

August 13, 2012

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4323 - Application for Approval of a Change in Electric and Gas
Base Distribution Rates Pursuant to R.I.G.L. Sections 39-3-10 and 39-3-11
Responses to Navy Data Requests - Set 1 - ELEC**

Dear Ms. Massaro:

Enclosed is an original and ten (10) copies of National Grid's¹ responses to the Navy's First Set of Data Requests in the above-captioned proceeding.

The responses to the First Set included with this filing are listed in the enclosed discovery log.

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 4323 Service List
Leo Wold, Esq.
Steve Scialabba, Division

¹ The Narragansett Electric Company d/b/a National Grid (herein referred to as "National Grid" or the "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/
Janea Dunne

August 13, 2012
Date

National Grid (NGrid) – Request for Change in Electric & Gas Distribution Rates
Docket No. 4323 – Service List updated on 6/22/12

Name/Address	E-mail Distribution	Phone
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	Joanne.scanlon@us.ngrid.com	
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	aramos@haslaw.com	
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	dmacrae@riag.ri.gov	
	Steve.scialabba@ripuc.state.ri.us	
	David.stearns@ripuc.state.ri.us	
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	Larry.r.allen@navy.mil	
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	enicholson@exeterassociates.com	
Bruce Gay Monticello Consulting 4209 Buck Creek Court North Charleston, SC 29420	bruce@monticelloconsulting.com	
Matthew Kahal c/o Exeter Associates 10480 Little Patuxent Parkway Suite 300 Columbia, MD 21044	mkahal@exeterassociates.com	
File original & 11 copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Lmassaro@puc.state.ri.us	401-780-2107
	Anault@puc.state.ri.us	
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	Nucci@puc.state.ri.us	
	Dshah@puc.state.ri.us	
	Sccamara@puc.state.ri.us	

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
DIVISION SET 1						
Division Set 1	Division 1-1-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme	Att. DIV 1-1-ELEC	
Division Set 1	Division 1-2-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme	Att. DIV 1-2-ELEC	
Division Set 1	Division 1-3-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme	Att. DIV 1-3-ELEC	
Division Set 1	Division 1-4-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme	Att. DIV 1-4-ELEC	
Division Set 1	Division 1-5-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme		
Division Set 1	Division 1-6-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-6-ELEC	
Division Set 1	Division 1-7-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-8-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme	Att. DIV 1-8-ELEC	
Division Set 1	Division 1-9-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-9-ELEC	
Division Set 1	Division 1-10-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme		
Division Set 1	Division 1-11-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-11-ELEC	
Division Set 1	Division 1-12-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-13-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-13-ELEC	
Division Set 1	Division 1-14-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-15-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-16-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-17-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-18-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-19-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-20-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme		
Division Set 1	Division 1-21-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-21-ELEC	
Division Set 1	Division 1-22-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-23-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-23-ELEC	
Division Set 1	Division 1-24-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme		
Division Set 1	Division 1-25-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-26-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-27-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-27-ELEC	
Division Set 1	Division 1-28-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
Division Set 1	Division 1-29-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-29-ELEC	
Division Set 1	Division 1-30-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-31-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
DIVISION SET 2						
Division Set 2	Division 2-1-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-1-GAS	
Division Set 2	Division 2-2-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-2-GAS	
Division Set 2	Division 2-3-GAS	5/14/2012	5/25/2012	Michael D. Laflamme		
Division Set 2	Division 2-4-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-4-GAS	
Division Set 2	Division 2-5-GAS	5/14/2012	5/25/2012	Michael D. Laflamme		
Division Set 2	Division 2-6-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-6-GAS	
Division Set 2	Division 2-7-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-7-GAS	
Division Set 2	Division 2-8-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-8-GAS	
Division Set 2	Division 2-9-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-9-GAS	
Division Set 2	Division 2-10-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-11-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-12-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-12-GAS	
Division Set 2	Division 2-13-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-14-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-15-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-16-GAS	5/14/2012	5/29/2012	Michael D. Laflamme	Att. DIV 2-16-1-GAS Att. DIV 2-16-2-GAS Att. DIV 2-16-3-GAS	
Division Set 2	Division 2-17-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-18-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-19-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-20-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-21-GAS	5/14/2012	5/29/2012	Michael D. Laflamme	Att. DIV 2-21-GAS	
Division Set 2	Division 2-22-GAS	5/14/2012	5/29/2012	Michael D. Laflamme	Att. DIV 2-22-GAS	
Division Set 2	Division 2-23-GAS	5/14/2012	5/29/2012	Michael D. Laflamme	Att. DIV 2-23-GAS	
Division Set 2	Division 2-24-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-25-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
DIVISION SET 3						
Division Set 3	Division 3-1-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme	Att. DIV 3-1-ELEC/GAS	
Division Set 3	Division 3-2-ELEC/GAS	5/30/2012	6/13/2012	Michael D. Laflamme	Att. DIV 3-2-ELEC/GAS	
Division Set 3	Division 3-3-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert	Att. DIV 3-3-ELEC/GAS	
Division Set 3	Division 3-4-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert		
Division Set 3	Division 3-5-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert	Att. DIV 3-5-ELEC/GAS	
Division Set 3	Division 3-6-ELEC/GAS	5/30/2012	6/13/2012	Michael D. Laflamme	Att. DIV 3-6-ELEC/GAS (Redacted)	Att. DIV 3-6-ELEC/GAS (Confidential)
Division Set 3	Division 3-7-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme	Att. DIV 3-7-1-ELEC/GAS Att. DIV 3-7-2-ELEC/GAS Att. DIV 3-7-3-ELEC/GAS	
Division Set 3	Division 3-8-ELEC/GAS	5/30/2012	6/12/2012	Legal Department and Robert B. Hevert		
Division Set 3	Division 3-9-ELEC/GAS	5/30/2012	6/11/2012	Mustally Hussain	Att. DIV 3-9-1-ELEC/GAS Att. DIV 3-9-2-ELEC/GAS Att. DIV 3-9-3-ELEC/GAS Att. DIV 3-9-4-ELEC/GAS Att. DIV 3-9-5-ELEC/GAS Att. DIV 3-9-6-ELEC/GAS Att. DIV 3-9-7-ELEC/GAS Att. DIV 3-9-8-ELEC/GAS Att. DIV 3-9-9-ELEC/GAS	
Division Set 3	Division 3-10-ELEC/GAS	5/30/2012	6/11/2012	Mustally Husain	Att. DIV 3-10-ELEC/GAS	
Division Set 3	Division 3-11-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme	Att. DIV 3-11-ELEC/GAS	
Division Set 3	Division 3-12-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme		
Division Set 3	Division 3-13-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme		
Division Set 3	Division 3-14-ELEC/GAS	5/30/2012	6/13/2012	Michael D. Laflamme		
Division Set 3	Division 3-15-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme		
Division Set 3	Division 3-16-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme		
Division Set 3	Division 3-17-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme	Att. DIV 3-17-ELEC/GAS	
Division Set 3	Division 3-18-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert		
Division Set 3	Division 3-19-ELEC	5/30/2012	6/12/2012	Robert B. Hevert		
Division Set 3	Division 3-20-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert		
Division Set 3	Division 3-21-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert		
Division Set 3	Division 3-22-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert	Att. DIV 3-22-ELEC/GAS	
Division Set 3	Division 3-23-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert	Att. DIV 3-23-ELEC/GAS	
Division Set 3	Division 3-24-ELEC/GAS	5/30/2012	6/13/2012	Robert B. Hevert	Att. DIV 3-24-ELEC/GAS	
Division Set 3	Division 3-25-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert	Att. DIV 3-25-ELEC/GAS	
Division Set 3	Division 3-26-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert		
Division Set 3	Division 3-27-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
DIVISION SET 4						
Division Set 4	Division 4-1-GAS	6/7/2012	6/29/2012	Paul M. Normand	See Attached Page	See Attached Page
Division Set 4	Division 4-2-GAS	6/7/2012	6/19/2012	Paul M. Normand		
Division Set 4	Division 4-3-GAS	6/7/2012	6/20/2012	Ann E. Leary		
Division Set 4	Division 4-4-GAS	6/7/2012	6/19/2012	Paul M. Normand		
Division Set 4	Division 4-5-GAS	6/7/2012	6/19/2012	Paul M. Normand		
Division Set 4	Division 4-6-GAS	6/7/2012	6/20/2012	Ann E. Leary		
Division Set 4	Division 4-7-GAS	6/7/2012	6/20/2012	Ann E. Leary		
Division Set 4	Division 4-8-GAS	6/7/2012	6/19/2012	Ann E. Leary	Att. DIV 4-8-1-GAS Att. DIV 4-8-2-GAS Att. DIV 4-8-3-GAS Att. DIV 4-8-4-GAS Att. DIV 4-8-5-GAS	
Division Set 4	Division 4-9-GAS	6/7/2012	6/20/2012	Ann E. Leary		
Division Set 4	Division 4-10-GAS	6/7/2012	6/19/2012	Ann E. Leary	Att. DIV 4-10-GAS	
Division Set 4	Division 4-11-GAS	6/7/2012	6/20/2012	Ann E. Leary		
Division Set 4	Division 4-12-GAS	6/7/2012	6/20/2012	Ann E. Leary	Att. DIV 4-12-GAS	
Division Set 4	Division 4-13-GAS	6/7/2012	6/19/2012	Ann E. Leary and Michael D. Laflamme		
DIVISION SET 5						
Division Set 5	Division 5-1-ELEC	6/8/2012	6/26/2012	Evelyn M. Kaye	Att. DIV 5-1-ELEC	
Division Set 5	Division 5-2-ELEC	6/8/2012	6/29/2012	Evelyn M. Kaye	Att. DIV 5-2-1-ELEC Att. DIV 5-2-2-ELEC Att. DIV 5-2-3-ELEC	
Division Set 5	Division 5-3-ELEC	6/8/2012	6/26/2012	Evelyn M. Kaye	Att. DIV 5-3-1-ELEC Att. DIV 5-3-2-ELEC	
Division Set 5	Division 5-3-ELEC (Corrected)	6/8/2012	7/2/2012	Evelyn M. Kaye		
Division Set 5	Division 5-4-ELEC	6/8/2012	6/22/2012	Evelyn M. Kaye	Att. DIV 5-4-ELEC	
Division Set 5	Division 5-5-ELEC	6/8/2012	6/22/2012	Evelyn M. Kaye	Att. DIV 5-5-1-ELEC Att. DIV 5-5-2-ELEC	
Division Set 5	Division 5-6-ELEC	6/8/2012	6/22/2012	Evelyn M. Kaye	Att. DIV 5-6-1-ELEC Att. DIV 5-6-2-ELEC Att. DIV 5-6-3-ELEC	
Division Set 5	Division 5-7-ELEC	6/8/2012	6/22/2012	Evelyn M. Kaye		
Division Set 5	Division 5-8-ELEC	6/8/2012	6/22/2012	Evelyn M. Kaye		

Division Set 4

Division 4-1-GAS

ATTACHMENT**CONFIDENTIAL
ATTACHMENT**

1-18 Design Winter Sales RATE YEAR Rev 4-2-12.xls

Att DIV 5-12 Meter Cost Detail MAC_B.xls

Attach 1-2B(Test Year PLT ACCUMDEPR Acct) with Rate Year Adj 4-6.xls

Attach 1-17 with Back-up (CY11_Charge_off(W Philibin 02 15 12)).xls

Attach 1-24 (Services Inv Allocator) MAC.xls

Attach 1-26 RATE YEAR (REG ACCNT 903000 CustRecordsColl Exp).xls

Attach 1-27 RATE YEAR (ACCNT 908000 Cust Assistance Exp).xls

Attach 1-29 with backup (6967 RI GAS SALES REPORT DEC11) MAC.xls

Attachment to 1-11 (Rev Proof & Bill Detm)_A.xls

Bill Impact-(2014 Base Rates and ISR for Rate Year template)_H AEL_1.xls

NG RI Design Day Rate Year Rev 3-20-12 (LS).xls

NG RI Gas Rate Design 4-16-12 B PMN - 7.xls

Ngrid No 1-28 (Deposits) (3).docx

RDA & ISR Adj by Rate Class.xls

RI Gas Allocated COS 4-13-12 MAC.xlsx

NGRI-GCOS Rate Year Revised 4-16-12 WITH ISR & RDA Revenues
PRO.xls

(REDACTED)

NGRI-GCOS Rate Year Revised 4-16-12 WITH ISR & RDA Revenues
PRO.xls

(CONFIDENTIAL)

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
Division Set 5	Division 5-9-ELEC	6/8/2012	6/26/2012	Evelyn M. Kaye	Att. DIV 5-9-ELEC	
Division Set 5	Division 5-10-ELEC	6/8/2012	6/26/2012	Evelyn M. Kaye	Att. DIV 5-10-1-ELEC Att. DIV 5-10-2-ELEC	
Division Set 5	Division 5-11-ELEC	6/8/2012	6/26/2012	Evelyn M. Kaye	Att. DIV 5-11-1-ELEC Att. DIV 5-11-2-ELEC Att. DIV 5-11-3-ELEC Att. DIV 5-11-4-ELEC	
Division Set 5	Division 5-12-ELEC	6/8/2012	6/26/2012	Evelyn M. Kaye		
Division Set 5	Division 5-13-ELEC	6/8/2012	6/22/2012	Evelyn M. Kaye		
Division Set 5	Division 5-14-ELEC	6/8/2012	6/22/2012	Evelyn M. Kaye	Att. DIV 5-14-ELEC	
Division Set 5	Division 5-15-ELEC	6/8/2012	6/22/2012	Evelyn M. Kaye	Att. DIV 5-15-ELEC	
Division Set 5	Division 5-16-ELEC	6/8/2012	6/29/2012	Evelyn M. Kaye	Att. DIV 5-16-1-ELEC Att. DIV 5-16-2-ELEC Att. DIV 5-16-3-ELEC Att. DIV 5-16-4-ELEC (REDACTED)	Att. DIV 5-16-2-ELEC Att. DIV 5-16-3-ELEC Att. DIV 5-16-4-ELEC (CONFIDENTIAL)
Division Set 5	Division 5-16-ELEC (Supplemental)	6/8/2012	7/20/2012	Evelyn M. Kaye	Att. DIV 5-16-1-ELEC Att. DIV 5-16-2-ELEC Att. DIV 5-16-3-ELEC Att. DIV 5-16-4-ELEC Supplemental (REDACTED)	Att. DIV 5-16-2-ELEC Att. DIV 5-16-3-ELEC Att. DIV 5-16-4-ELEC Supplemental (CONFIDENTIAL)
DIVISION SET 6						
Division Set 6	Division 6-1-GAS	6/8/2012	7/2/2012	Evelyn M. Kaye	Att. DIV 6-1-GAS	
Division Set 6	Division 6-2-GAS	6/8/2012	7/2/2012	Evelyn M. Kaye	Att. DIV 6-2-1-GAS Att. DIV 6-2-2-GAS	
Division Set 6	Division 6-2(d)-GAS (Supplemental)	6/8/2012	7/20/2012	Evelyn M. Kaye	Att. DIV 6-2(d)-GAS (Supplemental)	
Division Set 6	Division 6-3-GAS	6/8/2012	6/26/2012	Evelyn M. Kaye	Att. DIV 6-3-GAS	
Division Set 6	Division 6-3-GAS (Supplemental)	6/8/2012	7/20/2012	Evelyn M. Kaye	Att. DIV 6-3-GAS (Supplemental)	
Division Set 6	Division 6-4-GAS	6/8/2012	6/26/2012	Evelyn M. Kaye	Att. DIV 6-4-1-GAS Att. DIV 6-4-2-GAS	
Division Set 6	Division 6-5-GAS	6/8/2012	6/26/2012	Evelyn M. Kaye	Att. DIV 6-5-GAS	
Division Set 6	Division 6-6-GAS	6/8/2012	7/2/2012	Evelyn M. Kaye	Att. DIV 6-6-1-GAS Att. DIV 6-6-2-GAS Att. DIV 6-6-3-GAS (REDACTED)	Att. DIV 6-6-2-GAS Att. DIV 6-6-3-GAS (CONFIDENTIAL)
Division Set 6	Division 6-7-GAS	6/8/2012	6/22/2012	Evelyn M. Kaye		
Division Set 6	Division 6-8-GAS	6/8/2012	6/22/2012	Evelyn M. Kaye		
Division Set 6	Division 6-9-GAS	6/8/2012	6/26/2012	Evelyn M. Kaye		
Division Set 6	Division 6-9-GAS (Supplemental)	6/8/2012	7/20/2012	Evelyn M. Kaye	Att. DIV 6-9-GAS (Supplemental)	
Division Set 6	Division 6-10-GAS	6/8/2012	6/26/2012	Evelyn M. Kaye	Att. DIV 6-10-1-GAS Att. DIV 6-10-2-GAS	
Division Set 6	Division 6-11-GAS	6/8/2012	6/26/2012	Evelyn M. Kaye		
Division Set 6	Division 6-12-GAS	6/8/2012	6/26/2012	Evelyn M. Kaye		
Division Set 6	Division 6-13-GAS	6/8/2012	6/22/2012	Evelyn M. Kaye		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
Division Set 6	Division 6-14-GAS	6/8/2012	6/26/2012	Evelyn M. Kaye	Att. DIV 6-14-GAS	
Division Set 6	Division 6-15-GAS	6/8/2012	6/26/2012	Evelyn M. Kaye	Att. DIV 6-15-1-GAS Att. DIV 6-15-2-GAS Att. DIV 6-15-3-GAS	
Division Set 6	Division 6-16-GAS	6/8/2012	7/2/2012	Evelyn M. Kaye	Att. DIV 6-16-1-GAS Att. DIV 6-16-2-GAS Att. DIV 6-16-3-GAS Att. DIV 6-16-4-GAS Att. DIV 6-16-5-GAS (REDACTED)	Att. DIV 6-16-1-GAS Att. DIV 6-16-2-GAS Att. DIV 6-16-3-GAS Att. DIV 6-16-4-GAS Att. DIV 6-16-5-GAS (CONFIDENTIAL)
Division Set 6	Division 6-16-GAS (Supplemental)	6/8/2012	7/23/2012	Evelyn M. Kaye	Att. DIV 6-16-1-GAS Att. DIV 6-16-2-GAS Att. DIV 6-16-3-GAS Att. DIV 6-16-4-GAS Att. DIV 6-16-5-GAS Att. DIV 6-16-6-GAS Att. DIV 6-16-7-GAS Supplemental (REDACTED)	Att. DIV 6-16-1-GAS Att. DIV 6-16-2-GAS Att. DIV 6-16-3-GAS Att. DIV 6-16-4-GAS Att. DIV 6-16-5-GAS Att. DIV 6-16-6-GAS Supplemental (CONFIDENTIAL)
Division Set 6	Attachment Division 6-16-4-GAS (Supplemental) (Corrected)	6/8/2012	8/7/2012	Evelyn M. Kaye		Att. DIV 6-16-4-GAS (CONFIDENTIAL)
DIVISION SET 7						
Division Set 7	Division 7-1-GAS	6/12/2012	7/5/2012	Evelyn M. Kaye	Att. DIV 7-1-GAS	
Division Set 7	Division 7-2-ELEC	6/12/2012	7/5/2012	Evelyn M. Kaye	Att. DIV 7-2-GAS	
Division Set 7	Division 7-3-ELEC/GAS	6/12/2012	7/5/2012	Evelyn M. Kaye	Att. DIV 7-3-1-ELEC/GAS Att. DIV 7-3-2-ELEC/GAS Att. DIV 7-3-3-ELEC/GAS	
Division Set 7	Division 7-4-ELEC/GAS	6/12/2012	7/5/2012	Evelyn M. Kaye		
Division Set 7	Division 7-5-ELEC/GAS	6/12/2012	6/28/2012	Evelyn M. Kaye	Att. DIV 7-5-ELEC/GAS	
Division Set 7	Division 7-6-ELEC	6/12/2012	6/25/2012	Evelyn M. Kaye		
Division Set 7	Division 7-7-GAS	6/12/2012	6/25/2012	Evelyn M. Kaye		
Division Set 7	Division 7-8-ELEC/GAS	6/12/2012	6/28/2012	Evelyn M. Kaye		
DIVISION SET 8						
Division Set 8	Division 8-1-ELEC	6/14/2012	6/25/2012	Michael D. Laflamme	Att. DIV 8-1-ELEC	
Division Set 8	Division 8-2-ELEC	6/14/2012	6/25/2012	Michael D. Laflamme	Att. DIV 8-2-ELEC	
Division Set 8	Division 8-3-ELEC	6/14/2012	7/3/2012	Michael D. Laflamme	Att. DIV 8-3-ELEC	
Division Set 8	Division 8-4-ELEC	6/14/2012	6/25/2012	Michael D. Laflamme		
Division Set 8	Division 8-5-ELEC	6/14/2012	7/5/2012	Michael D. Laflamme	Att. DIV 8-5-ELEC	
Division Set 8	Division 8-6-ELEC	6/14/2012	7/6/2012	Michael D. Laflamme	Att. DIV 8-6-ELEC	
Division Set 8	Division 8-7-ELEC	6/14/2012	7/12/2012	Maureen P. Heaphy	Att. DIV 8-7-ELEC	
Division Set 8	Division 8-8-ELEC	6/14/2012	6/25/2012	Michael D. Laflamme		
Division Set 8	Division 8-9-ELEC	6/14/2012	6/27/2012	Michael D. Laflamme		
Division Set 8	Division 8-10-ELEC	6/14/2012	6/25/2012	Michael D. Laflamme		
Division Set 8	Division 8-11-ELEC	6/14/2012	6/27/2012	Michael D. Laflamme		
Division Set 8	Division 8-12-ELEC	6/14/2012	6/27/2012	Michael D. Laflamme		
Division Set 8	Division 8-13-ELEC	6/14/2012	7/6/2012	Michael D. Laflamme		
Division Set 8	Division 8-14-ELEC	6/14/2012	6/27/2012	Michael D. Laflamme		
Division Set 8	Division 8-15-ELEC	6/14/2012	6/27/2012	Michael D. Laflamme	Att. DIV 8-15-1-ELEC Att. DIV 8-15-2-ELEC	

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Division Set 8	Division 8-16-ELEC	6/14/2012	6/27/2012	Michael D. Laflamme	Att. DIV 8-16-ELEC	
DIVISION SET 9						
Division Set 9	Division 9-1-GAS	6/14/2012	7/2/2012	Michael D. Laflamme		
Division Set 9	Division 9-2-GAS	6/14/2012	7/2/2012	Michael D. Laflamme	Att. DIV 9-2-GAS	
Division Set 9	Division 9-3-GAS	6/14/2012	6/27/2012	Michael D. Laflamme		
Division Set 9	Division 9-4-GAS	6/14/2012	6/27/2012	Michael D. Laflamme & Susan L. Fleck		
Division Set 9	Division 9-5-GAS	6/14/2012	6/27/2012	A. Leo Silvestrini		
Division Set 9	Division 9-6-GAS	6/14/2012	6/27/2012	A. Leo Silvestrini	Att. DIV 9-6-GAS	
Division Set 9	Division 9-7-GAS	6/14/2012	6/27/2012	A. Leo Silvestrini		
Division Set 9	Division 9-8-GAS	6/14/2012	6/27/2012	A. Leo Silvestrini	Att. DIV 9-8-GAS	
Division Set 9	Division 9-9-GAS	6/14/2012	6/27/2012	A. Leo Silvestrini		
DIVISION SET 10						
Division Set 10	Division 10-1-ELEC	6/22/2012	7/3/2012	Howard S. Gorman	Att. DIV 10-1-1-ELEC Att. DIV 10-1-2-ELEC	
Division Set 10	Division 10-2-ELEC	6/22/2012	7/3/2012	Jeanne A. Lloyd	Att. DIV 10-2-1-ELEC Att. DIV 10-2-2-ELEC Att. DIV 10-2-3-ELEC Att. DIV 10-2-4-ELEC Att. DIV 10-2-5(1)-ELEC to Att. DIV 10-2-5(11)-ELEC Att. DIV 10-2-3-ELEC Att. DIV 10-2-4-ELEC Att. DIV 10-2-5-ELEC Att. DIV 10-2-6-ELEC Att. DIV 10-2-7-ELEC Att. DIV 10-2-8-ELEC Att. DIV 10-2-9-ELEC	
Division Set 10	Division 10-3-ELEC	6/22/2012	7/5/2012	Evelyn M. Kaye	Att. DIV 10-3-1-ELEC Att. DIV 10-3-2-ELEC	
Division Set 10	Division 10-4-ELEC	6/22/2012	7/3/2012	Alfred P. Morrissey	Att. DIV 10-4-ELEC	
Division Set 10	Division 10-5-ELEC	6/22/2012	7/5/2012	Howard S. Gorman	Att. DIV 10-5-ELEC	
Division Set 10	Division 10-6-ELEC	6/22/2012	6/28/2012	Howard S. Gorman		
Division Set 10	Division 10-7-ELEC	6/22/2012	6/28/2012	Howard S. Gorman	Att. DIV 10-7-ELEC	
Division Set 10	Division 10-8-ELEC	6/22/2012	6/28/2012	Howard S. Gorman		

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DIVISION SET 11						
Division Set 11	Division 11-1-ELEC/GAS	6/25/2012	7/13/2012	Michael D. Laflamme	Att. DIV 11-1-1-ELEC/GAS Att. DIV 11-1-2-ELEC/GAS	
Division Set 11	Division 11-2-ELEC/GAS	6/25/2012	7/6/2012	Maureen P. Heaphy		
Division Set 11	Division 11-3-ELEC/GAS	6/25/2012	7/6/2012	Maureen P. Heaphy		
Division Set 11	Division 11-4-ELEC/GAS	6/25/2012	7/13/2012	Michael D. Laflamme	Att. DIV 11-4-ELEC/GAS	
Division Set 11	Division 11-5-ELEC/GAS	6/25/2012	7/10/2012	Michael D. Laflamme		
Division Set 11	Division 11-6-ELEC/GAS	6/25/2012	7/13/2012	Michael D. Laflamme	Att. DIV 11-6-1-ELEC/GAS Att. DIV 11-6-2-ELEC/GAS	
Division Set 11	Division 11-7-ELEC/GAS	6/25/2012	7/13/2012	Michael D. Laflamme	Att. DIV 11-7-ELEC/GAS	
Division Set 11	Division 11-8-ELEC/GAS	6/25/2012	7/13/2012	Michael D. Laflamme	Att. DIV 11-8-1-ELEC/GAS Att. DIV 11-8-2-ELEC/GAS Att. DIV 11-8-3-ELEC/GAS Att. DIV 11-8-4-ELEC/GAS Att. DIV 11-8-5-ELEC/GAS	
Division Set 11	Division 11-9-ELEC/GAS	6/25/2012	7/12/2012	Michael D. Laflamme	Att. DIV 11-9-ELEC/GAS	
Division Set 11	Division 11-10-ELEC/GAS	6/25/2012	7/12/2012	Michael D. Laflamme		
Division Set 11	Division 11-11-ELEC/GAS	6/25/2012	7/10/2012	Michael D. Laflamme	Att. DIV 11-11-ELEC/GAS	
Division Set 11	Division 11-12-ELEC/GAS	6/25/2012	7/6/2012	Michael D. Laflamme	Att. DIV 11-12-ELEC/GAS	
Division Set 11	Division 11-13-ELEC/GAS	6/25/2012	7/6/2012	Michael D. Laflamme		
Division Set 11	Division 11-14-ELEC/GAS	6/25/2012	7/12/2012	Michael D. Laflamme	Att. DIV 11-14-ELEC/GAS	
Division Set 11	Division 11-15-ELEC/GAS	6/25/2012	7/6/2012	Michael D. Laflamme		
Division Set 11	Division 11-16-ELEC/GAS	6/25/2012	7/10/2012	Michael D. Laflamme		
Division Set 11	Division 11-17-ELEC/GAS	6/25/2012	7/13/2012	Michael D. Laflamme		
Division Set 11	Division 11-18-ELEC/GAS	6/25/2012	7/12/2012	Michael D. Laflamme	Att. DIV 11-18-ELEC/GAS	
Division Set 11	Division 11-19-ELEC/GAS	6/25/2012	7/13/2012	Michael D. Laflamme	Att. DIV 11-19-ELEC/GAS	
Division Set 11	Division 11-20-ELEC/GAS	6/25/2012	7/12/2012	Michael D. Laflamme	Att. DIV 11-20-ELEC/GAS	
Division Set 11	Division 11-21-ELEC/GAS	6/25/2012	7/13/2012	Michael D. Laflamme		
Division Set 11	Division 11-22-ELEC/GAS	6/25/2012	7/6/2012	Michael D. Laflamme		
Division Set 11	Division 11-23-ELEC/GAS	6/25/2012	7/6/2012	Michael D. Laflamme		
Division Set 11	Division 11-24-ELEC/GAS	6/25/2012	7/6/2012	Michael D. Laflamme		
Division Set 11	Division 11-25-ELEC/GAS	6/25/2012	7/6/2012	Michael D. Laflamme		
Division Set 11	Division 11-26-ELEC/GAS	6/25/2012	7/6/2012	Michael D. Laflamme		

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DIVISION SET 12						
Division Set 12	Division 12-1-GAS	6/28/2012	7/10/2012	A. Leo Silvestrini	Att. DIV 12-1-GAS	
Division Set 12	Division 12-2-GAS	6/28/2012	7/6/2012	A. Leo Silvestrini	Att. DIV 12-2-GAS	
Division Set 12	Division 12-3-GAS	6/28/2012	7/10/2012	A. Leo Silvestrini	Att. DIV 12-3-1-GAS Att. DIV 12-3-2-GAS	
Division Set 12	Division 12-4-GAS	6/28/2012	7/10/2012	A. Leo Silvestrini		
Division Set 12	Division 12-5-GAS	6/28/2012	7/10/2012	A. Leo Silvestrini		
Division Set 12	Division 12-6-GAS	6/28/2012	7/6/2012	A. Leo Silvestrini		
Division Set 12	Division 12-7-GAS	6/28/2012	7/10/2012	A. Leo Silvestrini		
Division Set 12	Division 12-8-GAS	6/28/2012	7/6/2012	A. Leo Silvestrini	Att. DIV 12-8-GAS	
Division Set 12	Division 12-9-GAS	6/28/2012	7/10/2012	A. Leo Silvestrini		
Division Set 12	Division 12-10-GAS	6/28/2012	7/10/2012	A. Leo Silvestrini	Att. DIV 12-10-1-GAS Att. DIV 12-10-2-GAS Att. DIV 12-10-3-GAS	
Division Set 12	Division 12-11-GAS	6/28/2012	7/6/2012	A. Leo Silvestrini		
Division Set 12	Division 12-12-GAS	6/28/2012	7/10/2012	A. Leo Silvestrini		
Division Set 12	Division 12-13-GAS	6/28/2012	7/13/2012	A. Leo Silvestrini	Att. DIV 12-13-GAS	
Division Set 12	Division 12-14-GAS	6/28/2012	7/6/2012	A. Leo Silvestrini		
Division Set 12	Division 12-15-GAS	6/28/2012	7/6/2012	A. Leo Silvestrini		
Division Set 12	Division 12-16-GAS	6/28/2012	7/10/2012	A. Leo Silvestrini		
Division Set 12	Division 12-17-GAS	6/28/2012	7/10/2012	A. Leo Silvestrini	Att. DIV 12-17-GAS	
Division Set 12	Division 12-18-GAS	6/28/2012	7/13/2012	A. Leo Silvestrini	Att. DIV 12-18-GAS	
Division Set 12	Division 12-19-GAS	6/28/2012	7/13/2012	A. Leo Silvestrini		
Division Set 12	Division 12-20-GAS	6/28/2012	7/10/2012	A. Leo Silvestrini		
Division Set 12	Division 12-21-GAS	6/28/2012	7/10/2012	A. Leo Silvestrini		
Division Set 12	Division 12-22-GAS	6/28/2012	7/6/2012	A. Leo Silvestrini		
Division Set 12	Division 12-23-GAS	6/28/2012	7/6/2012	A. Leo Silvestrini	Att. DIV 12-23-1-GAS Att. DIV 12-23-2-GAS	
Division Set 12	Division 12-24-GAS	6/28/2012	7/13/2012	A. Leo Silvestrini	Att. DIV 12-24-1-GAS Att. DIV 12-24-2-GAS Att. DIV 12-24-3-GAS	
Division Set 12	Division 12-25-GAS	6/28/2012	7/13/2012	A. Leo Silvestrini		
Division Set 12	Division 12-26-GAS	6/28/2012	7/13/2012	A. Leo Silvestrini		
Division Set 12	Division 12-27-GAS	6/28/2012	7/13/2012	Ann E. Leary	Att. DIV 12-27-GAS	
Division Set 12	Division 12-28-GAS	6/28/2012	7/13/2012	Ann E. Leary	Att. DIV 12-28-GAS	
Division Set 12	Division 12-29-GAS	6/28/2012	7/10/2012	Ann E. Leary		
Division Set 12	Division 12-30-GAS	6/28/2012	7/10/2012	Ann E. Leary		

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DIVISION SET 13						
Division Set 13	Division 13-1-GAS	7/11/2012	7/23/2012	Paul M. Normand		
Division Set 13	Division 13-2-GAS	7/11/2012	7/24/2012	Paul M. Normand	Att. DIV 13-2-1-GAS Att. DIV 13-2-2-GAS Att. DIV 13-2-3-GAS Att. DIV 13-2-4-GAS Att. DIV 13-2-5-GAS Att. DIV 13-2-6-GAS Att. DIV 13-2-7-GAS	
Division Set 13	Division 13-3-GAS	7/11/2012	7/23/2012	Paul M. Normand		
Division Set 13	Division 13-4-GAS	7/11/2012	7/23/2012	Ann E. Leary	Att. DIV 13-4-GAS	
Division Set 13	Division 13-5-GAS	7/11/2012	7/23/2012	Paul M. Normand		
Division Set 13	Division 13-6-GAS	7/11/2012	7/23/2012	Ann E. Leary		
Division Set 13	Division 13-7-GAS	7/11/2012	7/23/2012	Ann E. Leary		
Division Set 13	Division 13-8-GAS	7/11/2012	7/16/2012	A. Leo Silvestrini		
Division Set 13	Division 13-9-GAS	7/11/2012	7/17/2012	A. Leo Silvestrini		
Division Set 13	Division 13-10-GAS	7/11/2012	7/17/2012	A. Leo Silvestrini		
Division Set 13	Division 13-11-GAS	7/11/2012	7/17/2012	A. Leo Silvestrini		
Division Set 13	Division 13-12-GAS	7/11/2012	7/17/2012	A. Leo Silvestrini		
Division Set 13	Division 13-13-GAS	7/11/2012	7/17/2012	A. Leo Silvestrini		
DIVISION SET 14						
Division Set 14	Division 14-1-GAS	7/11/2012	7/23/2012	Evelyn M. Kaye		
Division Set 14	Division 14-2-GAS	7/11/2012	7/23/2012	Evelyn M. Kaye		
Division Set 14	Division 14-3-GAS	7/11/2012	7/23/2012	Evelyn M. Kaye		
Division Set 14	Division 14-4-GAS	7/11/2012	7/23/2012	Evelyn M. Kaye		
Division Set 14	Division 14-5-GAS (Redacted)	7/11/2012	7/24/2012	Evelyn M. Kaye		
Division Set 14	Division 14-5-GAS (Confidential)	7/11/2012	7/24/2012	Evelyn M. Kaye		
Division Set 14	Division 14-6-GAS	7/11/2012	7/23/2012	Evelyn M. Kaye		
Division Set 14	Division 14-7-GAS	7/11/2012	7/23/2012	Evelyn M. Kaye		
Division Set 14	Division 14-8-GAS	7/11/2012	7/23/2012	Evelyn M. Kaye		
Division Set 14	Division 14-9-GAS	7/11/2012	7/23/2012	Evelyn M. Kaye		
Division Set 14	Division 14-10-GAS	7/11/2012	7/23/2012	Evelyn M. Kaye		
Division Set 14	Division 14-11-GAS	7/11/2012	7/23/2012	Evelyn M. Kaye		
Division Set 14	Division 14-12-GAS (Redacted)	7/11/2012	7/24/2012	Evelyn M. Kaye	Att. DIV 14-12-GAS	
Division Set 14	Division 14-12-GAS (Confidential)	7/11/2012	7/24/2012	Evelyn M. Kaye		
Division Set 14	Division 14-13-GAS (Redacted)	7/11/2012	7/24/2012	Evelyn M. Kaye		
Division Set 14	Division 14-13-GAS (Confidential)	7/11/2012	7/24/2012	Evelyn M. Kaye		

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DIVISION SET 15						
Division Set 15	Division 15-1-ELEC	7/17/2012	7/26/2012	Michael D. Laflamme	Att. DIV 15-1-ELEC	
Division Set 15	Division 15-2-ELEC	7/17/2012	7/26/2012	Michael D. Laflamme		
Division Set 15	Division 15-3-ELEC	7/17/2012	7/24/2012	Michael D. Laflamme	Att. DIV 15-13-ELEC	
Division Set 15	Division 15-4-ELEC	7/17/2012	7/24/2012	Michael D. Laflamme		
Division Set 15	Division 15-5-ELEC	7/17/2012	7/24/2012	Michael D. Laflamme		
Division Set 15	Division 15-6-ELEC	7/17/2012	7/24/2012	Michael D. Laflamme		
Division Set 15	Division 15-7-ELEC	7/17/2012	7/24/2012	Michael D. Laflamme		
Division Set 15	Division 15-8-ELEC	7/17/2012	7/24/2012	Michael D. Laflamme		
Division Set 15	Division 15-9-ELEC	7/17/2012	7/26/2012	Michael D. Laflamme		
Division Set 15	Division 15-10-ELEC	7/17/2012	7/26/2012	Michael D. Laflamme		
Division Set 15	Division 15-11-ELEC	7/17/2012	7/24/2012	Michael D. Laflamme		
Division Set 15	Division 15-12-ELEC	7/17/2012	8/7/2012	Maureen P. Heaphy & Michael D. Laflamme	Att. DIV 15-12-ELEC	
Division Set 15	Division 15-13-ELEC	7/17/2012	7/24/2012	Michael D. Laflamme	Att. DIV 15-13-ELEC	
Division Set 15	Division 15-14-ELEC	7/17/2012	7/26/2012	Michael D. Laflamme		
Division Set 15	Division 15-15-ELEC	7/17/2012	7/26/2012	Michael D. Laflamme	Att. DIV 15-15-ELEC	
DIVISION SET 16						
Division Set 16	Division 16-1-GAS	7/17/2012	7/26/2012	Michael D. Laflamme	Att. DIV 16-1-GAS	
Division Set 16	Division 16-2-GAS	7/17/2012	7/26/2012	Michael D. Laflamme	Att. DIV 16-2-GAS	
Division Set 16	Division 16-3-GAS	7/17/2012	7/26/2012	Michael D. Laflamme		
Division Set 16	Division 16-4-GAS	7/17/2012	7/31/2012	Ann E. Leary	Att. DIV 16-4-GAS	
Division Set 16	Division 16-5-GAS	7/17/2012	7/24/2012	A. Leo Silvestrini	Att. DIV 16-5-GAS	
DIVISION SET 17						
Division Set 17	Division 17-1-ELEC	7/17/2012	7/27/2012	Howard S. Gorman		
Division Set 17	Division 17-2-ELEC	7/17/2012	7/30/2012	Alfred P. Morrissey and Jeanne A. Lloyd	Att. DIV 17-2-1-ELEC Att. DIV 17-2-2-ELEC Att. DIV 17-2-3-ELEC Att. DIV 17-2-4-ELEC	
Division Set 17	Division 17-3-ELEC	7/17/2012	7/26/2012	Howard S. Gorman		
Division Set 17	Division 17-4-ELEC	7/17/2012	7/30/2012	Jeanne A. Lloyd	Att. DIV 17-4-ELEC	
Division Set 17	Division 17-5-ELEC	7/17/2012	7/26/2012	Jeanne A. Lloyd		
DIVISION SET 18						
Division Set 18	Division 18-1-ELEC	7/20/2012	7/26/2012	Evelyn M. Kaye	Att. DIV 18-1-ELEC	
Division Set 18	Division 18-2-ELEC	7/20/2012	7/26/2012	Evelyn M. Kaye		
Division Set 18	Division 18-3-ELEC	7/20/2012	7/27/2012	Evelyn M. Kaye		
Division Set 18	Division 18-4-ELEC	7/20/2012	8/2/2012	Evelyn M. Kaye	Att. DIV 18-4-1-ELEC Att. DIV 18-4-2-ELEC Att. DIV 18-4-3-ELEC Att. DIV 18-4-4-ELEC Att. DIV 18-4-5-ELEC	
Division Set 18	Division 18-5-ELEC	7/20/2012	7/30/2012	Evelyn M. Kaye		
Division Set 18	Division 18-6-ELEC	7/20/2012	8/2/2012	Evelyn M. Kaye	Att. DIV 18-6-1-ELEC Att. DIV 18-6-2-ELEC Att. DIV 18-6-3-ELEC Att. DIV 18-6-4-ELEC	

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DIVISION SET 19						
Division Set 19	Division 19-1-ELEC/GAS	7/25/2012	8/8/2012	Michael D. Laflamme	Att. DIV 19-1-ELEC/GAS	
Division Set 19	Division 19-2-ELEC/GAS	7/25/2012	8/2/2012	Michael D. Laflamme		
Division Set 19	Division 19-3-ELEC/GAS	7/25/2012	8/2/2012	Michael D. Laflamme		
Division Set 19	Division 19-4-ELEC/GAS	7/25/2012	8/2/2012	Michael D. Laflamme		
Division Set 19	Division 19-5-ELEC/GAS	7/25/2012	8/2/2012	Michael D. Laflamme		
Division Set 19	Division 19-6-ELEC/GAS	7/25/2012	8/8/2012	Michael D. Laflamme	Att. DIV 19-6-ELEC/GAS	
Division Set 19	Division 19-7-ELEC/GAS	7/25/2012	7/30/2012	Maureen P. Heaphy	Att. DIV 19-7-ELEC/GAS	
Division Set 19	Division 19-8-ELEC/GAS	7/25/2012	7/30/2012	Maureen P. Heaphy		
Division Set 19	Division 19-9-ELEC/GAS	7/25/2012	8/8/2012	Michael D. Laflamme	Att. DIV 19-9-ELEC/GAS	
DIVISION SET 20						
Division Set 20	Division 20-1-ELEC	7/27/2012	8/9/2012	Evelyn M. Kaye	Att. DIV 20-1-1-ELEC Att. DIV 20-1-2-ELEC Att. DIV 20-1-3-ELEC (Redacted)	Att. DIV 20-1-1-ELEC Att. DIV 20-1-2-ELEC Att. DIV 20-1-3-ELEC (Confidential)
Division Set 20	Division 20-2-ELEC (Redacted)	7/27/2012	8/9/2012	Evelyn M. Kaye		
Division Set 20	Division 20-2-ELEC (Confidential)	7/27/2012	8/9/2012	Evelyn M. Kaye		
Division Set 20	Division 20-3-ELEC	7/27/2012	8/9/2012	Evelyn M. Kaye		
DIVISION SET 21						
Division Set 21	Division 21-1-ELEC	8/1/2012	8/7/2012	Howard S. Gorman		
Division Set 21	Division 21-2-ELEC	8/1/2012	8/10/2012	Jeanne A. Lloyd		
Division Set 21	Division 21-3-ELEC	8/1/2012	8/10/2012	Jeanne A. Lloyd		
Division Set 21	Division 21-4-ELEC	8/1/2012	8/10/2012	Howard S. Gorman		
Division Set 21	Division 21-5-ELEC	8/1/2012	8/10/2012	Howard S. Gorman		
Division Set 21	Division 21-6-ELEC	8/1/2012	8/10/2012	Howard S. Gorman		
DIVISION SET 22						
Division Set 22	Division 22-1-GAS	8/3/2012				
Division Set 22	Division 22-2-GAS	8/3/2012	8/13/2012	Evelyn M. Kaye	Att. DIV 22-2-1-GAS Att. DIV 22-2-2-GAS	
Division Set 22	Division 22-3-GAS	8/3/2012	8/7/2012	Evelyn M. Kaye		
Division Set 22	Division 22-4-ELEC	8/3/2012				
Division Set 22	Division 22-5-GAS	8/3/2012				
Division Set 22	Division 22-6-GAS	8/3/2012				
Division Set 22	Division 22-7-GAS	8/3/2012				
DIVISION SET 23						
Division Set 23	Division 23-1-ELEC/GAS	8/7/2012	8/13/2012	Michael D. Laflamme		
Division Set 23	Division 23-2-ELEC/GAS	8/7/2012				
Division Set 23	Division 23-3-ELEC/GAS	8/7/2012				
Division Set 23	Division 23-4-ELEC/GAS	8/7/2012				
Division Set 23	Division 23-5-ELEC/GAS	8/7/2012				
Division Set 23	Division 23-6-ELEC/GAS	8/7/2012				
Division Set 23	Division 23-7-ELEC/GAS	8/7/2012				
Division Set 23	Division 23-8-ELEC/GAS	8/7/2012				
Division Set 23	Division 23-9-ELEC/GAS	8/7/2012				

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
COMMISSION SET 1						
Commission Set 1	Commission 1-1-ELEC/GAS	5/24/2012	6/6/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-2-ELEC/GAS	5/24/2012	6/7/2012	Maureen P. Heaphy		
Commission Set 1	Commission 1-3-ELEC/GAS	5/24/2012	6/7/2012	Michael D. Laflamme	Att. COMM 1-3-1-ELEC/GAS Att. COMM 1-3-2-ELEC/GAS	
Commission Set 1	Commission 1-4-ELEC/GAS	5/24/2012	6/7/2012	Timothy D. Horan		
Commission Set 1	Commission 1-5-ELEC/GAS	5/24/2012	6/6/2012	Maureen P. Heaphy		
Commission Set 1	Commission 1-6-ELEC	5/24/2012	6/7/2012	Stephen F. Doucette and Maureen P. Heaphy		
Commission Set 1	Commission 1-7-ELEC	5/24/2012	6/7/2012	Stephen F. Doucette and Maureen P. Heaphy		
Commission Set 1	Commission 1-8-ELEC	5/24/2012	6/6/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-9-ELEC	5/24/2012	6/7/2012	Stephen F. Doucette and Maureen P. Heaphy		
Commission Set 1	Commission 1-10-ELEC	5/24/2012	6/6/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-11-ELEC	5/24/2012	6/6/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-12-ELEC	5/24/2012	6/6/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-13-ELEC/GAS	5/24/2012	6/4/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-14-ELEC/GAS	5/24/2012	6/4/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-15-ELEC/GAS	5/24/2012	6/6/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-16-ELEC/GAS	5/24/2012	6/4/2012	Evelyn M. Kaye and Michael D. Laflamme		
Commission Set 1	Commission 1-17-ELEC/GAS	5/24/2012	6/4/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-18-ELEC/GAS	5/24/2012	6/4/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-19-ELEC/GAS	5/24/2012	6/4/2012	Evelyn M. Kaye	Att. COMM 1-19-ELEC/GAS	
Commission Set 1	Commission 1-20-ELEC	5/24/2012	6/6/2012	Michael R. Hrycin	Att. COMM 1-20-1-ELEC Att. COMM 1-20-2-ELEC	
Commission Set 1	Commission 1-21-ELEC	5/24/2012	6/6/2012	Michael R. Hrycin	Att. COMM 1-21-ELEC	
Commission Set 1	Commission 1-22-ELEC	5/24/2012	6/6/2012	Michael R. Hrycin	Att. COMM 1-22-ELEC	
Commission Set 1	Commission 1-23-ELEC	5/24/2012	6/7/2012	Michael R. Hrycin		
Commission Set 1	Commission 1-24-ELEC	5/24/2012	6/7/2012	Michael R. Hrycin		
Commission Set 1	Commission 1-25-ELEC	5/24/2012	6/6/2012	Michael R. Hrycin		
Commission Set 1	Commission 1-26-ELEC	5/24/2012	6/6/2012	Michael R. Hrycin		
Commission Set 1	Commission 1-27-GAS	5/24/2012	6/6/2012	Jeffrey P. Martin		
Commission Set 1	Commission 1-28-GAS	5/24/2012	6/6/2012	Jeffrey P. Martin		
Commission Set 1	Commission 1-29-ELEC	5/24/2012	6/4/2012	Alfred P. Morrissey		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
Commission Set 1	Commission 1-30-ELEC	5/24/2012	6/4/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-31-ELEC	5/24/2012	6/4/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-32-ELEC	5/24/2012	6/4/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-33-ELEC	5/24/2012	6/7/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-34-ELEC	5/24/2012	6/7/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-35-ELEC/GAS	5/24/2012	6/6/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-36-ELEC/GAS	5/24/2012	6/7/2012	Michael D. Laflamme	Att. COMM 1-36-ELEC/GAS	
Commission Set 1	Commission 1-37-GAS	5/24/2012	6/7/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-38-ELEC	5/24/2012	6/6/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-39-ELEC/GAS	5/24/2012	6/7/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-40-ELEC/GAS	5/24/2012	6/7/2012	Ann E. Leary & Jeanne Lloyd	Att. COMM 1-40-ELEC/GAS	
Commission Set 1	Commission 1-41-ELEC/GAS	5/24/2012	6/6/2012	Robert B. Hevert		
Commission Set 1	Commission 1-42-ELEC/GAS	5/24/2012	6/6/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-43-ELEC/GAS	5/24/2012	6/6/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-44-ELEC/GAS	5/24/2012	6/7/2012	Maureen P. Heaphy	Att. COMM 1-44-ELEC/GAS	
Commission Set 1	Commission 1-45-ELEC/GAS	5/24/2012	6/6/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-46-GAS	5/24/2012	6/7/2012	Ann E. Leary		
COMMISSION SET 2						
Commission Set 2	Commission 2-1-ELEC/GAS	7/10/2012	7/24/2012	Maureen P. Heaphy	Att. COMM 2-1-ELEC/GAS	
Commission Set 2	Commission 2-2-ELEC/GAS	7/10/2012	7/19/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-3-ELEC/GAS	7/10/2012	7/23/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-4-ELEC/GAS	7/10/2012	7/23/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-5-ELEC/GAS	7/10/2012	7/19/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-6-ELEC/GAS	7/10/2012	7/24/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-7-ELEC/GAS	7/10/2012	7/19/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-8-ELEC/GAS	7/10/2012	7/24/2012	Maureen P. Heaphy	Att. COMM 2-8-ELEC/GAS	
Commission Set 2	Commission 2-9-ELEC/GAS	7/10/2012	7/20/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-10-ELEC/GAS	7/10/2012	7/24/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-11-ELEC/GAS	7/10/2012	7/19/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-12-ELEC/GAS	7/10/2012	7/19/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-13-ELEC/GAS	7/10/2012	7/20/2012	Maureen P. Heaphy		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
Commission Set 2	Commission 2-14-ELEC/GAS	7/10/2012	7/24/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-15-ELEC/GAS	7/10/2012	7/31/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-16-ELEC/GAS	7/10/2012	7/30/2012	Timothy D. Horan	Att. COMM 2-16-1-ELEC/GAS Att. COMM 2-16-2-ELEC/GAS	
Commission Set 2	Commission 2-17-ELEC/GAS	7/10/2012	7/18/2012	Robert B. Hevert		
Commission Set 2	Commission 2-18-ELEC/GAS	7/10/2012	7/18/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-19-ELEC	7/10/2012	7/16/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-20-GAS	7/10/2012	7/19/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-21-ELEC/GAS	7/10/2012	7/16/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-22-ELEC/GAS	7/10/2012	7/26/2012	Stephen F. Doucette		
Commission Set 2	Commission 2-23-ELEC/GAS	7/10/2012	8/1/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-24-GAS	7/10/2012	7/23/2012	Ann E. Leary		
Commission Set 2	Commission 2-25-ELEC/GAS	7/10/2012	7/23/2012	Evelyn M. Kaye	Att. COMM 2-25-1-ELEC/GAS Att. COMM 2-25-2-ELEC/GAS	
Commission Set 2	Commission 2-26-ELEC/GAS	7/10/2012	7/23/2012	Evelyn M. Kaye		
Commission Set 2	Commission 2-27-GAS	7/10/2012	7/16/2012	Evelyn M. Kaye		
Commission Set 2	Commission 2-28-ELEC/GAS	7/10/2012	7/16/2012	Evelyn M. Kaye		
Commission Set 2	Commission 2-29-ELEC/GAS	7/10/2012	7/16/2012	Evelyn M. Kaye		
Commission Set 2	Commission 2-30-ELEC/GAS	7/10/2012	7/16/2012	Evelyn M. Kaye		
Commission Set 2	Commission 2-31-ELEC	7/10/2012	7/24/2012	Evelyn M. Kaye	Att. COMM 2-31-ELEC/GAS	
Commission Set 2	Commission 2-32-GAS	7/10/2012	7/23/2012	Evelyn M. Kaye		
Commission Set 2	Commission 2-33-ELEC	7/10/2012	7/20/2012	Michael R. Hrycin		
Commission Set 2	Commission 2-34-ELEC	7/10/2012	7/20/2012	Michael R. Hrycin		
Commission Set 2	Commission 2-35-ELEC	7/10/2012	7/27/2012	Michael R. Hrycin	Att. COMM 2-35-1-ELEC Att. COMM 2-35-2-ELEC	
Commission Set 2	Commission 2-36-GAS	7/10/2012	7/24/2012	Jeffrey P. Martin		
Commission Set 2	Commission 2-37-ELEC/GAS	7/10/2012	7/19/2012	Jeffrey P. Martin		
Commission Set 2	Commission 2-38-ELEC	7/10/2012	7/16/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-39-GAS	7/10/2012	7/16/2012	A. Leo Silvestrini		
Commission Set 2	Commission 2-40-ELEC/GAS	7/10/2012	7/17/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-41-ELEC	7/10/2012	7/17/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-42-ELEC/GAS	7/10/2012	7/16/2012	Michael D. Laflamme		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
Commission Set 2	Commission 2-43-ELEC/GAS	7/10/2012	7/24/2012	Maureen P. Heaphy & Michael D. Laflamme	Att. COMM 2-43-ELEC/GAS	
Commission Set 2	Commission 2-44-ELEC/GAS	7/10/2012	7/16/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-45-ELEC	7/10/2012	7/20/2012	Michael D. Laflamme	Att. COMM 2-45-ELEC	
Commission Set 2	Commission 2-46-ELEC	7/10/2012	7/16/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-47-ELEC	7/10/2012	7/20/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-48-ELEC	7/10/2012	7/30/2012	Michael D. Laflamme		
Commission Set 2	Commission 2-49-ELEC/GAS	7/10/2012	7/18/2012	Michael D. Laflamme	Att. DIV 2-49-ELEC/GAS	
COMMISSION SET 3						
Commission Set 3	Commission 3-1-ELEC	8/7/2012				
Commission Set 3	Commission 3-2-ELEC/GAS	8/7/2012	8/10/2012	Michael D. Laflamme	Att. COMM 3-2-ELEC/GAS	
Commission Set 3	Commission 3-3-ELEC/GAS	8/7/2012	8/10/2012	Michael D. Laflamme		
Commission Set 3	Commission 3-4-ELEC/GAS	8/7/2012	8/10/2012	Michael D. Laflamme		
Commission Set 3	Commission 3-5-ELEC/GAS	8/7/2012	8/10/2012	Michael D. Laflamme	Att. COMM 3-5-ELEC/GAS	
Commission Set 3	Commission 3-6-ELEC/GAS	8/7/2012	8/10/2012	Michael D. Laflamme		
Commission Set 3	Commission 3-7-GAS	8/7/2012	8/10/2012	Michael D. Laflamme & Susan L. Fleck		
Commission Set 3	Commission 3-8-GAS	8/7/2012	8/10/2012	Michael D. Laflamme		
Commission Set 3	Commission 3-9-GAS	8/7/2012				
Commission Set 3	Commission 3-10-GAS	8/7/2012	8/8/2012	Michael D. Laflamme		
Commission Set 3	Commission 3-11-GAS	8/7/2012	8/10/2012	Ann E. Leary & A. Leo Silvestrini		
Commission Set 3	Commission 3-12-ELEC	8/7/2012				
Commission Set 3	Commission 3-13-GAS	8/7/2012	8/10/2012	Paul M. Normand		
Commission Set 3	Commission 3-14-GAS	8/7/2012	8/9/2012	Paul M. Normand		
Commission Set 3	Commission 3-15-GAS	8/7/2012	8/10/2012	Paul M. Normand	Att. COMM 3-15-GAS	
Commission Set 3	Commission 3-16-GAS	8/7/2012	8/10/2012	Paul M. Normand		
Commission Set 3	Commission 3-17-ELEC	8/7/2012				
Commission Set 3	Commission 3-18-ELEC/GAS	8/7/2012	8/8/2012	Michael D. Laflamme		
Commission Set 3	Commission 3-19-ELEC/GAS	8/7/2012	8/8/2012	Timothy F. Horan		
Commission Set 3	Commission 3-20-ELEC/GAS	8/7/2012				
Commission Set 3	Commission 3-21-ELEC/GAS	8/7/2012				
Commission Set 3	Commission 3-22-ELEC/GAS	8/7/2012				

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
Commission Set 3	Commission 3-23-ELEC/GAS	8/7/2012	8/10/2012	Evelyn M. Kaye		
Commission Set 3	Commission 3-24-ELEC/GAS	8/7/2012				
Commission Set 3	Commission 3-25-ELEC/GAS	8/7/2012	8/9/2012	Evelyn M. Kaye		
Commission Set 3	Commission 3-26-GAS	8/7/2012	8/10/2012	Evelyn M. Kaye		
Commission Set 3	Commission 3-27-GAS	8/7/2012				
Commission Set 3	Commission 3-28-ELEC/GAS	8/7/2012				
Commission Set 3	Commission 3-29-ELEC/GAS	8/7/2012				
Commission Set 3	Commission 3-30-ELEC/GAS	8/7/2012				
Commission Set 3	Commission 3-31-ELEC/GAS	8/7/2012				
Commission Set 3	Commission 3-32-ELEC/GAS	8/7/2012				
Commission Set 3	Commission 3-33-ELEC/GAS	8/7/2012				
Commission Set 3	Commission 3-34-ELEC	8/7/2012				
Commission Set 3	Commission 3-35-ELEC	8/7/2012				

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
NAVY SET 1						
Navy Set 1	Navy 1-1-ELEC	7/27/2012				
Navy Set 1	Navy 1-2-ELEC	7/27/2012				
Navy Set 1	Navy 1-3-ELEC	7/27/2012	8/13/2012	Legal Department	Att. Navy 1-3-ELEC	
Navy Set 1	Navy 1-4-ELEC	7/27/2012				
Navy Set 1	Navy 1-5-ELEC	7/27/2012	8/8/2012	Jeanne A. Lloyd	Att. Navy 1-5-1-ELEC Att. Navy 1-5-2-ELEC	
Navy Set 1	Navy 1-6-ELEC	7/27/2012	8/8/2012	Jeanne A. Lloyd & Michael D. Laflamme		
Navy Set 1	Navy 1-7-ELEC	7/27/2012	8/13/2012	Michael D. Laflamme		
Navy Set 1	Navy 1-8-ELEC	7/27/2012	8/7/2012	Jeanne A. Lloyd	Att. Navy 1-8-1-ELEC Att. Navy 1-8-2-ELEC Att. Navy 1-8-3-ELEC	
Navy Set 1	Navy 1-9-ELEC	7/27/2012	8/7/2012	Jeanne A. Lloyd		
Navy Set 1	Navy 1-10-ELEC	7/27/2012	8/7/2012	Howard S. Gorman		
Navy Set 1	Navy 1-11-ELEC	7/27/2012	8/2/2012	Howard S. Gorman		
Navy Set 1	Navy 1-12-ELEC	7/27/2012	8/2/2012	Howard S. Gorman		
Navy Set 1	Navy 1-13-ELEC	7/27/2012	8/2/2012	Howard S. Gorman		
Navy Set 1	Navy 1-14-ELEC	7/27/2012	8/13/2012	Michael D. Laflamme		

Navy 1-3-ELEC

Request:

Please provide a copy of all interrogatories, requests to produce or other requests for information received by the Company from participants in this proceeding.

Response:

Please refer to Attachment Navy 1-3-ELEC for copies of all sets of data requests received by the Company from the Rhode Island Division of Public Utilities and Carriers through August 9, 2012, as well as the first set of data requests received by the Company from the Rhode Island Public Utilities Commission (the "Commission"). The Company is not including copies of the second and third sets of data requests received by the Company from the Commission because the Navy intervened in this docket on June 20, 2012, and was added to the service list on June 20, 2012, and therefore received those two sets of data requests directly from the Commission.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: INVESTIGATION OF NARRAGANSETT
ELECTRIC COMPANY d/b/a NATIONAL GRID'S
PROPOSED CHANGES TO ELECTRIC AND
GAS BASE DISTRIBUTION RATES

DOCKET NO. 4323

COMMISSION'S FIRST SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID-ELEC/GAS
May 24, 2012

COMM 1-1-ELEC/GAS. What is the basis for the \$172M estimate of cost savings as of March 2013 referred to on p.12 of Timothy Horan's Testimony, lines 1-2?

COMM 1-2-ELEC/GAS. Referring to Timothy Horan's Testimony, p. 15, lines 12-13, are the 4 program managers new employees?

- a. If yes, when were they hired?
- b. Were they hired internally?
- c. What are the total operating costs associated with these new hires?

COMM 1-3-ELEC/GAS. Referring to Horan's Testimony, p.20, lines 3-12 (Restoration efforts after Tropical Storm Irene.) How many independent contractors did the Company hire to restore service after Tropical Storm Irene, and how much did it cost the Company to hire these contractors?

- a. How many of the independent contractors hired were from Rhode Island?

COMM 1-4-ELEC/GAS. (Timothy Horan, p. 21, lines 20-21) Mr. Horan refers to contributions to education projects, stating that the Company works with CCRI and the US Dept. of Energy to develop an energy utility technology certificate program. Please quantify to the extent possible the Company's work on this project in terms of number of employees devoted to this task and number of months and/or years the Company has been involved in this endeavor.

- a. What is the status of the development of the energy utility technology certificate program, i.e. is there an estimated date on which said certificate will be offered to students?
- b. What has been the cost of these programs?
- c. What has been the source of funds used to support these programs?

COMM 1-5-ELEC/GAS. As of today's date, how many employees does the Company have (in both Narragansett Electric and Narragansett Gas)?

COMM 1-6-ELEC. Referring to Stephen Doucette's Testimony, p.12, line 14, as of today's date, how many employees are scheduled to receive the defined benefit upon retirement, and how many are scheduled to receive the cash balance plan upon retirement?

COMM 1-7-ELEC. Referring to Stephen Doucette, p.12, lines 18-19, what specifically is the Company doing to transition to the defined contribution plan?

- a. Is there a date certain that the Company hopes to have all new union employees on a defined contribution plan?

COMM 1-8-ELEC. Stephen Doucette, p.11, lines 15-18. How much longer will the Company have to record on its books the cost associated with the employees who are still entitled to the defined benefit plan?

COMM 1-9-ELEC. Stephen Doucette, p.11, lines 14-15. How many Narragansett Electric employees are vested in the defined benefit plan?

COMM 1-10-ELEC. Stephen Doucette, p.12, lines 4-14. Mr. Doucette states on line 5 that as of July 14, 2002, the defined benefit plan was closed to new non-union employees. He states on line 14 that as of January 1, 2011, the defined benefit plan was closed to new non-union employees. On which date did the Company stop offering the defined benefit plan to new non-union hires?

COMM 1-11-ELEC. What is a consolidated pension plan referred to on Stephen Doucette, p. 26, line 8?

COMM 1-12-ELEC. The data on p. 31 of Stephen Doucette, entitled "10-Year History of Pension & Retiree Welfare Cost," reflects 6 years of data. Is data missing or is this a typo?

COMM 1-13-ELEC/GAS. Referring to Evelyn Kaye, p.17, line 1, what is a "cut season"?

COMM 1-14-ELEC/GAS. Referring to Evelyn Kaye, p.17, line 19, has the Company recovered any uncollectibles as a result of the 36 liens filed?

COMM 1-15-ELEC/GAS. Please define the term "balanced billing" referred to on p. 24, line 5 of Evelyn Kaye's Testimony?

COMM 1-16-ELEC/GAS. In what year(s) is the Company proposing to recover the amounts listed on page 20, lines 7-8 of Evelyn Kaye's Testimony (\$35,018,924 for electric and \$46,579,771 for gas)?

COMM 1-17-ELEC/GAS. Referring to Evelyn Kaye, p. 24, lines 18-20, please elaborate on the following statement, "When large companies foresee layoffs, the Consumer Advocates provide information to assist the unemployed."

- a. Does this mean the consumer advocate would reach out to the Company that is doing the lay-off?
- b. Would the Consumer Advocate get involved before or after the lay-off?

COMM 1-18-ELEC/GAS. Evelyn Kaye. Does the Company have consumer advocates in other service territories that perform the same or similar role as that proposed in this docket?

- a. If yes, how has the consumer advocates in other service territories contributed to the decline in collectibles?

COMM 1-19-ELEC/GAS. Evelyn Kaye, p. 25, lines 1-2, states that consumer advocates go to schools to provide students information on “how their actions affect our environment and their communities.” Page 24, line 6 also states the consumer advocates would provide energy saving tips to customers.

- a. This testimony implies that the role of the consumer advocate, at least in part, would be to educate customers and the community in general about energy efficiency. Is this true or false?
- b. If true, doesn't the Company already have staff dedicated to educating the community about energy efficiency?
- c. If the answer to b is yes, please explain the need for the consumer advocate to perform a task that is already performed by other employees.

COMM 1-20-ELEC. Please provide a copy of the union contract with Local 310 BUW Council/UWUA AFL-CIO (“Local 310”) referred to on p.2, line 18 of Michael Hrycin.

COMM 1-21-ELEC. Please provide a copy of the Memorandum of Understanding with Local 310 referred to on p.4, line 7 of Michael Hrycin.

COMM 1-22-ELEC. Michael Hrycin. Aside from assisting the Company in restoring services after weather related outages, what other duties will the new electrical workers perform?

COMM 1-23-ELEC. Michael Hrycin. What is the average cost of hiring a union employee versus a non-union employee for the same position? Please include salary and benefits in your analysis.

COMM 1-24-ELEC. Michael Hrycin. How do collective bargaining agreements serve to mitigate Narragansett Electric's costs in hiring trained staff?

COMM 1-25-ELEC. Michael Hrycin. Assuming the need for the addition of 19 electrical workers, please explain why the Company chose to hire union, as opposed to non-union, employees.

COMM 1-26-ELEC. Is the 4 year training period (p.4, line 20 and p.8, line 5 of Michael Hrycin) for new employees required by federal law/standards, state law, union rules or in-house company policy?

COMM 1-27-GAS. Referring to Jeffrey Martin, p. 10, lines 12-20, does the Company intend to consolidate electric and gas billing in the future?

COMM 1-28-GAS. Jeffrey Martin. Only 12% of customers have paperless billing. How does this number compare with the Company's other service territories and the industry in general?

COMM 1-29-ELEC. Referring to Alfred Morrissey, page 7, line 16 through p.8, line 2, please cite the source(s) from which the following projections were derived: RI employment levels, gross state product and population and number of households growth.

COMM 1-30-ELEC. Referring to Alfred Morrissey, page 12, lines 20 – 22, please define the following in layman's terms:

- a. Ordinary Least Squares
- b. The Yule-Walker method
- c. The Durbin-Watson statistic

COMM 1-31-ELEC. Referring to Alfred Morrissey, page 13, lines 8 – 9, please explain the phrase, "regressed against the explanatory variables."

COMM 1-32-ELEC. Referring to APM-1, please provide the source or basis for the GWh sales listed in the 2012, 2013 and 2014 forecasts.

COMM 1-33-ELEC. Referring to APM-6 page 1, please reconcile the total energy efficiency savings and EE percent of GWh sales listed for 2012, 2013 and 2014 (876.936, 969.609 and 1085.705 GWhs; 11.3%, 12.3% and 13.7%) with the energy savings targets approved in Dockets 4202 and 4284.

COMM 1-34-ELEC. Referring to APM-6 page 1, please reconcile the total energy efficiency savings percent of GWh sales listed for 2012, 2013 and 2014 (11.3%, 12.3% and 13.7%) with the energy savings targets approved in Dockets 4202 and 4284.

COMM 1-35-ELEC/GAS. Page 12 of Timothy Horan's direct states that the recent restructuring of National Grid will save Rhode Island \$172 million on a run rate basis as of March 2013.

- a. Please define run rate basis.
- b. Please itemize the savings of \$172 million.

COMM 1-36-ELEC/GAS. Page 22 of Timothy Horan's direct states that various programs (STEM, City Year, Education in Action) benefit from financial contributions and employee volunteer time.

- a. Please provide the amount of financial contributions for each of the last 3 years by program.
- b. Please identify the source of the contributions and whether the contributions are part of the company's revenue requirement.
- c. Are employees compensated for their volunteer time by the company?

COMM 1-37-GAS. Page 22 of Timothy Horan's direct states the company has converted to the CSS system and has stopped using Advantage/Banner and LDCM. Are there any unamortized costs related to Advantage/Banner and LDCM on the books. If yes, how will these costs be removed?

COMM 1-38-ELEC. Page 26 of Timothy Horan's direct states that the storm fund has a deficit balance in excess of \$11 million. The Docket 2509 Storm Fund Report for 2011 dated April 30,

2012 identifies a deficit of \$4.6 million as of 12/31/11. Please reconcile the \$11 million and \$4.6 million.

COMM 1-39-ELEC/GAS. Page 29 of Timothy Horan's direct states in part: "The Company's tax expenses increase annually not only from the rate rising in communities, but also each time that we invest in new infrastructure." Is this a new type of expense that the Company is facing, or have tax expenses historically increased as a result of rising tax rates? Has the Company historically faced increased taxes as a result of infrastructure investment, or is this a new phenomenon?

COMM 1-40-ELEC/GAS. Please provide a list of all US utilities that have a fully reconciling mechanism for commodity related bad debt.

COMM 1-41-ELEC/GAS. Page 21 of Mr. Hevert's direct indicates that he removed from his proxy group those companies that have less than 60% of total net operating income derived from regulated utility operations.

- a. Please provide the justification for the 60% threshold.
- b. What portion of RI net income is derived from regulated utility operations?

COMM 1-42-ELEC/GAS. Page 7, lines 3-4 of Ms. Heaphy's direct states that National Grid expects to fill 26 incremental positions associated with the US Foundations program. Please explain the US Foundations program, and provide the incremental cost to RI ratepayers that will result from this program.

COMM 1-43-ELEC/GAS. Page 16 of Ms. Heaphy's direct states that the variable pay of Band A employees is not included as part of the revenue requirement. Why not? Where does the money come from to pay the Band A variable pay?

COMM 1-44-ELEC/GAS. Page 22 Ms. Heaphy's direct states that the proposed management salary increases are supported by market studies and in line with raises granted over the last 10 years. Please provide the justification of using the last 10 years as a measure of reasonability given the significant changes to the economy over the last 10 years.

COMM 1-45-ELEC/GAS. Page 12 Mr. Doucette's direct states that the Company's contribution to the defined contribution plan will range from 4 to 8%.

- a. Please provide the justification for the range of 4 to 8%.
- b. How does the Company determine where in the range the contribution will fall? (i.e. Why would the contribution be 5% as opposed to 6%?)

COMM 1-46-GAS. Gas Tariff. Section 1. Schedule A. Paragraph 7.0. Billing and Reading of Meters. This section of the tariff states in part, "A late payment charge shall accrue on non-residential bills...in accordance with regulations of the RIPUC and RIDPUC." Please cite which RIPUC or RIDPUC regulations authorize the assessment of late charges.

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

**IN RE: APPLICATION OF THE NARRAGANSETT)
ELECTRIC COMPANY D/B/A NATIONAL GRID)
FOR APPROVAL OF A CHANGE IN ELECTRIC) DOCKET NO. 4323
AND GAS BASE DISTRIBUTION RATES)
PURSUANT TO R.I.G.L. §§ 39-3-10 and 39-3-11)**

**DIVISION'S FIRST SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID**

- Div 1-1 Referring to Schedule MDL-3-ELEC, Page 8, please provide workpapers supporting each of the normalizing adjustments.
- Div 1-2 Referring to Schedule MDL-3-ELEC, Page 8, Column (e), please provide documentation supporting the 2011 storm damage costs being normalized.
- Div 1-3 Referring to Schedule MDL-3-ELEC, Page 8, Column (g), please explain how the costs of the savings initiatives were identified and segregated from normal ongoing expenses.
- Div 1-4 Referring to Schedule MDL-3-ELEC, Page 9, please provide a brief narrative description of each of the normalizing adjustments on lines 11-35.
- Div 1-5 Referring to Schedule MDL-3-ELEC, Page 9, please provide workpapers supporting each of the normalizing adjustments.
- Div 1-6 Referring to Schedule MDL-3-ELEC, Pages 17-20, please provide the management and bargaining headcount by month for each month from December 2008 until the most recent month available.
- Div 1-7 Referring to Schedule MDL-3-ELEC, Page 21, please explain why actual test year variable pay exceeded the target variable pay for the corporate services employees.
- Div 1-8 Referring to Schedule MDL-3-ELEC, Page 21, please explain why the target variable pay including DSM is compared to actual test year actual variable pay excluding DSM for the purpose of calculating the necessary adjustment.
- Div 1-9 Please provide the actual variable pay as a percentage of target variable pay for each category of employees on Schedule MDL-3-ELEC, Page 21 for the years 2009 and 2010.

- Div 1-10 Referring to Schedule MDL-3-ELEC, Page 21, please explain why actual test year variable pay exceeded the target variable pay for the National Grid USA Service Co. employees.
- Div 1-11 Please provide the actual variable pay as a percentage of target variable pay for each category of employees on Schedule MDL-3-ELEC, Page 22 for the years 2009 and 2010.
- Div 1-12 Referring to Workpaper MDL-3, Page 9, please provide the number of vacancies on lines 8, 12, and 23 that have been filled in each month of 2012 to date.
- Div 1-13 Referring to Schedule MDL-3-ELEC, Page 23, please provide the actual healthcare costs for each employee category by month in 2012 to date and for the corresponding months in 2011.
- Div 1-14 Referring to Laflamme testimony, page 41, please provide a summary of the costs and savings attributable to the IS transformation initiatives. The response should show the total costs and annual savings, the costs and savings allocable to Narragansett – Electric, and the extent to which anticipated annual savings are reflected in the rate year cost of service, with specific reference to how and where such savings are reflected.
- Div 1-15 Referring to Laflamme testimony, page 45, please provide a summary of the savings attributable to the US Foundation Program. The response should show the total annual savings, the savings allocable to Narragansett – Electric, and the extent to which anticipated annual savings are reflected in the rate year cost of service, with specific reference to how and where such savings are reflected.
- Div 1-16 Referring to Workpaper MDL-7, Page 3, please provide any cost/benefit analysis prepared by or for the Company regarding the Outage Management System on Line 116 and the NE EMS Replacement on Line 122.
- Div 1-17 Referring to Workpaper MDL-7, Page 8, please provide the basis for the 13.06% allocation factor for Outage Management System on Line 116.
- Div 1-18 Referring to Workpaper MDL-7, Page 8, why is 21.43% of the NE EMS Replacement on Line 122 allocated to Narragansett Electric, as the system is indicated as being for transmission?
- Div 1-19 Referring to Schedule MDL-3-ELEC, Page 29, please explain the reasons for the increase in the Reservoir Woods Leasehold Improvements.
- Div 1-20 Referring to Schedule MDL-3-ELEC, Page 30, please explain the decrease in uninsured claims for Auto & General Liability from 2008 to the subsequent years.

- Div 1-21 Referring to Workpaper MDL-12, please provide documentation supporting the operating expenditures on Line 7.
- Div 1-22 Referring to Workpaper MDL-12, please provide a narrative explanation of how the operating expenditures on Line 7 were identified as being associated with capital expenditures.
- Div 1-23 Referring to Workpaper MDL-12, please provide the expense account or accounts to which the operating expenditures on Line 7 were charged.
- Div 1-24 Referring to Workpaper MDL-13, Page 2, please provide a narrative description of how the expense estimates were developed and any supporting documentation for those estimates.
- Div 1-25 Referring to Schedule MDL-3-ELEC, Page 45, how many of the additional employees have been hired to date? The response should provide the months in which the additional employees have been hired.
- Div 1-26 Referring to Schedule MDL-3-ELEC, Page 54, Lines 17 and 18, please provide the remaining unamortized balances of Merger CTA costs and Docket 4065 rate case costs as of December 31, 2011.
- Div 1-27 Referring to Schedule MDL-3-ELEC, Page 59, please provide documentation supporting the property tax expenses on lines 27-31.
- Div 1-28 Referring to Schedule MDL-3-ELEC, Page 60, please provide the remaining deferred income tax deficiency to be amortized as of December 31, 2011.
- Div 1-29 Referring to Laflamme testimony, page 112, please provide documentation and calculations supporting the estimated Storm Fund deficit of \$11.5 million.
- Div 1-30 Referring to Laflamme testimony, page 113, please explain how the Company determined that \$2.4 million per year for three years were appropriate factors for the SCRF.
- Div 1-31 Referring to Workpaper MDL-23, why is the \$1,041,000 base rate storm damage accrual omitted from the analysis?

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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**IN RE: APPLICATION OF THE NARRAGANSETT)
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AND GAS BASE DISTRIBUTION RATES)
PURSUANT TO R.I.G.L. §§ 39-3-10 and 39-3-11)**

**DIVISION'S SECOND SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID-GAS**

- Div 2-1-Gas Referring to Schedule MDL-3-GAS, Pages 4 and 6, please provide the financial statements from which the revenues and expenses were taken.
- Div 2-2-Gas Referring to Schedule MDL-3-GAS, Page 8, please provide workpapers supporting the normalizing adjustments in Columns (b) and (e).
- Div 2-3-Gas Referring to Schedule MDL-3-GAS, Page 8, Column (b), please explain how the costs of the savings initiatives were identified and segregated from normal ongoing expenses.
- Div 2-4-Gas Referring to Schedule MDL-3-GAS, Page 9, please provide a brief narrative description of each of the normalizing adjustments on lines 13-36.
- Div 2-5-Gas Referring to Schedule MDL-3-GAS, Page 9, please provide workpapers supporting each of the normalizing adjustments.
- Div 2-6-Gas Referring to Schedule MDL-3-GAS, Pages 17, please provide the management and bargaining headcount by month for each month from December 2008 until the most recent month available.
- Div 2-7-Gas Referring to Schedule MDL-3-GAS, Page 21, please explain why the target variable pay including DSM is compared to actual test year actual variable pay excluding DSM for the purpose of calculating the necessary adjustment.
- Div 2-8-Gas Please provide the actual variable pay as a percentage of target variable pay for Direct union and non-union employees for the years 2009 and 2010.
- Div 2-9-Gas Referring to Schedule MDL-3-GAS, Page 23, please provide the actual healthcare costs for Company Direct employees by month in 2012 to date and for the corresponding months in 2011.

- Div 2-10-Gas Referring to Laflamme testimony, page 41, please provide a summary of the costs and savings attributable to the IS transformation initiatives. The response should show the total costs and annual savings, the costs and savings allocable to Narragansett – Gas, and the extent to which anticipated annual savings are reflected in the rate year cost of service, with specific reference to how and where such savings are reflected.
- Div 2-11-Gas Referring to Laflamme testimony, page 45, please provide a summary of the savings attributable to the US Foundation Program. The response should show the total annual savings, the savings allocable to Narragansett – Gas, and the extent to which anticipated annual savings are reflected in the rate year cost of service, with specific reference to how and where such savings are reflected.
- Div 2-12-Gas Please provide the amortization of the costs of Docket No. 3943 recorded in 2011.
- Div 2-13-Gas Referring to Schedule MDL-3-GAS, Page 31, please explain why the actual uninsured claims expense in 2011 was less than the actual disbursements in that year.
- Div 2-14-Gas Schedule MDL-3-GAS, Page 35, when will the amortization of the OPEB transition obligation be complete?
- Div 2-15-Gas Referring to Workpaper MDL-13 GAS, Page 2, please provide a narrative description of how the expense estimates were developed and any supporting documentation for those estimates.
- Div 2-16-Gas Referring to Schedule MDL-3-GAS, Page 51, please provide documentation supporting the plant additions related to growth on line 4.
- Div 2-17-Gas Please provide the actual plant additions related to growth for each year 2009-2011.
- Div 2-18-Gas Please provide the actual plant additions related to growth in 2012 to date and for the corresponding period in 2011.
- Div 2-19-Gas Referring to Laflamme testimony, page 105, lines 13-14, please provide the growth in revenue related to the referenced investments.
- Div 2-20-Gas Please provide budgeted Fiscal Year 2013 capital spending, showing total capital spending, ISR capital spending, and non-ISR capital spending by function.
- Div 2-21-Gas Referring to Schedule MDL-3-GAS, Page 54, please provide documentation supporting the property tax expenses on lines 18-21.

- Div 2-22-Gas Referring to Schedule MDL-3-GAS, Page 54, please provide the increase in property tax expense from 2010 to 2011 related to increases in rates, as opposed to the increase in taxable property.
- Div 2-23-Gas Referring to Schedule MDL-3-GAS, Page 59, please provide the financial statements from which the rate base components were taken.
- Div 2-24-Gas Referring to Schedule MDL-3-GAS, Page 4, please reconcile the AFUDC income of \$980,168, to the average CWIP balance of \$45,978,033 on Schedule MDL-3-GAS, Page 59, showing which balances of CWIP accrue AFUDC and which do not.
- Div 2-25-Gas Referring to Schedule MDL-3-GAS, Page 55, please explain why the AFUDC income is not eliminated in the calculation of taxable income.

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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**IN RE: APPLICATION OF THE)
NARRAGANSETT ELECTRIC)
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FOR APPROVAL OF A CHANGE IN) DOCKET NO. 4323
ELECTRIC AND GAS BASE)
DISTRIBUTION RATES PURSUANT)
TO R.I.G.L. §§ 39-3-10 and 39-3-11)**

**DIVISION'S THIRD SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID -- ELEC/GAS**

- DIV 3-1. Please provide Narragansett Electric Company's ("NEC's" or "the Company's") balance of short-term debt and interest rate for each month, January 2011–May 2012. If the Company has projections of short-term debt balances for the remainder of 2012, please provide.
- DIV 3-2. Please provide the Company's current AFUDC rate and a workpaper showing how it was calculated.
- DIV 3-3. Please provide a workpaper showing how Mr. Hevert derived the common equity balance at 12/31/11 that he used for capital structure purposes. The response should quantify his adjustments for (a) goodwill; and (b) Other Comprehensive Income.
- DIV 3-4. Please provide Mr. Hevert's rationale for removing Other Comprehensive Income from common equity and any Rhode Island precedents that he is relying on for (or that support) this adjustment.

- DIV 3-5. For all utility rate cases within the past three years in which Mr. Hevert has submitted a recommendation on return on equity, please provide his return on equity recommendation.
- DIV 3-6. Please provide a copy of any RFP issued by NEC to obtain a rate of return witness, Mr. Hevert's proposal to the Company and any resulting contract or engagement letter.
- DIV 3-7. Please provide consolidated balance sheets at 12/31/11 for:
- (a) National Grid USA;
 - (b) NEC; and
 - (c) National Grid PLC.
- DIV 3-8. Is it the position of either Mr. Hevert or the Company that the Commission is precluded by Rhode Island statute from using the parent company capital structure or considering parent company debt in setting the ratemaking capital structure in this case? Please explain fully the Company's position on this question in light of Mr. Hevert's testimony cite to Rhode Island statute and his reference to the so-called "stand alone" language.
- DIV 3-9. Please provide copies of all NEC and National Grid credit rating reports issued since January 1, 2010.
- DIV 3-10. Please provide NEC's most recent presentation to credit rating agencies.
- DIV 3-11. Please provide NEC and National Grid's SEC Form 10Q report for the quarter ending March 31, 2012.

- DIV 3-12. Please provide NEC's income statement and statement of cash flow for 2011, with footnotes.
- DIV 3-13. Please provide NEC's capital spending for each year 2009, 2010 and 2011.
- DIV 3-14. Please provide NEC's projections of capital spending for 2012, 2013 and 2014.
- DIV 3-15. Please identify NEC's capital structure percentage targets and describe how those targets were determined.
- DIV 3-16. Please indicate and describe how NECs capital structure policy compares with those of its parent (National Grid USA) and ultimate parent (National Grid PLC).
- DIV 3-17. Please provide a listing of the returns on equity and capital structure ratios approved for each NEC U.S. utility affiliate since January 1, 2008. The response should identify the utility, jurisdiction, docket number, date (month/year) of award and whether the utility is gas or electric.
- DIV 3-18. One of Mr. Hevert's methods is the multi-stage DCF. Please state the weight that Mr. Hevert places on this method in formulating his recommendation.
- DIV 3-19. Please provide any analysis or evaluation conducted by Mr. Hevert of NEC's cost of equity at present as compared to NEC's cost of equity at the time of its last base rate case when the Commission awarded the Company a return on equity of 9.8 percent.
- DIV 3-20. Mr. Hevert applies weightings of 73 percent electric and 27 percent gas in determining an overall NEC utility cost of equity. Please explain why he did not

instead utilize the NEC electric and gas rate bases, as identified by Mr. Horan, as his gas versus electric weights.

- DIV 3-21. Mr. Hevert uses a long-term GDP growth rate of 5.77 percent in his multi-stage DCF study. What DCF result would his multi-stage model produce if he instead used a third-stage (or nominal GDP) growth rate of 4.77 percent instead of 5.77 percent?
- DIV 3-22. Per pages 39-40 of Mr. Hevert's testimony, please provide the source and source documents for the 66.78 percent electric and 69.50 percent long-term payout ratios used in his multi-stage DCF model.
- DIV 3-23. Please provide copies of the documents referenced in footnotes 29-35, 37-39, 42-43, and 50 of Mr. Hevert's testimony.
- DIV 3-24. Please provide the underlying RRA source documents for the authorized return on equity data used by Mr. Hevert in his risk premium statistical study.
- DIV 3-25. For each company in Mr. Hevert's DCF proxy groups, please provide the percentage of each proxy company's operations considered to be regulated utility, using his selected metric.
- DIV 3-26. Please provide Mr. Hevert's opinion regarding the relative business risk profiles of:
- (a) electric utility distribution service;
 - (b) regulated electric generation supply;

- (c) unregulated electric generation supply; and
- (d) gas utility distribution service.

DIV 3-27. Please provide evidence or studies that Mr. Hevert is aware of or has considered that demonstrate that firm size is an important business risk factor specifically for utility companies. For example, this would include studies of company risk or cost of capital that employed a data base composed primarily or entirely of utility companies.

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**DIVISION'S FOURTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – GAS**

June 6, 2012

Data Requests Regarding the Direct Testimony of National Grid witness Normand

- Div 4-1. Please provide a working copy of the Company's class cost of service study model with all cell references and cell formulas intact, as well as all other workpapers and electronic spreadsheet files relied upon to support witness Normand's Schedules PMN-2 through PMN-8. .
- Div 4-2. Provide the full detail of a class cost-of-service study that includes explicit allocations of costs to non-firm transportation service customers.
- Div 4-3. Please provide the data and analyses upon which the Company relies to support the levels of each of the gas marketer charges included in its proposed gas tariff.
- Div 4-4. Re: witness Normand's Schedule PMN-7, page 5 of 5, please provide the data, analyses and workpapers upon which the Company relies to assess the on-going appropriateness of the 20% Discount reflected in column (E).
- Div 4-5. Re: the Direct Testimony of witness Normand at page 21 of 25, please explain and provide the data and analyses upon which the Company relies to assess the reasonableness of setting customer charges for High Load Factor (HLF) and Low Load Factor (LLF) customers in the Large and Extra Large C&I rate classifications at the same levels when their customer-related costs of service differ.

Data Requests Regarding the Direct Testimony of National Grid witness Leary

Div 4-6. Re: the Direct Testimony of witness Leary at pages 8-9, please:

- a. Indicate whether it is the intent of the Company to set rates for non-firm transportation service on the basis of costs of service for that class.
 - i. If it is the Company's intent to set rates for non-firm transportation service on the basis of costs of service, please identify and provide a complete copy of the cost data and cost of service analysis upon the Company relies to determine its costs of providing non-firm (with all supporting workpapers, including electronic spreadsheet files with all cell formulas and cell references in tact);
 - ii. If it is not the Company's intent to set rates for non-firm transportation service on the basis of costs of service, explain and fully document (with all supporting workpapers, including electronic spreadsheet files with all cell formulas and cell references in tact) the basis on which the Company proposes to set its rates for non-firm transportation service in this proceeding.
- b. Provide the witness' understanding of the derivation of the "\$1.6 million revenue requirement" which the witness asserts was attributed to non-firm customers at the time of the 2008 Gas Rate Case, and explain the relevance of that \$1.6 million amount in this proceeding.
- c. Verify that at the time of the 2008 Gas Rate Case, service to the Company's non-firm transportation customers was billed on a value of service basis.

Div 4-7. Re: the Direct Testimony of witness Leary at page 8, lines 13-15, please provide the actual amounts credited or surcharged through the DAC for Dual Fuel customer margins for each year since the conclusion of Docket No. 3943.

Div 4-8. Re: the Direct Testimony of witness Leary at page 8, lines 19-22, please:

- a. Document the Company's actual non-firm throughput and revenue by customer by month for the test year;
- b. Provide the Company actual non-firm throughput and revenue by customer by month for each month since the conclusion of Docket No. 3943.
- c. Document the Company's actual firm Dual Fuel throughput and revenue by customer by firm rate classification by month for each month of the test year.

- d. Provide the Company actual firm Dual Fuel throughput and revenue by customer by firm rate classification by month for each month since the conclusion of Docket No. 3943.
- e. Document the movement of Dual Fuel customers between non-firm transportation and firm service rate classifications by customer by month for each month since the conclusion of Docket No. 3943 showing the rate schedule from which the customer migrated and the rate schedule to which the customer moved.

Div 4-9. Re: the Direct Testimony of witness Leary at page 8, lines 13-15, please provide the actual amounts credited or surcharged through the DAC for Dual Fuel customer margins for each year since the conclusion of Docket No. 3943.

Div 4-10. Re: the Direct Testimony of witness Leary at page 9, lines 5-6, please:

- a. Provide a numeric example of the manner in which the “annual target” will be adjusted to reflect the migration of Dual Fuel customers between non-firm and firm classes.
- b. Provide an explanation and a numeric example to demonstrate the manner in which firm service revenue requirements and rates will be adjusted to reflect the migration of customers between non-firm and firm classes between rate cases.
- c. Explain why the use of the customer’s prior year historical revenue is the appropriate basis for computing adjustments to the annual threshold if it is known that the migration of a given customer is intended to impact the customer’s gas usage (e.g., a customer recently discussed by the Company and the Division with respect to an amendment of the current threshold determinations).

Div 4-11. Re: the Direct Testimony of witness Leary at page 9, lines 5-6, please:

- a. Explain the manner in which adjustments to the threshold will be computed for a customer that transfers between firm and non-firm rate classifications in the middle of a DAC reconciliation period.
- b. Explain and provide a numeric example or examples to demonstrate the manner in which revenue decoupling adjustments otherwise applicable to a Firm Service Dual Fuel customer will be billed if the customer migrates to Non-Firm Service.
- c. Explain and provide all analyses and workpapers (including electronic spreadsheet files with all cell formulas and cell references intact), to support the appropriateness of the \$1,512,209 threshold for Non-Firm revenue the Company proposes to use in setting rates in this case.

- d. Document the determination of any and all weather normalization adjustments or other normalization adjustments made to test year throughput and revenue for non-firm customers to arrive at the proposed \$1,512,209 threshold. If no normalization adjustments were made, please explain why such adjustments are not necessary and appropriate.

Div 4-12. Re: the Direct Testimony of witness Leary at page 9, lines 14-21, please:

Provide a numeric example of the manner in which the proposed Property Tax Adjustment would be allocated or assigned to rate classes as part of the determination of DAC charges by rate class;

.

Div 4-13. Re: witness Leary's Schedule AEL-1, please provide the Company's assessment of the test year costs associated with its provision of each of the "Miscellaneous Services" for which revenue is reflected on lines 26-30.

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**DIVISION'S FIFTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – ELECTRIC**

June 7, 2012

Div 5-1. Please provide the total number of Electric Company customers (i.e.,
accountholders) by month for 2007-2011, including the following breakdown:

- a) Standard-Residential accounts
- b) Protected-Residential accounts (i.e., coded as low income, elderly,
handicapped, etc.)
- c) Residential heat accounts
- d) Residential non-heat accounts
- e) Commercial accounts
- f) Industrial accounts

Div 5-2. For 2007-2011, please provide the following information for the Electric
Company's total standard-residential, protected-residential, commercial and
industrial customers:

- a) Monthly sales revenue
- b) Number of monthly bills
- c) Average monthly bill amount
- d) Commodity related percentage portion of each average bill
- e) Monthly usage
- f) Average monthly usage

Note: Please provide an electronic version of this data with the response

Div 5-3. Please provide a detailed explanation of how the Electric Company calculates its annual net charge-offs. Please include gross charge-offs calculations and all subsequent and applicable offsets including collections, balances transfers, legal collections and accounting adjustments. For 2007-2011, please provide monthly data and calculations which show original gross charge-off dollars and subsequent offsets resulting in net charge-offs.

Div 5-4. For 2007-2011, please provide the Electric Company's monthly number of accounts and dollars associated with standard-residential, protected-residential, and non-residential disconnections for non-payment, including:

- a) Number of accounts and total dollar amount of notices for disconnection for non-payment ("DNP")
- b) Number of accounts and total dollar amount of actual field orders
- c) Number accounts and total dollar amount of actual disconnections for non-payment
- d) Number accounts and total dollar amount of actual service restorations (after DNP)

Note: Please provide an electronic version of this data with the response

Div 5-5. For 2007-2011, please provide the Electric Company's monthly outbound collection calling volumes, including the following information:

- a) Residential vs. non-residential programs and campaigns
- b) The source of the call (i.e., dialer, third-party vendor or live agent, etc.)
- c) The type of call (e.g., reminder call, disconnect call, 24-hour DNP call, etc.)
- d) The timing of the call (i.e., the point of time in the delinquency cycle)
- e) Information on whether or not the call is required by a regulatory rule
- f) Attempts vs. right-party contacts

Div 5-6. For 2007-2011, please provide the Electric Company's monthly data on collection reminders, notices and letters to customers, including:

- a) Residential vs. non-residential accounts
- b) Total number of notices by type (i.e., reminder, DNP notice, etc.)
- c) Timing of the notices (i.e., point in the delinquency cycle)
- d) Information on whether or not the notice is required by a regulatory rule
- e) Criteria for selecting the account for collection action

Div 5-7. Please provide the Electric Company's current procedure for scheduling and executing daily and weekly disconnections for non-payment, including:

- a) Residential accounts
- b) Non-residential accounts

- Div 5-8. Please provide the Electric Company's current procedure for transferring past-due balances to active accounts from closed accounts (i.e., pre-charge off account status and charged-off account status), including:
- a) Residential accounts
 - b) Non-residential accounts
- Div 5-9. For 2007-2011, please provide the Electric Company's number of accounts and dollars transferred to active accounts from closed accounts (i.e., pre-charge off account status and charged-off account status), including:
- a) Residential accounts
 - b) Non-residential accounts
- Div 5-10. Please provide a detailed explanation of the Electric Company's current process and procedure for new service applications, including the following data:
- a) Residential vs. non-residential account process
 - b) Process work flows and written procedures
 - c) Former customer/outstanding balance verification process
 - d) Procedure for identifying and handling outstanding balances
 - e) Balance transfer procedure (if applicable)
 - f) Deferred payment process (if applicable)
 - g) Positive ID program/process
 - h) Credit check and/or system to determine credit risk
 - i) Deposit process, including Surety Bonds, billing, collection and refunding
 - j) Residential vs. non-residential, if applicable

Div 5-11. Please provide a detailed overview and explanation of the Electric Company's current active account collection process and delinquent account management, including the following:

- a) Residential vs. non-residential account process
- b) Scoring and segmentation of accounts
- c) Account prioritization
- d) Timing of collection reminders and notices
- e) Outbound calling campaigns
- f) Disconnection for non-payment
- g) Field collections and payments
- h) Restoration of service, including fees
- i) Payment extensions and arrangements
- j) Security deposits

Div 5-12. Please provide a detailed explanation of all the changes made to the Electric Company's accounts receivable management processes and strategies since January 1, 2009. Please identify new processes and strategies and the date of deployment.

Div 5-13. Please provide a detailed overview and explanation of the Electric Company's current inactive account collection process, including the following:

- a) Final bills and reminder letters
- b) Account segmentation
- c) In-house collections vs. third-party collection agencies
- d) Account placement timing

e) Agency tier programs (i.e., early-out, primary, secondary, etc.)

Div 5-14. Please provide the Electric Company's monthly deferred payment arrangement data in the format shown in [Attachment 5-14E](#) (note: please include an electronic version with the response):

Div 5-15. Please provide the Electric Company's monthly accounts receivable (arrear) data in the format shown in [Attachment 5-15E](#) (note: please include an electronic version with the response):

Div 5-16. Please provide the Electric Company's 2007-2011, account-level, charge-off information in electronic data format shown in [Attachment 5-16E](#).

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

**IN RE: APPLICATION OF THE)
NARRAGANSETT ELECTRIC)
COMPANY D/B/A NATIONAL GRID)
FOR APPROVAL OF A CHANGE IN) DOCKET NO. 4323
ELECTRIC AND GAS BASE)
DISTRIBUTION RATES PURSUANT)
TO R.I.G.L. §§ 39-3-10 and 39-3-11)**

**DIVISION'S SIXTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – GAS**

June 7, 2012

- Div 6-1. Please provide the total number of Gas Company customers (i.e., accountholders) by month for 2007-2011, including the following breakdown:
- a) Standard-Residential accounts
 - b) Protected-Residential accounts (i.e., coded as low income, elderly, handicapped, etc.)
 - c) Residential heat accounts
 - d) Residential non-heat accounts
 - e) Commercial accounts
 - f) Industrial accounts
- Div 6-2. For 2007-2011, please provide the following information for the Gas Company's total standard-residential, protected-residential, commercial and industrial customers:

- a) Monthly sales revenue
- b) Number of monthly bills
- c) Average monthly bill amount
- d) Commodity related percentage portion of each average bill
- e) Monthly usage
- f) Average monthly usage

Note: Please provide an electronic version of this data with the response

Div 6-3. Please provide a detailed explanation of how the Gas Company calculates its annual net charge-offs. Please include gross charge-offs calculations and all subsequent and applicable offsets including collections, balances transfers, legal collections and accounting adjustments. For 2007-2011, please provide monthly data and calculations which show original gross charge-off dollars and subsequent offsets resulting in net charge-offs.

Div 6-4. For 2007-2011, please provide the Gas Company's monthly number of accounts and dollars associated with standard-residential, protected-residential, and non-residential disconnections for non-payment, including:

- a) Number of accounts and total dollar amount of notices for disconnection for non-payment ("DNP")
- b) Number of accounts and total dollar amount of actual field orders
- c) Number accounts and total dollar amount of actual disconnections for non-payment
- d) Number accounts and total dollar amount of actual service restorations (after DNP)

Note: Please provide an electronic version of this data with the response

Div 6-5. For 2007-2011, please provide the Gas Company's monthly outbound collection calling volumes, including the following information:

- a) Residential vs. non-residential programs and campaigns
- b) The source of the call (i.e., dialer, third-party vendor or live agent, etc.)
- c) The type of call (e.g., reminder call, disconnect call, 24-hour DNP call, etc.)
- d) The timing of the call (i.e., the point of time in the delinquency cycle)
- e) Information on whether or not the call is required by a regulatory rule
- f) Attempts vs. right-party contacts

Div 6-6. For 2007-2011, please provide the Gas Company's monthly data on collection reminders, notices and letters to customers, including:

- a) Residential vs. non-residential accounts
- b) Total number of notices by type (i.e., reminder, DNP notice, etc.)
- c) Timing of the notices (i.e., point in the delinquency cycle)
- d) Information on whether or not the notice is required by a regulatory rule
- e) Criteria for selecting the account for collection action

Div 6-7. Please provide the Gas Company's current procedure for scheduling and executing daily and weekly disconnections for non-payment, including:

- a) Residential accounts
- b) Non-residential accounts

Div 6-8. Please provide the Gas Company's current procedure for transferring past-due balances to active accounts from closed accounts (i.e., pre-charge off account status and charged-off account status), including:

- a) Residential accounts
- b) Non-residential accounts

Div 6-9. For 2007-2011, please provide the Gas Company's number of accounts and dollars transferred to active accounts from closed accounts (i.e., pre-charge off account status and charged-off account status), including:

- a) Residential accounts
- b) Non-residential accounts

Div 6-10. Please provide a detailed explanation of the Gas Company's current process and procedure for new service applications, including the following data:

- a) Residential vs. non-residential account process
- b) Process work flows and written procedures
- c) Former customer/outstanding balance verification process
- d) Procedure for identifying and handling outstanding balances
- e) Balance transfer procedure (if applicable)
- f) Deferred payment process (if applicable)
- g) Positive ID program/process
- h) Credit check and/or system to determine credit risk
- i) Deposit process, including Surety Bonds, billing, collection and refunding
- j) Residential vs. non-residential, if applicable

Div 6-11. Please provide a detailed overview and explanation of the Gas Company's current active account collection process and delinquent account management, including the following:

- a) Residential vs. non-residential account process
- b) Scoring and segmentation of accounts
- c) Account prioritization
- d) Timing of collection reminders and notices
- e) Outbound calling campaigns
- f) Disconnection for non-payment
- g) Field collections and payments
- h) Restoration of service, including fees
- i) Payment extensions and arrangements
- j) Security deposits

Div 6-12. Please provide a detailed explanation of all the changes made to the Gas Company's accounts receivable management processes and strategies since January 1, 2009. Please identify new processes and strategies and the date of deployment.

Div 6-13. Please provide a detailed overview and explanation of the Gas Company's current inactive account collection process, including the following:

- a) Final bills and reminder letters
- b) Account segmentation
- c) In-house collections vs. third-party collection agencies
- d) Account placement timing

e) Agency tier programs (i.e., early-out, primary, secondary, etc.)

Div 6-14. Please provide the Gas Company's monthly deferred payment arrangement data in the format shown in **Attachment 6-14G** (note: please include an electronic version with the response):

Div 6-15. Please provide the Gas Company's monthly accounts receivable (arrear) data in the format shown in **Attachment 6-15G** (note: please include an electronic version with the response):

Div 6-16. Please provide the Gas Company's 2007-2011, account-level, charge-off information in electronic data format shown in **Attachment 6-16G**.

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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TO R.I.G.L. §§ 39-3-10 and 39-3-11)**

**DIVISION'S SEVENTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – GAS
(Electric/Gas)**

June 12, 2012

- Div 7-1 Reference Kaye testimony, page 3, lines 13-20. Please provide all work papers, analyses, data and studies which specifically support the correlation relationship between gas commodity prices and the Company's level of uncollectible expense.
- Div 7-2 Reference Kaye testimony, page 3, lines 13-20. Please provide all work papers, analyses, data and studies which specifically support the correlation relationship between electric supply prices and the Company's level of uncollectible expense.
- Div 7-3 Reference Kaye testimony, page 9, lines 1-16.
- a) Please provide the number of accounts, type of accounts (i.e., standard-residential, protected residential and non-residential) and total incremental increase in accounts receivable resulting from suspending outbound calling and field collection activity between August and October 2011.
 - b) Please explain how the Company identifies and quantifies the accounts and dollars impacted as result of the suspended collection activities.

- c) Please provide the number and type of accounts and total incremental increase in accounts receivable, which were “pushed” into the Winter Moratorium Period.
- d) Please provide the final anticipated impact to charge-offs as a result of the suspended collection activity between August 2011 and October 2011.
- e) Please provide an explanation of the Company’s subsequent collection treatment strategies, activities and customer account management processes specifically designed and implemented to mitigate the impact of the suspended collection activity between August 2011 and October 2011.

Div 7-4 Reference Kaye testimony, page 9, lines 16-19, and page 10, lines 1-8.

- a) Please provide the total incremental increase in accounts receivable and subsequent impact to charge-offs which resulted from extending the winter protection periods in prior years.
- b) Please provide an explanation of the Company’s subsequent collection treatment strategies, activities and customer account management processes specifically designed and implemented to mitigate the impact of extending the winter protection periods in prior years.

Div 7-5 Reference Kaye testimony, page 15, lines 8-12. Please provide separate information on the 238 accounts, including:

- a) Electric Company vs. Gas Company accounts
- b) The average, past-due balance per account due at the time the petition was filed with the Division

- c) The terms of the payment plans and current status (i.e., active, defaulted or renegotiated).
- d) The number of accounts currently active and the current average past-due balance
- e) Please provide information on the final outcome (i.e., current status) of the 114 customers that did not initiate a payment plan.

Div 7-6 Please provide an explanation of how Narragansett Electric calculates its Provision for uncollectible accounts.

Div 7-7 Please provide an explanation of how Narragansett Gas calculates its Provision for uncollectible accounts.

Div 7-8 Please provide an explanation of how National Grid calculates and reports net write-offs in each of its other U.S.-based operating companies, including New Hampshire. Please explain any differences in the calculations and why Narragansett Electric/Gas may use a different methodology.

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**DIVISION'S EIGHTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – ELECTRIC**

June 14, 2012

- 8-1. Referring to Schedule MDL-3-ELEC, Page 1, please provide the financial statements from which the revenues and expenses were taken.
- 8-2. Referring to Schedule MDL-3-ELEC, Page 1, please reconcile the revenues and expenses to the electric revenues and expenses reported in The Narragansett Electric Company 2011 FERC Form 1.
- 8-3. Referring to Schedule MDL-3-ELEC, Page 63, please provide the financial statements from which the rate base was taken.
- 8-4. Referring to the response to DIV 1-2-ELEC, Attachment Page 1, please explain what the negative storm expense for the 09/03/10 storm represents.
- 8-5. Please provide the “normalized” storm damage expense remaining in the 2012 test year after the normalizing adjustment in the response to DIV 1-2-ELEC. The response should provide supporting workpapers and calculations.
- 8-6. Please provide the actual net storm damage expense in each year 2006-2010.
- 8-7. Referring to the response to DIV 1-6-ELEC, please explain the differences between employee levels as of December 2011 and the employee levels as of December 2011 indicated on Schedule MDL-3-ELEC.
- 8-8. Referring to Workpaper MDL-15, Pages 1 and 17, why are the savings for National Grid Service Company USA shown as zero?

- 8-9. Referring to the response to DIV 1-16, ELEC, what were the lives of the systems being replaced?
- 8-10. Referring to the response to DIV 1-17, ELEC why are none of the costs of the outage management system allocated to KEDLI or KEDNY?
- 8-11. Referring to the response to DIV 1-24, ELEC, please provide any research or studies that show that the contemplated “campaigns” are more effective than “bill inserts and website updates” for customer outreach and education activities.
- 8-12. Referring to the response to DIV 1-26, ELEC, why is the remaining balance of merger costs shown as negative amount?
- 8-13. Referring to the response to DIV 1-27, ELEC, please provide the increase in property tax expense from 2010 to 2011 related to increases in rates, as opposed to the increase in taxable property.
- 8-14. Referring to the response to DIV 1-27, ELEC, has the Company received any property tax bills in 2012 to date? If the response is affirmative, please provide the amounts of such bills and the amounts of the corresponding property tax bills in 2011.
- 8-15. Referring to Schedule MDL-3-ELEC, Page 67, please provide forecasted ISR capital spending, and non-ISR capital spending by function for 2012 and 2013.
- 8-16. Referring to Schedule MDL-3-ELEC, Page 67, please provide the actual ISR capital spending, and non-ISR capital spending by function for each month in 2012 to date.

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DIVISION'S NINTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – GAS

(Gas)

June 14, 2012

- 9-1. Referring to Schedule MDL-3-GAS, Page 4, please describe what the “Other Revenue Adjustment” on Line 44 represents and why it is eliminated by means of a normalizing adjustment.
- 9-2. Referring to the response to DIV-2-1-GAS, Page 1, please explain the increase in expenses charged to Account 844.2 from the expense charged to that account for the twelve months ended June 30, 2011 in the Annual Report to the RIPUC.
- 9-3. Referring to the response to DIV-2-1-GAS, Page 2, please explain the increase in expenses charged to Account 923 from the expense charged to that account for the twelve months ended June 30, 2011 in the Annual Report to the RIPUC.
- 9-4. Referring to the response to DIV-2-2-GAS, please provide a complete description of the “Westerly Event” and an explanation of how the expenses attributable to that event were identified.
- 9-5. Referring to the response to DIV-2-20-GAS, please quantify the increase in customer demand for gas conversions. The response should show the expected increase in Gas FY 2013 over the prior year and should explain how that increase is reflected in the forecast of rate year revenues.
- 9-6. Please provide the number of gas customers by rate class for each month from January 2011 to the most recent month available.
- 9-7. Referring to Schedule ALS-4, please explain the forecasted decreases in deliveries from Fiscal Year 2012 to Fiscal Year 2014 for the following rate classes: LLF large FT-1, LLF XL FT-1, and HLF XL FT-1.

- 9-8. Referring to Schedule ALS-4, please provide the actual monthly deliveries in 2012 to date and in the corresponding months in 2011 for the following rate classes: LLF large FT-1, LLF XL FT-1, and HLF XL FT-1.
- 9-9. Referring to Schedule ALS-4, please explain why the residential heating sales increase from Fiscal Year 2012 to Fiscal Year 2013 and then decrease from Fiscal Year 2013 to Fiscal Year 2014.

IN RE: APPLICATION OF THE NARRAGANSETT ELECTRIC)
COMPANY D/B/A NATIONAL GRID FOR)
APPROVAL OF A CHANGE IN ELECTRIC AND)
GAS BASE DISTRIBUTION RATES PURSUANT TO)
R.I.G.L. §§ 39-3-10 and 39-3-11)
) DOCKET NO. 4323
)
)
)
)

DIVISION'S TENTH SET OF DATA REQUESTS

DIRECTED TO NATIONAL GRID – ELEC

June 21, 2012

Request for electronic versions of Witness Schedules and Workpapers

1. Please provide the following Schedules produced by Mr. Howard Gorman in electronic format (e.g., Microsoft Excel) with all formulas intact:
 - Schedule HSG-1 (including the Allocated Class Cost of Service Study model)
 - Schedule HSG-2
 - Schedule HSG-3
2. Please provide the following Schedules produced by Ms. Jeanne Lloyd in electronic format (e.g., Microsoft Excel) with all formulas intact:
 - Schedule JAL-1
 - Schedule JAL-2 and Workpaper JAL-2
 - Schedule JAL-3
 - Schedule JAL-4 and Workpaper JAL-4
 - Schedule JAL-5
 - Schedule JAL-6 and Workpaper JAL-6
 - Schedule JAL-7
 - Schedule JAL-9
3. Please provide the following Schedules produced by Ms. Evelyn Kaye in electronic format (e.g., Microsoft Excel) with all formulas intact:
 - Schedule EMK-1
 - Schedule EMK-2

- Schedule EMK-3
 - Schedule EMK-4
4. Please provide the following Schedules produced by Dr. Alfred Morrissey in electronic format (e.g., Microsoft Excel) with all formulas intact:
- Schedule APM-1
 - Schedule APM-2
 - Schedule APM-3
 - Schedule APM-4
 - Schedule APM-5
 - Schedule APM-6
 - Schedule APM-6A
 - Schedule APM-7

Questions for Witness Mr. Howard Gorman

5. Please provide the “Historical MWh”, “Historical Class NCP”, and “Historical Contribution to 1CP” for the following time periods in the same format presented in Schedule HSG-3Q:
- a. 12 months ended December 31, 2009
 - b. 12 months ended December 31, 2010
 - c. 12 months ended December 31, 2011
6. Please explain and provide the supporting documentation used to determine the 67.5 percent and 32.5 percent weights in Schedule HSG-3Q that were used to weight load data from 2008 and 2011, respectively.
7. According to page 18, lines 18-20 of Mr. Gorman’s direct testimony, “Line transformers (Account 368) were assigned based on a special study of the customers served by each transformer (Schedules HSG-3D to HSG-3F).” Schedule HSF-1F-3 suggests that the distribution plant component of line transformers and the distribution expense O&M component of line transformers are allocated on the basis of the “NCP_PriSec” allocator (HSG-1F-3 page 1, line 18 and HSG-1F-3 page 2, line 69).
- a. Are line transformers (distribution plant and distribution expense) allocated to the customer classes on the basis of the “NCP_PriSec” allocator?
 - b. What costs are allocated within the allocated class cost of service study on the “Xfmr_Cost” allocator presented in page 2, lines 37-38 of Schedule HSG-2C?
 - c. Is the “NCP_PriSec” allocator presented on page 1, lines 22-23 of Schedule HSG-2C equal to the average of the “NCP_at_Pri” and “NCP_at_Sec” allocators?

8. With respect to Mr. Gorman's Schedules HSG-3E and HSG-3F, please answer the following questions:
- a. Please define the column variables in Schedule HSG-3F.
 - b. Please provide the kVa rating of each "Transformer Type" listed in column 1 of Schedule HSG-3F.
 - c. Do the values in column 1 "Transformer" of Schedule HSG-3E represent the 32 "Transformer Types" listed in column 1 of Schedule HSG-3F?
 - d. What method was used to assign customers, including their customer class, to the various "Transformer" categories (column 1) in Schedule HSG-3E?
 - e. Is each Narragansett Electric Company distribution customer assigned to one and only one line transformer (or transformer type) in Schedule HSG-3E?

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**DIVISION'S ELEVENTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – ELEC/GAS**

June 25, 2012

11-1. Regarding National Grid's service companies, p. 13 of Mr. LaFlamme's testimony refers to 3 KeySpan service companies, a NGSC, and a separate engineering services company. MDL-1 refers to 4 service companies:

- a) Please clarify the current list of companies;
- b) Please provide a description of the function of and activities performed by each of these companies;
- c) Please indicate for each company whether it uses PeopleSoft, Oracle, both, or neither accounting system;
- d) Please provide the location(s) of current service companies, and
- e) Please provide the total number of employees of each service company annually from 2007 to 2011.
- f) Please provide the number of service company employees by location in 2010 and 2011.

11-2. Does National Grid have a system of employee pay or skill grades or some other system to provide comparable employee rankings that apply to service company employees? If so, please describe.

11-3. If National Grid does have some system ranking employees, does it pay employees of the same ranking in different locations the same pay, on average? If not, why not?

11-4. When does National Grid plan to consolidate existing service companies? Please provide any testimony, reports or memos that describe such plans and potential savings from such consolidation.

11-5. Do any of National Grid service companies directly make any capital investments? If so, please indicate the nature of such investments and the accounts to which they are booked.

11-6. Please provide copies of any documents (manuals and policy statements) regarding National Grid's previous Service Company allocation agreements and instructions for direct charging costs, including the revised comprehensive cost-allocation model referred to by Mr. Laflamme on p. 16.

11-7 Please provide copies of any documents (manuals and policy statements) regarding National Grid's new Service Company allocation agreements and instructions for direct charging costs.

11-8. Please provide copies of any documents (manuals and policy statements) regarding the Service Company allocation agreements and instructions for direct charging costs that are utilized by the KeySpan service companies.

11-9. Please provide formulae detailing how Gross Margin is calculated for Electric and for Gas Utilities, referring to specific FERC accounts or subaccounts that define revenues and costs that are netted out.

11-10. Is the Gross Margin derived from total operating company revenues or from regulated rate revenues?

11-11. Please provide an electronic workpaper that computes the annual amount of Gross Margins of each National Grid affiliate for 2009, 2010, and 2011, as defined for the purposes of Service Company allocations. This workpaper should show total revenue by year by affiliate and the categories of costs that are subtracted to get Gross Margins.

11-12. Does National Grid utilize Asset Management Agreements ("AMAs") to manage its gas assets in any of its operating companies? If so:

- a) List companies that utilize AMAs
- b) Provide the amount of assets that are managed by AMAs in each operating company.

11-13. On p.19 Mr. Laflamme states that Stranded Costs are removed in the computation of Gross Margins. Please list the operating companies that still have Stranded Costs.

11-14. Please provide a spreadsheet indicating the accounts of all costs that are included in the O&M expense allocator referred to on p. 19 of Mr. Laflamme's testimony.

11-15. In MDL-1 p. 7, what is meant by the label "Multiple" under Narragansett Electric?

11-16. In MDL-1 p. 7, are the adjustments to the two Narragansett companies primarily the result of adjustments to the allocation between the two companies, or something else. Please explain.

11-17. On p.13 Mr. Laflamme states that the underlying metric data to arrive at cost causative allocators are calculated differently. Please describe these differences and indicate the percentage allocators provided by the two methods, when the metrics are different.

11-18. Please produce workpapers in the form of fully functioning spreadsheets in Excel format that list by FERC account and sub-account the original-test year allocation of costs from each KeySpan service company to all National Grid operating companies, including Narragansett Electric and Narragansett Gas.

11-19. Please produce workpapers in the form of fully functioning spreadsheets in Excel format that list by FERC account and sub-account the revised allocation of costs from each KeySpan service company to all National Grid operating companies, including Narragansett Electric and Narragansett Gas. Please specify, by account, whether the revision was due to the change to the three-factor general allocator or something else.

11-20. Please produce workpapers in the form of fully functioning spreadsheets in Excel format that list by FERC account and sub-account the original-test year allocation of costs from NGSC to all National Grid operating companies, including Narragansett Electric and Narragansett Gas.

11-21. Please produce workpapers in the form of fully functioning spreadsheets in Excel format that list by FERC account and sub-account the revised allocation of costs, if there was any reallocation of costs from NGSC, from each NGSC to all National Grid operating companies, including Narragansett Electric and Narragansett Gas.

11-22. If any of the reallocation of costs between the Rhode Island gas and electric utilities was due to anything other than the treatment of service company costs (i.e. allocation of costs from other operating companies), please explain these reallocations.

11-23. Please indicate, by FERC account, any decreases in direct Narragansett electric or gas costs that are reflected in the rate filing because of consolidation of service companies.

11-24. Please provide all Requests for Proposals (“RFPs”) issued by Narragansett Electric for the services procured from affiliates, including the Service Company, for the years 2010 and 2011. Include all bid responses, bid scorings and analyses and an explanation of why Narragansett Electric did not issue RFPs where services were procured without RFP.

11-25. Please provide all Requests for Proposals (“RFPs”) issued by Narragansett Electric for the services procured from affiliates, including the Service Company, for the years 2010 and 2011. Include all bid responses, bid scorings and analyses and an explanation of why Narragansett Electric did not issue RFPs where services were procured without RFP.

11-26. Please provide a list of service companies that allocate costs between gas and electric operating companies on the basis of three-factor allocators.

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ELECTRIC AND GAS BASE)
DISTRIBUTION RATES PURSUANT)
TO R.I.G.L. §§ 39-3-10 and 39-3-11)**

**DIVISION'S TWELFTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – GAS**

June 28, 2012

Div 12-1. Re: Schedules ALS-1 through ALS-7 and Appendix ALS attached to the Direct Testimony of witness Silvestrini at page 9, lines 13-18, please provide the information in each schedule ALS-1 through ALS-7 and Appendix ALS in electronic spreadsheet format with all cell references and cell formulas.

Div 12-2. Re: the Direct Testimony of witness Silvestrini at page 4 of 18, lines 5-17, please:

- a. Provide the data, workpapers (including electronic spreadsheet files with all cell references and cell formulas), and other analyses upon which National Grid relies to assess that a 10-year average remains reasonable and appropriate for defining "normal" weather for ratemaking purposes;
- b. Provide the daily temperature data for the period January 1, 2002 through December 31, 2011, that was used in the determination of "normal weather" degree days by day for January 1, 2011 through December 31, 2011;
- c. Explain and provide all analyses, texts, and other authoritative documents which support the inclusion of the period to be weather-normalized (i.e., January 1, 2011 through December 31, 2011) in the historic period used to compute "normal weather" degree days.

Div 12-3. Re: the Direct Testimony of witness Silvestrini at page 4 of 18, lines 18-21, please:

- a. Provide the data, assumptions, workpapers (including electronic spreadsheet files with all cell references and cell formulas), and other analyses

upon which National Grid relies to compute the adjustments for changes in numbers of customers and changes in customer usage that are expected to occur between the test year and the end of the rate year;

- b. Provide actual numbers of customers by rate classification (including non-firm and transportation services) by month for calendar years 2002 through 2011;
- c. Provide actual usage by rate classification (including non-firm and transportation services) by month for calendar years 2002 through 2011.

Div 12-4. Re: Schedule ALS-2, please provide the data, analyses, calculations, assumptions, and workpapers (including electronic spreadsheet files with all cell references and cell formulas) used to determine the magnitude of the "Proforma Adjustment" in column (e) for each rate classification.

Div 12-5. Re: the Direct Testimony of witness Silvestrini at page 6 of 18, lines 6-8, please provide the data, analyses, workpapers (including electronic spreadsheet files with all cell references and cell formulas), studies and other documents upon which the Company relies to determine base gas use for each rate classification.

Div 12-6. Re: the Direct Testimony of witness Silvestrini at page 6 of 18, lines 6-10, please:

- a. Provide the data, analyses, workpapers (including electronic spreadsheet files with all cell references and cell formulas), studies and other documents upon which the Company relies to assess the relationship between heating degree day measures and natural gas use for water heating;
- b. Provide the Company's assessment of the amount of gas use in each month for each rate classification that is the result of water heating requirements.

Div 12-7. Re: Schedule ALS-2, please explain in detail and provide supporting workpapers (including electronic spreadsheet files with all cell references and cell formulas) and analyses which document the manner in which customer movement between rate classifications was considered in the Company's estimation of the weather-adjusted test year volumes by rate classification.

Div 12-8. Re: Schedule ALS-2, please provide actual gas service volumes and revenue by year for the 2005 through 2011 period for:

- i. NGV service
- ii. Gas Lights
- iii. Manchester St.

iv. Marketers

Div 12-9. Re: the Direct Testimony of witness Silvestrini at page 7 of 18, lines 8-20, please:

- a. Identify the time period(s) from which data inputs were used in the estimation of customer counts for each rate classification for the test year;
- b. Identify the time period(s) from which data inputs were used in the estimation of use-per-customer for each rate classification for the test year;
- c. Provide the workpapers (including electronic spreadsheet files with all cell references and cell formulas), data, and analyses upon which the Company relied to “re-normalize” historical volumes by rate class.

Div 12-10. Re: the Direct Testimony of witness Silvestrini at page 8 of 18, lines 4-15, please:

- a. Indicate the specific period for which the referenced 2005 total annual deliveries were measured (i.e., Does that 2005 measure of total deliveries reflect calendar year deliveries, fiscal year deliveries, deliveries for a DAC reconciliation period or some other measure);
- b. Provide estimated total normal weather annual deliveries to customers across all firm rate classes for each year from 2005 through 2011;
- c. Provide the average cost of Company-supplied gas service for sales service customers (including GCR, DAC and all other surcharges) by rate class by year for the years 2005 through 2011;
- d. Provide the data upon which the Company concludes that the trend in average residential use per customer has stabilized over the past three years;

Div 12-11. Re: the Direct Testimony of witness Silvestrini at pages 8-9, please:

- a. Provide the data, analyses and studies upon which the Company relies to assess that 1.3% growth customer count represents modest growth by industry standards;
- b. Provide the data, analyses, and studies relied upon to assess the “decline in population” for Rhode Island;
- c. Provide actual year-by-year customer additions from 2005 to 2011;

Div 12-12. Re: Schedule ALS-3 attached to the Direct Testimony of witness Silvestrini, please:

- a. Provide the data, analyses, studies and rationales upon which the Company relies to explain:
 - i. The increases in Residential Non-Heat gas use from 620,472 Dth and 669,299 Dth between 2007 and 2008;
 - ii. The increases in Residential Non-Heat gas use from 669,299 Dth and 744,431 Dth between 2008 and 2009;

Div 12-13. Re: Schedule ALS-4 attached to the Direct Testimony of witness Silvestrini, please:

- a. Provide the formulas and analyses used to derive the “Rate Year Ending Jan-2014” deliveries for each rate class;
- b. Document and explain the factors driving the increase in forecasted **Residential Heat Low Income deliveries** between 2012 and 2013 and the subsequent reduction in the deliveries for such customers in the 2014 forecast;
- c. Document and explain the factors driving the increase in forecasted **C&I Medium FT-1 deliveries** between 2012 and 2013 and the subsequent reduction in the deliveries for such customers in the 2014 forecast;
- d. Document and explain the factors driving the increase in forecasted **LLF Large FT-2 deliveries** between 2012 and 2013 and the subsequent reduction in the deliveries for such customers in the 2014 forecast;
- e. Document and explain the factors driving the increase in forecasted **LLF XL FT-2 deliveries** between 2012 and 2013 and the subsequent reduction in the deliveries for such customers in the 2014 forecast;
- f. Document and explain the factors driving the forecasted increases in **HLF XL FT-2 deliveries** between 2012 and 2013 and between 2013 and 2014;

Div 12-14. Re: Schedule ALS-4 attached to the Direct Testimony of witness Silvestrini, please:

- a. Verify that the forecasted deliveries presented in Schedule ALS-4 are intended to represent forecasted deliveries under normal weather conditions;

- b. Verify that the (797,480) Annual change shown in the column headed "2012" represents the difference between forecasted normal weather deliveries for 2012 and actual (non-weather-normalized) deliveries for 2011;
- c. Demonstrate the manner in which the "Average Annual Percentage Change" would be altered if the change from 2011 to 2012 was based on the difference between forecasted normal weather deliveries for 2012 and estimated normal weather deliveries for 2011.

Div 12-15. Re: Schedule ALS-5 attached to the Direct Testimony of witness Silvestrini, please:

- a. Document by year for each year of the period 2005 through 2011 the number of Residential Non-Heat customers that transferred to Residential Heating service:
 - i. For rate classification 1012
 - ii. For rate classification 1101
- b. For those Residential Non-Heat and Low Income Residential Non-Heat accounts that were lost and did not transfer to Residential Heat service or Residential Low Income Heat service, provide the Company's understanding of what happened to those customers. (i.e., Were the dwellings abandoned? Did the customers replace gas appliances with electric appliances? Other?)
- c. Explain the factors causing the total residential customer count to decline in 2011 when for all prior years and for each of the forecasted years total residential customers increase in every year.

Div 12-16. Re: Schedule ALS-6 attached to the Direct Testimony of witness Silvestrini, please provide the formulas and analyses used to derive the "Rate Year Ending Jan-2014" customer count for each rate class.

Div 12-17. Re: Schedule ALS-7 attached to the Direct Testimony of witness Silvestrini, please:

- a. Provide a definition of the acronym at the top of each column on each page of Schedule ALS-7;
- b. Provide the source documents from which the data in each column on the pages of Schedule ALS-7 were derived;
- c. Provide the units of measure for the data in each column on the pages of Schedule ALS-7;

d. Document and explain how and where each variable listed in the columns of Schedule ALS-7 was used:

- i. In the Company's forecasting of customer counts for each rate class;
- ii. In the Company's forecasting of gas deliveries for each rate class.

Div 12-18. Re: the Direct Testimony of witness Silvestrini at page 9, lines 13-15, please:

- a. Document and provide data, analyses, workpapers (including electronic spreadsheet files with all cell references and cell formulas), and assumptions used to support the Company's evaluation of the "potential impact that the Company-sponsored energy efficiency programs would have on the forecasted delivery quantities" for each firm sales and transportation rate classification;
- b. Provide the data, analyses, workpapers (including electronic spreadsheet files with all cell references and cell formulas), and assumptions the Company has used to assess the actual impact that the Company-sponsored energy efficiency programs has had on delivery quantities by rate classification to date.

Div 12-19. Re: the Direct Testimony of witness Silvestrini at page 11, lines 1-4, please explain and document the derivation of the "alpha" value shown for each month for each rate class, and provide data, calculations, and workpapers to demonstrate their use in the estimation of forecasted use per customer for each rate classification for which use per customer estimates were generated.

Div 12-20. Re: the Direct Testimony of witness Silvestrini at page 11, lines 15-19, please provide the data, analyses, workpapers (including electronic spreadsheet files with all cell references and cell formulas), and assumptions that support the Company's determination that "the monthly distribution of the annual volumes were skewed toward the winter heating months and away from the shoulder and non-heating months when compared to recent historical experience."

Div 12-21. Re: the Direct Testimony of witness Silvestrini at page 11, lines 15-19, please:

- a. Provide the data, analyses, studies, and assumptions relied upon to support the appropriateness of the decision to use a "three-year-moving average" over the 2006 – 2011 period as opposed to a different moving average or some other tool to adjust for the claimed anomaly;

- b. Explain why the use of three-year-moving averages starts with 2006 when most of the data by rate class that the Company presents includes 2005.

Div 12-22 Re: the Direct Testimony of witness Silvestrini at page 12-13, please verify that the basis for the forecast of delivery volumes the Company presents in this proceeding is consistent with the basis for the Company's estimation of:

- a. Design Peak Day Demand in its most recent long range supply plan;
- b. Design Winter Requirements in its most recent long ranges supply plan

Div 12-23 Re: the Direct Testimony of witness Silvestrini at page 13-14, please:

- a. Provide the data, analyses, workpapers (including electronic spreadsheet files with all cell references and cell formulas) and other documents and studies upon which the Company has relied to test and verify the reasonableness of the results of the Moody's economic forecasting model for Rhode Island.
- b. Provide documentation for the Moody's economic forecasting model for Rhode Island upon which the Company has relied;

Div 12-24 Re: Appendix ALS to the Direct Testimony of witness Silvestrini, please:

- a. For each of the regression equations specified for the Models by rate classification presented on the pages of Appendix ALS, provide:
 - i. The estimated intercept value
 - ii. T-statistics for each estimated variable (including the intercept value)
 - iii. The computed standard deviation for each variable
 - iv. F-Statistics
 - v. Durbin-Watson statistics
- b. Explain the rationale(s) for the choice of explanatory variable for each use per customer model presented for each rate class.
- c. Provide correlations between weather sensitive gas use and degree days over the 2002-2011 period for each rate class for:
 - i. the month of April,
 - ii. the month of May,
 - iii. the month of June,

- iv. the month of September,
- v. the month of October, and
- vi. the month of November.

- d. For the pages of Appendix ALS which present data relating to the estimation of Use per Customer, document and explain the derivation of the data in the column headed "For Monthly Allocation of HDD."
- e. Define the acronym "GOF."

Div 12-25 Re: Appendix ALS, page 8 of 72, to the Direct Testimony of witness Silvestrini, please:

- a. Provide the Company's interpretation of the 0.2607 R-Square value shown for the Slope Model and its statistical implications;
- b. Explain the rational for the "Slope Model" and document and explain the manner in which the "Slope Model" differs from the "Base Model."

Div 12-26 Re: Appendix ALS, page 11 of 72, to the Direct Testimony of witness Silvestrini, please:

- a. Provide the Company's interpretation of the 0.2137 R-Square value shown for the Base Model and its statistical implications;
- b. Provide the Company's interpretation of the 0.247 R-Square value shown for the Slope Model and its statistical implications;
- c. Explain the rational for the "Slope Model" and document the manner in which that model differs from the "Base Model."

Requests Regarding the Direct Testimony of National Grid witnesses Normand and Leary

Div 12-27 For Gas Marketers, please provide a breakdown of revenue and by charge for each year 2005 through 2011 and show the aggregate billing determinants for all marketers for each charge billed for each year.

Div 12-28 Please provide the number of active gas marketers in the Company's Rhode Island Service Territory by month for each year in 2005 through 2011 period.

Div 12-29 Please provide the Company's assessment of the impact of its proposed Gas Marketer Tariff Changes in Docket No. 4270 on its rate year costs for coordination, administration, and billing of marketer services compared to those it actually incurred during the test year.

Div 12-30 Please detail the costs that National Grid attributes to its test year provision of service to:

- a. Gas Lights
- b. Manchester St.
- c. Natural Gas Vehicles

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

**IN RE: APPLICATION OF THE)
NARRAGANSETT ELECTRIC)
COMPANY D/B/A NATIONAL GRID)
FOR APPROVAL OF A CHANGE IN) DOCKET NO. 4323
ELECTRIC AND GAS BASE)
DISTRIBUTION RATES PURSUANT)
TO R.I.G.L. §§ 39-3-10 and 39-3-11)**

**DIVISION'S THIRTEENTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – GAS**

July 11, 2012

Div 13-1. Re: The Company's response to Division 4-2-Gas, given that the Company disagrees that rates for non-firm transportation service should be set on a cost-of-service basis, please:

- a. Explain conceptually how the Company believes non-firm transportation service should be priced and provide the conceptual rationale(s) for the Company's position;
- b. Indicate whether the Company would support a return to value of service pricing for non-firm transportation service and, if so, provide the data, analyses, and rationales upon which it relies to support that position;
- c. If the Company's position that continued reliance on a discount from firm service pricing is appropriate, detail conceptually the methods that the Company would use to evaluate the on-going appropriateness of the 20% discount adopted in the Company's last base rate case;

Div 13-2. Re: The Company's response to Division 4-2-Gas, please:

- a. Document and explain the manner in which non-firm transportation service is priced in each of the other jurisdictions in which National Grid provides gas service;
- b. Provide the summary pages of National Grid's most recent embedded class cost of service study in each other jurisdiction in which it provides gas service;

- c. Provide the basis for the Company's assertion that "an embedded study is only related to firm service;"
- d. Provide all studies and surveys available to the Company which assess the extent to which other gas utilities in the U.S. used embedded cost of service studies to price non-firm gas service.

Div 13-3. Re: The Company's response to Division 4-2-Gas, please:

- a. Document each instance known to the Company over the last three years in which a non-firm customer has substituted an alternate fuel for natural gas service to take advantage of price changes during periods when gas service was NOT subject to interruption or curtailment by the Company and identify the alternate fuel used in each instance;
- b. Identify all steps the Company has taken through contract or tariff provisions (e.g., minimum take provisions, demand charges and/or contract term provisions) to increase the predictability of non-firm service requirements and, if it has taken no such steps, explain why.

Div 13-4. Please provide any data, analyses, studies or other documents upon which the Company relies to assess:

- a. The need for, and/or the appropriateness of, its continued offering of Non-firm gas sales service in Rhode Island;
- b. The numbers in each month since the Commission's final order in Docket No. 3943 that used non-firm gas sales service and the volumes of non-firm gas sales service in billed in each month.

Div 13-5. Re: The Company's response to Division 4-4-Gas, please verify that the referenced 20% discount was offered by the Division as a compromise position filed on November 10, 2008, in the "Reply of the Division of Public Utilities and Carriers to Post-hearing Memoranda" and was presented in the context of the Division's expression of concerns regarding inadequacies of the record in that case.

Div 13-6. Re: The Company's response to Division 4-6-Gas, part (a), please:

- a. Indicate whether the Company believes that setting rates for non-firm transportation service by applying a 20 percent discount off firm pricing constitutes cost-based ratemaking;
- b. Provide the data and analyses performed by or for the Company to assess the continuing reasonableness of the 20% discount from firm pricing that was adopted in the Company's last base rate case:
 - i. For this proceeding;

ii. For future base rate proceedings.

Div 13-7. Re: The Company's response to Division 4-7-Gas, please provide Total Dual Fuel margins for the period July 2011 through June 2012 as soon as that information is available.

Div 13-8. Re: Attachment DIV 12-23-1-Gas, page 1 of 24, please indicate whether the presentation that constitutes the referenced attachment was prepared by National Grid, Moody's or some other party, and if some other party, identify the party who prepared the presentation.

Div 13-9. Re: Attachment DIV 12-23-1-Gas, page 4 of 24, please:

- a. Identify each of the 25 major investor owned gas and electric utilities referenced;
- b. Identify each of the 17 utilities using Moody's;
- c. Explain the reference to EEI Load Forecasting Group 2009 survey and indicate:
 - i. The purpose of the survey;
 - ii. The types of information that addressed by the survey;
 - iii. The frequency with which such surveys are performed;
 - iv. The relationship between Moody's and the EEI Load Forecasting Group;
- d. Indicate the restrictions, if any, to Division access to the EEI Load Forecasting Group 2009 Survey;
- e. Indicate when the 2009 survey data will be updated.

Div 13-10. Re: Attachment DIV 12-23-1-Gas, page 7 of 24, please:

- a. Explain and document the manner in which the percentages shown in the table on page 7 of 24 relating to differences in average annual growth rates were computed and clearly indicate the intended meaning of a negative value in that table;
- b. Document the manner in which the +/- 2% in the first bullet point below the table was computed;
- c. Provide similar comparisons of differences in average annual growth rates for each year in the period 2009 through 2015;
- d. Define the acronym "GMP" and explain how the Company uses GMP data in its gas forecast for Rhode Island;

- e. Indicate the date that the Moody's Forecast was completed and the time period(s) from which the inputs for that forecast were derived.
- f. Indicate the date that the Global Forecast was completed and the time period(s) from which the inputs for that forecast were derived.

Div 13-11. Re: Attachment DIV 12-23-1-Gas, page 10 of 24, please:

- a. Explain and document the meaning and importance of the insertion of the word "construction" in parentheses after "Total Employment" and indicate why a similar reference is not found in the table on page 7 of 24;
- b. Document the manner in which the "~2%" figure in the first bullet point below the table was computed;
- c. Provide the basis for the statement that "The 2010 forecasts will be dramatically different based on the recovery from recession;"
- d. The table on page 10 of 24 appears to provide only positive differences. Are these absolute values or was one forecast consistently higher on average than the other?:
 - i. If average results for one forecast were consistently higher than the average results for the other forecast, indicate which forecast (Moody's or Global) was higher;
 - ii. If the data shown in the table on page 10 of 24 represent absolute values, please provide the results showing positives and negatives as was done in the table on page 7 of 24.

Div 13-12. Re: Attachment DIV 12-23-1-Gas, page 12 of 24, please explain why maintaining consistency with NE and NY ISOs is important for the Company's gas forecasts.

Div 13-13. Re: Attachment DIV 12-23-1-Gas, page 14 of 24, please provide a similar set of comparisons for Moody's and Global forecasts for Rhode Island.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: APPLICATION OF THE)
NARRAGANSETT ELECTRIC)
COMPANY D/B/A NATIONAL GRID)
FOR APPROVAL OF A CHANGE IN)
ELECTRIC AND GAS BASE)
DISTRIBUTION RATES PURSUANT) **DOCKET NO. 4323**
TO R.I.G.L. §§ 39-3-10 and 39-3-11)
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DIVISION'S FOURTEENTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – GAS AND ELECTRIC

July 11, 2012

- Div 14-1. Reference Div. 6-16-GAS. The Company provided only 14 of the 136 data elements/columns of data originally requested. Please provide a detailed status and delivery update with regard to the missing data.
- Div 14-2. Reference Div. 6-16-GAS. Please provide a key or explanation of the following columns which contain codes:
- a) "Rate"
 - b) "Rate Code"
 - c) "Status"

Div 14-3. Reference Div. 6-16-GAS. Only one account number (i.e., column) is provided on the data file. Is this Customer number or an Account number? Is there a customer number and account number with the Company's Gas customers as there is with it Electric customers?

Div 14-4. Reference Div. 6-16-GAS. Please explain the asterisk ("*") in front of some of the customer names.

Div 14-5. Reference Div. 6-16-GAS. Please explain the following:

- a) [REDACTED] has 2 charge-offs of \$416 each on 5/17/2011, at 2 separate floors of the same address.
- b) [REDACTED] has 9 charge-offs of exactly \$160 on 6/23/2011, at 9 separate apartment numbers of the same address
- c) [REDACTED] has 6 charge-offs of exactly \$256 on 2/15/11, at the same address with only three apartments/floors.

Div 14-6. Reference Div. 5-16-ELEC. In the Company's response there are 71 of the 136 data elements noted as "Pending." Please provide a detailed status and delivery update with regard to the pending or missing data.

Div 14-7. Reference Div. 5-16-1-ELEC. Referencing the "pending" data elements with "data limitations" due to individual accounts with multiple charge-offs,

reconnections and finals, it is requested that the Company provide multiple information as required. For example, if an account charged-off in 2008, reconnected in 2009 and closed and charged-off again in 2010, there will be multiple payment statuses, amounts and dates required to capture the data requested.

Div 14-8. Reference Div. 5-16-1-ELEC. Please provide a key or explanation of the following columns which contain codes:

- a) "Premise Type Code"
- b) "Account Status Code"
- c) "Electric Meter Location Code"
- d) "External Score"

Div 14-9. Reference Div. 5-16-1-ELEC. Please provide a correct zip code

Div 14-10. Reference Div. 5-16-ELEC. Of the 111,195 charged-off accounts provided, there are about 22,310 (20.1%) which are coded as "Final." Please explain how these accounts have a current status of "Final" if they were previously charged-off?

Div 14-11. Reference Div. 5-16-ELEC. Of the 111,195 charged-off accounts provided, there are 49,943 accounts which show a last payment date of "1/1/1900". Please explain this date and how it relates to accounts coded as "Final" and Written Off."

Div 14-12. Reference Div. 5-16-ELEC. Reference the accounts associated with the two premises shown in the tables below, please provide a detailed history and explanation of the delinquency at each premise, including the following (note: the accountholder's last name has been removed for confidentiality)::

- a) Total number of charge-offs
- b) Total dollars charged-off
- c) The total number of individual accountholders
- d) Any known relationship between each accountholder
- e) The total number of payments made by each accountholder
- f) The total amount of payments made by each accountholder
- g) The sequential collection treatment effort applied to the current accountholder, including collection calls, letters, disconnection notices, payment plans, DNPs, restorations, and balance transfers since their first date of delinquency
- h) The current delinquency status of the of the current accountholder
- i) The sequential collection treatment effort applied to the current accountholder, including call, letters, disconnection notices, payment plans, DNPs and restorations, since the first date of delinquency

- j) Explanation of how the Company's external scoring system was applied in the collection treatment strategies of each accountholder
- k) Date last pay of "1/1/1900". Please explain.
- l) Any risk mitigation strategies deployed by the Company, including fraud investigations at the time of account initiation.

Customer Name	Cust#	Acct#	Start Date	End Date	Date Last Pay	Charge-Off	Charge-Off	Address
						Amount	Date	
[REDACTED]	[REDACTED]	[REDACTED]	10/17/2007	2/20/2008	1/1/1900	569.06	5/21/2008	[REDACTED]
			2/19/2008	2/25/2008	1/1/1900	57.24	5/27/2008	
			2/25/2008	8/20/2008	1/1/1900	439.75	11/21/2008	
			8/20/2008	1/14/2009	1/1/1900	318.65	4/15/2009	
			1/12/2009	5/18/2009	1/1/1900	97.38	8/19/2009	
			10/12/2010	11/8/2010	1/1/1900	7.48	1/19/2011	
			3/29/2011	5/27/2011	1/1/1900	2,238.69	8/31/2011	
			5/27/2011	8/1/2011	7/20/2011	84.66	11/2/2011	
			8/1/2011	9/12/2011	1/1/1900	20.27	11/18/2011	
Customer Name	Cust#	Acct#	Start Date	End Date	Date Last Pay	Charge-Off	Charge-Off	Address
						Amount	Date	
[REDACTED]	[REDACTED]	[REDACTED]	6/5/2007	7/16/2008	1/1/1900	927.18	10/17/2008	[REDACTED]
			7/16/2008	1/29/2009	3/18/2009	0.01	4/2/2009	
			1/28/2009	2/20/2009	6/30/2009	71.03	5/27/2009	
			2/20/2009	2/23/2009	1/1/1900	0.09	3/24/2009	
			8/31/2009	1/11/2010	1/1/1900	1,490.05	4/28/2010	
			1/11/2010	4/28/2010	1/1/1900	934.44	7/29/2010	
			8/31/2009	1/11/2010	1/1/1900	1,490.05	4/28/2010	
			1/11/2010	4/28/2010	1/1/1900	934.44	7/29/2010	

REDACTED

Div 14-13. Reference Div. 5-16-ELEC. There appears to be over 5,000 duplicate accounts, each with the same premise address, name, customer number, charge-off amount, charge-off date, etc. Please explain the duplication and indicate if it can be corrected. A random sample of duplicates is noted below (note: the accountholder's last name has been removed for confidentiality):

Residential/Non-Residential Code	Premise Type Code	Customer Name	Cust#	Acct#	Account Status Code	Description	Start Date	End Date	Date Last Pay	Charge-Off Amount	Charge-Off Date
R	1				18	Written Off	1/4/2008	7/7/2008	1/1/1900	354.33	10/8/2008
R	1				18	Written Off	1/4/2008	7/7/2008	1/1/1900	354.33	10/8/2008
R	1				18	Written Off	6/21/2007	3/19/2008	1/1/1900	432.81	6/20/2008
R	1				18	Written Off	6/21/2007	3/19/2008	1/1/1900	432.81	6/20/2008
R	1				18	Written Off	2/13/2008	4/10/2008	1/1/1900	29.46	7/11/2008
R	1				18	Written Off	2/13/2008	4/10/2008	1/1/1900	29.46	7/11/2008
R	1				18	Written Off	4/10/2008	3/25/2009	1/1/1900	166.58	6/26/2009
R	1				18	Written Off	4/10/2008	3/25/2009	1/1/1900	166.58	6/26/2009
R	1				18	Written Off	3/18/2010	9/7/2011	1/1/1900	358.24	12/9/2011
R	1				18	Written Off	3/18/2010	9/7/2011	1/1/1900	358.24	12/9/2011
C	24				18	Written Off	7/2/2008	7/8/2009	1/1/1900	27,529.77	5/26/2009
C	24				18	Written Off	7/2/2008	7/8/2009	1/1/1900	27,529.77	6/1/2009
C	24				18	Written Off	7/2/2008	7/8/2009	1/1/1900	27,529.77	6/8/2009
C	24				18	Written Off	7/2/2008	7/8/2009	1/1/1900	27,529.77	7/6/2009
C	24				18	Written Off	7/2/2008	7/8/2009	1/1/1900	27,529.77	7/8/2009
C	19				18	Written Off	6/23/2010	7/1/2011	2/22/2011	1,375.64	12/9/2011
C	19				18	Written Off	6/23/2010	7/1/2011	2/22/2011	1,375.64	12/19/2011
C	19				18	Written Off	6/23/2010	7/1/2011	2/22/2011	1,375.64	12/9/2011
C	19				18	Written Off	6/23/2010	7/1/2011	2/22/2011	1,375.64	12/19/2011
C	19				18	Written Off	6/23/2010	7/1/2011	2/22/2011	1,375.64	12/9/2011
C	19				18	Written Off	6/23/2010	7/1/2011	2/22/2011	1,375.64	12/19/2011
R	1				18	Written Off	11/9/2010	7/14/2011	6/1/2011	1,182.00	12/9/2011
R	1				18	Written Off	11/9/2010	7/14/2011	6/1/2011	1,182.00	12/19/2011
R	1				18	Written Off	11/9/2010	7/14/2011	6/1/2011	1,182.00	12/9/2011
R	1				18	Written Off	11/9/2010	7/14/2011	6/1/2011	1,182.00	12/19/2011
R	1				18	Written Off	6/15/2010	4/11/2011	3/4/2011	462.67	12/9/2011
R	1				18	Written Off	6/15/2010	4/11/2011	3/4/2011	462.67	12/19/2011
R	1				18	Written Off	6/15/2010	4/11/2011	3/4/2011	462.67	12/9/2011
R	1				18	Written Off	6/15/2010	4/11/2011	3/4/2011	462.67	12/19/2011

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

**IN RE: APPLICATION OF THE)
NARRAGANSETT ELECTRIC)
COMPANY D/B/A NATIONAL GRID)
FOR APPROVAL OF A CHANGE IN) DOCKET NO. 4323
ELECTRIC AND GAS BASE)
DISTRIBUTION RATES PURSUANT)
TO R.I.G.L. §§ 39-3-10 and 39-3-11)**

**DIVISION'S FIFTEENTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – ELECTRIC**

July 17, 2012

1. Please update the response to DIV-1-6-ELEC.
2. Please update the response to DIV-1-12-ELEC.
3. Please update the response to DIV-1-13-ELEC.
4. Please update the response to DIV-1-25-ELEC.
5. Referring to the response to DIV 8-2, please describe the prior period adjustment of \$1,142,955 made to the FERC Form 1, and explain why it is appropriate to eliminate this item.
6. Referring to the response to DIV 8-3, is it correct that the understatement of deferred taxes of \$11,935,000 is completely allocated to distribution?
7. Referring to the response to DIV 8-3, please explain the decrease in the property related deferred tax balance from \$224,237,000 as of September 2011 to \$218,055,000 as of December 2011.
8. Referring to Schedule MDL-3-ELEC, page 64, please explain the decrease in the distribution Accumulated Deferred FIT from \$192,314,000 as of September 2011 to \$176,750,000 as of December 2011.
9. Referring to the response to DIV 8-3, please provide the "Net Operating Loss in Acct 236200" for each month from January 2011 to the most recent month available.

10. Referring to Schedule MDL-3-ELEC, page 70, please explain why the deferred tax reversal of \$7,403,074 related to the safe harbor protection would not be offset against the Net Operating Loss as of December 2011.
11. Referring to Workpaper MDL-22-ELEC, Page 1, what was the actual Narragansett Electric Tax Depreciation of Embedded Distribution Plant in 2011?
12. Referring to the response to DIV 8-7, please provide workpapers supporting the revenue requirement associated with the 11 employee overstatement of \$13,909 and \$5,648 for Narragansett Electric and Narragansett Gas, respectively.
13. Please update the response to DIV-8-16-ELEC.
14. Referring to Schedule MDL-3-ELEC, page 53, please explain the forecasted increase in the rate of non-ISR capital spending subsequent to March 2012.
15. Please provide the actual non-ISR capital additions in 2011.

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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ELECTRIC AND GAS BASE)	
DISTRIBUTION RATES PURSUANT)	
TO R.I.G.L. §§ 39-3-10 and 39-3-11)	

DIVISION'S SIXTEENTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – GAS

July 17, 2012

1. Please update the response to DIV-2-6-GAS.
2. Please update the response to DIV-2-9-GAS.
3. Please update the response to DIV-2-18-GAS.
4. Please update the response to DIV-9-6-GAS, with the data in native spreadsheet format.
5. Please update the response to DIV-9-8-GAS, with the data in native spreadsheet format.

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

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ELECTRIC AND GAS BASE)
DISTRIBUTION RATES PURSUANT)
TO R.I.G.L. §§ 39-3-10 and 39-3-11)

DIVISION'S SEVENTEENTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – ELECTRIC

July 20, 2012

- 1) With regard to Howard Gorman's schedule HSG-3Q, please answer the following:
 - a) Please provide the rationale for selecting loads from the "12 months ended 12/31/2008" and the "12 months ended 11/30/2011" to construct the rate year NCP and 1CP demands.
 - b) Please provide the rationale for excluding loads during calendar years 2009 and 2010 from the rate year NCP and 1CP calculations.
 - c) Please explain why the load factor from the 12 months ending November 30, 2011 was used for the Lighting and Propulsion classes rather than the weighted average of the 2008 and 2011 time periods.
 - d) Please reconcile the difference between the rate year energy forecast presented in Schedule HSG-3Q ("Rate year MWh") and the rate year energy forecast presented in Schedule APM-1.
 - e) Please reconcile the difference between the Rate Year 1CP presented in Schedule HSG-3Q (1,888.8 MW) and the Rate Year peak demand in Schedule APM-7 (1,904.4 MW).
- 2) Please provide supporting documentation for the forecasted kWh usage and customer counts presented in Workpaper JAL-2, page 15.
- 3) How is the "2003 VERO" annual amortization amount, described on page 114 of Mr. Laflamme's testimony, allocated to the customer classes within the electric distribution Allocated Class Cost of Service study?

- 4) With regard to Jeanne Lloyd's Workaper JAL-6:
 - a. Please provide documentation that supports how the three Standard Offer Service Administrative costs listed in Workpaper JAL-6, page 10 (Estimated GIS Cost, Estimated CWC, and Estimate of Other Administrative Costs) were allocated to the three customer groups.
 - b. Please define "Estimated GIS Cost" on line 1 of Workpaper JAL-6, page 10.
 - c. Please describe the expense items within "Other Administrative Costs" on line 3 of Workpaper JAL-6, page 10.
- 5) Please provide a rationale for allocating Transmission Service Cost Adjustment Provision on coincident peak demands ("1CP") rather than a broader measure of annual demands such as 12CP demands?

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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DISTRIBUTION RATES PURSUANT) DOCKET NO. 4323
TO R.I.G.L. §§ 39-3-10 and 39-3-11

DIVISION'S EIGHTEENTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – ELECTRIC

July 20, 2012

- Div 18-1 Reference Attachments Div. 5-3-1-Elec and 5-3-2-Elec. Please provide an electronic version of all tables.
- Div 18-2 Reference Attachments Div. 5-3-1-Elec and 5-3-2-Elec. Please explain in detail the source of the monthly “GROSS WRITE-OFF” dollars and accounts (residential and non-residential) shown in the tables, including whether or not the data is estimated, calculated, time-lagged or actual. In addition, please confirm all dollars and accounts were actually written-off in the months shown.

Div 18-3 Reference Attachments Div. 5-3-1-Elec and 5-3-2-Elec. Please explain in detail and provide examples (residential and non-residential) of the following:

- a. “MISC. CREDITS”
- b. “BILLING ADJUSTMENTS”
- c. “EXCESS CREDITS”
- d. “LPC CREDITS”
- e. “GENERAL CREDITS”
- f. “UNWORKED-BALANCE”
- g. “MISC JRNLS”

Div 18-4 Reference Kaye testimony Schedule EMK-1, page 2 of 4. Please provide a detailed explanation and the actual calculations and historical data used to determine net charge-offs, including each of the following for 2007-2011:

- a. Beginning Balance (FERC 144)
- b. Adjustments to Reserve (FERC 904)
- c. Ending Balance (FERC 144)

Please include the Company’s actual calculations and historical data used to determine the “Black Motor Method” calculating the Provision for uncollectible accounts (Reference Div. 7-6-Elec.). Please include copies of the Company’s Regulatory Balance Sheets for each year showing the pages containing the corresponding and related Regulatory Account (i.e., #144000, 144001, 144007, 144010, 904000 and etc.)

Div 18-5 Reference Div. 7-6-Elec. Please indicate the approximate date the Company first started using the Black Motor Method to calculate its provision. Please provide an explanation of the previous method the Company used, if applicable.

Div 18-6 Reference Attachment Div. 5-9-Elec.

- a. Please explain in detail the credits on commercial account balance transfers, including why there are no similar credits on residential accounts
- b. Please confirm the balance transfers included transfers from closed accounts with open final balances (i.e., pre-charge-off) and charged-off balances.
- c. Please confirm the “Transfers to Active” dollars and accounts shown in the tables of Div. 5-3-1-Elec. are included in Attachment Div. 5-9-Elec.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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DISTRIBUTION RATES PURSUANT) DOCKET NO. 4323
TO R.I.G.L. §§ 39-3-10 and 39-3-11

DIVISION'S NINETEENTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – ELECTRIC AND GAS

July 25, 2012

(Pertaining to allocation of affiliates costs)

1. Please provide an electronic machine readable spreadsheet that shows the total service company costs and the costs charged **to** Narragansett Electric (including transmission) and Narragansett Gas **from** National Grid Service Company and all of the KeySpan Service Companies by year from 2007 to 2011.
2. Does the allocation of service company costs result in Narragansett Electric and Gas being charged a share of employee benefits and payroll taxes associated with most service company employees , wherever they are located? Please describe the types of employees who are not included in this sharing.
3. Does the allocation of service company costs result in Narragansett Electric and Gas being charged a share of employee benefits and payroll taxes associated with most National Grid employees, wherever they are located? Please explain.

4. Does the allocation of service company costs result in Narragansett Electric and Gas being charged a share of employee benefits and payroll taxes associated with most service company employees, wherever they are located?
5. Does the allocation of service company costs result in Narragansett Electric and Gas being charged a share of employee benefits and payroll taxes associated with most National Grid employees (other than just service company employees), wherever they are located? Please explain.
6. Please provide the average payroll tax rate and tax per employee paid by National Grid in each state.
7. The response to Division 11-3 indicates that National Grid has three separate salary structures for its three geographic regions. Please provide documentations of those salary structures, including how they compare per grade per region.
8. Does National Grid provide the same benefit packages to employees located in its three regions? If not, describe how those benefits differ.
9. The following questions refer to the Attachment to the Company response to Division 11-19:
 - a.) What activities and expenses are included in the costs that are listed as "G&A" in this response?
 - b.) What activities and expenses are included in the costs that are listed as "Employees" in this response?
 - c.) What category of service company costs includes employee benefits, and payroll taxes? Does this category include benefits on all employees or only on service company employees?
 - d.) Is the average per employee cost in each state for health benefits the same?
 - e.) What category of service company costs includes payroll taxes? Does this category include payroll taxes on all employees or only on service company employees?
 - f.) On the tab "New Allocators", what precisely is meant by # of customers and what is the source of this data for Narragansett Electric and Narragansett Gas?
 - g.) On tab "New Allocators", what precisely is meant by # of employees and what is the source of this data for Narragansett Electric and Narragansett Gas?
 - h.) In the tab "totals", what is the source (or sources) of the totals for new revenue, new plant, new O&M, for the 3 Narragansett utilities. If these totals do not refer to other tabs in this file, please provide a worksheet that does show their derivation.
 - i.) In the tab "as proposed bp details", please describe the specific types of costs that are included in the lines shown below. The line numbers and bill pool labels contain the identification of the costs as shown in this worksheet (which is a subset of 11-19, tab "as proposed bp details").

		(a)	(b)	(c)	(f)	(g)
		As Booked To	Reassignmen	Revised Allocat	Narragansett	Narrag.Gas
Line No.	Bill Pool					
44	G&A - Grid - All (excl Parent)	14,234,850	(692,157)	13,542,693	1,321,714	549,685
47	G&A - Grid - Dist	24,935,861	(8,577,507)	16,358,354	2,136,017	-
48	G&A - Grid - Dist - NE only	9,171,039	(1,608,586)	7,562,453	1,898,127	-
51	G&A - Grid - Dist & Gas - RI only	61,988	-	61,988	43,780	18,208
52	G&A - Grid - Dist & Tran	11,391,480	(3,952,288)	7,439,191	841,335	-
54	G&A - Grid - Dist, Tran & Gas - RI only	877,961	(67,654)	810,307	600,149	210,158
57	G&A - Grid - NIMO Dist & Gas	4,141,694	-	17,330,431	-	-
60	G&A - Grid - Ops Companies	7,635,441	(1,800,027)	10,253,469	1,008,969	419,618
61	G&A - Grid - Ops Companies - NE only	(371,825)	(74,293)	7,561,148	1,487,592	618,671
63	G&A - Grid - Trans	289,197	(5,354,170)	10,350,927	1,392,729	-
65	G&A - Grid & KS - All (exlcuding Parent)	143,942	(10,775,298)	205,121,319	11,484,645	4,776,323
71	G&A - Grid & KS - Dist & Gas	1,436,301	(12,240,919)	20,126,651	1,282,836	533,516
73	G&A - Grid & KS - Dist & Gas - NE only	905,002	(893,342)	4,466,732	743,618	309,262
87	G&A - Grid & KS - Gas	4,904,182	(20,541,500)	19,497,377	-	1,335,547
172	Customers - Grid NE Retail	-	330	10,457,954	2,781,426	-
243	Capex - Grid & KS - Gas	-	12,535,515	6,577,415	-	710,347
341	# Employees - Grid & KS - All (exlcuding Parent)	-	54,309	30,918,337	1,286,943	1,030,189
348	Employees - GRID & KS DIST, TRAN, GAS, GEN, KS NREG	-	626,384	19,613,061	816,373	653,501

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
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DISTRIBUTION RATES PURSUANT) DOCKET NO. 4323
TO R.I.G.L. §§ 39-3-10 and 39-3-11

DIVISION'S TWENTIETH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – ELECTRIC
REDACTED

July 27, 2012

- Div 20-1. Reference Div. 5-16-1-Elec (Supp). The requested service termination type is not provided due to “not available” and “not applicable” explanations. Please explain why the service termination type data attribute is not provided. (This information had been provided to the Division in 2009 for Docket 4065, which was after the Company converted to its current CSS system.)
- Div 20-2. Reference Div. 5-16-1-Elec (Supp). Please explain how there can be multiple customers with the same name, account number, start date, end date, charge-off amount, charge-off date and premise address (i.e., possible duplicate accounts)

and yet have different Meter ID Numbers for the same time period (i.e., “Electric Meter Equipment Number”). Please see two examples below:

Example: File shows 6 charged-off accounts. There appears to be just two unique accounts, but 3 different Meter ID numbers. Please explain.

	<u>Customer Name</u>	<u>NUMCUST</u>	<u>Pseudo #</u>	<u>End Date</u>	<u>Charge-Off Amount</u>	<u>Charge-Off Date</u>	<u>Electric Meter Equipment Number</u>
1				4/13/2009	3,657.02	7/15/2009	
2				4/13/2009	3,552.33	1/4/2010	
3				4/13/2009	3,657.02	7/15/2009	
4				4/13/2009	3,552.33	1/4/2010	
5				4/13/2009	3,657.02	7/15/2009	
6				4/13/2009	3,552.33	1/4/2010	

Example: File shows 9 charged-off accounts from the same premise. There appears to be just 3 unique accounts, but 3 different Meter ID numbers for each charge-off instance. Please explain.

	<u>Customer Name</u>	<u>NUMCUST</u>	<u>Pseudo #</u>	<u>End Date</u>	<u>Charge-Off Amount</u>	<u>Charge-Off Date</u>	<u>Electric Meter Equipment Number</u>
1					987.56	10/6/2009	
2					987.56	10/6/2009	
3					987.56	10/6/2009	
4					2.08	11/29/2010	
5					2.08	11/29/2010	
6					2.08	11/29/2010	
7					340.70	9/14/2011	
8					340.70	9/14/2011	
9					340.70	9/14/2011	

Div 20-3. Reference Div. 5-16-1-Elec (Supp). There appears to be 4,708 duplicate accounts (i.e., 2 account instances), and 189 duplicate accounts (i.e., 3 account instances), each customer with the with the same name, account number, start date, end date, charge-off amount, charge-off date and premise address. Please explain or correct the file to remove the incorrect data.

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TO R.I.G.L. §§ 39-3-10 and 39-3-11**

DIVISION’S TWENTY FIRST SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – ELECTRIC

August 1, 2012

- 1) Please explain how the \$0.41/kW-month transformer credit, which is \$0.42/kW-month within Jeanne Lloyd’s Schedules and the proposed tariff, was developed. In particular:
 - a. Why does the calculation on line 21 of Schedule HSG-1H produce a reasonable estimate of the “Monthly Transformer Billing Credit per kW”?
 - b. What is the source of “Annual Billing Demand Units - B32/G32/B62/G62” on line 20 of Schedule HSG-1H and how does it differ from “Annual Demand Units - B32/G32/B62/G62” on line 19 of Schedule HSG-1H?
- 2) With regard to Schedule JAL-4, page 12, please explain the basis for the \$2.75/kW-month “High Voltage Delivery (115 kV)” credit.
- 3) Referring to customer migrations from Rate G-62 to G-32, Jeanne Lloyd’s testimony, states that “in order to ensure that the lost revenue [from customer migration to Rate G-32] is recovered from only Rate G-32 customers, the rates for Rate G-32 have been adjusted to account for the expected customer migration” (Lloyd direct at 20). Please explain how Narragansett performed this adjustment.
- 4) With regard to the electric distribution ACCOS study, please provide a description of the items included in the following customer service accounts:
 - a. Customer Service - Supervision
 - b. Customer Assistance Expenses
 - c. Customer Service - Miscellaneous Expenses
 - d. Demonstration and Selling Expenses

- 5) With regard to the electric distribution ACCOS study, please explain the rationale for Narragansett's choice of allocator for the following customer service accounts:
 - a. Customer Service - Supervision (Acct908)
 - b. Customer Assistance Expenses (Acct908)
 - c. Customer Service - Miscellaneous Expenses (Acct910)
 - d. Demonstration and Selling Expenses (Customers-Large)

- 6) Please describe the costs included in the "Commercial and Industrial Custom" and "Construction / Contract Management" expense categories used to develop the "Acct908" allocator as described in Schedule HSG-3L.

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TO R.I.G.L. §§ 39-3-10 and 39-3-11**

DIVISION'S TWENTY SECOND SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID – ELECTRIC AND GAS

August 3, 2012

- Div 22-1. Reference Company's response to Div. 6-16-Gas (Supp). Please explain the following:
- a. Accounts with missing service end dates.
 - b. Accounts with charge-off dates earlier than service end date
 - c. Blank "Last Pay Amount"
- Div 22-2. Reference Company's response to Div. 6-15-Gas. Please provide similar attachments (and electronic versions) for historical aged accounts receivable and accounts for active accounts only.
- Div 22-3. Reference Company's response to Div. 6-15-Gas. Please clarify the A/R Bucket shown as "180 and over/180-359." Specifically, does the data column represent accounts receivable 180 days and over or 180-359 days past due?

Div 22-4. Reference Company’s response to Div. 6-15-Electric. Please provide similar attachments (and electronic versions) for historical aged accounts receivable and accounts for active accounts only.

Div 22-5. Reference Company’s responses to Div. 6-16-Gas and Div. 14-3-Gas. Specifically, the response to Div. 14-3-Gas states that the “Account numbers are comprised of two components – customer code and premises code – which are separated by the “/” symbol. The customer code is the first segment of the complete account number.” Please explain why there are similar premise codes for different premises.

Div 22-6. Reference Company’s responses to Attachment Div. 6-16-7-Gas. Please provide additional explanation related to the following Gas Rate Codes:

Gas Rate	DECODE
82EN	TB:DF#4 Oil-Energy Charge
CDEP	Customer Deposit
CIAC	Contr. In Aid of Construction
CNGS	CONVERSION-GAS
CNMN	Conversion - Merchandise
CONG	Conversion - Gas
GC39	Cost of Gas-LI Res Heat
GCA1	Cost of Gas-Res Non-Heat
GCA2	Cost of Gas-Res Heat
GCA3	Cost of Gas-C&I Small
GCA4	Cost of Gas-C&I Medium
GCA5	Cost of Gas-C&I Large Low Load
LABR	Labor - Service Order
LNI	Installment Loan Interest
MDSE	Merchandise Sale
MISC	Miscellaneous Adjustment
RNLC	Rental Type L - Conversion Burner
RNLH	Rental Type L - Space Heater
RNLW	Rental Type L - Water Heater
RNOC	Rental Type O - Conversion Burner
RNTS	Rental to Sale
RWHI	Rental Water Heater Install
SPB	Service Plan - Boiler
SPF	Service Plan - Furnace
SPS	Service Plan - Steam
SPW	Service Plan - Water Heater
SVGA	SERVGUARD PLAN A

Specifically, please explain why these rate codes appear as separate write-off charges on the historical write-off data file. For example, please explain how a customer deposit (Gas Rate: CDEP) is a write-off, and why the Cost of Gas-Res Heat (Gas Rate: GCA2) is not included in the Gas Rate 1247 (Residential Heating). In addition, please explain if the above Gas Rate charge-offs are included in the Company's net write-off calculations (i.e., Kaye testimony, Schedule EMK-1) including items such as installment loan interest, merchandise sales, rentals and service plans.

Div 22-7. Reference Company's responses to Div. 14-5-Gas. Please explain the Company's water heater rental program in detail, including the following:

- a. When it was started
- b. Current status
- c. How it is billed (i.e., billed separately or on same bill as energy usage)
- d. Annual program revenue
- e. Procedures for collections

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION

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TO R.I.G.L. §§ 39-3-10 and 39-3-11)	

DIVISION'S TWENTY-THIRD SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID -- ELECTRIC/GAS

August 7, 2012

- DIV 23-1 Per Attachment 3-2, the Company provided an AFUDC calculation for April 2012. This calculation used a common equity cost rate of 10.15 percent. What is the source of that figure?
- DIV 23-2 Please state whether the Company intends to continue to use the same AFUDC calculation method as shown on Attachment 3-2 after the conclusion of this case.
- DIV 23-3 Please update the response to Division 3-1 extending through July 2012.
- DIV 23-4 Please provide the Company's balance sheet at June 30, 2012.
- DIV 23-5 Please provide the Company's capital structure at June 30, 2012 on the same basis as the proposed capital structure in this case (i.e., year-end 2011). In doing so, please show the quantification (i.e., dollar amount) of each adjustment to the actual balance sheet values. For example, in the case of common equity this

would require a showing of the (a) amount of goodwill and (b) other comprehensive income removed from the actual common equity.

DIV 23-6 The Company's financing petition pending before the Division requests authority to issue \$250 million of long-term debt. In this rate case, the Company recognizes only \$150 million of long-term debt. Please reconcile the difference and explain what the Company believes that it is appropriate to recognize only \$150 million for capital structure purposes.

DIV 23-7 Attachment DIV 3-7-2 (Elec/Gas), page 3 of 4 (the Company's FERC Form 1 balance sheet) shows common equity of \$1,400 billion which is inclusive of a negative \$84.2 million Other Comprehensive Income ("OCI"). The response to Division 3-3 Elec/Gas shows common equity of \$1,490 billion excluding OCI. Please reconcile these two common equity figures. As part of the response, please state the dollar amount of OCI excluded from the Company's 12/31/11 common equity to arrive at the \$1,490 billion equity balance.

DIV 23-8 Division 3-21-Elec/Gas requested that Mr. Hevert calculate the result that his multistage DCF model would produce if he used a 4.77 percent GDP growth rate in place of a 5.77 percent growth rate. The result was not provided. Please state the amount of effort that would be required to perform the requested calculation. If the level of effort is not extensive and very time consuming, the Division requests that this calculation be performed.

DIV 23-9 Division 3-25 Elec/Gas requested information on the percentage of operations for each of Mr. Hevert's proxy companies that is regulated electric and gas. It

appears that the response merely divided the regulated operations into electric versus gas. Please supplement the response by identifying the percentage of operations (e.g., operating income that is utility) versus non-regulated (i.e., non-utility).

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: APPLICATION OF THE)	
NARRAGANSETT ELECTRIC)	
COMPANY D/B/A NATIONAL GRID)	
FOR APPROVAL OF A CHANGE IN)	
ELECTRIC AND GAS BASE)	
DISTRIBUTION RATES PURSUANT)	DOCKET NO. 4323
TO R.I.G.L. §§ 39-3-10 and 39-3-11)	
)	
)	

DIVISION'S TWENTY FOURTH SET OF DATA REQUESTS

DIRECTED TO NATIONAL GRID – GAS

August 7, 2012

Div 24-1. Reference the Company's response to Div. 6-16-Gas (Supp.). Please explain the why the Company charged-off the following non-residential customers between 2007-2011:

REDACTED

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4323
Attachment Navy 1-3-ELEC
Page 88 of 89

Div. 6-16-Gas (Supp.)		
Customer Name	Account #	Total \$ Charged-Off
		\$10,126.44
		\$518.39
		\$215.44
		\$509.46
		\$4,936.65
		\$69,620.00
		\$82,972.00
		\$4,930.03
		\$13,704.38
		\$6,013.34
		\$1,076.11
		\$9,518.97
		\$9,746.00
		\$581.40
		\$4,719.07
		\$185.03
		\$216.89
		\$73.60
		\$1,121.68
		\$18.00
		\$436.01
		\$226.58
		\$120,937.58
		\$432.76
		\$23,693.57
		\$84.41
		\$639.00
		\$14.43
		\$1,589.83
		\$931.35
		\$213.75
		\$1,628.81
		\$1,726.91
		\$395.20
		\$1,808.78
		\$6,881.25
		\$669.08
		\$1,741.28
		\$135.83
		\$384,989.29

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: APPLICATION OF THE)	
NARRAGANSETT ELECTRIC)	
COMPANY D/B/A NATIONAL GRID)	
FOR APPROVAL OF A CHANGE IN)	DOCKET NO. 4323
ELECTRIC AND GAS BASE)	
DISTRIBUTION RATES PURSUANT)	
TO R.I.G.L. §§ 39-3-10 and 39-3-11)	

DIVISION'S TWENTY FIFTH SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID - GAS

- Div 25-1. Please provide the annual historic volumes of therms for all Dual Fuel customers and for Non-Firm Customers for each of the last four years.
- Div 25-2. Please provide a history of all interruptions or curtailments of Non-Firm customers in the last four years. Please include for each event the following:
- a. Date and hour of the start of interruption or curtailment.
 - b. Date and hour of the end of interruption or curtailment.
 - c. Number of customers impacted.
 - d. Reason for interruption or curtailment.
 - e. Volume of gas Interrupted or curtailed.
- Div 25-3. Re: Witness Normand's Schedules PMN-6 to PMN-8, please provide these schedules in an electronic workbook with all cell references and formulas attached:

Navy 1-7-ELEC

Request:

Referring to the direct testimony of Company witness Jeanne Lloyd, page 33:

- a) Please explain in detail the Company's rationale for its proposal to recover the storm fund deficit over a 36-month period as opposed to another (longer or shorter) time period;
- b) Please provide a table that summarizes the historical frequency of the Company's electric base rate adjustments over the past twenty years.

Response:

- a) Please refer to Section VII of the Direct Testimony of Company Witness Michael D. Laflamme starting at Page 111 of 121 for a detailed description of the Company's storm cost recovery proposal. As described in this testimony, the Company's storm cost recovery proposal is an inter-related two-pronged proposal that seeks to (1) reinstate the \$1,041,000 base-rate recovery of contributions to the Storm Fund, and (2) recover the \$11.5 million deficit in the Storm Fund caused primarily by Tropical Storm Irene in August 2011. The decision to propose a three-year, or 36-month, period for recovering the Storm Fund deficit was deemed to be an appropriate period of time to balance the interests of customers in having a level of rate stability with the Company's critical need for timely cost recovery.

b)

Year Filed	Docket No.	
1991	2019	Rate Case
1995	2290	Rate Case
1997	Statute	Performance Based Rates
1998	Statute	Performance Based Rates
1999	2930	Merger Settlement
2004	3617	Settlement
2009	4065	Rate Case

Navy 1-14-ELEC

Request:

Please provide a table that summarizes the following items for each of the years 2007-2011:

- a) Storm expense;
- b) Property tax expense;
- c) Pension and OPEB expense;
- d) Delivery service revenues.

Response:

- a) Please refer to the Company's responses to Division 8-5-ELEC and Division 8-6-ELEC.

For the Company's response to Parts b), c) and d), please refer to the table below:

		2007	2008	2009	2010	2011
b)	Property tax expense	\$17,136,969	\$17,959,422	\$19,494,858	\$20,831,185	\$24,541,416
c)	Pension and OPEB expense	\$10,007,810	\$8,196,609	\$13,468,872	\$15,470,195	\$15,732,275
d)	Delivery service revenues	\$344,985,964	\$357,059,833	\$352,497,225	\$396,776,579	\$400,712,096