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VIA HAND DELIVERY

October 29, 2009

Ms. Luly Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: The Narragansett Electric Company d/b/a National Grid
v. The Town of Hopkinton, et al (Docket Number 4076)

Dear Luly:

Enclosed please find seven (7) copies of National Grid's Responses to the PUC's First Data Requests in the above-referenced matter. I am also sending this filing to you electronically.

Please acknowledge receipt of the enclosed testimony by date and time stamping the enclosed copy and returning it with my messenger to my office. Thank you.

Sincerely,



Peter V. Lacouture

PVL:lgo
Enclosures

cc: Patricia A. Buckley, Esq.
Linda Urso, Town Manager
Thomas R. Teehan, Esq.
Ladawn Toon, Esq.



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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

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THE NARRAGANSETT ELECTRIC
COMPANY d/b/a NATIONAL GRID,
Plaintiff,

v.

THE TOWN OF HOPKINTON, et al
Defendants.

Docket No. 4076

**NATIONAL GRID'S RESPONSE TO THE
PUBLIC UTILITIES COMMISSION'S FIRST SET OF DATA REQUESTS**

PUC DATA REQUEST 1-1:

How is the proposed substation characterized by ISO New England in terms of cost recovery (i.e. PTF, RNS, LNS, etc.)? Please provide underlying detail in answering this question.

RESPONSE:

According to Section II.49.1 of the ISO New England Open Access Tariff: "*The following do not constitute PTF: (a) Those lines and associated facilities which are required to serve local load only. . .*" Since the facilities associated with the Hopkinton Substation are required to serve local load only, they are not considered PTF, and therefore cost recovery would not be under RNS.

Response prepared by or under the supervision of
Mark Stevens, P.E.

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Docket No. 4076

**NATIONAL GRID'S RESPONSE TO THE
PUBLIC UTILITIES COMMISSION'S FIRST SET OF DATA REQUESTS**

PUC DATA REQUEST 1-2:

When was the subject parcel of land purchased?

RESPONSE:

The proposed substation site on Route 3 was purchased in sections. Some of the property was purchased in 1929 but the bulk of the land was purchased in 1968, including an 8 acre tract which includes a portion of the existing right-of-way and the site of the proposed substation.

Response prepared by or under the supervision of
Michael D. DiNezza

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PUC DATA REQUEST 1-3:

At the public hearing in Hopkinton, it was suggested that National Grid owns another 70 acre parcel of land nearby. Is this true? If so, when was the land purchased, and for what purpose?

RESPONSE:

National Grid owns a 72 acre site south of Chase Hill Road which was purchased in 1951. The site was used for a diesel generating station which was constructed in the early 1950's. The diesel generating station operated until the mid-1970's when it was dismantled.

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**NATIONAL GRID'S RESPONSE TO THE
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PUC DATA REQUEST 1-4:

What is the long term plan for transmission facilities in the subject area looking outward 10 to 20 years? Please provide underlying detail relative to load forecasts.

RESPONSE:

The New England transmission planning horizon is ten years. The transmission system is modeled as it would be ten years in the future, using the best available information in terms of load forecast and future generation, demand reduction, and transmission upgrades. From this model the future needs are determined and upgrades are proposed and tested. Some longer term (beyond 10 years) testing is done on the proposed upgrades in order to evaluate the longevity of the upgrades, but usually additional upgrades are not proposed to solve needs that appear beyond the 10 year horizon. The reason for this is that beyond ten years the certainty to which the transmission system can be accurately modeled becomes much less.

At this time National Grid has no long term transmission plans for new or upgraded facilities in the area of the proposed Hopkinton substation.

Response prepared by or under the supervision of
Mark Stevens, P.E.

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**NATIONAL GRID'S RESPONSE TO THE
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PUC DATA REQUEST 1-6:

Was this substation considered as part of the South County transmission upgrades that were recently approved by the EFSB? Please explain.

RESPONSE:

No. The need and geographic location of the South County transmission upgrades which were the subject of National Grid's Southern Rhode Island Transmission Project (EFSB Docket No. 2005-01 and PUC Docket No. 3732) were identified coincident with the need to reinforce the supply to the distribution system in the South County East study area. This substation is located in the South County West study area and was not part of the South County East study.

Response prepared by or under the supervision of
Alan T. LaBarre, P.E.

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**NATIONAL GRID'S RESPONSE TO THE
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PUC DATA REQUEST 1-7:

What standards guide the industry on placement of substations in proximity to homes or public places?

RESPONSE:

Distribution substations are located to serve local need. As such they are located near the load center which generally are population centers. National Grid operates many substations in residential areas. The facilities are designed in accordance with the National Electric Safety Code (NESC) which provides for the safety of the general public as well as utility personnel working within the substation. Other codes and guides which govern the design, construction, and maintenance of the proposed project include the Institute of Electrical and Electronic Engineers (IEEE), the American Society of Civil Engineers (ASCE), the American Concrete Institute (ACI), and the American National Standards Institute (ANSI).

Response prepared by or under the supervision of
Daniel McIntyre, P.E. and Michael Rook, P.E.

The following are some of the substation design features to protect workers and the public:

- Fencing around perimeter of substation. National Grid exceeds NESC standards by installing a taller fence topped with barbed wire.
- Safe separation distances from the perimeter fence to energized equipment.
- Safe clearance distances of energized equipment above the ground.
- Construction using non-flammable material (steel, aluminum, copper, etc.)
- Secondary containment around the transformer unit.
- Grounding of all equipment and fencing and surfacing the substation yard with a layer of crushed stone as a grounding precaution from static currents.
- Lightning protection.

In addition to the safety features designed into a substation, National Grid performs other functions that are intended to promote safety at its facilities. Company crews routinely make visual and operational inspections of its substations to verify that equipment is in proper working condition. The substation equipment is alarmed to notify our Control Center, which is manned 24 hours a day, seven days a week, of any problem. A qualified crew would be dispatched to the substation by the Control Center to investigate an equipment alarm.

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**NATIONAL GRID'S RESPONSE TO THE
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PUC DATA REQUEST 1-8:

Provide more detailed history regarding the Diesel Site, including any available information regarding environmental conditions at the site, potential contamination, formal and/or informal assessments by the company or third parties, and information regarding regulatory compliance issues and the like.

RESPONSE:

As indicated in the response to PUC Data Request 1-3, the Diesel Site was purchased in 1951. A diesel generating station was constructed and operated on the site from the early 1950's until the mid-1970's. The buildings associated with the former facility have been removed. However, some foundations and chain link fences remain on site. National Grid has not conducted, directly or through a third party, an investigation of conditions on the Diesel Site. A locked gate prohibits vehicle access to the Diesel Site by unauthorized individuals. National Grid has responded to illegal dumping of household and/or construction waste on the property. Such waste has been removed from the site and disposed of in accordance with applicable regulations. In addition, the property appears to be used by members of the public to access a make-shift boat launch on the Pawcatuck River. National Grid has not authorized this access. There are no records indicating any regulatory compliance issues related to the site.

Response prepared by or under the supervision of
Amy A. McKinnon

CERTIFICATE OF SERVICE

I hereby certify that a copy of National Grid's Response to the Public Utilities Commission's First Data Requests was delivered to the Service List associated with the Docket via electronic mail this 29th day of October, 2009.

Liza M. DeBlasio
