b>BULK</b>
DIV-20-1	Filed	8/27/2009	Gorman		Attachment DIV 20-1
DIV-20-2	Filed	8/21/2009	Gorman		Attachment DIV 20-2
DIV-20-3	Filed	8/21/2009	Gorman		
DIV-20-4	Filed	8/21/2009	Gorman		
DIV-20-5	Filed	8/27/2009	Gorman		Attachment DIV 20-5
DIV-20-6	Filed	9/1/2009	Gorman		Attachments DIV 20-6 (1-6) <b>BULK</b>
DIV-21-1	Filed	8/24/2009	O'Brien		Attachment DIV 21-1
DIV-21-2	Filed	8/27/2009	O'Brien		Attachment DIV 21-2
DIV-21-3	Filed	8/21/2009	O'Brien		
DIV-21-4	Filed	8/21/2009	Gorman		
DIV-21-4 (Supp.)	Filed	9/1/2009	Gorman		
DIV-21-5	Filed	8/24/2009	O'Brien		
DIV-22-1	Filed	9/1/2009	Pettigrew		
DIV-22-2	Filed	9/1/109	Pettigrew		Attachments DIV 22-2 (1-2)
DIV-22-3	Filed	8/27/2009	O'Brien		Attachments DIV 22-3 (1-3)
DIV-22-4	Filed	9/1/2009	Pettigrew	C-attachment	Attachment DIV 22-4 <b>BULK</b>
DIV-22-5	Filed	9/1/2009	Pettigrew		
DIV-22-6	Filed	8/27/2009	O'Brien		Attachment DIV 22-6
DIV-22-7	Filed	8/27/2009	O'Brien		Attachment DIV 22-7 (a-b)
DIV-23-1(A)	Filed	9/1/2009	O'Brien		
DIV-23-1(B)	Filed	9/1/2009	Gorman		Attachment DIV 23-1(B)
DIV-23-2	Filed	9/1/2009	O'Brien		
DIV-23-3	Filed	9/1/2009	O'Brien		
DIV-23-4	Filed	9/1/2009	Gorman		
DIV-23-5	Filed	9/1/2009	O'Brien		Attachment DIV 23-5
DIV-23-6	Filed	9/1/2009	O'Brien		Attachment DIV 23-6
DIV-24-1	Filed	9/30/2009	Wynter		Attachment DIV 24-1 <b>BULK</b>
DIV-24-2	Filed	9/30/2009	Wynter		
DIV-24-3	Filed	9/10/2009	Wynter		
DIV-24-4	Filed	9/10/2009	Wynter		
DIV-24-5	Filed	9/10/2009	Wynter		
DIV-24-6	Filed	9/10/2009	Wynter		
DIV-24-7	Filed	9/30/2009	Wynter		Attachment DIV 24-7
DIV-25-1	Filed	9/30/2009	Wynter		Attachment DIV 25-1
DIV-26-1	Filed	9/30/2009	Wynter		Attachment DIV 26-1 (excel)
DIV-26-2	Filed	9/30/2009	Wynter		Attachment DIV 26-2
DIV-27-1	Filed	10/23/2009	O'Brien		Attachments DIV 27-1 (1-7) <b>BULK</b>
DIV-27-2	Filed	10/23/2009	O'Brien		Attachments DIV 27-2 (1-3)
DIV-27-3	Filed	10/23/2009	O'Brien		Attachments DIV 27-3
DIV-27-4	Filed	10/23/2009	O'Brien		
DIV-27-5	Filed	10/23/2009	Pettigrew		
DIV-27-6	Filed	10/23/2009	O'Brien		Attachment DIV 27-6
DIV-27-7	Filed	10/23/2009	O'Brien		
DIV-27-8	Filed	10/23/2009	O'Brien		

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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 <b>BULK</b>
DIV-31-10	Filed	10/23/2009	Cannell		Attachment DIV 31-10
DIV-31-11	Filed	10/23/2009	Cannell		Attachment DIV 31-11
DIV-31-12	Filed	10/23/2009	Cannell		
DIV-31-13	Filed	10/23/2009	Moul		
DIV-31-14	Filed	10/23/2009	Moul		
DIV-32-1	Filed	10/30/2009	Tierney		Attachment DIV 32-1 (Excel)

The Narragansett Electric Company d/b/a National Grid					
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<b>Information Request</b>	<b>Status</b>	<b>Date Filed</b>	<b>Witness</b>	<b>CONFIDENTIAL</b>	<b>Attachments</b>
NAVY-1-1	Filed	6/29/2009			
NAVY-1-2	Filed	6/29/2009			
NAVY-1-3	Filed	6/29/2009			
NAVY-1-4	Filed	6/29/2009			
NAVY-2-1	Filed	7/22/2009	Gorman, Wynter, O'Brien		Excel attachments
NAVY-2-2	Filed	7/22/2009	Gorman, O'Brien		Excel attachments
NAVY-3-1	Filed	8/18/2009	Gorman		Attachment NAVY 3-1 (a)
NAVY-3-2	Filed	8/14/2009	Fields/Gorman		
NAVY-3-3	Filed	8/14/2009	Gorman		
NAVY-3-4	Filed	8/14/2009	Gorman		
NAVY-3-5 (a, b & e)	Filed	6/29/2009	Gorman		Attachments NAVY 3-5(b) (1-3)
NAVY-3-5 (c & d)	Filed	6/29/2009	O'Brien		Attachment NAVY 3-5©
NAVY-3-6	Filed	6/29/2009	Gorman		<b>BULK</b>
NAVY-3-7	Filed	6/29/2009	Gorman		Attachments NAVY 3-7 (1-2) Excel
NAVY-3-8	Filed	8/18/2009	Gorman		

<b>The Narragansett Electric Company d/b/a National Grid</b>					
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<b>Discovery Log</b>					
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[C-denotes confidentiality is being sought]					
<b>Information Request</b>	<b>Status</b>	<b>Date Filed</b>	<b>Witness</b>	<b>CONFIDENTIAL</b>	<b>Attachments</b>
GWC-1-1	Filed	8/27/2009	Gorman		
GWC-1-2	Filed	8/27/2009	Gorman		Attachment GWC 1-2
GWC-1-3	Filed	8/27/2009	Gorman		Attachment GWC 1-3
GWC-1-4	Filed	8/27/2009	Gorman		
GWC-1-5	Filed	8/27/2009	Gorman		



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	Record Request	Hearing Date	Status	Date Filed	Witness	CONFIDENTIAL	Attachments
	RR-COMM-1	Nov. 3, 2009	Filed	12/02/09	Dowd		Attachment RR-COMM-1
	RR-COMM-2	Nov. 3, 2009	Filed	12/02/09	Pettigrew		
	RR-COMM-3	Nov. 3, 2009	Filed	12/02/09	Pettigrew		
	RR-COMM-4	Nov. 3, 2009	Filed	12/02/09	Pettigrew		
	RR-COMM-5	Nov. 3, 2009	Pending				
	RR-COMM-6	Nov. 3, 2009	Filed	12/02/09	O'Brien		
	RR-COMM-7	Nov. 3, 2009	Pending				
	RR-COMM-8	Nov. 3, 2009	Filed	12/02/09	Pettigrew		Attachment RR-COMM-8
	RR-COMM-9	Nov. 3, 2009	Filed	12/02/09	Pettigrew		
	RR-COMM-10	Nov. 3, 2009	Filed	12/02/09	Pettigrew		
	RR-COMM-11	Nov. 3, 2009	Filed	12/02/09	Pettigrew		
	RR-COMM-12	Nov. 4, 2009	Filed	12/01/09	Laflamme		Attachments RR-COMM-12
	RR-COMM-13	Nov. 4, 2009	Filed	12/04/09	Tierney		Attachment RR-COMM-13
	RR-COMM-14	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-COMM-15	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-COMM-16	Nov. 4, 2009	Filed	12/04/09	Stout		
	RR-COMM-17	Nov. 5, 2009	Filed Herewith	12/04/09	O'Brien		
	RR-COMM-18	Nov. 5, 2009	Pending				
	RR-COMM-19	Nov. 5, 2009	Pending				
	RR-COMM-20	Nov. 5, 2009	Pending				
	RR-COMM-21	Nov. 5, 2009	Filed Herewith	12/04/09	O'Brien		
	RR-COMM-22	Nov. 5, 2009	Filed Herewith	12/04/09	O'Brien	C-Attachment	Attachment RR-COMM-22
	RR-COMM-23	Nov. 5, 2009	Filed Herewith	12/04/09	O'Brien		
	RR-COMM-24	Nov. 5, 2009	Pending				
	RR-COMM-25	Nov. 5, 2009	Filed Herewith	12/04/09	O'Brien		
	RR-COMM-26	Nov. 5, 2009	Pending				
	RR-COMM-27	Nov. 5, 2009	Pending				
	RR-COMM-28	Nov. 5, 2009	Filed Herewith	12/04/09	Dowd		
	RR-COMM-29	Nov. 5, 2009	Filed Herewith	12/04/09	Dowd		
	RR-COMM-30	Nov. 5, 2009	Filed Herewith	12/04/09	O'Brien		
	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	12/04/09	Tierney		
	RR-DIV-2	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-DIV-3	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-DIV-4	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-DIV-5	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-DIV-6	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-DIV-7	Nov. 4, 2009	Filed	12/04/09	Morrissey		
	RR-DIV-8	Nov. 6, 2009	Pending				
	RR-DIV-9	Nov. 6, 2009	Pending				
	RR-DIV-10	Nov. 6, 2009	Pending				
	RR-DIV-11	Nov. 6, 2009	Pending				
	RR-TEC-RI-1	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-TEC-RI-2	Nov. 4, 2009	Filed	12/04/09	Stout		
	RR-TEC-RI-3	Nov. 4, 2009	Filed	12/04/09	Tierney		
	RR-TEC-RI-4	Nov. 13, 2009	Pending				
	Discovery Log Ends Here: December 4, 2009						

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  
Motion for Protective Treatment**

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of National Grid's<sup>1</sup> Motion for Protective Treatment concerning the Company's response to the Commission's record requests from the November 5, 2009 evidentiary hearing under separate cover in the above-captioned proceeding. Specifically, the Company is requesting confidential treatment of attachment 2 for record request RR-COMM-22 as permitted by Commission Rule 1.2(g) and R.I.G.L. § 38-2-2(4)(i)(B).

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

Very truly yours,



Thomas R. Teehan

Enclosures

cc: Docket 4065 Service List

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

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**RHODE ISLAND PUBLIC UTILITIES COMMISSION**

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

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

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

**I. BACKGROUND**

On Friday, December 4, 2009, the Company filed responses to record requests issued by the Rhode Island Public Utilities Commission (the "Commission") in the above referenced proceeding concerning the Company's application for a change in base rates. In those record requests, the Commission requested disclosure of certain amounts related to the Company's reserve amounts. In response to RR-COMM-22-2 , the Company disclosed those amounts. For the reasons stated below, the Company requests that these reserve amounts be protected from public disclosure.

## **II. LEGAL STANDARD**

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

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

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

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

The Rhode Island Supreme Court has held that the determination as to whether this exemption applies requires the application of a two-pronged test set forth in Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I.2001). The first prong of the test assesses whether the information was provided voluntarily to the governmental agency. Providence Journal, 774 A.2d at 47. If the answer to the first question is affirmative, then the question becomes whether the information is "of a kind

that would customarily not be released to the public by the person from whom it was obtained." Id.

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

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

National Grid seeks protection from public disclosure of the reserve amounts listed in the response to RR-COMM-22-2. The reserve amounts listed in this response are subject to confidential settlement discussions. If this information were disclosed on the public record, both the Company's ability to limit its exposure in legal actions and the privacy interest of individuals or business entities with which the Company may settle would be harmed. Public disclosure of this information would be commercially harmful to National Grid and its customers because potential litigants would gain information regarding the Company's settlement strategies.

Consistent with the standard for confidentiality established under Rhode Island law, the confidential reserve amounts represent information that would customarily not be released to the public. The Company is under no obligation in any other forum to

disclose the information and, as is customary in relation to any type of legal settlement, the Company would not ordinarily release the information in a public forum because of the detrimental impact that such a release would have its business interests and the costs of doing business. In addition, the Company has provided all other information in the response for the public record and to assist in the Commission's evaluation of the Company's proposals in this case. Accordingly, in this case, the need to ensure that the confidential settlement amounts are protected outweighs the general public interest inherent in disclosure of information pending before regulatory agencies.

## **V. CONCLUSION**

The reserve amounts listed in the response to RR-COMM-22-2 are confidential, commercially sensitive and proprietary. Disclosure of this information on the public record would be detrimental to the public interest in that it would negatively affect the Company's bargaining position in future settlement negotiations and the Company's ability to minimize the cost of those services. Accordingly, the Company requests that the Commission protect the settlement amounts submitted in response to RR-COMM-22-2.

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

Respectfully submitted,

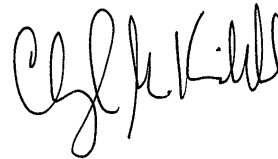
**NATIONAL GRID**

By its attorneys,



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



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

Dated: December 4, 2009

Commission Record Request 17

Request:

Does the rate year revenue requirement include any charges for the customer information system that is no longer used in Rhode Island?

Response:

The test year included approximately \$74,000 in residual costs associated with the customer information system that is no longer in use in Rhode Island. The majority of these costs reflect internal labor and related benefits and payroll taxes associated with final tasks required under Sarbanes Oxley to fully consolidate customer systems, such as removing security groups and e-mail groups, moving source code and archiving data where necessary. As the costs are associated with current National Grid employees, they were appropriately included in the calculation of the rate-year revenue requirement.



Commission Record Request 21

Request:

Referring to the Company's response to Commission Data Request 7-19, how does the rate year O&M costs compare to the historic O&M costs presented in this response?

Response:

The historic O&M costs presented in the response to Commission Data Request 7-19 represent total O&M costs, excluding purchased power. These total O&M costs include costs associated with transmission, energy efficiency and costs to achieve and do not reflect any apportionment of costs to transmission in conjunction with the integrated facilities agreement.

Conversely, the Company's rate year O&M costs are intended to reflect only those costs associated with its distribution revenue requirement, and therefore exclude the previously mentioned items.

Commission Record Request 22

Request:

Please provide a detailed breakdown of the Injuries & Damages rate year expense. In addition, referencing Workpaper NG-RLO-31 for Injuries & Damages, please provide a breakdown of the incidents behind the 2005 through 2008 reserve balances.

Response:

Please see Attachment 1 for a detailed breakdown of the Injuries and Damages rate year expense.

The amounts shown on Workpaper NG-RLO-31 reflect the Company's reserve balances associated with uninsured claims. The offset to changes in reserves is recorded as Injuries and Damages expense. A breakdown of the incidents behind the 2005 through 2008 reserve balances is provided in Attachment 2 to this response. Please note that Attachment 2 contains confidential information, and therefore, the Company is providing Attachment 2 to the Commission and the Division, along with a Motion for Protective Treatment.

**The Narragansett Electric Company  
Injuries and Damages Expenses (FERC 925000)**

Line	Description	Amount	
1	Injuries & Damages Reserve Adjustments	3,205,191	
2	Self-Insured Worker's Compensation	1,268,950	
3	Service Company Costs	964,346	1\
4	Accounts Payable	854,085	
5	Amortization of Prepaid Insurance	432,784	
6	Labor Related Costs	268,685	
7	Other	60,464	
8	Total Test Year Injuries & Damages Expense	<u>7,054,506</u>	
9			
10	Known and Measureable Adjustments	<u>(351,284)</u>	2\
11	Subtotal Test Year Charges	<u>6,703,222</u>	
12			
13	Less Amount Not Subject to Inflation	<u>(584,256)</u>	3\
14	Adjusted Test Year Injuries & Damages Expense Subject to Inflation	<u>6,118,966</u>	
15			
16	Less Amount Applicable to the IFA	4.64% <u>(283,920)</u>	
17	Total Test Year Injuries & Damages Expense Subject to Inflation	<u>5,835,046</u>	
18			
19	Inflation Adjustment for Calendar Year 2009	0.705% <u>41,137</u>	
20	Injuries & Damagess Expense for Calendar Year 2009	<u>5,876,183</u>	
21			
22	Inflation Calculation for Calendar Year 2010	0.251% <u>14,749</u>	
23	Injuries & Damages Expenses for Calendar Year 2010	<u>\$5,890,932</u>	

1\ Includes costs related to uninsured claims reserves, insurance and labor.

2\ Principally reflects the recovery associated with the Integrated Facilites Agreement.

3\ Principally reflects salaries and wages expense.

Commission Record Request 23

Request:

Regarding the funds received associated with the burial of the power line along the Providence waterfront, how are these funds accounted for? Do they earn interest? What is the current balance?

Response:

The funds related to the burial of the power line along the Providence waterfront are accounted for in a regulatory liability on the books of the Company. No interest is earned because these funds offset monies spent on the project by the Company. The current balance in the account is \$6,033,701.

Commission Record Request 25

Request:

Referencing Workpaper NG-RLO-28, Page 3 of 8, relating to capital associated with storms, please identify and describe the three categories of storm expenditures (O&M relating to extraordinary storms, O&M relating to non-extraordinary storms, and capital relating to all storms) and how they relate to one another.

Response:

The three categories of storm expenditures are identified and described below. It is important to note that the Company does not recognize the storm reference terms of “extraordinary storms” and “non-extraordinary storms.” Instead, storms would fall into the category of either a deferrable event, which can be applied against the Company’s approved storm fund, or a non-deferrable event.

1. O&M relating to deferrable storms: Per Docket No. 2930 (originally 2509), a storm qualifies for inclusion in the storm fund if incremental costs associated with that storm exceed an expense threshold, which for calendar year 2009 is \$729,000. The threshold changes annually by the rate of inflation. The Company has a deductible of \$375,000 and therefore is allowed to include in the storm fund incremental storm restoration costs in excess of the deductible once the threshold has been exceeded.
2. O&M relating to non-deferrable storms: As noted above, storm events that exceed the specified expense threshold qualify for the storm fund and are deferrable. Costs associated with storm events that do not exceed that threshold would not be deferrable and would remain in O&M.
3. Capital relating to all storms: Capital costs are incurred by the Company to the extent a storm event (either deferrable or non-deferrable) results in capital items in need of replacement. This would include such things as replacing poles, transformers or wire damaged in the storm. Capital costs are not included in the storm fund.

The categorization of a storm as deferrable or non-deferrable has no bearing on how the Company would initially classify costs as either capital or O&M. Once a storm is determined to be eligible for deferral under the storm fund, a credit is applied to O&M representing incremental storm restoration costs in excess of the deductible once the threshold has been exceeded.

Commission Record Request 28

Request:

In the labor negotiations out of which the union workforce received a 3% wage increase, what concessions did the union make that resulted in financial savings for the Company?

Response:

There were no specific concessions by the union that offset the general wage increase. The general wage increase, as its name suggests, is intended to maintain a competitive base pay structure relative to the market. As is always the case, labor negotiations deal with a large number of items, both economic and non-economic, and agreed upon adjustments are viewed by both parties as a fair and reasonable resolution of the issues both sides brought to the table.

Commission Record Request 29

Request:

Referencing Schedule NG-WFD-10, are summary pages missing from this schedule summarizing the benefit analysis associated with management employees? If so, please provide those pages.

Response:

There are no summary pages to the non-union BENVAl report, Schedule NG-WFD-10. The report was initially reviewed in person with the Towers Perrin representative and the summary conclusions were discussed as part of that meeting. The union BENVAl was delivered by mail, and since there would not be an opportunity to talk through the report upon receipt, a written summary was provided.

Commission Record Request 30

Request:

Comparing the Company's response to Commission Data Request 7-21 and the salaries and wages amounts appearing in Mr. Dowd's testimony for non-union and union employees of approximately \$22 million and \$23 million, respectively, please explain why the two documents do not agree.

Response:

The salaries and wages amounts appearing on pages 10 and 13 of Mr. Dowd's testimony for non-union and union of approximately \$22 million and \$23 million, respectively, reflect only that portion of salaries and wages anticipated to be charged to O&M expense during the rate year. These amounts are derived based on the sum of the rate year O&M wages as shown on NG-RLO-2, pages 5 through 7. Conversely, the amounts appearing in the Company's response to Commission Data Request 7-21 reflect capitalized salaries and wages in addition to salaries and wages charged to O&M.



### Certificate of Service

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

/S/  
Linda Samuelian

December 4, 2009  
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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