



DEPARTMENT OF THE NAVY
OFFICE OF THE GENERAL COUNSEL
NAVY LITIGATION OFFICE
720 KENNON STREET SE RM 233
WASHINGTON NAVY YARD DC 20374-5013

September 13, 2012

Via regular mail and email to:

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

Re: Docket No. 4323 -Narragansett Electric d/b/a National Grid
Application for Approval of a Change in Electric and Gas Base
Distribution Rates Pursuant to R.I.G.L. §§ 39-3-10 and 39-1-3-11

Dear Ms. Massaro

Per our phone conversation this afternoon, please find enclosed with this letter an original set of the Navy's written Responses to the Division's First Data Requests, and eleven copies, and an original of the accompanying Excel spread sheets, plus 4 additional CDs. We are providing the spread sheets on a CD because of their bulk and size. If the Commission requires a complete printed-out version we will provide that on request.

If you have any questions please contact me at 202-685-2235. Your consideration is appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Ellen M. Evans", is written over the typed name.

Ellen M. Evans
Senior Trial Attorney
Naval Litigation Office

Cc:
Service List

Certificate of Service

I certify that a copy of the cover letter and the Department of the Navy's Responses of the Division's First Data Request and Excel attachments were electronically submitted and/or mailed to the individuals listed on the attached service list for this docket.

A handwritten signature in black ink, appearing to read "Ellen M. Evans", written over a horizontal line.

Ellen M. Evans

September 13, 2012

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

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**The Narragansett Electric Company
R.I.P.U.C Docket No. 4323**

**The U.S. Department of the Navy's
Responses to Division's First Set of Data Requests**

Data Request No. 1-1:

Referring to Mr. Al-Jabir's Exhibits AZA-1 through AZA-3, please provide electronic versions of these exhibits in electronic format with all formulas intact.

Navy Response 1-1:

Please refer to the attached electronic file:

"Attachment 1-1.xlsx"

**The Narragansett Electric Company
R.I.P.U.C Docket No. 4323**

**The U.S. Department of the Navy's
Responses to Division's First Set of Data Requests**

Data Request No. 1-2:

Referring to Mr. Al-Jabir's Exhibits AZA-1 through AZA-3, please provide all workpapers in electronic format with all formulas intact. Please include in these workpapers a working version of the Navy's "Modified CCOSS" cost of service study referenced in Exhibit AZA-3 and page 15 of Mr. Al-Jabir's direct testimony.

Navy Response 1-2:

Please refer to the attached electronic files:

"Attachment DIV 10-2-1-ELEC_Company.xls"

"DIV-10-1- Elec Att-1_Company.xlsm"

"DIV-10-1-Elec Att-2_Company.xlsm"

"Attachment DIV 10-2-1-ELEC_Modified.xls"

"DIV-10-1- Elec Att-1_Modified.xlsm"

"DIV-10-1-Elec Att-2_Modified.xlsm"

**The Narragansett Electric Company
R.I.P.U.C Docket No. 4323**

**The U.S. Department of the Navy's
Responses to Division's First Set of Data Requests**

Data Request No. 1-3:

Please provide a reference, such as a Narragansett Electric Company Schedule or Data Request Response, for the "Company Proposed Revenue Distribution" in column (4) of Exhibit AZA-3.

Navy Response 1-3:

The data in column (4) of Exhibit AZA-3 are calculated based on Schedule JAL-1 to the direct testimony of Company witness Jeanne A. Lloyd and the Company's response to Division 21-4(d)-ELEC (Supplemental). Specifically, the revenue distribution shown in column (4) results from applying the revenue distribution criteria that the Company employed in Section 2 of Schedule JAL-1 to the class revenue requirements resulting from the Company's revised allocated class cost of service study, as summarized in Schedule HSG-1A that is attached to the Company's response to Division 21-4(d)-ELEC (Supplemental).