Request:

Provide Schedule JGA-3to the testimony of Witness John Athas in working Excel format with formulae intact.

Response:

Please see Excel Attachment 1-1-1: Schedule JGA-3 Workpaper and Attachment 1-1-2: NECo-17 ACOS (Filed) as submitted by the Company as a workpaper with their filing.

Request:

Provide the workpapers and other documents that support Schedule JGA-3 to the testimony of Witness John Athas. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.

Response:

Please see response to Request 1-1.

Request:

Provide Table 1 contained within the testimony of Witness John Athas, in native format and, as applicable, in Excel format with formulae intact.

Response:

Please see Excel Attachment 1-3-1: Table 1 JGA Workpaper and Attachment 1-3-2: RI-Electric 2012 ACOS (Compliance) as submitted by the Company in response to Discovery from The Division set 9-37.

Request:

Provide all workpapers and other documents that support Table 1 contained within the testimony of Witness John Athas, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

Please see response to Request 1-3.

Request:

Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness John Athas, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

There is no additional information other than has been responded in Request 1-1 through 1-4.

Request:

Provide Schedule JGA-4, and Schedule JGA-5 to the testimony of Witness John Athas in working Excel format with formulae intact.

Response:

Please see Attachment 1-6 Athas Scheds JGA 4 and 5. The charts contained in Schedule JGA-5 can be found in the tabs labeled "A16_noMin", "A60", and "A16_Min", respectively.

Request:

Provide the workpapers and other documents that support Schedule JGA-4, and Schedule JGA-5 to the testimony of Witness John Athas. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.

Response:

Please refer to the response to Request 1-6.

Request:

Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness John Athas, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

There is no additional information other than has been responded in Request 1-6 through 1-7.

Request:

Provide Exhibit GBE-3 to the testimony of Witnesses Tina Bennett and Allen Neale in working Excel format with formulae intact.

Response:

Please see Attachment 1-9_Exh GBE-3_Rev Requ.

Request:

Provide the workpapers and other documents that support Exhibit GBE-3 to the testimony of Witnesses Tina Bennett and Allen Neale. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.

Response:

In addition to the National Grid's witness Melissa Little's Schedule Mal-36 and Schedule Mal-36 (REV-1), please see Attachment 1-10_GBE Savings.

Request:

Provide the table that appears at the top of page 26 of the testimony of Witnesses Tina Bennett and Allen Neale in native format and, as applicable, in Excel format with formulae intact.

Response:

Please see Attachment 1-11_Table p 26.

Request:

Provide all workpapers and other documents that support the table that appears at the top of page 26 of the testimony of Witnesses Tina Bennett and Allen Neale, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

In addition to Attachment DIV 3-61 provided in National Grid's response to discovery request Division 3-61, please see Attachment 1-10_GBE Savings.

Request:

Provide any additional workpapers and other documents that support the conclusions in the testimony of Witnesses Tina Bennett and Allen Neale, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

Please see response to National Grid Discovery Request to the Division set 1-9 through 1-12, the joint testimony of witnesses Anthony H. Johnston and Christopher J. Connolly including schedules and workpapers, the Gas Business Enablement related sections of the testimony of witness Melissa Little including related schedules and workpapers, and National Grid's response to Gas Business Enablement related discovery requests referenced in the body and footnotes of the testimony of witness used to support the conclusions in the testimony of witness Tina Bennett and Allen Neale.

Request:

Provide Schedules RDC-1, RDC-2, RDC-3, RDC-4, RDC-5, and RDC-6 to the testimony of Witness Roger D. Colton in working Excel format with formulae intact.

Response:

The requested workpapers are attached.

Request:

Provide the workpapers and other documents that support RDC-1, RDC-2, RDC-3, RDC-4, RDC-5, and RDC-6 to the testimony of Witness Roger D. Colton. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.

Response:

See response to NGRID-1-14.

Request:

Provide Chart 1, Chart 2, Chart 3, Chart 4, Chart 5, Chart 6, Chart 7, Chart 8, Chart 9, Chart 10, Chart 11, Chart 12, Table 1, Table 2, Table 3, Table 4, Table 5, Table 6, Table 7, Table 8, Table 9, Table 10, Table 11, Table 12, and Table 13 from the testimony of Witness Roger D. Colton in native format and, as applicable, in Excel format with formulae intact.

Response:

The requested workpapers are attached.

Request:

Provide all workpapers and other documents that support Chart 1, Chart 2, Chart 3, Chart 4, Chart 5, Chart 6, Chart 7, Chart 8, Chart 9, Chart 10, Chart 11, Chart 12, Table 1, Table 2, Table 3, Table 4, Table 5, Table 6, Table 7, Table 8, Table 9, Table 10, Table 11, Table 12, and Table 13 from the testimony of Witness Roger D. Colton, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

See Response to NGRID-1-16.

Request:

Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness Roger D. Colton, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

Attached are workpapers supporting the following aspects of Mr. Colton's Direct Testimony:

- 1. Cost analysis of 25% discount appearing at pages 69-70 of Colton's Direct Testimony.
- 2. Cost analysis of 5% "adder" appearing at pages 70-71of Colton's Direct Testimony.

Request:

Provide Schedules RMM-1 and RMM-2 to the testimony of Witness Roxie McCullar in working Excel format with formulae intact.

Response:

Provided is Excel file "RMM-1 (NG-Elec)" which supports Schedule RMM-1 and Excel file "RMM-2 (NG-Gas)" which supports Schedule RMM-2. The Excel files are being provided with formulae and links intact.

Request:

Provide the workpapers and other documents that support Schedules RMM-1 and RMM-2 to the testimony of Witness Roxie McCullar. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.

Response:

Excel file "RMM-1 (NG-Elec)" provide in response to 1-19 contains links to the National Grid provided Excel files "Narragansett Electric – 2016 Table 1" and "Attachment DIV 1-18".

Excel file "RMM-2 (NG-Gas)" provide in response to 1-19 contains links to the National Grid provided Excel files "Narragansett Gas – 2016 Table 1" and "Attachment DIV 1-35".

The adjustments to the depreciation rates are supported by the Direct Testimony of Roxie McCullar.

Request:

Provide Schedules RMM-5, RMM-8 and RMM-10 to the testimony of Witness Roxie McCullar in working Excel format with formulae intact.

Response:

Provided are Excel files "RMM-5 (Acct 376-Salvage)", "RMM-8 (Acct 380-Salvage)" and "RMM-10 (Acct 368-Salvage)". The Excel files are being provided with formulae intact.

Request:

Provide the workpapers and other documents that support Schedules RMM-5, RMM-8 and RMM-10 to the testimony of Witness Roxie McCullar. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.

Response:

The support for the 2% reasonable estimate of inflation used in the calculations in the Excel files provided in response to 1-21 that support Schedules RMM-5, RMM-8 and RMM-10 is provided in Schedule RMM-4 attached to the Direct Testimony of Roxie McCullar.

The CPI used in the calculations in the Excel files provided in response to 1-21 that support Schedules RMM-5, RMM-8 and RMM-10 can be found at http://www.bls.gov/cpi/ and attached to the Direct Testimony of Roxie McCullar as Schedule RMM-3.

The historic plant data used in the calculations in the Excel files provided in response to 1-21 that support Schedules RMM-5, RMM-8 and RMM-10 were provided by National Grid as "Attachment DIV 1-6-1" for electric plant "Attachment DIV 1-26-1" for natural gas plant.

The historic salvage data used in the calculations in the Excel files provided in response to 1-21 that support Schedules RMM-5, RMM-8 and RMM-10 were provided by National Grid as "Attachment DIV 1-8-1" for electric plant "Attachment DIV 1-27-1" for natural gas plant.

The calculations are also discussed and supported in the Direct Testimony of Roxie McCullar.

Request:

Provide Table 1, Table 2, Table 3, Table 4, Table 5, and Table 6 from the testimony of Witness Roxie McCullar in native format and, as applicable, in Excel format with formulae intact.

Response:

The amounts and depreciation rates shown in Table 1 and Table 2 are supported by National Grid's response to DIV 1-18, National Grid's response to DIV 1-35, pages 49-51 of Schedule NWA-2 Electric, pages 49-51 of Schedule NWA-2 Gas, Schedule RMM-1 and Schedule RMM-2. The Excel file "Tables 1 and 2" is being provided with formulae intact.

The future net salvage percents in Table 3 are supported by National Grid's response to DIV 1-18, National Grid's response to DIV 1-35, pages 49-51 of Schedule NWA-2 Electric, pages 49-51 of Schedule NWA-2 Gas, Schedule RMM-1 and Schedule RMM-2. There is no Excel file of Table 3.

Table 4 is supported by Schedule RMM-2, page 49 of Schedule NWA-2 Gas, and Schedule RMM-5. There is no Excel file of Table 4.

Table 5 is supported by Schedule RMM-2, page 49 of Schedule NWA-2 Gas, and Schedule RMM-8. There is no Excel file of Table 5.

Table 6 is supported by Schedule RMM-1, page 49 of Schedule NWA-2 Electric, and Schedule RMM-10. There is no Excel file of Table 6.

Request:

Provide all workpapers and other documents that support Table 1, Table 2, Table 3, Table 4, Table 5, and Table 6 from the testimony of Witness Roxie McCullar, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

Please see the responses and Excel files provided in response to 1-19, 1-20, 1-21, 1-22, and 1-23 of this set. Also, see the Direct Testimony of Roxie McCullar for the support of Table 1, Table 2, Table 3, Table 4, Table 5, and Table 6.

Request:

Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness Roxie McCullar, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

The Direct Testimony of Roxie McCullar references support for the conclusions reached.

Request:

Provide Schedule RRP-E-1, RRP-E-2, RRP-E-3, RRP-E-4, RRP-E-5, RRP-E-6, RRP-E-7, RRP-E-8, RRP-E-9, RRP-G-1, RRP-G-2, RRP-G-3, RRP-G-4, RRP-G-4.1, RRP-G-5, RRP-G-6, RRP-G-7, RRP-G-8, RRP-G-8, 1, and RRP-G-9 to the testimony of Witnesses Michael R. Ballaban and David J. Effron in working Excel format with formulae intact.

Response:

Please see Attachment 1-26_RRP Rev Req Schedules.

Request:

Provide the workpapers and other documents that support RRP-E-1, RRP-E-2, RRP-E-3, RRP-E-4, RRP-E-5, RRP-E-6, RRP-E-7, RRP-E-8, RRP-E-9, RRP-G-1, RRP-G-2, RRP-G-3, RRP-G-4, RRP-G-4.1, RRP-G-5, RRP-G-6, RRP-G-7, RRP-G-8, RRP-G-8.1, and RRP-G-9 to the testimony of Witnesses Michael R. Ballaban and David J. Effron. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.

Response:

Please see the following Attachments:

- Attachment 1-27-1_Ballaban+Effron_Schedule_E
- Attachment 1-27-2_Ballaban+Effron_Schedule_G
- Attachment 1-27-3_RPP_DIV-29-6
- Attachment 1-27-4_RRP-OM-Exp Labor
- Attachment 1-27-5_RPP New IS Investments Rev Req
- Attachment 1-27-6_RRP IS Project Analysis Workpapers
- Attachment 1-27-7_RRP Labor Expenses Workpapers
- Attachment 1-27-8_Workpaper_RRP-E-5
- Attachment 1-27-9_Workpaper_RRP-G-5
- Attachment 1-27-10_Workpaper_RRP-G-8.1

Request:

Provide Figure 1, Figure 2, Figure 3, Figure 4, Table 4, Table 6, Table 7 (on page 49), Table 7 (on page 50), and Table 8 from the testimony of Witnesses Michael R. Ballaban and David J. Effron in native format and, as applicable, in Excel format with formulae intact.

Response:

Please refer to the following Attachments in response to National Grid Discovery Requests 1-27 and 1-28:

Attachment 1-27-6_RRP IS Project Analysis Workpapers (Figures 1-4 and Table 6) Attachment 1-28_RRP-Book 4. (Schedule OPEX-1-RI 10 yr) (Table 4) Attachment 1-27-7_RRP Labor Expenses Workpapers (Table 7 on page 49 and page 50) Attachment 1-27-4_RRP-OM-Exp Labor and 1-27-7 (Table 8)

Request:

Provide all workpapers and other documents that support Figure 1, Figure 2, Figure 3, Figure 4, Table 4, Table 6, Table 7 (on page 49), Table 7 (on page 50), and Table 8 from the testimony of Witnesses Michael R. Ballaban and David J. Effron, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

Please refer to the response to National Grid Discovery Request 1-28.

Request:

Provide any additional workpapers and other documents that support the conclusions in the testimony of Witnesses Michael R. Ballaban and David J. Effron, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

Please see the following Attachments:

Attachment 1-30-1_IS-Panel-Testimony Attachment 1-30-2_NMPC JP Order Attachment 1-30-3_PUC 5-23 Response

Request:

Provide Schedule MIK-1, MIK-2, MIK-3, MIK-4 and MIK-5 to the testimony of Witness Matthew I. Kahal in working Excel format with formulae intact.

Response:

Please see Attachment A to this response which is the excel model for Schedules MIK-3 and 4, pages 1-5. Excel files were not created for Schedules MIK-1, 2 or 5.

Request:

Provide the workpapers and other documents that support Schedule MIK-1, MIK-2, MIK-3, MIK-4 and MIK-5 to the testimony of Witness Matthew I. Kahal. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.

Response:

Please see attached to this response a workpaper showing the embedded calculation of debt for gas service of 5.10 percent. Also enclosed are copies of the growth rates from YahooFinance, Zacks, CNN and Reuters referenced in Schedule MIK-4, page 3. (Note that Value Line reports for the proxy companies are already in Company's possession as they are used by Company witness Hevert.) Data from Schedule MIK-2 and page 2 of Schedule MIK-5 are available from U.S. government websites, specifically, <u>www.bls.gov</u> for CPI data and <u>www.federalreserve.gov</u> for Treasury security yields (3 month, 10 year, 20 year and 30 year). Single A utility bond yields are from Mergent's <u>Bond Record</u> and are attached with this response.

Request:

Provide Table 2 from the testimony of Witness Matthew I. Kahal in native format and, as applicable, in Excel format with formulae intact.

Response:

No excel file was created for Table 2 other than that provided in response to 1-31. See Schedules MIK-4, page 1 and MIK-5, page 1.

Request:

Provide all workpapers and other documents that support Table 2 from the testimony of Witness Matthew I. Kahal, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

Please see Schedules MIK-4 and 5 and responses to 1-31, 1-32 and 1-35.

Request:

Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness Matthew I. Kahal, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

Please see attached the Blue Chip long-term forecasts referenced in Mr. Kahal's testimony and an except cited from the Brealy et. al. finance textbook pertaining to the equity risk premium. Also, attached with this response is the calculation of the proxy company share price data growth rate embedded in Mr. Hevert's multi-stage DCF analysis referenced in Mr. Kahal's testimony. Mr. Kahal's testimony also referenced the Federal Reserve's February 2018 Monetary Policy Report and the most recent press release of the Federal Open Market Committee in March 2018. Both documents are available on at <u>www.federalreserve.gov</u>. See the monetary policy section of that web site for these documents.

Request:

Provide Schedule BRO-1 and BRO-2 to the testimony of Witness Bruce R. Oliver in working Excel format with formulae intact.

Response:

See the attached electronic spreadsheets labeled "4770 Wkpr Sch BRO-1.xlsx" and "4770 Wkpr Sch BRO-2.xlsx."

The data presented in Schedule BRO-1 were copied directly from Schedules PMN-3 and PMN-9.

The data presented in the first two columns of Schedule BRO-2, page 1 of 2, were taken directly from Schedule PMN-9, pages 50 of 136 and 51 of 136, lines 27 and 28 on each page. The data presented in the last two columns of Schedule BRO-2 were computed from the electronic version of Schedule PMN-9 provided by the Company with the tax rate inputs adjusted to reflect the lower federal income tax rate that has resulted from the passage of the Federal Tax Cut and Jobs Act ("TCJA"). The information extracted from the Company's Schedule PMN-9 and from the version of that schedule that was modified to reflect the change in the effective Federal Income Tax rate are summarized on page 2 of Schedule BRO-2, page 2 of 2. An electronic version of the pages of Schedule BRO-2 is provided

Request:

Provide the workpapers and other documents that support Schedule BRO-1 and BRO-2 to the testimony of Witness Bruce R. Oliver. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.

Response:

See the response to National Grid's Data Request 1-36.

Request:

Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness Bruce R. Oliver, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

See the response to National Grid Data Request 1-43.

Request:

Provide Schedule BRO-3, BRO-4, BRO-5, BRO-6, and BRO-7 to the testimony of Witness Bruce R. Oliver in working Excel format with formulae intact.

Response:

See the accompanying electronic spreadsheet files:

"4770 Wkpr Sch BRO-3.xlsx," "4770 Wkpr Sch BRO-4.xlsx," "4770 Wkpr Sch BRO-5.xlsx," "4770 Wkpr Sch BRO-6.xlsx," and "4770 Wkpr Sch BRO-3.xlsx."

Request:

Provide the workpapers and other documents that support Schedule BRO-3, BRO-4, BRO-5, BRO-6, and BRO-7 to the testimony of Witness Bruce R. Oliver. When possible, provide the work papers and other documents requested electronically, in Excel format (or in text delimited format if not available in Excel), with formulae intact.

Response:

See the response to National Grid Data Request 1-39.

Request:

Provide Table 1 from the testimony of Witness Bruce R. Oliver in native format and, as applicable, in Excel format with formulae intact.

Response:

Table 1 was not generated in Excel format. Also, see the Division's response to National Grid's Data Request 1-42.

Request:

Provide all workpapers and other documents that support Table 1 from the testimony of Witness Bruce R. Oliver, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

The Tail Block Charges presented in Table 1 are derived from Schedule PMN-7. The current Residential Heat Tail Block Charge is from Schedule PMN-7, page 1 of 6, column (N), lines 11 and 12. The current Small C&I Tail Block Charge is from Schedule PMN-7, page 1 of 6, column (N), lines 17 and 18. The proposed charges for Tail Block usage are taken from Schedule PMN-7, page 3 of 6, column (H). It is noted that the Company's proposed rates would apply a single Distribution Charge to all therm usage and do not have a separate Tail Block Charge.

The percentage increase in the Small C&I Tail Block Charge is correct as presented in Table 1. The increase in the Small C&I Tail Block Charge in terms of dollars per therm is incorrect. The Residential increase was inadvertently repeated in place of the Small C&I increase. The Small C&I Tail Block increase should be \$0.2531 per therm.

Request:

Provide any additional workpapers and other documents that support the conclusions in the testimony of Witness Bruce R. Oliver, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

See "4770 Wkpr for Non-Firm Distribution Charges.xlsx." There are no additional supporting workpapers or documents other than those cited in Witness Oliver's testimony, the Company's responses to Division Data Requests (particularly Division Set 7), and the electronic spreadsheet files provided in the Division's responses to National Grid's Data Requests 1-36 through 1-42.

Request:

Provide: (a) Table 5, Figure 2, Figure 3, from the testimony of Witnesses Tim Woolf and Melissa Whited, and (b) Table 1, Table 2, Table 3, and Table 4 from Exhibit TW/MW-3 to the testimony of Witnesses Tim Woolf and Melissa Whited, in native format and, as applicable, in Excel format with formulae intact.

Response:

a) Testimony Table 5: Please see Attachment NG 1-44(a) Electric Earnings Report Results.xlsx

Testimony Figure 2: Please see Division Exhibit 4_Docket 4770.xlsx, sheet "FCM Targets".

Testimony Figure 3: Please see Division Exhibit 4_Docket 4770.xlsx, sheet "Tx Targets".

b) Exhibit 3, Table 1: Please see Division Exhibit 4_Docket 4770.xlsx, sheet "Global Inputs" row 54, row 60, row 66, row 78, and row 90.

Exhibit 3, Table 2: Please see Division Exhibit 4_Docket 4770.xlsx, sheet "Benefit Calcs", columns F through I.

Exhibit 3, Table 3: Please see Division Exhibit 4_Docket 4770.xlsx, sheet "Incentives" column G.

Exhibit 3, Table 4: Please see Division Exhibit 4_Docket 4770.xlsx, sheet "Global Inputs" row 94.

Prepared by Tim Woolf

Request:

Provide all workpapers and other documents that support (a) Table 5, Figure 2, Figure 3, from the testimony of Witnesses Tim Woolf and Melissa Whited, and (b) Table 1, Table 2, Table 3, and Table 4 from Exhibit TW/MW-3 to the testimony of Witnesses Tim Woolf and Melissa Whited, and, as applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

- a) There are no workpapers beyond those provided in response to 1-44.
- b) For Table 1, Please see Attachment NG 1-45(b) Daymark.xlsx. The avoided distribution cost assumption was taken from National Grid's 2018 energy efficiency screening workbook: NGRID RI 2018 Electric Screening Model_RITest_for SRP_20171205.xls.

For Table 4, please see the Company's Workpaper 9.4 – Incentive Benefits, Page 1 of 5.

Prepared by Tim Woolf

<u>Request</u>:

Provide any additional workpapers and other documents that support the conclusions in the testimony of Witnesses Tim Woolf and Melissa Whited, and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Response:

Not applicable.

Prepared by Tim Woolf