

# Schacht & McElroy

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May 15, 2015

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

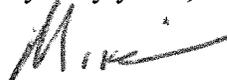
In Re: 2014 Standard Offer Service Procurement Plan and 2014 Renewable Energy  
Standard Procurement Plan – Docket No. 4556

Dear Luly:

Enclosed for filing are an original and 10 copies of Lt. Governor Daniel J. McKee's  
Responses to the Division's 1<sup>st</sup> Set of Data Requests.

If you have any questions, please feel free to call.

Very truly yours,



Michael R. McElroy

MRMc:tmg  
cc: Service List

McKee/Docket 4556/Massaro2

The Lieutenant Governor of Rhode Island  
Witness: John Farley  
RIPUC Docket No. 4556  
The Narragansett Electric Company  
d/b/a National Grid  
2016 Standard Offer Service Procurement Plan  
2016 Renewable Energy Standard Procurement Plan  
Responses to the Division of Public Utilities' First Set of Data Requests  
Issued on April 28, 2015

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DIV 1-1

Request:

Please provide a copy of the ABACCUS 2014 report referenced on page 8 at lines 19-20 of Mr. Farley's testimony.

Response:

The ABACCUS 2014 report is hereby provided as an electronic document and labelled Attachment DIV 1-1.

DIV 1-2

Request:

On page 10 at lines 1-2, Mr. Farley states that one of the reasons for low levels of switching to competitive suppliers is the lack of a significant price difference between standard offer and competitive offers. Please provide all data and information that Mr. Farley relied upon in offering that opinion.

Response:

Mr. Farley first of all relied on his experience in observing competitive markets. In underdeveloped markets, competitive supplier marketing and recruitment activity tends to increase during times where there is an opportunity for the suppliers to make offers which are lower than the standard offer (or equivalent).

In addition, Mr. Farley relied on the findings of the ABACCUS report as to the factors which contributed to increasing switching rates in certain states. The ABACCUS report described the process of electric market transformation as a three-stage evolution. In Stage 1, providers compete on the price of the commodity.

The ABACCUS report also details the experiences of individual states. The experiences of two of those states are relevant to this question.

In 2008, Ohio enacted electric utility legislation that fundamentally changed the way standard service offer rates were set. Electric utilities could choose to set a retail rate for a term (generally three years). Retail competition serves as a check against that price being too high. "A high rate will invite retail competitors to enter the market and undercut the utility's price." This is what happened, and over a two year period customer switching went from virtually nil at the outset of this new approach to 22% of the sales for the residential sector statewide as of June 2010.

Prepared by or under the supervision of: John Farley

In Pennsylvania, the PUC set a goal to make Pennsylvania the most competitive electricity market in the country. The PUC implemented Standard Offer programs in 2013 that allow electric distribution companies to refer non-shopping customers to a voluntary program that guarantees 7 percent off the utility's "Price to Compare" at the time of enrollment. Since the program's inception in August 2013, more than 41,000 electric customers have chosen to enroll with a competitive supplier, a nearly 85% enrollment rate.

Thirdly, Mr. Farley relied on a study of retail competition in the New England states conducted by Polestar Communications & Strategic Analysis for the New England Energy Alliance titled "A Review of Electric Industry Restructuring in New England" (September 2006).

The lack of a significant price difference was listed in Mr. Farley's testimony as one of a set of factors that can contribute to low levels of switching to competitive suppliers. The set was provided to make the point that the billing adjustment was not the sole barrier to a healthy competitive market in Rhode Island.

Finally, Mr. Farley acknowledges the lack of primary data or studies documenting price differentials for competitive suppliers in Rhode Island. He would love to see that information become readily available, as well as a comprehensive examination of what is needed to develop a robust retail competitive electricity market for residential and small business customers.

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DIV 1-3

Request:

Please provide the supporting documentation, assumptions, and calculations that produced the figures on page 17 at line 19.

Response:

Here is the step-by-step procedure used to produce the figures on page 17 at line 19.

The first step was to prepare a reasonable model for monthly kWh consumption for a typical residential (A-16 rate), low income (A-60), and small commercial (C-06) customer, since it is these three rate classes that make up the bulk of the customer base receiving fixed standard offer pricing. Annual average use data from the 2012 National Grid distribution rate case was combined with monthly distribution of energy from the 2015 Retail rate filing to prepare the monthly kWh consumption. The following table DIV 1-3 (a) shows the monthly kWh consumption figures used for this analysis:

Table DIV1-3 (a): Typical Customer Monthly kWh

|     | A-16 |  | A-60 |  | C-06  |
|-----|------|--|------|--|-------|
| Jan | 696  |  | 667  |  | 1,052 |
| Feb | 639  |  | 612  |  | 1,003 |
| Mar | 618  |  | 592  |  | 970   |
| Apr | 549  |  | 526  |  | 940   |
| May | 473  |  | 454  |  | 899   |
| Jun | 520  |  | 498  |  | 941   |
| Jul | 667  |  | 639  |  | 1,063 |
| Aug | 801  |  | 768  |  | 1,106 |
| Sep | 686  |  | 657  |  | 1,107 |
| Oct | 523  |  | 501  |  | 919   |
| Nov | 486  |  | 466  |  | 873   |
| Dec | 615  |  | 590  |  | 956   |
|     |      |  |      |  |       |

Second, the fixed and variable prices were prepared. The year 2015 was used for this purpose, even though the prices for this year were unusually extreme for the winter months. The prices used for January-June 2015 came from the then current (as of March 24, 2015) SOS Rates Tables on the National Grid web site for use in calculating the billing adjustment.

For the residential classes, monthly variable rates for July through December 2015 were estimated using the price differential between the June 2015 variable price and the Reference New England Internal Hub Price in the November 19, 2014 filing by National Grid in docket 4393. The differential for June was applied to the Hub prices for July through December 2015. Prices for July-December were not estimated for the commercial class because standard offer rates were not approved as of the date of the testimony.

Prepared by or under the supervision of: John Farley

Table DIV 1-3 (b) shows the prices that were used.

Table DIV 1-3 (b) Assumed standard offer prices in effect for the year, cents per kWh

|                | A-16   |  | A-60   |  | C-06      |
|----------------|--------|--|--------|--|-----------|
| Fixed Jan-June | 10.248 |  | 10.248 |  | 11.659    |
| Fixed Jul-Dec  | 10.248 |  | 10.248 |  | not known |
| Variable:      |        |  |        |  |           |
| Jan            | 18.671 |  | 18.671 |  | 18.366    |
| Feb            | 17.770 |  | 17.770 |  | 17.881    |
| Mar            | 10.736 |  | 10.736 |  | 11.233    |
| Apr            | 8.069  |  | 8.069  |  | 7.310     |
| May            | 6.924  |  | 6.924  |  | 6.140     |
| Jun            | 7.764  |  | 7.764  |  | 7.399     |
| Jul            | 7.959  |  | 7.959  |  |           |
| Aug            | 7.363  |  | 7.363  |  |           |
| Sep            | 6.612  |  | 6.612  |  |           |
| Oct            | 6.896  |  | 6.896  |  |           |
| Nov            | 8.336  |  | 8.336  |  |           |
| Dec            | 13.42  |  | 13.42  |  |           |

Next, typical supply costs for each month and rate class were calculated by multiplying the variable price for the month and class by the typical usage for that month and class.

Table DIV 1-3(c) presents the typical supply costs in dollars by month and rate class.

Table DIV 1-3 ( c ) Typical supply costs for the month in dollars

|     | A-16     |  | A-60     |  | C-06     |
|-----|----------|--|----------|--|----------|
| Jan | \$129.89 |  | \$124.48 |  | \$193.19 |
| Feb | \$113.56 |  | \$108.83 |  | \$179.31 |
| Mar | \$66.33  |  | \$63.57  |  | \$108.97 |
| Apr | \$44.29  |  | \$42.44  |  | \$68.73  |
| May | \$32.78  |  | \$31.41  |  | \$55.19  |
| Jun | \$40.38  |  | \$38.69  |  | \$69.64  |
| Jul | \$53.08  |  | \$50.87  |  |          |
| Aug | \$58.99  |  | \$56.53  |  |          |
| Sep | \$45.34  |  | \$43.45  |  |          |
| Oct | \$36.08  |  | \$34.57  |  |          |
| Nov | \$40.53  |  | \$38.85  |  |          |
| Dec | \$82.60  |  | \$79.16  |  |          |
|     |          |  |          |  |          |

In the same way, typical customer payments on the fixed rate were calculated by multiplying the fixed rate by the typical monthly usage. Table DIV 1-3 (d) provides these values.

Table DIV 1-3 ( d ) Typical customer monthly payments on the fixed rate, in dollars

|     | A-16    |  | A-60    |  | C-06     |
|-----|---------|--|---------|--|----------|
| Jan | \$71.29 |  | \$68.32 |  | \$122.64 |
| Feb | \$65.49 |  | \$62.76 |  | \$116.92 |
| Mar | \$63.32 |  | \$60.68 |  | \$113.10 |
| Apr | \$56.25 |  | \$53.90 |  | \$109.62 |
| May | \$48.51 |  | \$46.49 |  | \$104.80 |
| Jun | \$53.29 |  | \$51.07 |  | \$109.74 |
| Jul | \$68.34 |  | \$65.50 |  |          |
| Aug | \$82.10 |  | \$78.68 |  |          |
| Sep | \$70.27 |  | \$67.34 |  |          |
| Oct | \$53.61 |  | \$51.38 |  |          |
| Nov | \$49.83 |  | \$47.75 |  |          |
| Dec | \$63.07 |  | \$60.45 |  |          |
|     |         |  |         |  |          |

Next, the differences between supply cost and customer payment are calculated. These values are provided in Table DIV 1-3 (e)

Table DIV 1-3 (e) Difference between typical cost and payment, in dollars

|     | A-16     | A-60     | C-06     |
|-----|----------|----------|----------|
| Jan | \$58.60  | \$56.16  | \$70.55  |
| Feb | \$48.07  | \$46.07  | \$62.39  |
| Mar | \$3.02   | \$2.89   | -\$4.13  |
| Apr | -\$11.96 | -\$11.46 | -\$40.89 |
| May | -\$15.74 | -\$15.08 | -\$49.61 |
| Jun | -\$12.92 | -\$12.38 | -\$40.10 |
| Jul | -\$15.27 | -\$14.63 |          |
| Aug | -\$23.11 | -\$22.15 |          |
| Sep | -\$24.93 | -\$23.89 |          |
| Oct | -\$17.54 | -\$16.81 |          |
| Nov | -\$9.30  | -\$8.91  |          |
| Dec | \$19.52  | \$18.71  |          |
|     |          |          |          |

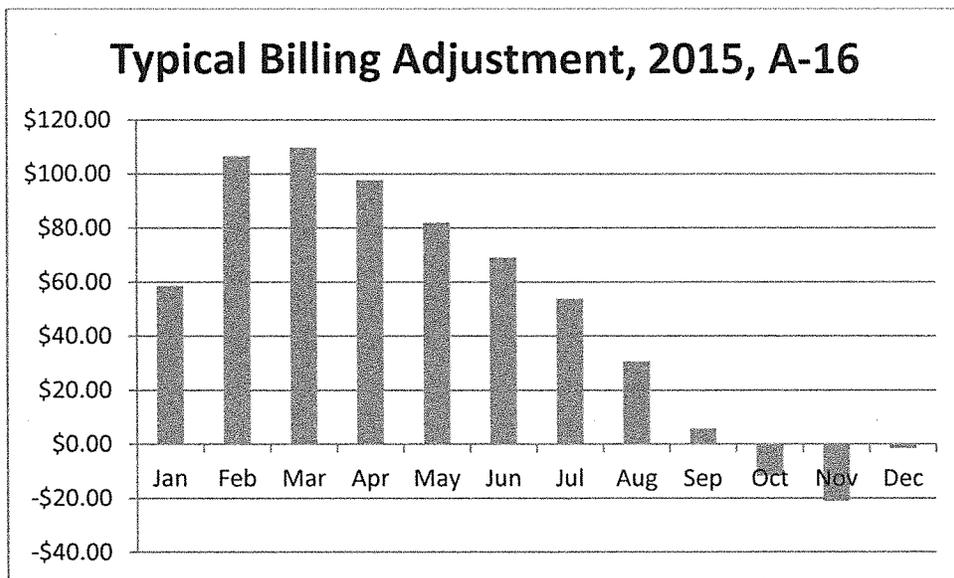
Finally, typical billing adjustments for each month are calculated making the simplifying assumption that all customers switch on the last day of each month. The values for any month are the summation of all differences in Table DIV1-3 (e) starting in January and ending in the month in question.

Table DIV 1-3 (f) shows the typical billing adjustments per customer for each month

Table DIV 1-3 (f) Typical billing adjustments per customer, in dollars

|     | A-16     | A-60     | C-06     |
|-----|----------|----------|----------|
| Jan | \$58.60  | \$56.16  | \$70.55  |
| Feb | \$106.67 | \$102.22 | \$132.94 |
| Mar | \$109.68 | \$105.11 | \$128.81 |
| Apr | \$97.72  | \$93.65  | \$87.92  |
| May | \$81.99  | \$78.57  | \$38.31  |
| Jun | \$69.07  | \$66.19  | -\$1.78  |
| Jul | \$53.80  | \$51.56  |          |
| Aug | \$30.69  | \$29.41  |          |
| Sep | \$5.76   | \$5.52   |          |
| Oct | -\$11.78 | -\$11.29 |          |
| Nov | -\$21.07 | -\$20.19 |          |
| Dec | -\$1.55  | -\$1.48  |          |

As an aid to understanding, the following chart shows the typical A-16 billing adjustments per customer in graph form:



Prepared by or under the supervision of: John Farley

The final piece of the puzzle was to construct scenarios as to how many customers in each rate class will switch in each month of the year.

The scenarios vary according to the percentage of customers in the class that switch in the year, and the pattern across the months. Two scenarios for the number of customers switching in the year were used: typical and high.

Table DIV 1-3 (g) shows the assumptions for total number of customers switching for both scenarios, by rate class

Table DIV 1-3 (g) Scenarios for number of customers switching in 2015

|                | A-16          | A-60         | C-06         |
|----------------|---------------|--------------|--------------|
| Typical        | 3%            | 3%           | 5%           |
| High           | 5%            | 5%           | 7.50%        |
| <b>Counts</b>  |               |              |              |
| <b>Typical</b> | <b>11,673</b> | <b>1,257</b> | <b>2,528</b> |
| <b>High</b>    | <b>19,455</b> | <b>2,094</b> | <b>3,792</b> |

Finally, two alternative patterns for switching by month were examined: an even pattern where the same number of customers switch each month, and a “front-loaded” pattern where twice as many customers switch on the two months with the highest billing adjustments: February and March.

The values quoted in Mr. Farley’s testimony came from the Front-ended Loaded pattern for Typical and for High.

Table DIV 1-3 (h) provides the number of customers switching by month under the High-Front-End Loaded scenario.

Table DIV 1-3 (h) Number of customers switching, High, Front-end Loaded scenario

| Monthly count | High, Front end loaded |  |              |              |
|---------------|------------------------|--|--------------|--------------|
| Annual:       | <b>19,455</b>          |  | <b>2,094</b> | <b>3,792</b> |
|               | A-16                   |  | A-60         | C-06         |
| Jan           | 1,390                  |  | 150          | 271          |
| Feb           | 2,779                  |  | 299          | 542          |
| Mar           | 2,779                  |  | 299          | 542          |
| Apr           | 1,390                  |  | 150          | 271          |
| May           | 1,390                  |  | 150          | 271          |
| Jun           | 1,390                  |  | 150          | 271          |
| Jul           | 1,390                  |  | 150          | 271          |
| Aug           | 1,390                  |  | 150          | 271          |
| Sep           | 1,390                  |  | 150          | 271          |
| Oct           | 1,390                  |  | 150          | 271          |
| Nov           | 1,390                  |  | 150          | 271          |
| Dec           | 1,390                  |  | 150          | 271          |

The number of customers switching in a month is multiplied by the typical billing adjustment for that month to calculate the total amount of billing adjustments in that month. Those totals are summed across the year to calculate the total billing adjustments for the year.

The calculations for the C-06 class were made for the first six months of the year only. Then the ratio between the January-June total and the annual total for the A-16 rate was applied to the C-06 January-June total to derive an estimate of the annual total for C-06.

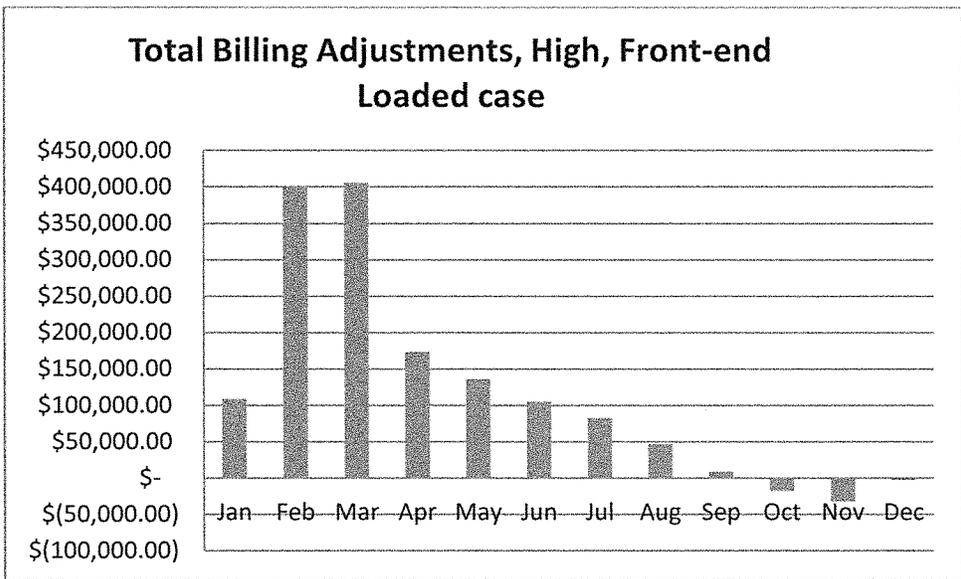
Table DIV 1-3(i) shows the results for the High, Front-end Loaded scenario.

Prepared by or under the supervision of: John Farley

Table DIV 1-3 (i) Total Billing Adjustments, High, Front-end Loaded case

|              | A-16                  | A-60                | C-06                | Total                 |
|--------------|-----------------------|---------------------|---------------------|-----------------------|
| Jan          | \$81,451.11           | \$8,423.58          | \$19,118.90         | \$108,993.60          |
| Feb          | \$296,427.11          | \$30,564.97         | \$72,055.36         | \$399,047.44          |
| Mar          | \$304,806.25          | \$31,428.96         | \$69,815.53         | \$406,050.74          |
| Apr          | \$135,834.64          | \$14,047.87         | \$23,826.27         | \$173,708.78          |
| May          | \$113,962.20          | \$11,785.85         | \$10,382.48         | \$136,130.52          |
| Jun          | \$96,006.42           | \$9,928.88          | -\$483.35           | \$105,451.94          |
| Jul          | \$74,787.88           | \$7,734.48          | \$0.00              | \$82,522.36           |
| Aug          | \$42,661.54           | \$4,412.01          | \$0.00              | \$47,073.55           |
| Sep          | \$8,006.33            | \$828.01            | \$0.00              | \$8,834.34            |
| Oct          | -\$16,368.02          | -\$1,692.76         | \$0.00              | -\$18,060.79          |
| Nov          | -\$29,290.85          | -\$3,029.23         | \$0.00              | -\$32,320.08          |
| Dec          | -\$2,153.78           | -\$222.74           | \$0.00              | -\$2,376.52           |
| <b>Total</b> | <b>\$1,106,130.82</b> | <b>\$114,209.87</b> | <b>\$209,414.72</b> | <b>\$1,429,755.41</b> |

Again to aid understanding, the following chart shows the Total billing adjustments for the High, Front-end Load case, in graph form:



For reference, 93% of the total billing adjustments for the year occur in the period January-June for the Front-end Loaded case.

Prepared by or under the supervision of: John Farley

Here are the results for the Typical , Front-end Loaded case;

Table DIV 1-3 (j) Total Billing Adjustments, Typical, Front-end Loaded case

|              | A-16                | A-60               | C-06                | Total               |
|--------------|---------------------|--------------------|---------------------|---------------------|
| Jan          | \$48,870.67         | \$5,054.15         | \$12,769.45         | \$66,694.27         |
| Feb          | \$177,920.26        | \$18,400.32        | \$47,992.59         | \$244,313.17        |
| Mar          | \$182,949.56        | \$18,920.44        | \$46,500.75         | \$248,370.75        |
| Apr          | \$81,500.78         | \$8,428.72         | \$15,913.49         | \$105,842.99        |
| May          | \$68,377.32         | \$7,071.51         | \$6,934.42          | \$82,383.25         |
| Jun          | \$57,603.85         | \$5,957.33         | -\$322.83           | \$63,238.35         |
| Jul          | \$44,872.73         | \$4,640.69         | \$0.00              | \$49,513.42         |
| Aug          | \$25,596.92         | \$2,647.21         | \$0.00              | \$28,244.13         |
| Sep          | \$4,803.80          | \$496.80           | \$0.00              | \$5,300.60          |
| Oct          | -\$9,820.81         | -\$1,015.66        | \$0.00              | -\$10,836.47        |
| Nov          | -\$17,574.51        | -\$1,817.54        | \$0.00              | -\$19,392.05        |
| Dec          | -\$1,292.27         | -\$133.64          | \$0.00              | -\$1,425.91         |
|              |                     |                    |                     |                     |
| <b>Total</b> | <b>\$663,808.30</b> | <b>\$68,650.33</b> | <b>\$139,583.82</b> | <b>\$872,042.45</b> |
|              |                     |                    |                     |                     |

The totals were rounded up to the next \$100,000 for citation in the testimony.

The Lieutenant Governor of Rhode Island  
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DIV 1-4

Request:

Please provide the supporting documentation, assumptions, and calculations that produced the figures on page 18 at lines 1 to 5.

Response:

The figures on page 18 at lines 1 to 5 were derived from the results depicted in the response to DIV 1-3.

The method is patterned after the calculation for the standard offer service adjustment charge.

The total billing adjustments by SOS procurement group (residential, commercial) were divided by the total annual forecasted SOS kWh for that group for the period April 1, 2015 – March 31, 2016, as reported in the 2015 Retail rate filing, docket 4554, Schedule JAL-3, page 1 of 2.

This produced an adjustment factor in \$/ kWh.

The adjustment factor was then multiplied by an estimate for the typical monthly usage to arrive at the impact on the typical monthly bill.

The following table, Table DIV 1-4 (a), provides these calculations:

Table DIV 1-4 (a)

| All billing adjustments for the year | typical migration, front end loaded |                |                   |
|--------------------------------------|-------------------------------------|----------------|-------------------|
|                                      |                                     |                |                   |
| Monthly impact on typical bill       |                                     |                |                   |
|                                      | Residential                         | Commercial     |                   |
| Bill adjustment costs, \$            | \$ 732,459                          | \$ 139,584     | <b>\$ 872,042</b> |
| Annual SOS kWh                       | 3055680499                          | 1229036477     |                   |
| rate ,\$/kWh                         | \$ 0.000240                         | \$ 0.000114    |                   |
| typical customer monthly kWh         | 550                                 | 1500           |                   |
| impact on monthly bill, \$           | <b>\$ 0.13</b>                      | <b>\$ 0.17</b> |                   |

| All billing adjustments for the year | high migration, front end loaded |                |                     |
|--------------------------------------|----------------------------------|----------------|---------------------|
|                                      |                                  |                |                     |
| Monthly impact on typical bill       |                                  |                |                     |
|                                      | Residential                      | Commercial     |                     |
| Bill adjustment costs, \$            | \$ 1,220,341                     | \$ 209,415     | <b>\$ 1,429,755</b> |
| Annual SOS kWh                       | 3055680499                       | 1229036477     |                     |
| rate ,\$/kWh                         | \$ 0.000399                      | \$ 0.000170    |                     |
| typical customer monthly kWh         | 550                              | 1500           |                     |
| impact on monthly bill, \$           | <b>\$ 0.22</b>                   | <b>\$ 0.26</b> |                     |

Finally, the total billing adjustment dollars for the two cases were divided by the SOS reconciliation for the period January 2014 through December 2014, which amounted to an under-recovery of approximately \$5.7 million as reported in the testimony of Jeanne A. Lloyd of National Grid, docket 4554, page 6. This calculation appears in the following table:

Table DIV 1-4 (b)

|                           |  |             |                         |
|---------------------------|--|-------------|-------------------------|
|                           |  |             |                         |
| 2014 SOS reconciliation   |  | \$5,700,000 |                         |
|                           |  |             | % of SOS reconciliation |
| Low end bill adjustments  |  | \$872,042   | 15%                     |
| High end bill adjustments |  | \$1,429,755 | 25%                     |
|                           |  |             |                         |

Prepared by or under the supervision of: John Farley

**Docket No. 4556 - National Grid – 2016 Standard Offer Service (SOS) and Renewable Energy Standard (RES) Procurement Plans  
Service List updated 4/7/15**

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|   | <a href="mailto:Al.mancini@dpuc.ri.gov">Al.mancini@dpuc.ri.gov</a>                             |                           |
|   | <a href="mailto:Joseph.shilling@dpuc.ri.gov">Joseph.shilling@dpuc.ri.gov</a>                   |                           |
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