

January 15, 2016

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4568 – The Narragansett Electric Company d/b/a National Grid
Review of Electric Distribution Rate Design Pursuant to R.I. Gen. Laws § 39-26.6-24
Unopposed Motion to Withdraw Filing**

Dear Ms. Massaro:

On behalf of National Grid¹, I enclose ten (10) copies of the Company's Unopposed Motion to Withdraw Filing.

Thank you for your attention to this transmittal. If you have any questions concerning this filing, please contact me at 781-907-2153.

Very truly yours,



Celia B. O'Brien

Enclosures

cc: Docket 4568 Service List
Leo Wold, Esq.
Jon Hagopian, Esq.
Steve Scialabba

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

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

In Re: Review of The Narragansett Electric Company)	
d/b/a National Grid’s Rate Design Pursuant to)	Docket No. 4568
R.I. Gen. Laws § 39-26.6-24)	
)	

UNOPPOSED MOTION TO WITHDRAW FILING

Pursuant to Rule 1.15 of the Rhode Island Public Utilities Commission’s (PUC) Rules of Practice and Procedure, National Grid¹ hereby submits an Unopposed Motion to Withdraw the Company’s filing in this docket without prejudice. In support of this motion, the Company states:

1. In this docket, on July 31, 2015, the Company filed with the PUC a revenue-neutral allocated cost of service study for all rate classes and a proposal for new rates for all customers in each rate class pursuant to R.I. Gen. Laws § 39-26.6-24. In its filing, the Company used the distribution revenue requirement and the allocated cost of service that was filed with the compliance filing from its last base rate case (Docket No. 4323).

2. The electric distribution rates that are currently in effect were determined by the PUC in Docket No. 4323 to be just and reasonable, reflecting the appropriate cost responsibility and contributions to the operation, maintenance, and investment in the distribution system relied upon by all customers. Such rates need not be revised at this time.

3. In addition to the Rhode Island Division of Public Utilities and Carriers (the Division), the following parties have been granted intervener status in this proceeding: the Rhode Island Office of Energy Resources (OER), Rhode Island Energy Efficiency Resources Management Council (EERMC), Acadia Center (Acadia), Conservation Law Foundation (CLF),

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

the Department of the Navy (DON), Energy Development Partners, LLC (EDP), Forbes Street Solar LLC (Forbes), Hecate Energy LLC and CME Energy (Hecate-CME), Narragansett Bay Commission (NBC), Northeast Clean Energy Council (NECEC), The Alliance for Solar Choice (TASC), Wal-Mart Stores East, LP and Sam's East, Inc. (Walmart), and Green Development, LLC d/b/a Wind Energy Development LLC (WED) (OER, EERMC, Acadia, CLF, DON, EDP, Forbes, Hecate-CME, NBC, NECEC, TASC, Walmart, and WED are collectively referred to hereinafter as the Intervening Parties).

4. The Company understands that the Division and the Intervening Parties do not support the Company's proposed rates, but have expressed their interest in engaging in further discussions on rate design and distribution cost allocation among rate classes in light of net metering and the changing distribution system that is expected to include more distributed energy resources, including, but not limited to, distributed generation. The Company supports further discussion on these issues. Therefore, the Company desires to withdraw its filing without prejudice.

5. Pursuant to PUC Rule of Practice and Procedure 1.15(b), the Company contacted the Division and the Intervening Parties to determine whether any of these entities has an objection to the Company's proposed withdrawal of its filing in this docket. As of the time of the filing of this motion, the Company has received no objection to the Company's withdrawal of its filing.

CONCLUSION

For these reasons, the Company respectfully requests that the PUC grant its unopposed motion to withdraw its filing in this docket without prejudice.

[SIGNATURE PAGE FOLLOWS]

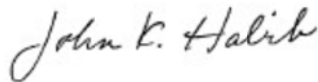
Respectfully submitted,

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID**

By its attorneys,



Celia B. O'Brien, Esq. (#4484)
National Grid
40 Sylvan Road
Waltham, MA 02451
(781) 907-2153
celia.obrien@nationalgrid.com



John K. Habib, Esq. (#7431)
Nicholas Horan, Esq. (#8156)
Keegan Werlin LLP
265 Franklin Street
Boston, MA 02110-3113
(617) 951-1400
Jack Habib jhabib@keeganwerlin.com
Nicholas Horan nhoran@keeganwerlin.com

Dated: January 15, 2016

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Joanne M. Scanlon

January 15, 2016

Date

**Docket No. 4568 National Grid's Rate Design Pursuant to R.I. Gen. Laws Sec 39-26.6-24
Service List updated 1/7/16**

Parties' Name/Address	E-mail	Phone
National Grid Celia B. O'Brien, Esq. National Grid 280 Melrose Street Providence, RI 02907	Celia.obrien@nationalgrid.com;	781-907-2153
	Joanne.scanlon@nationalgrid.com;	
	Theresa.burns@nationalgrid.com;	
	Jeanne.lloyd@nationalgrid.com;	
	Ian.springsteel@nationalgrid.com;	
	Timothy.roughan@nationalgrid.com;	
	Peter.zschokke@nationalgrid.com;	
Nick Horan, Esq. Jack Habib, Esq. Keegan Werlin LLP	NHoran@keeganwerlin.com;	
	JHabib@keeganwerlin.com;	
Division of Public Utilities & Carriers (Division) Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Lwold@riag.ri.gov;	401-222-2424 Ext. 2218
	Jon.hagopian@dpuc.ri.gov;	
	Jmunoz@riag.ri.gov;	
	Dmacrae@riag.ri.gov;	
	Steve.scialabba@dpuc.ri.gov;	
	Al.contente@dpuc.ri.gov;	
Richard Hahn Daymark Energy Associates 1 Washington Mall, 9th floor Boston, MA 02108	rhahn@daymarkea.com;	
	apereira@daymarkea.com;	
Office of Energy Resources (OER) Daniel W. Majcher, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4 th Floor Providence, RI 02908	Daniel.majcher@doa.ri.gov;	401-222-8880
Marion Gold, Commissioner Office of Energy Resources One Capitol Hill, 4 th Floor Providence, RI 02908	Marion.gold@energy.ri.gov;	401-574-9113
	Nicholas.Ucci@energy.ri.gov;	
	Danny.musher@energy.ri.gov;	
	Christopher.kearns@energy.ri.gov;	

Conservation Law Foundation (CLF) Jerry Elmer, Esq. Conservation Law Foundation 55 Dorrance Street Providence, RI 02903	jelmer@clf.org ;	401-351-1102 Ext. 2012
Acadia Center Mark E. LeBel Acadia Center 31 Milk Street Suite 501 Boston, MA 02108	mlebel@acadiacenter.org ;	617-742-0054 Ext. 104
	aanthony@acadiacenter.org ;	
	lmalone@acadiacenter.org ;	
Quentin Anthony, Attorney at Law 41 Long Wharf Mall Newport, RI 02840	qanthony@verizon.net ;	401-847-1008
Energy Efficiency Resources Mgmt. Council (EERMC) Marisa Desautel, Esq. Law Office of Marisa Desautel, LLC 55 Pine St. Providence, RI 02903	marisa@desautelesq.com ;	401-477-0023
Scudder Parker 128 Lakeside Avenue Suite 401 Burlington, VT 05401	sparker@veic.org ;	
Walmart Melissa M. Horne, Esq. Higgings, Cavanagh & Cooney, LLP 123 Dyer St. Providence, RI 02903	mhorne@hcc-law.com ;	401-272-3500
Stephen W. Chriss, Sr. Mgr. Regulatory Analysis Walmart 2001 Southeast 10 th St. Bentonville, AR 72716-5530	Stephen.chriss@walmart.com ;	479-204-1594
New England Clean Energy Council (NECEC) Narragansett Bay Commission (NBC) Joseph A. Keough, Jr., Esq. Keough & Sweeney 41 Mendon Ave. Pawtucket, RI 02861	jkeoughjr@keoughsweeney.com ;	401-724-3600
Sue AnderBois Janet Besser New England Clean Energy Council	sanderbois@necec.org ;	
	jbesser@necec.org ;	
Karen Giebink Jim McCaughey Narragansett Bay Commission	KGiebink@narrabay.com ;	
	jmccaughey@narrabay.com ;	
Wind Energy Development (WED) Seth H. Handy Handy Law, LLC 42 Weybosset Street Providence, RI 02903	seth@handylawllc.com ;	401-626-4839

Michelle Carpenter Wind Energy Development, LLC 3760 Quaker Lane North Kingstown, RI 02852	md@wedenergy.com ;	
The Alliance for Solar Choice (TASC) Michael McElroy, Esq. Leah J. Donaldson, Esq. Schacht & McElroy PO Box 6721 Providence, RI 02940-6721	Michael@McElroyLawOffice.com ;	401-351-4100
	Leah@McElroyLawOffice.com ;	
Thadeus B. Culley, Esq. Keyes, FOX & Weidman LLP 401 Harrison Oaks Blvd., Suite 100 Cary, NC 27517	tculley@kfwlaw.com ;	510-314-8205
Gracie Walovich Carine Dumit Katie Sheldon Evan Dube	gracie@allianceforsolarchoice.com ;	
	cdumit@solarcity.com ;	
	ksheldon@solarcity.com ;	
	evand@sunrunhome.com ;	
Dept. of the Navy (Navy) Allison Genco, Esq. NAVFAC HQ- Building 33 Dept. of the Navy 1322 Patterson Ave SE, Suite 1000 Washington Navy Yard, D.C. 20374-5065	allison.genco@navy.mil ;	
Dr. Kay Davoodi, P.E., Director Utility Rates and Studies Office NAVFAC HQ- Building 33 Dept. of the Navy 1322 Patterson Ave SE, Suite 1000 Washington Navy Yard, D.C. 20374-5065	Khojasteh.davoodi@navy.mil ;	
Larry R. Allen, Public Utilities Specialist Dept. of the Navy	Larry.r.allen@navy.mil ;	
Maurice Brubaker P.O. Box 412000 St. Louis, Missouri 63141-2000 636-898-6726	mbrubaker@consultbai.com ;	636-898-6726
Ali Al-Jabir 5106 Cavendish Drive Corpus Christi, TX 78413	aaljabir@consultbai.com ;	361-994-1767
Energy Development Partner Christian F. Capizzo, Counsel Shechtman Halperin Savage, LLP 1080 Main St. Pawtucket, RI 02860	ccapizzo@shslawfirm.com ;	401- 272-1400
Frank A. Epps, Managing Director, USA Energy Development Partners, LLC 51 Industrial Drive North Smithfield, RI 02896	frank@edp-energy.com ;	401-884-2248

Hecate Energy & CME Energy Alan Shoer, Esq. Adler Pollock & Sheehan, Inc. One Citizens Plaza, 8 th Floor Providence, RI 002903	ashoer@apslaw.com ;	401-274-7200
Nicholas Bulling Gabriel Wapner Hecate Energy, LLC 115 Rosa Parks Blvd. Nashville, TN 37203	NBullinger@HecateEnergy.com ;	
	GWapner@HecateEnergy.com ;	
CME Energy, LLC William J. Martin, President Kevin Stacom CME Energy, LLC 20 Park Plaza, Suite #400 Boston, MA 02116	Wmartin@cme-energy.com ;	
	Kevin.stacom@gmail.com ;	
Forbes Street Solar William Bernstein, Esq. William L. Bernstein, Esquire 627 Putnam Pike Greenville, RI 02828	wlblaw@verizon.net ;	401-949-2228 Ext 102
File an original & 9 copies w/ PUC: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ;	401-780-2107
	Cynthia.wilsonfrias@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	
	Todd.bianco@puc.ri.gov ;	
Linda George, RI Senate Policy	lgeorge@rilin.state.ri.us ;	
Matt Davey, Silver Sprint Networks	mdavey@silverspringnet.com ;	
Christopher Long	christopher.long@opower.com ;	
Douglas Gablinske, The Energy Council-RI	Doug@tecri.org ;	
Eugenia T. Gibbons, ECANE d/b/a Mass Energy & People's Power & Light	eugenia@massenergy.org ;	
Laurence Ehrhardt	replarry@gmail.com ;	
Kat Burnham, People's Power & Light	kat@ripower.org ;	
Vito Buonomano	info@neastsolar.com ;	