

July 13, 2018

**VIA HAND DELIVERY AND ELECTRONIC MAIL**

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

**RE: Docket 4770 – Application of The Narragansett Electric Company d/b/a National Grid for Approval of a Change in Electric and Gas Base Distribution Rates  
Docket 4780 – The Narragansett Electric Company d/b/a National Grid  
Proposed Power Sector Transformation Vision and Implementation Plan  
Responses to Record Requests**

Dear Ms. Massaro:

Enclosed are an original and one copy of the Company's<sup>1</sup> response to Record Request No. 37, which was issued at the June 27, 2018 evidentiary hearing before the Public Utilities Commission (PUC) in the above-referenced dockets.

This filing includes a Motion for Protective Treatment of Confidential Information in accordance with Rule 1.2(g) of the PUC's Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B) for the Company's response to Record Request No. 37. The Company seeks protection from public disclosure of certain confidential information contained in the response to Record Request No. 37. Accordingly, the Company has provided the PUC with one complete, unredacted copy of the confidential document in a sealed envelope marked "**Contains Privileged and Confidential Information – Do Not Release,**" and has included redacted copies of this document for the public filing.

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (the Company).

Luly E. Massaro, Commission Clerk  
Dockets 4770/4780 – Responses to Record Requests  
July 13, 2018  
Page 2 of 2

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

Very truly yours,

A handwritten signature in blue ink that reads "Celia B. O'Brien". The signature is written in a cursive, flowing style.

Celia B. O'Brien

Enclosures

cc: Docket 4770 Service List  
Docket 4780 Service List  
Macky McCleary, Division  
Jonathan Schrag, Division  
John Bell, Division  
Al Mancini, Division  
Ron Gerwatowski, Division  
Leo Wold, Esq.

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

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IN RE: THE NARRAGANSETT ELECTRIC COMPANY )  
d/b/a NATIONAL GRID – ELECTRIC AND GAS )  
DISTRIBUTION RATE FILING )

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Docket No. 4770

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IN RE: THE NARRAGANSETT ELECTRIC COMPANY )  
d/b/a NATIONAL GRID’S PROPOSED POWER )  
SECTOR TRANSFORMATION (PST) VISION )  
AND IMPLEMENTATION PLAN )

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Docket No. 4780

**THE COMPANY’S MOTION  
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

The Company<sup>1</sup> respectfully requests that the Rhode Island Public Utilities Commission (PUC) provide confidential treatment to and grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by PUC Rule 1.2(g) and R.I. Gen. Laws § 38-2-2(4)(B). The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to Rule 1.2 (g)(2).

**I. BACKGROUND**

On July 13, 2018, the Company filed a response to Record Request No. 37 issued by the PUC on June 27, 2018. Record Request No. 37 sought “the amount included in Rate Year 2 and 3 in Revenue Requirement in contractual labor increases for Labor Contracts expiring during multi-year rate plan.” The Company’s written response Record Request No. 37 includes the dollar amounts the Company included in its revenue requirement for contractual labor increases

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (the Company).

for labor contracts that will expire during the proposed multi-year rate plan. This information is confidential and proprietary financial information that the Company ordinarily would not share with the public. Specifically, this information is privileged and confidential information regarding the Company's negotiation strategy with respect to the labor contracts at issue. Therefore, the Company requests that, pursuant to Rule 1.2(g), the PUC afford confidential treatment to the Company's unredacted response to Record Request No. 37.

## **II. LEGAL STANDARD**

PUC Rule 1.2(g) provides that access to public records shall be granted in accordance with the Access to Public Records Act (APRA), R.I. Gen. Laws § 38-2-1, *et seq.* Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a "public record," unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I. Gen. Laws § 38-2-2(4). Therefore, to the extent that information provided to the PUC falls within one of the designated exceptions to the public records law, the PUC has the authority under the terms of the APRA to deem such information to be confidential and to protect that information from public disclosure.

In that regard, R.I. Gen. Laws § 38-2-2(4)(B) provides that the following types of records shall not be deemed public:

Trade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature.

The Rhode Island Supreme Court has held that this confidential information exemption applies where disclosure of information would be likely either to (1) impair the Government's ability to obtain necessary information in the future; or (2) cause substantial harm to the competitive position of the person from whom the information was obtained. Providence Journal

Company v. Convention Center Authority, 774 A.2d 40 (R.I. 2001). Disclosure of information would impair the Government's ability to obtain such information in the future when: (a) information is provided voluntarily to the governmental agency, and (b) that information is of a kind that customarily would not be released to the public by the person from whom it was obtained. Providence Journal, 774 A.2d at 47.

### **III. BASIS FOR CONFIDENTIALITY**

The information contained in the Company's unredacted response to Record Request No. 37 is privileged and confidential. This response contains privileged and confidential information about the Company's negotiations position with respect to labor contracts that will expire during the term of the proposed multi-year rate plan. If the information contained in these attachments was permitted into the public domain, the Company would be placed at a competitive disadvantage. Accordingly, it is the type of information that the Company ordinarily would not disclose to the public. Therefore, the Company is providing the unredacted response to Record Request No. 37 to the PUC on a voluntary basis to assist the PUC with its decision-making in this proceeding, but respectfully requests that the PUC provide confidential treatment to these attachments.

### **IV. CONCLUSION**

Accordingly, the Company respectfully requests that the PUC grant protective treatment to the Company's unredacted response to Record Request No. 37.

**WHEREFORE**, the Company respectfully requests that the PUC grant this Motion for Protective Treatment.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC COMPANY**

By its attorneys,



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Celia B. O'Brien, Esq. (RI #4484)  
National Grid  
280 Melrose Street  
Providence, RI 02907  
(781) 907-2153



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Jennifer Brooks Hutchinson. (RI #6176)  
National Grid  
280 Melrose Street  
Providence, RI 02907  
(401) 784-7288



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Adam M. Ramos, Esq. (RI #7591)  
Hinckley, Allen & Snyder LLP  
100 Westminster Street, Suite 1500  
Providence, RI 02903-2319  
(401) 457-5164

Dated: July 13, 2018

### Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically transmitted and/or hand delivered to the individuals listed below.



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Najat Coye

July 13, 2018  
Date

**Docket No. 4770 - National Grid – Rate Application**  
**Service list updated 6/5/2018**

<b>Name/Address</b>	<b>E-mail Distribution List</b>	<b>Phone</b>
<b>National Grid</b> Celia O'Brien, Esq. Jennifer Hutchinson, Esq. National Grid 280 Melrose St. Providence, RI 02907	<a href="mailto:Celia.obrien@nationalgrid.com">Celia.obrien@nationalgrid.com</a> ;	781-907-2153 401-784-7288
	<a href="mailto:Jennifer.hutchinson@nationalgrid.com">Jennifer.hutchinson@nationalgrid.com</a> ;	
	<a href="mailto:Najat.coye@nationalgrid.com">Najat.coye@nationalgrid.com</a> ;	
	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com</a> ;	
	<a href="mailto:Bill.Malee@nationalgrid.com">Bill.Malee@nationalgrid.com</a> ;	
	<a href="mailto:Melissa.little@nationalgrid.com">Melissa.little@nationalgrid.com</a> ;	
	<a href="mailto:William.richer@nationalgrid.com">William.richer@nationalgrid.com</a> ;	
	<a href="mailto:Theresa.burns@nationalgrid.com">Theresa.burns@nationalgrid.com</a> ;	
	<a href="mailto:Ann.leary@nationalgrid.com">Ann.leary@nationalgrid.com</a> ;	
	<a href="mailto:Scott.mccabe@nationalgrid.com">Scott.mccabe@nationalgrid.com</a> ;	
	<a href="mailto:Najat.coye@nationalgrid.com">Najat.coye@nationalgrid.com</a> ;	
	<a href="mailto:kayte.o'neill2@nationalgrid.com">kayte.o'neill2@nationalgrid.com</a> ;	
	<a href="mailto:kate.grant2@nationalgrid.com">kate.grant2@nationalgrid.com</a> ;	
	<a href="mailto:Mary.coleman@nationalgrid.com">Mary.coleman@nationalgrid.com</a> ;	
	<a href="mailto:Timothy.roughan@nationalgrid.com">Timothy.roughan@nationalgrid.com</a> ;	
Adam Ramos, Esq. Hinckley Allen Hinckley Allen 100 Westminster Street, Suite 1500 Providence, RI 02903-2319	<a href="mailto:aramos@hinckleyallen.com">aramos@hinckleyallen.com</a> ;	401-457-5164
<b>Division of Public Utilities (Division)</b> Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Lwold@riag.ri.gov">Lwold@riag.ri.gov</a> ;	404-274-4400
	<a href="mailto:Jmunoz@riag.ri.gov">Jmunoz@riag.ri.gov</a> ;	
	<a href="mailto:Dmacrae@riag.ri.gov">Dmacrae@riag.ri.gov</a> ;	
Jonathan Schrag, Deputy Administrator Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Jonathan.Schrag@dpuc.ri.gov">Jonathan.Schrag@dpuc.ri.gov</a> ;	401-780-2140
	<a href="mailto:Macky.McCleary@dpuc.ri.gov">Macky.McCleary@dpuc.ri.gov</a> ;	
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ;	
	<a href="mailto:Al.mancini@dpuc.ri.gov">Al.mancini@dpuc.ri.gov</a> ;	
	<a href="mailto:Thomas.kogut@dpuc.ri.gov">Thomas.kogut@dpuc.ri.gov</a> ;	
Tim Woolf Jennifer Kallay	<a href="mailto:twoolf@synapse-energy.com">twoolf@synapse-energy.com</a> ;	617-661-3248

Synapse Energy Economics 22 Pearl Street Cambridge, MA 02139	<a href="mailto:jkallay@synapse-energy.com">jkallay@synapse-energy.com</a> ;	
	<a href="mailto:mwhited@synapse-energy.com">mwhited@synapse-energy.com</a> ;	
	<a href="mailto:jhall@synapse-energy.com">jhall@synapse-energy.com</a> ;	
David Effron Berkshire Consulting 12 Pond Path North Hampton, NH 03862-2243	<a href="mailto:Djeffron@aol.com">Djeffron@aol.com</a> ;	603-964-6526
Bruce Oliver Tim Oliver Revilo Hill Associates 7103 Laketree Drive Fairfax Station, VA 22039	<a href="mailto:Boliver.rha@verizon.net">Boliver.rha@verizon.net</a> ;	703-569-6480
	<a href="mailto:tim.b.oliver@gmail.com">tim.b.oliver@gmail.com</a> ;	
Matt Kahal 1108 Pheasant Crossing Charlottesville, VA 22901	<a href="mailto:mkahal@exeterassociates.com">mkahal@exeterassociates.com</a> ;	434-964-0604
Ronald Gerwatowski  Nicole Rohr	<a href="mailto:gerwat@verizon.net">gerwat@verizon.net</a> ;	508-259-7963
	<a href="mailto:Ronald.Gerwatowski@dpuc.ri.gov">Ronald.Gerwatowski@dpuc.ri.gov</a> ;	
	<a href="mailto:nrohr443@g.rwu.edu">nrohr443@g.rwu.edu</a> ;	
M. Ballaban LaCapra Associates	<a href="mailto:mballaban@daymarkea.com">mballaban@daymarkea.com</a> ;	
T. Bennett S. Bobo Daymark Energy Advisors	<a href="mailto:tbennett@daymarkea.com">tbennett@daymarkea.com</a> ;	
	<a href="mailto:sbobo@daymarkea.com">sbobo@daymarkea.com</a> ;	
William Dunkel and Associates 8625 Farmington Cemetery Road Pleasant Plains, IL 62677	<a href="mailto:WilliamDunkel@consultant.com">WilliamDunkel@consultant.com</a> ;	217-626-1934
	<a href="mailto:RoxieMcCullar@consultant.com">RoxieMcCullar@consultant.com</a> ;	
Gregory L. Booth, PE, PLS Linda Kushner PowerServices, Inc. 1616 East Millbrook Rd. Suite 210 Raleigh, NC 27609	<a href="mailto:gbooth@powerservices.com">gbooth@powerservices.com</a> ;	919-256-5900
	<a href="mailto:lkushner@powerservices.com">lkushner@powerservices.com</a> ;	
<b>Office of Energy Resources (OER)</b> Andrew Marcaccio, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4 <sup>th</sup> Floor Providence, RI 02908	<a href="mailto:Andrew.Marcaccio@doa.ri.gov">Andrew.Marcaccio@doa.ri.gov</a> ;	401-222-8880
Carol Grant, Commissioner Office of Energy Resources	<a href="mailto:Carol.grant@energy.ri.gov">Carol.grant@energy.ri.gov</a> ;	401-574-9100
	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
	<a href="mailto:Danny.Musher@energy.ri.gov">Danny.Musher@energy.ri.gov</a> ;	
	<a href="mailto:Nicholas.Ucci@energy.ri.gov">Nicholas.Ucci@energy.ri.gov</a> ;	
	<a href="mailto:Becca.Trietch@energy.ri.gov">Becca.Trietch@energy.ri.gov</a> ;	
	<a href="mailto:Carrie.Gill@energy.ri.gov">Carrie.Gill@energy.ri.gov</a> ;	
<b>Conservation Law Foundation (CLF)</b> Jerry Elmer, Esq.	<a href="mailto:jelmer@clf.org">jelmer@clf.org</a> ;	401-228-1904



Max Greene, Esq. Conservation Law Foundation 235 Promenade Street Suite 560, Mailbox 28 Providence, RI 02908	<a href="mailto:mgreene@clf.org">mgreene@clf.org</a> ;	
<b>Dept. of Navy (DON)</b> Kelsey A. Harrer, Esq. Office of Counsel NAVFAC Atlantic, Department of the Navy 6506 Hampton Blvd. Norfolk, VA 23508-1278	<a href="mailto:kelsey.a.harrer@navy.mil">kelsey.a.harrer@navy.mil</a> ;	757-322-4119
Kay Davoodi, Director Larry R. Allen, Public Utilities Specialist Utilities Rates and Studies Office NAVFAC HQ, Department of the Navy 1322 Patterson Avenue SE Suite 1000 Washington Navy Yard, D.C. 20374	<a href="mailto:khojasteh.davoodi@navy.mil">khojasteh.davoodi@navy.mil</a> ;	
	<a href="mailto:larry.r.allen@navy.mil">larry.r.allen@navy.mil</a> ;	
Ali Al-Jabir Brubaker and Associates 5106 Cavendish Dr. Corpus Christi, TX 78413  Maurice Brubaker Brubaker and Associates P.O. Box 412000 St Louis, Missouri 63141-2000	<a href="mailto:aaljabir@consultbai.com">aaljabir@consultbai.com</a> ;	
	<a href="mailto:mbrubaker@consultbai.com">mbrubaker@consultbai.com</a> ;	
<b>New Energy Rhode Island (NERI)</b> Seth H. Handy, Esq. Handy Law, LLC 42 Weybosset St. Providence, RI 02903  The RI League of Cities and Towns c/o Brian Daniels, Executive Director  PRISM & WCRPC c/o Jeff Broadhead, Executive Director  Newport Solar c/o Doug Sabetti  Green Development, LLC c/o Michelle Carpenter  Clean Economy Development, LLC c/o Julian Dash	<a href="mailto:seth@handylawllc.com">seth@handylawllc.com</a> ;	401-626-4839
	<a href="mailto:helen@handylawllc.com">helen@handylawllc.com</a> ;	
	<a href="mailto:randelle@handylawllc.com">randelle@handylawllc.com</a> ;	
	<a href="mailto:bdaniels@rileague.org">bdaniels@rileague.org</a> ;	401 272-3434
	<a href="mailto:jb@wcrpc.org">jb@wcrpc.org</a> ;	401-792-9900
	<a href="mailto:doug@newportsolarri.com">doug@newportsolarri.com</a> ;	401.787.5682
	<a href="mailto:mc@green-ri.com">mc@green-ri.com</a> ;	401.295.4998
	<a href="mailto:jdash@cleaneconomydevelopment.com">jdash@cleaneconomydevelopment.com</a> ;	

ISM Solar Development, LLC c/o Michael Lucini	<a href="mailto:mlucini@ismgroup.com">mlucini@ismgroup.com</a> ;	401.435.7900
	<a href="mailto:unger@hrtwd.com">unger@hrtwd.com</a> ;	401.861.1650
<b>Energy Consumers Alliance of NE</b> James Rhodes Rhodes Consulting 860 West Shore Rd. Warwick, RI 02889  Kat Burnham, PPL Larry Chretien, PPL	<a href="mailto:jamie.rhodes@gmail.com">jamie.rhodes@gmail.com</a> ;	401-225-3441
	<a href="mailto:Kat@ripower.org">Kat@ripower.org</a> ;	
	<a href="mailto:larry@massenergy.org">larry@massenergy.org</a> ;	
<b>Acadia Center</b> Robert D. Fine, Esq. Chace, Ruttenberg & Freedman, LLP One Park Row, Suite 300 Providence, RI 02903  Amy Boyd, Esq. Acadia Center 31 Milk St., Suite 501 Boston MA 02109-5128	<a href="mailto:rfine@crflp.com">rfine@crflp.com</a> ;	401-453-6400 Ext. 115
	<a href="mailto:aboyd@acadiacenter.org">aboyd@acadiacenter.org</a> ;	617-472-0054 Ext. 102
	<a href="mailto:ENiedowski@acadiacenter.org">ENiedowski@acadiacenter.org</a> ;	
	<a href="mailto:Mlebel@acadiacenter.org">Mlebel@acadiacenter.org</a> ;	
<b>Northeast Clean Energy Council</b> Joseph A. Keough, Jr., Esq. Keough & Sweeney 41 Mendon Ave. Pawtucket, RI 02861  Jannet Besser, NECEC	<a href="mailto:jkeoughjr@keoughsweeney.com">jkeoughjr@keoughsweeney.com</a> ;	401-724-3600
	<a href="mailto:jbesser@necec.org">jbesser@necec.org</a> ;	
	<a href="mailto:jdickerson@necec.org">jdickerson@necec.org</a> ;	
<b>The George Wiley Center</b> John Willumsen-Friedman, Esq. Deputy Director Rhode Island Center for Justice 1 Empire Plaza, Suite 410 Providence, RI 02903  Camilo Viveros, Wiley Center	<a href="mailto:jwillumsen@centerforjustice.org">jwillumsen@centerforjustice.org</a> ;	401-491-1101 Ext. 810
	<a href="mailto:georgewileycenterri@gmail.com">georgewileycenterri@gmail.com</a> ;	
	<a href="mailto:Camiloviveiros@gmail.com">Camiloviveiros@gmail.com</a> ;	
	<a href="mailto:chloechassaing@hotmail.com">chloechassaing@hotmail.com</a> ;	
<b>Wal-Mart Stores East &amp; Sam's East, Inc.</b> Melissa M. Horne, Esq. Higgins, Cavanagh & Cooney, LLC 10 Dorrance St., Suite 400 Providence, RI 02903  Gregory W. Tillman, Sr. Mgr./ERA Walmart	<a href="mailto:mhorne@hcc-law.com">mhorne@hcc-law.com</a> ;	401-272-3500
	<a href="mailto:Greg.tillman@walmart.com">Greg.tillman@walmart.com</a> ;	479-204-1594

<b>AMTRAK</b> Clint D. Watts, Esq. Paul E. Dwyer, Esq. McElroy, Deutsch, Mulvaney & Carpenter 10 Dorrance St., Suite 700 Providence, RI 02903  Robert A. Weishaar, Jr., Esq. Kenneth R. Stark, Esq.	<a href="mailto:CWatts@mdmc-law.com">CWatts@mdmc-law.com</a> ;	401-519-3848
	<a href="mailto:PDwyer@mdmc-law.com">PDwyer@mdmc-law.com</a> ;	
	<a href="mailto:BWeishaar@mcneeslaw.com">BWeishaar@mcneeslaw.com</a> ;	
	<a href="mailto:KStark@mcneeslaw.com">KStark@mcneeslaw.com</a> ;	
<b>Original &amp; 9 copies file w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ;	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
	<a href="mailto:Margaret.hogan@puc.ri.gov">Margaret.hogan@puc.ri.gov</a> ;	
<b>Interested Persons</b>		
EERMC Marisa Desautel, Esq	<a href="mailto:marisa@desautelesq.com">marisa@desautelesq.com</a> ;	401-477-0023
	<a href="mailto:guerard@optenergy.com">guerard@optenergy.com</a> ;	
	<a href="mailto:loiter@optenergy.com">loiter@optenergy.com</a> ;	
Bob Chatham	<a href="mailto:bchatham@vcharge-energy.com">bchatham@vcharge-energy.com</a> ;	401-742-8264
John DiTomasso, AARP	<a href="mailto:jditomasso@aarp.org">jditomasso@aarp.org</a> ;	401-248-2655
Frank Epps, EDP	<a href="mailto:Frank@edp-energy.com">Frank@edp-energy.com</a> ;	
Matt Davey	<a href="mailto:mdavey@ssni.com">mdavey@ssni.com</a> ;	
Jesse Reyes	<a href="mailto:JReyes@brownrudnick.com">JReyes@brownrudnick.com</a> ;	
Nathan Phelps	<a href="mailto:nathan@votesolar.org">nathan@votesolar.org</a> ;	
Douglas W. Gablinske, TEC-RI	<a href="mailto:doug@tec.ri.org">doug@tec.ri.org</a> ;	
Karl Rabago	<a href="mailto:krabago@law.pace.edu">krabago@law.pace.edu</a> ;	
Radina Valova, Pace Energy & Climate Ctr.	<a href="mailto:rvalova@law.pace.edu">rvalova@law.pace.edu</a> ;	
Marc Hanks, Sr. Mgr./GRA Direct Energy Services	<a href="mailto:Marc.hanks@directenergy.com">Marc.hanks@directenergy.com</a> ;	413-642-3575
	<a href="mailto:cwaksler@eckertseamans.com">cwaksler@eckertseamans.com</a> ;	

REDACTED  
Record Request No. 37

Request:

Please provide the amount included in Rate Year 2 and 3 in Revenue Requirement in contractual labor increases for Labor Contracts expiring during multi-year rate plan.

Response:

The amount of labor increases included in Rate Year 2 and Rate Year 3 for Labor Contracts expiring during the multi-year rate plan is \$[REDACTED] and \$[REDACTED], respectively.

Additionally, while the Company was preparing the response to this record request, it discovered an error in the calculation of National Grid USA Service Company, Inc. union labor charged to Narragansett Gas. The error resulted in an overstatement of \$11,434 in Rate Year 1 and \$20,664 in Rate Year 2. The Company will include this correction in its compliance filing in this proceeding.