



## STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION  
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Chairperson Margaret E. Curran  
Commissioner Marion S. Gold  
Commissioner Abigail Anthony

### MEMORANDUM

To: Interested Parties to Docket Nos. 4770 & 4780  
From: Cynthia G. Wilson-Frias, Deputy Chief of Legal Services  
Date: January 28, 2018  
Re: Docket No. 4770 – The Narragansett Electric Company d/b/a National Grid Electric and Gas Distribution Rate Filing and Docket No. 4780 – The Narragansett Electric Company d/b/a National Grid Electric and Proposed Power Sector Transformation (PST) Vision and Implementation Plan

### DISCOVERY UPDATE

Discovery and responses will be rolling – Parties are asked to group their data requests by topics with the appropriate labeling of the topic. Electronic data response filings will be made by the respondent to the service list as they come in. At the end of the 21-day period, the respondent should provide Luly with a complete set, sequentially numbered with a cover page – the cover page will be a list of the data requests, each one followed by where the response can be found. An example is attached hereto. The full set of responses can be provided via email no later than 4:00 p.m. on the 21<sup>st</sup> day if it can be sent as one attachment. If the responses are too voluminous, please provide a cd-rom or flash drive to Luly by noon on the 21<sup>st</sup> day so she can upload it to the website and send a link by the end of the day to all of the parties.

**FIRST UPDATE:** The hard copies may be filed as late as two days following the filing of the complete electronic set. It is the Commission's understanding that only the Commission and Division are receiving one hard copy each and all other parties are receiving electronic-only service, per agreement at the prehearing conference. It is the Commission's understanding that this change will reduce the cost of producing discovery.

**SECOND UPDATE:** Previously, the Commission had directed parties who intended to file identical data requests in both Docket No. 4770 and Docket No. 4780 to do so in discrete sets and to note in the email that they were identical. There have been several sets of these identical data requests that have been filed in both dockets. From this date forward, when there is one set of data requests filed in both dockets to which identical responses are to be filed in each docket, the final full set of responses in Docket No. 4780 will be due one day later than the final full set of responses in Docket No. 4770. The respondent shall notify both service lists that the full set has been filed electronically with the Commission. This does NOT affect data requests in Docket No. 4780 to which there is no identical question asked in Docket No. 4770.

If there is a question that got an extension, please simply note that in the answer and then follow up with a separate response just for that answer, sequentially numbered from the beginning of that answer. This is the same for true supplemental responses to amend or add additional information.

As originally scheduled, commencing 04/19/2018 – All data requests issued from this date forward will have a 14-day response period.

# **SAMPLE COVER PAGE TO FULL SET OF DATA RESPONSES**

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IN RE: THE NARRAGANSETT ELECTRIC COMPANY :  
d/b/a NATIONAL GRID – ELECTRIC AND GAS : DOCKET NO. 4770  
DISTRIBUTION RATE FILING :

## **NATIONAL GRID’S RESPONSES TO COMMISSION’S SECOND SET OF DATA REQUESTS**

### **E-183 Undergrounding and Customer Credit**

2-1. What is the total amount in the E-183 account dedicated to Providence and East Providence for the burial of lines?

Response can be found at page 1.

2-2. What is the status of the burial of the lines related to E-183?

Response can be found at pages 2-4.

2-3. Please provide a copy of the currently effective tariff directing the refund of the customer credit that was deferred by Providence and East Providence as set forth in Docket No. 3617 (RIPUC No. 1185 was filed in Docket No. 3617 Settlement bates pages 122-23).

Response can be found at pages 5-6.