

September 12, 2016

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4610 – Environmental Response Fund Provision, RIPUC No. 2164
Supplemental Responses to Division Data Requests – Set 1

Dear Ms. Massaro:

On behalf of National Grid,¹ I enclose ten (10) copies of the Company's supplemental responses to Division 1-3 and Division 1-4 in the above-referenced docket.

With respect to any future requests to propose additions to the list of environmental sites covered by the Environmental Response Fund, the Company will indicate in its request the first fiscal year for which it seeks to include remediation costs for the site through the fund, which will be no earlier than the fiscal year for which the Company is concurrently filing its annual report. For example, if the Company seeks to add a site for which it incurred costs during Fiscal Year (FY) 2017, at the time the Company files its FY2017 annual report, it will file a request to add the site to the Environmental Response Fund and state that it is seeking recovery of FY2017 and future spending through the fund. If the PUC approves the Company's request to include the additional site in the list of environmental sites included in the Company's Environmental Response Fund tariff, and the PUC also approves the inclusion of FY2017 and future Environmental Response Costs in the Environmental Response Fund, then the Company would file a supplemental annual report for FY2017 that includes a summary and accounting of all Environmental Response Costs associated with the additional site to be charged to the fund. The Company believes this approach is consistent with the existing tariff language and will not require any revisions to the tariff.

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 4610 Service List
Leo Wold, Esq.
Steve Scialabba, Division

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

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

September 12, 2016
Date

**Docket No. 4610 – National Grid – Electric Environmental Response Fund
Service List as of 5/11/16**

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|---|--|--------------|
| Celia O'Brien, Esq. National Grid 280 Melrose St. Providence, RI 02907 | Celia.obrien@nationalgrid.com ; | 401-784-7288 |
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| File an original & nine (9) copies w/: 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 ; | |
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Division 1-3 (Supplemental)

Request:

Is it National Grid's belief that under the proposed Environmental Response Fund tariff provision, R.I.P.U.C No. 2164, that any or all of the \$234,000 spending at the Chandonnet Site will be eligible for recovery through the Environmental Response Fund? If the answer is in the affirmative, will the Company deem the tariff approval in Docket 4610 as the Commission's approval to recover these costs from the fund, or will a future filing seek approval to recover these costs?

Supplemental Response:

If the PUC approves the Company's request in this docket to include the Chandonnet Site to the list of environmental sites included in the Company's Environmental Response Fund tariff, it is the Company's position that all Environmental Response Costs associated with the Chandonnet Site incurred in Fiscal Year 2016 and to be incurred in the future may be charged to the Environmental Response Fund. The portion of the \$234,143 of costs incurred during Fiscal Year 2016 totals \$90,484. The Company will not seek recovery of the \$143,659 incurred prior to Fiscal Year 2016.

Division 1-4 (Supplemental)

Request:

If the Company believes that prior period spending is recoverable from the Environmental Response Fund, please explain that contention in light of the tariff language, in both the current and proposed tariff that states in section (C) " The Company will file an annual report with the Commission providing a summary and accounting of all *costs incurred during such year* which have been applied to the fund." (Emphasis supplied).

Supplemental Response:

It is the Company's belief that, if the PUC approves the Company's request to include the Chandonnet Site in the list of environmental sites included in the Company's Environmental Response Fund tariff, and the PUC also approves the inclusion of Environmental Response Costs in the Environmental Response Fund, then the spending for Fiscal Year 2016 as well as future spending on the Chandonnet Site can be charged to the Environmental Response Fund. Assuming PUC approval, in its next annual report, the Company will include a summary and accounting of eligible Environmental Response Costs, which is defined in the tariff to include all reasonable and prudently incurred costs that have been incurred regarding this site and charged to the Environmental Response Fund.