



DEPARTMENT OF THE NAVY

NAVAL FACILITIES ENGINEERING COMMAND
1322 PATTERSON AVENUE, SE, SUITE 1000
WASHINGTON NAVY YARD, DC 20374-5065

VIA FIRST CLASS MAIL AND ELECTRONIC MAIL

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

October 8, 2015

Re: Review of the Narragansett Electric Company d/b/a National Grid Rate Design
Pursuant to R.I. Gen. Laws § 39-26.6-24 – Docket No. 4568;
Department of the Navy Data Requests to National Grid, Set 1

Dear Ms. Massaro:

On behalf of the Department of the Navy (DON), I enclose ten (10) copies of the DON's first set of data requests to National Grid in the above-referenced docket.

Please call me at (202) 685-9122 if you have any questions concerning this filing. Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "A. Genco", with a long horizontal flourish extending to the right.

Allison M. Genco, Esq.
Department of the Navy
Filing on Behalf of the
Federal Executive Agencies

cc: Service List for Docket No. 4568

CERTIFICATE OF SERVICE
RI PUC Docket No. 4568

I hereby certify on this 8th day of October, 2015, a copy of the cover letter and the Department of the Navy's First Set of Data Requests to National Grid were electronically transmitted to the individuals listed below. An original hard copy was sent via first class mail to National Grid and the Division of Public Utilities & Carriers. An original hard copy and nine (9) copies of this filing have been sent via first class mail to the Clerk of the Rhode Island Public Utilities Commission.



Allison M. Genco, Esq.

**Docket No. 4568 National Grid's Rate Design Pursuant to R.I. Gen. Laws Sec 39-26.6-24
Service List updated 10/2/15**

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

IN RE: REVIEW OF THE NARRAGANSETT :
ELECTRIC COMPANY d/b/a NATIONAL GRID : DOCKET NO. 4568
RATE DESIGN PURSUANT TO R.I. GEN. LAWS § 39-26.6-24 :

**DEPARTMENT OF THE NAVY'S
FIRST SET OF DATA REQUESTS
TO NATIONAL GRID**

Through counsel, the Department of the Navy (DON) makes the following data requests to National Grid.

- DON 1-1 Please provide a copy of all Exhibits and Schedules in the instant filing in native format (i.e., WORD and EXCEL or a compatible format). EXCEL workbooks should be provided with all formulas and links intact.
- DON 1-2 Please provide a copy of all workpapers supporting the Schedules contained in the Testimony in native format (i.e., WORD and EXCEL or a compatible format). EXCEL workbooks should be provided with all formulas and links intact.
- DON 1-3 Please provide a copy of all interrogatories, requests to produce or other requests for information received by the Company from participants in this proceeding.
- DON 1-4 Please provide, when available, a copy of all discovery responses, including responses to both interrogatories and requests to produce.
- DON 1-5 Please provide a copy of all studies, reports, analysis and related workpapers the Company relied upon to support its proposal to combine G62 and G32 classes.in native format (i.e. WORD and EXCEL or compatible format). EXCEL workbooks should be provided with all formulas and links intact.
- DON 1-6 Please provide, in electronic Microsoft Excel format with all formulas intact, a complete copy of the workpapers supporting the Navy bill impact analysis prepared by National Grid and summarized in National Grid's supplemental response to PUC discovery request no. 1-31.