

Division 1-1

Request:

Re: The Environmental Report for the Period April 1, 2014 through March 31, 2015

Re: the 642 Allens Avenue project, please:

- a. Indicate when a closure letter from RIDEM for Phase 1 remedial activities is anticipated;
- b. Provide the results of the Company's semi-annual groundwater/non-aqueous phase liquid gauging and groundwater sampling for each semi-annual gauging for the over the five-year period ended March 31, 2015;
- c. Identify the costs of maintaining the boom in the Providence River over the last year (i.e., April 1, 2014 through March 31, 2015) and explain why continued maintenance of that boom is necessary from an environmental protection perspective;
- d. Identify the costs associated with stockpile management and disposal;
- e. Identify the costs associated with the completion of a supplemental site investigation to address data gaps from the previous site investigation;
- f. Provide an explanation of the nature of the data gaps from the previous site investigation that were addressed by the supplemental site investigation.

Response:

- a. The Company does not know when it will receive an Interim Letter of Compliance (closure letter for the Phase 1 activities) from RIDEM; however, in the meantime, the Company is working with RIDEM and moving forward with site investigation and remediation activities at the Site.
- b. The results of the Company's semi-annual groundwater/non-aqueous phase liquid gauging and groundwater sampling for each semi-annual gauging for the five-year period ending March 31, 2015 are included as Attachment DIV 1-1, which is being provided on CD-ROM.

Division 1-1, page 2

- c. Maintenance was performed on the boom in the Providence River on March 21, 2014 at a total cost of \$9,075.70. Costs incurred by GZA GeoEnvironmental, Inc. for oversight of the boom replacement and inspection totaled \$1,114.23. The remaining \$7,961.47 was for Clean Harbors Environmental Services, Inc. to remove and replace the existing boom. Maintenance was also performed on the boom on November 13, 2014 at a total cost of \$6,387.16 (\$799.50 for GZA and \$5,587.66 for Clean Harbors). Sheen outbreaks within the cove area continue on a regular basis and the boom is necessary to control this sheen. Additionally, \$1,189.10 was incurred by Clean Harbors for replacement of boom on August 18, 2014 within catch basins in the northwestern corner of the property which are maintained as a precaution against potential sheen outbreak within two catch basins.
- d. Total costs associated with stockpile management and disposal were \$44,616.02 (\$28,841.82 ESMI; \$10,914.40 GZA and \$4,859.80 Clean Harbors).
- e. Total costs associated with completion of the Supplemental Site Investigation were \$205,173.32 (\$190,196.29 GZA and \$14,977.03 Clean Harbors).
- f. The supplemental site investigation was designed to fill data gaps identified during more recent assessment and rehabilitation activities at the Site:
- **Drainage Rehabilitation Area:** Sheen / product were identified in several drainage structures and the conveyance piping between them in the northwestern corner of the Site. The sheen was determined to be comprised of complex mixtures of variably weathered petroleum, with the major component being middle distillate petroleum (i.e. diesel fuel, or fuel oil #2). The source of this sheen / product is unknown. Additional investigations were performed to further define the limits of non-aqueous phase liquid (NAPL) in this area.
 - **Natural Gas Leak Repair Area:** Sheen was observed in an excavation associated with the natural gas piping repair proximate to the former Booster House. The sheen was identified to be comprised of primarily heavy middle distillate (e.g., cutting oil, light lubricating oil, or gear oil), with low levels of pyrogenic PAHs. The source of this sheen is unknown. Additional investigations were performed to further define the impacts in this area.

Division 1-1, page 3

- **Lead UCLs:** Four surface soil samples collected directly proximate to former Gasholders Nos. 18 and 21 exceeded the total lead RIDEM Upper Concentration Limit (UCL) of 10,000 mg/kg. The two gasholders were decommissioned and demolished in 2010. Supplemental surface soil sampling was conducted for lead to define the extent of lead impacts in this area.
- **Oxide Box Area:** Several rounds of investigation and sampling have been conducted in the Oxide Box Area. Supplemental soil characterization was conducted in order to further assess excavation volumes and soil management options.
- **RCA-3:** RCA-3 is located in the north-central portion of the Site proximate to the cove. Dense non-aqueous phase liquid (DNAPL) was identified in RCA-3 during 2011 and 2012 in trace amounts. An additional deeper monitoring well was installed to further characterize the extent of DNAPL in the area.
- **RCA-21 LNAPL:** RCA-21 is located on the LNG portion of the property. GZA gauged and recovered light non-aqueous phase liquid (LNAPL) from RCA-21 on an at least monthly basis during 2011 (the second half), 2012 and 2013. Initially, the thickness of LNAPL in RCA-21 was 2.79 feet in February 2012. While RCA-21 was being recovered every week, the thickness of LNAPL decreased to approximately 1 foot. During monthly gauging and recovery, the thickness of LNAPL has been detected at thickness ranging from 1.4 to 1.89 feet. The recovery rate of LNAPL in RCA-21 is estimated to be in the order of 3 to 5 days. The Company conducted a test pit investigation within the area of RCA-21 to determine if a subsurface structure that may be holding LNAPL could be identified. When no structures were identified, RCA-21 was replaced with a recovery well to aid in the continued recovery of LNAPL.
- **Deeper Site Investigation:** Environmental explorations completed at the Site have generally been shallow, extending to the water table, regardless of the level of impacts noted during advancement. Several deeper borings/wells were installed to supplement existing data.

Division 1-1, page 4

- **Cove Area:** Limited investigations were completed along the cove that is proximate to the northern portion of the Site. Sheen observations have been consistently observed since at least 1996. Additional explorations, including shallow and deep monitoring wells were performed to further assess the vertical and horizontal extent of NAPL along the northern property line adjacent to the cove.
- **Site Perimeter:** Limited investigations were completed along the northern and western property line / Site boundary. Additional investigations were performed to further define the impacts along the site boundary.

The results of these explorations will be used to further the Company's understanding of environmental conditions in these specific areas of the Site and assess whether additional response actions may be warranted.

Division 1-2

Request:

Re: the "Cost Breakdown by Category" for the 642 Allens Avenue project, please:

- a. Detail the Consulting activities for which payments were made during the reporting period;
- b. Identify the organization that provided each consulting service;
- c. Provide copies of all reports, studies, or other documents which communicated the results of activities undertaken or completed by consultants for which payments were made during the reporting period.

Response:

- a. Consulting activities conducted during the reporting period, for which payments were made, include: annual groundwater and semi-annual groundwater/non-aqueous phase liquid (NAPL) monitoring; reporting to RIDEM; monthly site visits and monthly NAPL recovery; boom repair/maintenance oversight; review of historic plans and documents for the Site; management of the former Material Handling Area (MHA) stockpile; preliminary design of an engineered cap for the former gasholder area; conducting supplemental site investigation activities at the Site; environmental support consisting of soil and ground water management and documentation for several facility projects, including hydrant replacement, trenching for electrical upgrades at the LNG, water line upgrade and final capping activities at the LNG, upgrades to the foam system at the LNG and repairs to a damaged water service on the gas operations portion of property. In addition, oversight was provided for planning support for upgrades to the natural gas regulator station; repair of the septic system at the Holcim Cement – occupied portion of the property; oversight for the transportation and disposal of excess soil generated during several facility projects; and health and safety monitoring for gas line cutoffs.
- b. GZA GeoEnvironmental, Inc. conducted the services described in subpart (a) above with the exception of the health and safety monitoring for the gas line cutoffs, which was conducted by Coneco Engineers and Scientists.

Division 1-2, page 2

- c. The following reports, studies, or other documents were prepared during the reporting period:
- *Groundwater Monitoring Report – 2013*, by GZA GeoEnvironmental, dated September 17, 2014;
 - *Summary of LNG Water Line Upgrade Activities*, by GZA GeoEnvironmental, dated November 7, 2014;
 - *Application for FONSI– Planned Site Investigation Activities*, by GZA GeoEnvironmental, dated April 8, 2014;
 - *Notice to Abutter – Planned Site Investigation Activities*, by GZA GeoEnvironmental, dated May 13, 2014;

Please see Attachment DIV 1-2 for copies of the reports, studies, or other documents listed above prepared during the reporting period. Please be advised that due to the voluminous nature of this attachment, the Company is providing Attachment DIV 1-2 on CD-ROM.

Division 1-3

Request:

Re: the "Cost Breakdown by Category" for the 642 Allens Avenue project, please provide full supporting detail for the "Construction/Disposal/Removal Costs" showing separately costs of each construction, disposal, and removal activity and clearly indentifying all costs associated with:

- a. Emergency utility repairs
- b. Stockpile management and disposal
- c. Other activities

Response:

Please refer to Attachment DIV 1-3 for supporting detail for the "Construction/Disposal/Removal" costs for the reporting period.

Division Data Request DIV 1-3

Date	Payee	Amount	Description of Service	Response
01/15/15	Clean Harbors Environmental Services, Inc.	\$ 7,260.83	Environmental support for damaged water service repair	DIV 1-3a
01/29/15	Clean Harbors Environmental Services, Inc.	\$ 4,859.80	Soil loading for off-Site thermal treatment	DIV 1-3b
01/13/15	Environmental Soil Management, Inc.	\$ 28,841.82	Thermal Treatment for soil from various projects	DIV1-3b
04/24/14	Clean Harbors Environmental Services, Inc.	\$ 7,961.47	Boom replacement within cove	DIV 1-3c
06/24/14	Clean Harbors Environmental Services, Inc.	\$ 2,393.30	Perform Test pits during data gap investigation	DIV 1-3c
07/17/14	Clean Harbors Environmental Services, Inc.	\$ 14,977.03	Soil and ground water disposal from data gap investigation	DIV 1-3c
08/21/14	Clean Harbors Environmental Services, Inc.	\$ 1,189.10	Boom replacement within catchbasins	DIV 1-3c
11/06/14	Clean Harbors Environmental Services, Inc.	\$ 528.00	Environmental support for high expansion foam project	DIV 1-3c
11/20/14	Clean Harbors Environmental Services, Inc.	\$ 5,587.66	Boom replacement within cove	DIV 1-3c
03/05/15	T. Ford Company Inc.	\$ 7,616.95	Removal of truck washing station from former remediation project	DIV 1-3c

TOTAL: \$81,215.96

Division 1-4

Request:

Re: the "Cost Breakdown by Category" for the 642 Allens Avenue project, please provide full supporting detail for the "Other Costs" associated with the 642 Allens Avenue project for the reporting period.

Response:

The amount for "Other Costs" associated with the 642 Allens Avenue project for the reporting period was \$22,056. The entire cost is Company labor and burden for management of 642 Allens Avenue. The Company project management activities performed during this reporting period were associated with oversight of the consultants and contractors performing environmental work at the Site including review of corresponding invoices, coordination with Company personnel related to environmental support during planned and emergency projects at the Site and communications with RIDEM. In addition, project management activities included review of permit applications, draft monitoring reports, environmental summary reports and disposal documentation.

Division 1-5

Request:

Re: the 170 Allens Avenue project, please provide detailed documentation of the manner in which the dollar amounts of the Cargill reimbursements for costs incurred for the 170 Allens Avenue project were determined including the supporting workpapers, studies and analyses for those determinations.

Response:

Per a confidential agreement with Cargill, Inc. (Cargill), Cargill reimburses the Company a percentage share of all costs associated with the upland investigation and remediation of the site and certain ancillary costs associated with this project. The invoices to Cargill include charges related to actual applicable invoices paid by the Company that have been included in this and previous filings. One invoice was sent to Cargill during the reporting period:

- The invoice, which was sent on November 13, 2014, was in the amount of \$80,604.11 and covered the period from February 1, 2014 through October 31, 2014. Payment was received in January 2015 and was included in Category 4 "Property Purchases/Settlements/Legal" for this project during the reporting period. A copy of this invoice is provided as Attachment DIV 1-5.

In addition, please see the response to Division Data Request 1-6d for the workpapers, studies and analyses used in determining the dollar amounts of the Cargill reimbursements.



INVOICE

The Narragansett Electric Company
 d/b/a National Grid
 RIPUC Docket No. 4573
 In Re: 2015 Distribution Adjustment Charge Filing
 Attachment DIV 1-5
 Page 1 of 1

DATE:
 November 13, 2014

INVOICE No.
 170 Allens-Cargill-Inv. 5

BILL TO:
 Cargill Incorporated
 9350 Excelsior Boulevard
 MS 150 – Attn Joe Baker
 Hopkins, MN 55343

FOR:
 Shared Environmental Costs
 170 Allens Ave Site
 National Grid Project 90000124896
 For Period: February 1, 2014 through October 31, 2014

DESCRIPTION	INVOICE NUMBER	INVOICE DATE	SERVICE PERIOD	AMOUNT ON INVOICE	NON COST SHARE RELATED	TOTAL BILLED IN THIS INVOICE
OUTSIDE REIMBURSEABLE EXPENSES						
Charter Environmental, Inc	7	3/12/2014	01/01/2014-02/28/2014	\$ 22,789.80	\$ -	\$ 22,789.80
Charter Environmental, Inc	8	7/9/2014	03/01/2014-06/30/2014	\$ 30,673.02	\$ -	\$ 30,673.02
Clean Harbors Environmental Services Inc.	1000381013	3/25/2014	3/7/2014	\$ 4,066.92	\$ -	\$ 4,066.92
GZA GeoEnvironmental, Inc	0680521	2/26/2014	12/28/52013-01/24/2014	\$ 24,742.65	\$ -	\$ 24,742.65
GZA GeoEnvironmental, Inc	0680945	3/11/2014	01/25/2014-02/28/2014	\$ 12,386.26	\$ -	\$ 12,386.26
GZA GeoEnvironmental, Inc	0685509	4/10/2014	03/01/2014-04/4/2014	\$ 6,204.69	\$ -	\$ 6,204.69
GZA GeoEnvironmental, Inc	0686847	5/13/2014	4/5/2014-04/24/2014	\$ 4,539.50	\$ -	\$ 4,539.50
GZA GeoEnvironmental, Inc	0689713	7/17/2014	04/25/2014-05/30/2014	\$ 18,224.67	\$ -	\$ 18,224.67
GZA GeoEnvironmental, Inc	0690032	7/24/2014	05/31/2014-06/27/2014	\$ 7,515.92	\$ -	\$ 7,515.92
GZA GeoEnvironmental, Inc	0690549	8/6/2014	06/28/2014-07/31/2014	\$ 5,972.72	\$ -	\$ 5,972.72
GZA GeoEnvironmental, Inc	0692443	9/18/2014	08/01/2014-09/12/2014	\$ 19,504.73	\$ -	\$ 19,504.73
Hinckley Allen & Snyder, LLP	Various (See attached table)	02/12/2014-10/10/2014	01/14/2014-09/30/2014	\$ 11,367.84	\$ 6,780.50	\$ 4,587.34
SUBTOTAL OUTSIDE EXPENSES				\$ 167,988.72	\$ 6,780.50	\$ 161,208.22
CARGILL REIMBURSEMENT (50%)						\$ 80,604.11
					CARGILL TOTAL DUE	\$ 80,604.11

Please reference work order number 90000124896 and remit to:
 National Grid
 Attn: Mr. Kenneth E. Lento
 Project Manager
 Site Investigation and Remediation Group
 40 Sylvan Road
 Waltham, MA 02451

Division 1-6

Request:

Re: the "Cost Breakdown by Category" for the 170 Allens Avenue project, please:

- a. Detail the Consulting activities for which payments were made during the reporting period;
- b. Identify the credits associated with both Cargill and Rhode Island Hospital;
- c. Identify the organization that provided each consulting service;
- d. Provide copies of all reports, studies, or other documents which communicated the results of activities undertaken or completed by consultants for which payments were made during the reporting period.

Response:

- a. Consulting activities conducted during the reporting period for which payment was made include sediment-related feasibility evaluation, timber dock evaluation, cost estimating/evaluations for property use, periodic reporting/meetings, groundwater/non-aqueous phase liquid gauging/monitoring/recovery, construction oversight, preparation of Remedial Action Closure Report, preparation of environmental land use restriction submittals, site inspections, and project management.
- b. As indicated in response to Division Request 1-5, a payment of \$80,604.11 was received from Cargill in January for reimbursement of charges incurred between February 1, 2014 and October 31, 2014. This credit was included under Category 4 Property Purchases/Settlements/Legal.

The Company-owned property was leased to Rhode Island Hospital for satellite parking during two periods of time:

- The first time period was between July 1, 2014 and August 31, 2014. The license fee was originally \$12,000 per month but was reduced to \$6,000 per month for the second month due to a reduced usage of the property by Rhode Island Hospital. The first month payment of \$12,000 and second payment of \$6,000 were both received in July 2014. The first payment was inadvertently credited to another account and will be properly credited in the FY16 (April 1, 2015 through March 31, 2016) reporting period filing. The second payment was credited to the

Division 1-6, page 2

project and was included in Category 5 "Other Costs." (Note that the text of the FY2015 Annual Report for Gas Service submitted to the Commission on August 3, 2015 incorrectly indicated that this credit was included in Category 4 "Property Purchases/Settlements/Legal.")

- The second time period was between February 17, 2015 and March 16, 2015. The license fee was \$10,400, which was paid in two installments. The first payment of \$5,200 was received in March 2015. The first payment was credited to the project and was included in Category 5 "Other Costs." (Note that the FY2015 Annual Report filing text incorrectly indicated that this credit was included in Category 4 "Property Purchases/Settlements/Legal.") The second payment of \$5,200 was received in April 2015 and will be included in the FY16 (April 1, 2015 through March 31, 2016) reporting period.
- c. GZA GeoEnvironmental, Inc. conducted the sediment related feasibility evaluation, timber dock evaluation, cost estimating/evaluations for property use, periodic reporting/meetings, groundwater/non-aqueous phase liquid gauging/monitoring/recovery, construction oversight, preparation of Remedial Action Closure Report, preparation of environmental land use restriction submittals, and site inspections. EECS, Inc. conducted the project management activities.
- d. The following reports, studies, or other documents were prepared during the reporting period:
- *Closure Report - 170 Allens Avenue*, by GZA GeoEnvironmental, Inc., dated July 25, 2014.
 - *Notice of Completion Letter*, by GZA GeoEnvironmental, Inc., dated June 13, 2014.
 - *Notice of Termination Forms*, by GZA GeoEnvironmental, Inc., dated August 4, 2014.
 - *Letter to the Coastal Resource Management Council*, by GZA GeoEnvironmental, Inc., dated September 10, 2014.
 - *Monthly Status Report - August 1 through August 31, 2014*, by GZA GeoEnvironmental, Inc., dated September 26, 2014.
 - *Monthly Status Report - September 1 through September 30, 2014*, by GZA GeoEnvironmental, Inc., dated October 31, 2014.

Division 1-6, page 3

- *Monthly Status Report - October 1 through October 31, 2014*, by GZA GeoEnvironmental, Inc., dated November 13, 2014.
- *Monthly Status Report - November 1 through November 30, 2014*, by GZA GeoEnvironmental, Inc., dated January 11, 2015.
- *Transmittal Letter for Environmental Land Usage Restrictions*, by GZA GeoEnvironmental, Inc., dated January 23, 2015.
- *Monthly Status Report - December 1 through December 31, 2014*, by GZA GeoEnvironmental, Inc., dated January 29, 2015.
- *Monthly Status Report - January 1 through January 31, 2015*, by GZA GeoEnvironmental, Inc., dated March 11, 2015.
- *Notice of Termination - Multi-Sector General Permit*, by GZA GeoEnvironmental, Inc., dated March 13, 2015.

Please see Attachment DIV 1-6d (parts 1 through 4) for copies of the reports, studies, or other documents listed above prepared during the reporting period. Please be advised that due to the voluminous nature of this attachment, the Company is providing Attachment DIV 1-6 (parts 1 through 4) on CD-ROM.

Division 1-7

Request:

Re: the "Cost Breakdown by Category" for the 170 Allens Avenue project, please provide full supporting detail for the "Construction/Disposal/ Removal Costs" showing separately costs of each construction, disposal, and removal activity.

Response:

Please see Attachment DIV 1-7 for supporting detail for the "Construction/Disposal/Removal Costs" showing separately each construction, disposal, and removal activity for the reporting period.

Division Data Request DIV 1-7

Date	Payee	Amount	Description of Service
3/25/2014	CLEAN HARBORS ENVIRONMENTAL SVCS	\$4,066.92	Disposal of dense non-aqueous phase liquid from monitoring well gauging/recovery
6/12/2014	CHARTER ENVIRONMENTAL INC.	\$30,673.02	Construction of upland remedy primarily demobilization work and release of retainage

*note 1

Total: \$34,739.94

*1 Clean Harbors invoice was over accounted by \$2 and will be credited in next fiscal year FY16

Division 1-8

Request:

Re: Woonsocket (Hamlet Ave.) MGP, Rhode Island project, please provide a copy of the referenced November 2014 Supplemental Site Investigation Work Plan submitted to the RIDEM.

Response:

A copy of the November 2014 Supplemental Site Investigation Work Plan submitted to the RIDEM is included in Attachment DIV 1-8. The electronic version and the file size of this attachment is large and is being provided on CD-ROM.

Division 1-9

Request:

Re: the PCB Regulated Pipe Abandonment project, please:

- a. Provide full supporting detail for the "Construction/Disposal/Removal Costs" shown in the "Cost Breakdown by Category," including separate itemization of costs of each construction, disposal, and removal activity.
- b. Provide a detailed explanation of the manner in which the Company's accelerated replacement of gas services and mains impacts its incurrence of PCB Regulated Pipe Abandonment costs.

Response:

- a. The supporting detail for the "Construction/Disposal/Removal Costs" shown in the "Cost Breakdown by Category," including separate itemization of costs of each construction, disposal, and removal activity are included in Attachment DIV 1-9a.
- b. The PCB Regulated Pipe Abandonment project tracks costs associated with the removal of gas pipe from throughout the Rhode Island gas system, as well as in-place PCB testing of pipe as required by the U.S. Environmental Protection Agency. As the pipe is removed, the pipe material is brought to a Company facility where the materials are then consolidated, transported off-site and decontaminated. Any associated condensate and drip water are removed and disposed of from the field by a licensed Hazardous Waste Transporter. The costs included in this project relate to the PCB testing, decontamination and transport of these materials.

The PCB Regulated Pipe Abandonment costs are directly related to the amount of gas pipe that is removed from the system, and this is impacted by numerous factors including the following:

- The amount of mains and services replaced by the Company. The Company has accelerated its replacement of gas services and mains to improve system reliability;
- The number of leaks repaired. The Company removes some pipe during repair of system leaks; and

Division 1-9, page 2

- The increased number of state and public works projects. Many towns and the State of Rhode Island have been performing an increased number of infrastructure upgrades and replacements. The Company has been experiencing an increased amount of requests from government agencies to remove gas pipe that had been abandoned in place to allow for the replacement of bridges and installation of new subsurface utilities (i.e., water, sewer and drainage lines) in public right of ways that are becoming increasingly congested below the street level with active and abandoned piping.

Attachment DIV 1-9(a)

Date	Payee	Invoice Number	Amount	Description of Services
2/10/2014	Clean Harbors	1000323277	\$ 653.40	Transport and decontamination of pipe from Middletown Service Center
2/11/2014	Clean Harbors	1000324532	\$ 2,615.53	Transport and decontamination of pipe from Lincoln Service Center
2/11/2014	Clean Harbors	1000324842	\$ 3,279.38	Transport and decontamination of pipe from Prov-Melrose Service Center
3/10/2014	Clean Harbors	1000362303	\$ 717.20	Transport and decontamination of pipe from North Kingstown Service Center
3/24/2014	Clean Harbors	1000379178	\$ 3,035.73	Transport and decontamination of pipe from Prov-Dexter St. Service Center
4/3/2014	Clean Harbors	1000395645	\$ 330.00	Transport and decontamination of pipe from Middletown Service Center
4/3/2014	Clean Harbors	1000395642	\$ 353.10	Transport and decontamination of pipe from North Kingstown Service Center
4/8/2014	Clean Harbors	1000404291	\$ 5,571.78	Transport and decontamination of pipe from Prov-Melrose Service Center
4/15/2014	Clean Harbors	1000411898	\$ 4,321.08	Transport and decontamination of pipe from Lincoln Service Center
4/16/2014	Clean Harbors	1000412273	\$ 2,292.13	Transport and decontamination of pipe from Prov-Dexter St. Service Center
4/16/2014	Clean Harbors	1000412278	\$ 3,002.73	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
5/1/2014	Clean Harbors	1000432822	\$ 799.70	Transport and decontamination of pipe from North Kingstown Service Center
5/6/2014	Clean Harbors	1000440029	\$ 2,473.63	Transport and decontamination of pipe from Lincoln Service Center
5/6/2014	Clean Harbors	1000442450	\$ 2,484.08	Transport and decontamination of pipe from Prov-Melrose Service Center
5/12/2014	Clean Harbors	1000449133	\$ 2,553.38	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
5/15/2014	Clean Harbors	1000453916	\$ 3,084.13	Transport and decontamination of pipe from Prov-Dexter St. Service Center
6/4/2014	Clean Harbors	1000481286	\$ 717.20	Transport and decontamination of pipe from North Kingstown Service Center
6/4/2014	Clean Harbors	1000481297	\$ 653.40	Transport and decontamination of pipe from Middletown Service Center
6/10/2014	Clean Harbors	1000490024	\$ 2,313.03	Transport and decontamination of pipe from Lincoln Service Center
6/11/2014	Clean Harbors	1000491990	\$ 3,325.58	Transport and decontamination of pipe from Prov-Dexter St. Service Center
6/11/2014	Clean Harbors	1000491995	\$ 3,575.28	Transport and decontamination of pipe from Prov-Melrose Service Center
6/11/2014	Clean Harbors	1000492005	\$ 3,754.58	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
6/27/2014	Clean Harbors	1000512073	\$ 717.20	Transport and decontamination of pipe from North Kingstown Service Center
6/27/2014	Clean Harbors	1000512078	\$ 653.40	Transport and decontamination of pipe from Middletown Service Center
6/30/2014	Clean Harbors	1000514262	\$ 2,443.93	Transport and decontamination of pipe from Lincoln Service Center
7/14/2014	Clean Harbors	1000525079	\$ 3,836.53	Transport and decontamination of pipe from Prov-Melrose Service Center
7/14/2014	Clean Harbors	1000534156	\$ 3,143.53	Transport and decontamination of pipe from Prov-Dexter St. Service Center
7/14/2014	Clean Harbors	1000534151	\$ 3,644.58	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
7/23/2014	Clean Harbors	1000544607	\$ 2,303.68	Transport and decontamination of pipe from Prov-Melrose Service Center
7/23/2014	Clean Harbors	1000544835	\$ 565.95	Transport and decontamination of pipe from North Kingstown Service Center
7/23/2014	Clean Harbors	1000544841	\$ 518.10	Transport and decontamination of pipe from Middletown Service Center
7/25/2014	Clean Harbors	1000547204	\$ 2,589.68	Transport and decontamination of pipe from Lincoln Service Center
7/25/2014	Clean Harbors	1000547200	\$ 2,539.63	Transport and decontamination of pipe from Prov-Melrose Service Center
8/4/2014	Clean Harbors	1000560593	\$ 3,074.78	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
8/4/2014	Clean Harbors	1000530590	\$ 3,229.33	Transport and decontamination of pipe from Prov-Dexter St. Service Center
8/4/2014	Clean Harbors	1000560588	\$ 1,970.38	Transport and decontamination of pipe from Prov-Melrose Service Center
8/21/2014	Clean Harbors	1000583356	\$ 653.40	Transport and decontamination of pipe from Middletown Service Center
8/21/2014	Clean Harbors	1000583303	\$ 3,144.08	Transport and decontamination of pipe from Lincoln Service Center
8/21/2014	Clean Harbors	1000583309	\$ 717.20	Transport and decontamination of pipe from North Kingstown Service Center
8/22/2014	Clean Harbors	1000584756	\$ 3,829.38	Transport and decontamination of pipe from Prov-Melrose Service Center
9/4/2014	Clean Harbors	1000602481	\$ 2,376.28	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
9/4/2014	Clean Harbors	1000602472	\$ 3,336.03	Transport and decontamination of pipe from Prov-Dexter St. Service Center
9/18/2014	Clean Harbors	1000621409	\$ 3,072.03	Transport and decontamination of pipe from Lincoln Service Center
9/23/2014	Clean Harbors	1000625760	\$ 3,010.98	Transport and decontamination of pipe from Prov-Melrose Service Center
9/25/2014	Clean Harbors	1000629498	\$ 3,865.13	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
9/30/2014	Clean Harbors	1000635936	\$ 3,160.58	Transport and decontamination of pipe from Prov-Dexter St. Service Center
10/2/2014	Clean Harbors	1000640719	\$ 653.40	Transport and decontamination of pipe from Middletown Service Center
10/2/2014	Clean Harbors	1000640714	\$ 717.20	Transport and decontamination of pipe from North Kingstown Service Center
10/15/2014	Clean Harbors	1000658269	\$ 653.40	Transport and decontamination of pipe from Middletown Service Center
10/15/2014	Clean Harbors	1000657610	\$ 3,564.28	Transport and decontamination of pipe from Lincoln Service Center
10/16/2014	Clean Harbors	1000659042	\$ 717.20	Transport and decontamination of pipe from North Kingstown Service Center
10/27/2014	Clean Harbors	1000671499	\$ 2,591.88	Transport and decontamination of pipe from Prov-Dexter St. Service Center
10/27/2014	Clean Harbors	1000670786	\$ 3,542.28	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
10/27/2014	Clean Harbors	1000670784	\$ 3,104.48	Transport and decontamination of pipe from Prov-Melrose Service Center
11/20/2014	Clean Harbors	1000706793	\$ 653.40	Transport and decontamination of pipe from Middletown Service Center
11/20/2014	Clean Harbors	1000706796	\$ 2,722.78	Transport and decontamination of pipe from Lincoln Service Center
11/20/2014	Clean Harbors	1000706797	\$ 691.90	Transport and decontamination of pipe from North Kingstown Service Center
11/20/2014	Clean Harbors	1000706799	\$ 3,576.38	Transport and decontamination of pipe from Prov-Melrose Service Center
11/24/2014	Clean Harbors	1000710433	\$ 3,923.98	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
12/3/2014	Clean Harbors	1000722432	\$ 2,643.03	Transport and decontamination of pipe from Prov-Dexter St. Service Center
12/16/2014	Clean Harbors	1000739625	\$ 871.20	Transport and decontamination of pipe from Middletown Service Center
12/16/2014	Clean Harbors	1000739619	\$ 2,872.93	Transport and decontamination of pipe from Lincoln Service Center
12/16/2014	Clean Harbors	1000739612	\$ 3,206.78	Transport and decontamination of pipe from Prov-Melrose Service Center
12/18/2014	Clean Harbors	1000743322	\$ 677.60	Transport and decontamination of pipe from North Kingstown Service Center
12/18/2014	Clean Harbors	1000743319	\$ 4,934.33	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
12/30/2014	Clean Harbors	1000752038	\$ 2,236.03	Transport and decontamination of pipe from Prov-Dexter St. Service Center
1/12/2015	Clean Harbors	1000770282	\$ 465.30	Transport and decontamination of pipe from North Kingstown Service Center
1/12/2015	Clean Harbors	1000770285	\$ 465.30	Transport and decontamination of pipe from Middletown Service Center
1/13/2015	Clean Harbors	1000771529	\$ 3,511.48	Transport and decontamination of pipe from Lincoln Service Center
1/14/2015	Clean Harbors	1000772591	\$ 935.00	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
1/19/2015	Clean Harbors	1000777507	\$ 5,050.38	Transport and decontamination of pipe from Prov-Melrose Service Center

*note 1

1/20/2015	Clean Harbors	1000779588	\$ 5,688.93	Transport and decontamination of pipe from Prov-Dexter St. Service Center
2/3/2015	Clean Harbors	1000806126	\$ 844.80	Transport and decontamination of pipe from North Kingstown Service Center
2/3/2015	Clean Harbors	1000806133	\$ 844.80	Transport and decontamination of pipe from Middletown Service Center
2/4/2015	Clean Harbors	1000808710	\$ 1,259.50	Transport and decontamination of pipe from Lincoln Service Center
2/10/2015	Clean Harbors	1000817550	\$ 4,590.03	Transport and decontamination of pipe from Prov-Melrose Service Center
2/10/2015	Clean Harbors	1000816870	\$ 1,696.48	Transport and decontamination of pipe from Lincoln Service Center
2/18/2015	Clean Harbors	1000826002	\$ 5,630.63	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
2/18/2015	Clean Harbors	1000825950	\$ 3,706.18	Transport and decontamination of pipe from Prov-Dexter St. Service Center
2/26/2015	Clean Harbors	1000835545	\$ 653.40	Transport and decontamination of pipe from Middletown Service Center
2/26/2015	Clean Harbors	1000835535	\$ 4,372.78	Transport and decontamination of pipe from Lincoln Service Center
2/26/2015	Clean Harbors	1000835540	\$ 717.20	Transport and decontamination of pipe from North Kingstown Service Center
3/2/2015	Clean Harbors	1000840803	\$ 6,983.08	Transport and decontamination of pipe from Prov-Melrose Service Center
3/9/2015	Clean Harbors	1000851536	\$ 4,298.25	Transport and decontamination of pipe from Prov-Allens Ave. Service Center
3/12/2015	Clean Harbors	1000856397	\$ 6,859.88	Transport and decontamination of pipe from Prov-Dexter St. Service Center

Total: \$ 213,429.70

*1 Clean Harbors invoice was under accounted by \$6 and will be credited in next fiscal year FY16

Division 1-10

Request:

Re: the "Cost Breakdown by Category" for the PCB Regulated Pipe Abandonment project, please provide full supporting detail for the "Construction/Disposal/ Removal Costs" shown including separate itemization of costs of each construction, disposal, and removal activity.

Response:

Please see the Company's response to Division 1-9(a).

Division 1-11

Request:

Re: The Thames & Wellington project, please:

- a. Describe the purpose of each referenced facility upgrade and provide a detailed breakdown of the costs associated with those referenced upgrades;
- b. Describe the purpose of each referenced utility upgrade and provide a detailed breakdown of the costs associated with those referenced upgrades;
- c. Identify the cost associated with the oxygen-releasing compound (ORC) pilot study;
- d. Provide copies of the referenced "monthly status reports" provided to RIDEM and detail the costs incurred for preparation of those reports;
- e. Provide full supporting detail for the "Consulting Costs" shown in the "Cost Breakdown by Category," including separate itemization of costs of each consulting activity;
- f. Provide full supporting detail for the "Construction/Disposal/ Removal Costs" shown in the "Cost Breakdown by Category," including separate itemization of costs of each construction, disposal, and removal activity;
- g. Provide supporting detail for the "Property Purchases/Settlements/Legal costs for associated with the Thames & Wellington project for the reporting period.

Response:

- a. One minor facility project was performed at the Thames and Wellington Site during the reporting period: installation of a replacement fence along portions of the western property line of the resort. All costs within this reporting period related to the above project were for only environmental support during the project implementation. The environmental support costs are considered an environmental remediation expense due to the presence of manufactured gas plant (MGP) impacted soil and groundwater within the areas of the projects. Costs incurred for the oversight and documentation of the activity (GZA \$2,095.70) and disposal of excess soil from the work (Clean Harbors \$523.67) totaled \$2,619.37.

Division 1-11, page 2

- b. Two utility upgrade projects were supported at the Thames and Wellington Site during the reporting period: completion of the National Grid regulator station upgrade and planning support for the proposed City of Newport Sewer Force Main Project. All costs within this reporting period related to the above project were for only environmental support during the project implementation and/or planning. The environmental support costs are considered an environmental remediation expense due to the presence of manufactured gas plant (MGP) impacted soil and groundwater within the areas of the projects. Costs incurred for the oversight and documentation or planning support of the activities were: \$1,109.98 and \$8,976.41, respectively.
- c. Costs incurred for the gas holder area oxygen release compound pilot testing totaled \$12,005.54 (\$11,251.04 GZA and \$754.50 Clean Harbors).
- d. Copies of the 12 monthly status reports are included as Attachment DIV 1-11 (provided on CD-ROM), and include status reports covering the months of February 2014 through January 2015. Costs incurred for the preparation and submittal of these reports totaled \$3,549.12.
- e. For the reporting period "Consulting Costs" totaled \$79,866 in the FY2015 Annual Report for Gas Service submitted to the Commission on August 3, 2015, and actual spend was \$97,129.37; a credit of \$17,263.37 was applied to the project as a result of an overpayment and was transferred out of the project and will be accounted for in the FY2016 report. GZA costs totaled \$95,046.87 for the reporting period and included: \$6,087.61 for meetings/conference calls; \$52,536.83 for routine Site monitoring, including non-aqueous phase liquid (NAPL) gauging and recovery, annual groundwater monitoring and inspection of the engineered cap; \$11,251.04 for gas holder area oxygen release compound pilot testing; \$3,549.12 for monthly reporting to RIDEM; \$2,001.84 for environmental support for the fence replacement; \$969.38 for environmental support for the gas regulator station upgrade; \$8,976.41 for environmental support for City of Newport Sewer Force Main upgrade and \$9,674.64 for consulting services related to legal support. In addition, Coneco Engineers & Scientists, Inc. costs totaled \$2,082.52 for health and safety monitoring in support of the gas regulator station upgrade.
- f. For the reporting period "Construction/Disposal/ Removal Costs" Clean Harbors costs totaled \$2,763.14; for disposal of drums related to quarterly NAPL gauging and recovery and the annual monitoring event (\$455.30 and 1,029.67, respectively); pick up and disposal of a drum related to oxygen release compound exchange and

Division 1-11, page 3

- concurrent NAPL gauging and recovery event (\$754.50); and disposal of excess soil from fence installation (\$523.67).
- g. No property purchases or settlements were made during the twelve months ended March 31, 2015. Legal fees in the amount of \$99,425.44 were paid to Hinckley, Allen & Snyder LLP during the twelve months ended March 31, 2015.

Division 1-12

Request:

Re: Miscellaneous MGP Program Costs, please provide supporting detail for the dollar amounts shown for Miscellaneous MGP Program Costs, and describe the purpose of each activity for which those costs were incurred.

Response:

The detail for the \$42,960 in costs included in Miscellaneous MGP Program Costs, Rhode Island, including detail by month the Company charged in labor to the project, the specific tasks performed each month, and the specifics of the material and expense costs incurred each month are included in Attachment DIV 1-12.

The labor charges included on this Project are for the following activities:

- Program management: Tasks include the preparation of the Annual Environmental Report for Gas Services, preparation of responses to data requests, reporting and updates to management, program/project management activities related to the overall RI-Gas MGP program and attendance at staff meetings, training and other MGP-related meetings.
- Financial management: Tasks include analyst review of invoices, processing and tracking of invoices, filing of invoices, review and management of consultant and contractor proposals and change notices, annual budgeting, monthly budget review and quarterly budget forecasting.
- Training: Tasks include attendance at coursework required for working at MGP sites.
- RI MGP Site Research: The Company worked with GZA to research information on certain RI-Gas holder and MGP sites.
- Contract program management and financial management: National Grid contracts with EECS, Inc. to provide contract services to support the program and financial management tasks described above to assist the Company's staff.

Attachment DIV 1-12

EMPLOYEE LABOR

<u>Month</u>	<u>Activities Performed</u>	<u>Total Labor</u>
April, 2014	Program management and financial management	\$1,642.59
May, 2014	Program management and financial management	\$1,289.79
June, 2014	Program management and financial management	\$2,947.25
July, 2014	Program management, financial management and preparation of the annual environmental report	\$3,081.32
August, 2104	Program management, financial management and response to Division Requests	\$1,657.98
September, 2014	Program management, financial management and response to Division Requests	\$3,317.19
October, 2014	Program management and financial management	\$2,065.96
November, 2014	Program management and financial management	\$2,311.22
December, 2014	Program management and financial management	\$1,319.21
January, 2015	Program management and financial management	\$659.05
February, 2015	Program management and financial management	\$1,294.10
March, 2015	Program management and financial management	\$2,121.66

Totals: \$23,707.32

Notes:

1. *Program management:* Tasks include the preparation of the Annual Environmental Report for the Gas Services, preparation of Responses to the Division Requests, reporting and updates to management, and attendance at staff meetings and other MGP-related meetings.
2. *Financial management:* Tasks include analyst review of invoices, processing and tracking of invoices, filing of invoices, review and management of consultant and contractor proposal and change invoices, annual budgeting, monthly budget review and quarterly budget forecasting.

Attachment DIV 1-12

EMPLOYEE EXPENSES

<u>Month</u>	<u>Employee Expenses</u>
April, 2014	\$390.86
June, 2014	\$416.27
August, 2014	\$563.32
November, 2014	\$14.00
January, 2015	\$100.00
March, 2015	\$1,997.70

Totals: \$3,482.15

Notes:

1. Employee Expenses: Employee expenses are for general travel, including tolls, and vehicle charges, which are associated with employee use of their personal vehicles to drive to the MGP sites (or other related locations such as the RI Department of Environmental Management offices) associated with RI-Gas. All vehicle charges associated with RI-Gas MGP sites are carried under this general work order.

Attachment DIV 1-12

OUTSIDE SERVICES

Month	Vendor Name	Invoice Number	Amount	Description
June, 2014	EECS INC.	328	\$3,593.75	Contract project and financial management activities
August, 2014	EECS INC.	329	\$3,156.25	Contract project and financial management activities
September, 2014	EECS INC.	334	\$3,396.25	Contract project and financial management activities
December, 2014	EECS INC.	337	\$425.00	Contract project and financial management activities
December, 2014	EECS INC.	340	\$487.50	Contract project and financial management activities
December, 2014	EECS INC.	342	\$1,050.00	Contract project and financial management activities
March, 2015	EECS INC.	345	\$525.00	Contract project and financial management activities
March, 2015	EECS INC.	349	\$875.00	Contract project and financial management activities
March, 2015	EECS INC.	351	\$477.00	Contract project and financial management activities
August, 2014	GZA GEOENVIRONMENTAL INC.	0691308	\$1,350.00	RI Gas Holder/MGP Site Research
August, 2014	GZA GEOENVIRONMENTAL INC.	0693694	\$424.50	RI Gas Holder/MGP Site Research
April, 2014	CHWMEG INC.	314-1415	\$10.20	Disposal facility audits (NEG share)

Total: \$15,770.45

Division 1-13

Request:

Re: the "Insurance Recovery Activities" addressed on page 14 of 18 of the Environmental Report, please provide a detailed itemization of costs included in the \$53,634 of "Property Purchases/Settlements/Legal costs as well as the reasons for the Company's incurrence of those costs."

Response:

A detailed itemization of the Property Purchase/Settlements/Legal costs incurred in support of the Company's insurance recovery activities is included in Attachment DIV 1-13.

The costs were incurred by the Company for the environmental insurance and third party recovery activities, and include legal fees and expenses related to *OneBeacon America Insurance Company v. The Narragansett Electric Company*, Commonwealth of Massachusetts, County of Suffolk, Superior Court, Civil Docket No. SUCV2005-03086, and *The Narragansett Electric Company v. American Home Assurance, et al.*, Case No. 11 CIV 8299 (SDNY) 2011, in which the Company is pursuing insurance coverage for liabilities or potential liabilities associated with the environmental remediation of numerous sites.

Attachment 1-13

Offset Account Name	Invoice Date	Invoice Number	Invoice Amount
COVINGTON & BURLING	3/28/2014	60634924	\$377.57
COVINGTON & BURLING	03/31/14	60634926	\$3,983.92
COVINGTON & BURLING	3/28/2014	60634925	\$20,570.87
COVINGTON & BURLING	4/21/2014	60637228	\$522.33
COVINGTON & BURLING	5/21/2014	60640128	\$519.00
COVINGTON & BURLING	5/21/2014	60640129	\$659.85
COVINGTON & BURLING	7/3/2014	60644672	\$7,248.14
COVINGTON & BURLING	2/28/2014	60632273	\$10,952.96
COVINGTON & BURLING	7/24/2014	60647334	\$58.56
COVINGTON & BURLING	6/30/2014	60644574	\$1,807.45
COVINGTON & BURLING	7/25/2014	60647519	\$1,933.31
COVINGTON & BURLING	8/19/2014	60650353	\$45.52
COVINGTON & BURLING	8/19/2014	60650354	\$153.43
COVINGTON & BURLING	9/9/2014	60652838	\$154.01
COVINGTON & BURLING	9/10/2014	60652837	\$294.21
COVINGTON & BURLING	4/21/2014	60637229	\$1,896.50
COVINGTON & BURLING	10/23/2014	60656556	\$25.47
COVINGTON & BURLING	10/23/2014	60656557	\$65.74
COVINGTON & BURLING	12/17/2014	60661339	\$124.17
COVINGTON & BURLING	12/16/2014	60661340	\$286.92
COVINGTON & BURLING	12/17/2014	60661338	\$1,228.11
COVINGTON & BURLING	1/30/2015	60665634	\$78.21
SALLY & FITCH LLP	05/13/14	24205	\$54.47
SALLY & FITCH LLP	06/16/14	25403	\$116.70
SALLY & FITCH LLP	4/22/2014	24026	\$183.97
SALLY & FITCH LLP	7/16/2014	24755	\$172.20
SALLY & FITCH LLP	12/16/2014	25963	\$3.80
SALLY & FITCH LLP	5/13/2014	24205-D1	\$54.47
SALLY & FITCH LLP	1/17/2014	23183-D1	\$61.80

Total: \$53,633.66

Division 1-14

Request:

Re: the "Consulting Costs" included in pages 17 and 18 of the Annual Environmental Report, please:

- a. Provide supporting invoices for the dollar amounts billed to each project showing wage rates and hours worked for the referenced Consulting services;
- b. Identify which of the dollar amounts identified by contractor represent "Consulting Costs" and which represent "Construction/Disposal/Removal Costs.";
- c. Identify each project for which contractor services were not obtained through competitive bidding and explain why competitive procurement processes were not employed for each project identified;
- d. For all projects for which contractor services were obtained through competitive bidding procedures, provide copies of the competitive bids received and the data and analyses upon which the Company relied to evaluate each bid.

Response:

- a. Regarding the "Consulting Costs" included on page 17 of the Annual Environmental Report, the supporting invoices are included in the following attachments:
 - Attachment DIV 1-14a(i) – 642 Allens Ave, Providence, RI
 - Attachment DIV 1-14a(ii) – 170 Allens Ave, Providence, RI (**Confidential**)
 - Attachment DIV 1-14a(iii) – Pawtucket (Tidewater) MGP, RI (20% of invoice dollars charged to the Company) (**Confidential**)
 - Attachment DIV 1-14a(iv) – Woonsocket (Hamlet Ave) MGP (only a portion of each invoice charged to the Company) (**Confidential**)
 - Attachment DIV 1-14a(v) – Thames & Wellington, Newport (**Confidential**)
 - Attachment DIV 1-14a(vi) – MSR Program
 - Attachment DIV 1-14a(vii) – Miscellaneous MGP, RI (**Confidential**)
 - Attachment DIV 1-14a(viii) – East Providence Holder

Division 1-14, page 2

Regarding the "Contractor Costs" included on page 18 of the Annual Environmental Report, the supporting invoices are included in the following attachments:

- Attachment DIV 1-14a(ix) – 642 Allens Ave, Providence, RI (**Confidential**)
- Attachment DIV 1-14a(x) – 170 Allens Ave, Providence, RI
- Attachment DIV 1-14a(xi) – Pawtucket(Tidewater) MGP, RI (20% of invoice dollars charged to the Company)
- Attachment DIV 1-14a(xii) – PCB Regulated Pipe Abandonment
- Attachment DIV 1-14a(xiii) – Thames & Wellington, Newport
- Attachment DIV 1-14a(xiv) – MSR Program
- Attachment DIV 1-14a(xv) – East Providence Holder

The supporting invoices include hourly rates and the hours worked. Attachments DIV 1-14a(ii), DIV 1-14a(iii), DIV 1-14a(iv), DIV 1-14a(v), DIV 1-14a(vii), and DIV 1-14a(ix) contain confidential and proprietary business information.

Accordingly, the Company is providing a confidential version of these attachments to the PUC subject to a Motion for Protective Treatment, and has provided redacted copies of these attachments for the public filing. Due to the voluminous nature of these invoices, these attachments are being provided on a CD-ROM that has been marked "Confidential".

- b. The information on page 17 of the Annual Environmental Report and included in the above Attachments DIV 1-14a(i) through DIV 1-14a(viii) is for "Consulting Costs" only. The information on page 18 of the Annual Environmental Report and included in the above Attachments DIV 1-14a (ix) through DIV 1-14a (xv) is for "Construction/Disposal/Removal Costs" only.
- c. For environmental work, the Company procures two types of services: consulting services and contractor services. For the consulting services, the Company uses Master Service Agreements (MSAs). In 2008 and 2009, National Grid conducted a 12-month, multi-step, competitive request for proposal (RFP) process to select a small number of environmental consulting firms to provide high-quality, cost-effective environmental consulting services for National Grid in New England and New York. The result of the RFP process was the extensive negotiation and award of MSAs with four "Preferred Firms" to provide these services in New England, including Rhode Island. The negotiated rates, mark-up and volume

Division 1-14, page 3

discounts were held for a two-year period (approximately August 1, 2009 through July 31, 2011). The MSAs were re-negotiated in 2012 and 2014 and the firms either agreed to hold the rates or accept small rate increases. The Preferred Firm program has resulted in a cost-effective program through which most environmental consulting services are assigned to the Preferred Firms based on an overall strategic plan.

Whenever possible, environmental contractor work relating to environmental response activities is subject to a competitive bid selection process. Exceptions to this requirement are situations such as implementing short-term response actions where there is insufficient time for a competitive bid process or smaller value jobs (typically <\$75K). For smaller value jobs and waste disposal/ treatment, the Company has negotiated Blanket Contracts with agreed upon rates for performance of work on Company projects. These vendors include Environmental Soil Management, Inc. (thermal treatment of impacted soils), Clean Harbors Environmental Services (waste disposal, emergency response, small environmental projects), T. Ford Company, Inc. (small value environmental projects), and Citiworks (fencing repair).

- d. The Company had no large-scale construction projects begin in fiscal year 2015 for which contractor services were procured through a separate competitive bidding process. The Company did complete one large-scale construction project in fiscal year 2015 for which contractor services were procured through a separate competitive bidding process in fiscal year 2014. This project was for the remediation of the upland area of the 170 Allens Avenue Site. The information regarding the competitive bidding process for this project was provided previously in the Company's response to Division Data Request 2-1d provided in RIPUC Docket No. 4514, and has not been duplicated as part of this response.