



November 27, 2017

**VIA HAND DELIVERY AND ELECTRONIC MAIL**

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

**RE: Application of The Narragansett Electric Company d/b/a National Grid for  
Approval of a Change in Electric and Gas Base Distribution Rates  
Pursuant to R.I. Gen. Laws §§ 39-3-10 and 39-3-11**

Dear Ms. Massaro:

Enclosed for filing with the Public Utilities Commission (PUC) is an original and eleven copies of the Company's<sup>1</sup> Application for a Change in Electric and Gas Base Distribution Rates Pursuant to R.I. Gen. Laws §§ 39-3-10 and 39-3-11.

The Company's filing consists of two parts. First, the Company is requesting an increase in electric and gas base distribution rates to recover the costs incurred to operate the electric and gas distribution systems on a safe and reliable basis for customers. The requested base distribution rate increase is approximately \$41.3 million for the electric system and approximately \$30.3 million for the gas system. Recovery of the costs to operate the systems is necessary for the Company to maintain and repair distribution infrastructure; maintain a qualified and dedicated workforce; and deliver the quality service that customers expect. The Company is committed to its role as the electric and natural gas service provider in Rhode Island and takes seriously its obligations to provide energy infrastructure essential for Rhode Island's economy to grow and for customers to obtain safe and reliable utility service.

The second part of the Company's filing consists of its Power Sector Transformation Vision and Implementation Plan (PST Plan). Over the past year, the Company has worked closely with Rhode Island officials and stakeholders to develop the Rhode Island Power Sector Transformation Phase One Report, which was submitted to Governor Gina Raimondo on November 8, 2017. The Company has included a comprehensive suite of proposals within its PST Plan to further the objectives of Rhode Island's Power Sector Transformation Initiative.

This Application also contains specific proposals that relate to the Company's recovery of costs in several key areas of its Rhode Island operations, as follows:

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

1. **Incremental Job Positions:** The Company plans to increase staffing, including positions for new electric and gas workers, which is necessary to address employee retirements in the gas and electric business. For gas operations, these additional workers will support increased workload, as well as gas-safety and compliance programs. These positions will also assist the Company in fulfilling interconnection requests for distributed energy resources, such as local solar or wind generation resources constructed for the benefit of Rhode Island.
2. **Income Eligible Customer Engagement:** The Company is proposing a redesign of its low income electric and gas distribution rates to provide low income customers with a fixed total bill discount of 15 percent. The Company is also proposing several new programs to engage income eligible customers and increase participation in assistance programs to help pay utility bills.
3. **Gas Business Enablement Program:** National Grid's Gas Business Enablement Program is a multi-year initiative to upgrade three core operating systems – Work Management, Asset Management, and Customer Enablement. Implementation of these three systems will fundamentally change the way the gas business works – from internal cross-functional department coordination to external interactions – to improve the Company's operational efficiency and introduce new and better ways to deliver safe and reliable service for customers.

The Company's filing encompasses elements that are critical to maintain the Company's ability to provide its customers with the high level of service that they expect from the Company. If approved by the PUC as filed, the proposed rate increases would result in an increase of 6.3 percent on the total monthly bill for the typical Narragansett Electric residential customer consuming 500 kWh monthly. For Narragansett Gas, the increase on the total annual bill for the typical residential heating customer consuming 845 therms annually would be 5.4 percent.

#### Effective Date of New Rates

Consistent with the provisions of R.I. Gen. Laws § 39-3-11 and § 1.3(e) of the PUC's Rules of Practice and Procedure, the enclosed proposed tariffs have an effective date of January 1, 2018. The Company prepared its case with the expectation that the PUC would suspend the effective date of the proposed rate changes for a period of eight months so that the rate changes would ultimately take effect on September 1, 2018.

#### Description of Volumes Included with the Filing

The Company has prepared a separate revenue requirement for each of the electric and gas operations.<sup>2</sup> In accordance with PUC Rules 2.5(a) and 2.5(b), the Company's complete direct case is hereby submitted in the form of prepared written testimony and schedules, along

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<sup>2</sup> Where there is a need to refer to the Company's individual electric or gas operations, this filing uses the terms "Narragansett Electric" or "Narragansett Gas," respectively, as appropriate.

with the Company's current and proposed tariffs. Also, in accordance with PUC Rule 2.5(e), the Company has included all supporting information and records required under Rules 2.4 through 2.10. In support of the Application, enclosed are 20 books of supporting materials as follows:

Book 1

- a. Testimony of Timothy F. Horan, President and Chief Operating Officer, Rhode Island Jurisdiction regarding the Company's commitment to providing Rhode Island customers with safe, reliable, and efficient utility service and the operating factors motivating the Company's proposals in this filing; and
- b. Testimony and schedules of Maureen P. Heaphy, Vice President, U.S. Compensation, Benefits, and Pensions, providing supporting analysis and documentation for the recovery of employee compensation, benefit, and pension costs.

Book 2

- a. Testimony and schedules of Robert B. Hevert, Partner and Rates, Regulation, and Planning Practice Leader at ScottMadden, Inc., supporting the Company's proposed rate of return and capital structure.

Book 3

- a. Testimony and schedules of Joseph F. Gredder, Manager of Electric Regulatory Support, presenting the forecast of electric deliveries and customer counts used to support the revenue requirement and rate design for Narragansett Electric; and
- b. Testimony and schedules of Theodore E. Poe, Jr., Principal Analyst of Gas Load Forecasting and Analysis, presenting the historical and forecast of customer count and customer demand data used to support the revenue requirement and rate design for Narragansett Gas.

Book 4

- a. Joint testimony and schedules of Raymond J. Rosario, Jr., Director, Overhead and Underground Lines, Rhode Island for the Company's electric operations, Alfred Amaral III, Vice President, Customer Meter Services, New England, and Ryan M. Constable, Acting Director, Asset Management – Distribution, presenting the Company's proposal to add new electrical and gas worker positions over and above the Company's current staffing complement to address system workforce requirements, increased distributed generation interconnection applications, and gas-safety and compliance programs. Mr. Rosario also discusses the Company's proposal to increase test year expense for additional crane operator licenses for 30 employees pursuant to Occupational Safety and Health Administration regulations, and the lease of three trouble trucks to improve truck availability and response times in Rhode Island; and

- b. Testimony and schedules of John F. Isberg, Vice President, Customer Solutions, presenting the Company's customer-based proposals that seek to engage and educate all customers about National Grid programs and services available to them, with a particular focus on income-eligible customers.

Book 5

- a. Testimony and schedules of Ned Allis, Project Manager, Depreciation and Technical Development with Gannett Fleming Valuation and Rate Consultants, LLC, presenting the depreciation study and proposed depreciation rates for ratemaking purposes for Narragansett Electric.

Book 6

- a. Testimony and schedules of Ned Allis, Project Manager, Depreciation and Technical Development with Gannett Fleming Valuation and Rate Consultants, LLC, presenting the depreciation study and proposed depreciation rates for ratemaking purposes for Narragansett Gas.

Book 7

- a. Joint testimony and schedules of Anuraag Bhargava, Senior Vice President and U.S. Chief Information Officer, Daniel J. DeMauro, Director of U.S. IS Regulatory Compliance, and Mukund Ravipaty, Director and Global Head Security Services, Design and Architecture, describing National Grid USA's Information Services function and the major Information Services investments and initiatives, both during the test year and post-test year.
- b. Joint testimony and schedules of Anthony H. Johnston, Senior Vice President of Gas Business Enablement, and Christopher J. Connolly, Vice President of Process and Business Requirements for the Gas Business Enablement, presenting the critical need for the Company's Gas Business Enablement Program and its benefits.

Book 8

- a. Testimony of Melissa A. Little, Director, Revenue Requirements – New England, presenting the Company's revenue-requirement analyses for Narragansett Electric and Narragansett Gas.

Book 9

- a. Schedule MAL-1 through Schedule MAL-29 of Melissa A. Little, Director, Revenue Requirements – New England.

Book 10

- a. Schedule MAL-30 through Workpaper MAL-5 of Melissa A. Little, Director, Revenue Requirements – New England.

Book 11

- a. Workpaper MAL-6 through Workpaper MAL-12-GAS of Melissa A. Little, Director, Revenue Requirements – New England.

Book 12

- a. Testimony, schedules, and workpapers of Howard S. Gorman, President of HSG Group, Inc., presenting the allocated cost of service study for Narragansett Electric, proposed class revenue allocation and rate design, and typical bill impacts.

Book 13

- a. Testimony and Schedule PMN-1 through Schedule PMN-6 of Paul M. Normand, President of Management Applications Consulting, Inc., describing the Company's proposed allocated cost of service study for Narragansett Gas, proposed class revenue allocation and rate design, and typical bill impacts.

Book 14

- a. Schedule PMN-7 through Schedule PMN-9 of Paul M. Normand, Principal of Management Applications Consulting, Inc.

Book 15

- a. Joint testimony, schedules, and workpapers of Ann E. Leary, Manager of New England Gas Pricing, and Scott M. McCabe, Manager of New England Electric Pricing, presenting the change in the manner by which eligible customers receive the low income bill discount proposed for Narragansett Gas and Narragansett Electric, respectively. Ms. Leary's testimony also explains the development of rate year revenue and presents Narragansett Gas' proposed distribution service tariffs. Mr. McCabe's testimony also explains the development of rate year revenue and presents Narragansett Electric's proposed distribution service tariffs.

Book 16

- a. Schedule PP-4-ELEC and Schedule PP-5-ELEC containing clean and marked proposed tariffs, respectively, for Narragansett Electric.

Book 17

- a. Schedule PP-4-GAS and Schedule PP-5-GAS containing clean and marked proposed tariffs, respectively, for Narragansett Gas.

PST Book 1

- a. Testimony, schedule, and Appendices 2.1 and 2.2 of the Power Sector Transformation Panel, presenting the Company's proposals relating to Rhode Island's Power Sector Transformation Initiative.

PST Book 2

- a. Appendices 4.1-10.11 of the Power Sector Transformation Panel.

PST Book 3

- a. Workpapers 3.1-9.4 of the Power Sector Transformation Panel.

Enclosed is a Formal Application for Rate Change pursuant to Rules 1.5(a) and 1.9 of the PUC's Rules on Practice and Procedure. Also enclosed is the Attestation of the Company's Chief Financial Officer pursuant to Rule 2.7 of the PUC's Rules of Practice and Procedure. The Company would like to note that, in order to conform to the provisions of R.I. Gen. Laws § 39-3-11, which was amended in 2009 to allow a suspension period of eight months, and to the requirement of PUC Rule 2.6 that the rate year be the twelve-month period for which new rates are designed to recover the proposed cost of service, the Company's filing includes a rate year consisting of the twelve-month period beginning September 1, 2018. Lastly, the Company has included for PUC approval a proposed draft notice of the filing for publication in The Providence Journal pursuant to the requirement of PUC Rule 2.4.

This filing also includes a Motion for Protective Treatment 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). The Company seeks protection from public disclosure of certain confidential vendor pricing information contained in Workpaper MAL-9 Electric Operations (Book 11), Appendix 4.1 (PST Book 2), and Workpaper 4.1 (PST Book 3). Accordingly, the Company has provided the PUC with one complete, unredacted copy of the confidential documents in a sealed envelope marked **"Contains Privileged and Confidential Information – Do Not Release,"** and has included redacted copies of these materials for the public filing.

The Company is also including a CD-ROM containing the Excel versions of the workpapers contained in Books 2-6, 8-13, and 15.

Luly E. Massaro, Commission Clerk  
Approval of a Change in Electric and Gas Base Distribution Rates  
November 27, 2017  
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Thank you very much for your time and attention to this matter. If you have any questions, please contact Celia O'Brien at 781-907-2153 or Jennifer Brooks Hutchinson at 401-784-7288.

Very truly yours,



Celia B. O'Brien



Jennifer Brooks Hutchinson

Enclosures

cc: Macky McCleary, Administrator, Division of Public Utilities and Carriers  
Jonathan Schrag, Deputy Administrator, Division of Public Utilities and Carriers  
Steve Scialabba, Chief Accountant, Division of Public Utilities and Carriers  
John Bell, Assistant Chief Accountant, Division of Public Utilities and Carriers  
Peter F. Kilmartin, Rhode Island Attorney General  
Leo Wold, Esq., Office of the Attorney General

Formal Application for  
Rate Change Pursuant to Sections 1.5(a) and 1.9  
of the Commission's Rules on Practice and Procedure

I, Celia B. O'Brien, on behalf of The Narragansett Electric Company d/b/a National Grid, do hereby make application to the Public Utilities Commission pursuant to Rhode Island General Laws §§ 39-3-10 and 39-3-11 for new rates and tariffs designed to increase annual electric distribution revenue by approximately \$41.3 and gas distribution revenue by approximately \$30.3 with a proposed effective date of January 1, 2018, and state as follows:

1. The exact legal name of the applicant is The Narragansett Electric Company d/b/a National Grid (National Grid).
2. National Grid is incorporated under Rhode Island General Laws and is authorized to do business in Rhode Island.
3. Its principal place of business is located at 280 Melrose Street, Providence, Rhode Island 02907.
4. National Grid's request for an increase in base distribution rates and for approval of related proposals applies to both its electric delivery service and to its natural gas distribution service.
5. All correspondence in connection with the rate application should be addressed to the following representatives of the Company:

Celia B. O'Brien, Esq. (R.I. BBO #4484)  
Jennifer Brooks Hutchinson, Esq. (R.I. BBO #6176)  
c/o The Narragansett Electric Company  
280 Melrose Street  
Providence, Rhode Island 02907



Signed and executed on this 27th day of November, 2017, by:

Celia B. O'Brien, Esq.  
Assistant General Counsel and Director  
c/o The Narragansett Electric Company  
280 Melrose Street  
Providence, Rhode Island 02907



Celia B. O'Brien, Esq.  
Assistant General Counsel and Director  
National Grid

STATE OF RHODE ISLAND

COUNTY OF PROVIDENCE

In Providence on this 27 day of November, 2017, before me personally appeared Celia B. O'Brien, Assistant General Counsel and Director of The Narragansett Electric Company d/b/a National Grid, to me known and known by me to be the party so executing the foregoing instrument, and she acknowledged said instrument, by her so executed, to be her free act and deed in said capacity and the free act and deed of said National Grid.



Notary Public

My Commission Expires:

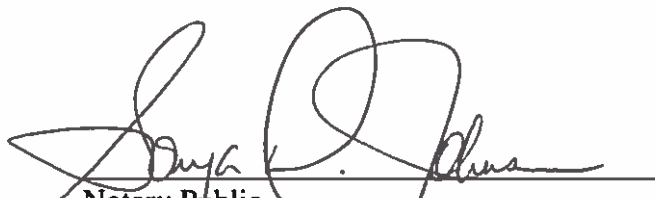
Geraldine Russillo  
Notary Public, State of Rhode Island  
Expires September 20, 2020

Attestation of Margaret Smyth

I, Margaret Smyth, do hereby attest that, to the best of my knowledge, information, and belief, the cost and revenue statements and the supporting data submitted, which purport to reflect the books of the Company, do in fact set forth the results shown by such books and the results of operations, and all differences between the books and the test year data, and any changes in the manner of recording an item on the Company's books during the test year, have been expressly noted.

  
Margaret Smyth  
Chief Financial Officer, National Grid US

Subscribed and attested to before me  
this 28<sup>th</sup> day of November, 2017

  
Notary Public  
My Commission Expires May 18, 2018

SONYA D. JOHNSON  
Notary Public, State of New York  
Registration #02JO6007140  
Qualified in Kings County  
My Commission Expires May 18 2018

## **The Narragansett Electric Company d/b/a National Grid**

### **NOTICE OF FILING AND CHANGE IN RATE SCHEDULES**

On November 27, 2017, pursuant to the Rhode Island General Laws Sections 39-3-10 and 39-3-11, The Narragansett Electric Company d/b/a National Grid (the Company), a subsidiary of National Grid USA (National Grid), submitted a comprehensive filing with the Rhode Island Public Utilities Commission (PUC) to increase base distribution rates for its electric distribution (Narragansett Electric) and gas distribution (Narragansett Gas) operations in Rhode Island.

Along with its request for a change in base distribution rates, the Company is requesting approval of certain ratemaking proposals designed to recover the costs of serving customers, including those relating to: increased staffing, including positions for new electric and gas workers; computer system upgrades; cost recovery procedures for major storm events; a multi-year, enterprise-wide, gas-operations program that will enhance National Grid's core gas operating capabilities necessary to support National Grid's U.S. gas distribution business into the future; new programs and services for income-eligible customers and increased investment in current income-eligible customer offerings; and the Energy Innovation Hub located in Providence designed to expand customer education and outreach and enrich customers' understandings of energy and the options available to them to manage their energy use. The Company is currently operating under the terms of the Amended Settlement Agreement approved by the PUC in RIPUC Docket No. 4323 (2012) for Narragansett Electric and Narragansett Gas.

In addition, the Company is requesting approval of a Power Sector Transformation (PST) Vision and Implementation Plan (Plan), which presents the following proposals: (1) grid modernization-enabling investments; (2) advanced metering functionality; (3) beneficial electrification proposals, including an electric heat initiative and an electric transportation initiative; (4) utility-owned energy storage and solar demonstration program; and (5) a rewards program for income-eligible customers. In support of these proposals, the Plan also includes proposed performance incentive mechanisms, a cost recovery tariff designed to recover the Company's incremental costs associated with PST activities, and a description of the revenue requirement associated with the Plan. The Company's PST cost recovery tariff is designed to recover costs associated with the Plan commencing September 1, 2018.

For Narragansett Electric, the proposed rates would increase annual operating revenue by approximately \$41.3 million, or 4.6 percent, with varying impacts on individual customer bills. Generally, the total monthly bill impact for a typical residential electric customer using 500 kilowatt-hours per month would be an increase of 6.3 percent, or \$6.66 per month. Electric commercial and industrial customers would experience total monthly bill impacts ranging from an increase of approximately 3 percent to an increase of approximately 9 percent.

For Narragansett Gas, the proposed rates would increase annual operating revenue by approximately \$30.3 million, or 8.0 percent, with varying impacts on individual customer bills. Generally, the total annual bill impact for a typical residential gas heating customer consuming 845 therms annually, would be an increase of 5.4 percent, or \$66.82 per year. Gas commercial and industrial customers would experience total annual bill impacts that will range from an increase of approximately 1 percent to approximately 6 percent.

National Grid has requested that the new rate schedules take effect on January 1, 2018. However, no rate change will take effect until the PUC has conducted a full investigation of the proposed base distribution rate increase and related proposals. Through the course of proceedings, it is possible that the PUC will revise and modify the Company's proposals set forth in its filing. The PUC will publish a notice of the hearing dates when those dates are scheduled. At that time, customers can comment on the Company's proposals.

A copy of the filing is available at the offices of The Narragansett Electric Company, 280 Melrose Street, Providence, RI 02907, and at the office of the Public Utilities Commission, 89 Jefferson Boulevard, Warwick, RI 02888, for review by the public during business hours. This notice is given pursuant to the Commission's Rules of Practice and Procedure effective May 1, 1998.

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**RHODE ISLAND PUBLIC UTILITIES COMMISSION**

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**Application of The Narragansett Electric Company  
d/b/a National Grid for Approval of a Change in  
Electric and Gas Base Distribution Rates  
Pursuant to R.I. Gen. Laws §§ 39-3-10 and 39-3-11**

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) **Docket No. 4770**  
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**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a NATIONAL GRID  
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

The Narragansett Electric Company d/b/a National Grid (the Company) hereby requests that the Rhode Island Public Utilities Commission (PUC) provide confidential treatment and grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by Rule 1.2(g) of the PUC's Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B). The Company also hereby 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 November 27, 2017, the Company filed with the PUC an Application for a Change in Electric and Gas Base Distribution Rates Pursuant to R.I. Gen. Laws §§ 39-3-10 and 39-3-11, which the PUC assigned Docket No. 4770. In support of the specific proposals included in its request, the Company is submitting pre-filed direct testimony and supporting schedules, appendices, and/or workpapers, including the workpapers of Company Witness Melissa A. Little in support of the revenue-requirement analyses and the

appendices and workpapers of the Power Sector Transformation (PST) Panel in support of the Company's PST Plan. The Company requests that the PUC protect from public disclosure certain vendor pricing information reflected in the following documents submitted in the Company's November 27, 2017 filing (collectively, the Confidential Documents):

- Workpaper MAL-9 Electric Operations of Company Witness Melissa A. Little, which is provided in Book 11, contains confidential vendor pricing information relating to crane operator training that is competitively sensitive and customarily not released to the public by the person from whom it was obtained ; and
- Appendix 4.1 and Workpaper 4.1 of the PST Panel, which are provided in PST Book 2 and PST Book 3, respectively, contain confidential vendor pricing information regarding advanced metering functionality (AMF) costs that is competitively sensitive and customarily not released to the public by the person from whom it was obtained .

The Company has provided redacted public versions of these documents with its November 27, 2017 filing in this docket, as well as unredacted, confidential versions.

## **II. LEGAL STANDARD**

Rule 1.2(g) of the PUC's Rules of Practice and Procedure 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 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 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 the determination as to whether this exemption applies requires the application of a two-pronged test set forth in Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I. 2001). The exemption applies where the disclosure of information would be likely to either (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. See Providence Journal, 774 A.2d 40.

The first prong of the test assesses whether the information was provided voluntarily to the governmental agency. Providence Journal, 774 A.2d at 47. If the answer to the first question is affirmative, then the question becomes whether the information is "of a kind that would customarily not be released to the public by the person from whom it was obtained." Id.

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

The Confidential Documents contain competitively sensitive vendor pricing terms associated with the Company's crane operator training and AMF costs. Disclosure of the

Confidential Documents would jeopardize the ability of the Company to ensure that customers are being served by the lowest cost option, which would have an adverse impact on the Company's customers. The Confidential Documents should be protected because the documents contain pricing information offered by vendors on a confidential basis.

The cost estimates associated with crane operator training was derived from the Company's competitive bid process. The estimates associated with its Company's AMF costs were provided through confidential discussions with leading AMF vendors. To the Company's knowledge, neither set of cost estimates would customarily be released to the public, given that they were offered to the Company through confidential means.

Accordingly, both sets of data should be protected from public disclosure, because the public release of such pricing information would seriously undermine the Company's negotiating position in the market for these goods and services in the future, and thus, jeopardize the ability of the Company to ensure that customer are being served by the lowest cost option. Protection of the Confidential Documents allows the Company to procure the most cost-efficient resources to support its customers. Accordingly, the Company requests that the PUC not require the Company to disclose its vendor pricing information, which would provide potential vendors with a negotiating advantage that may lead to higher prices for the Company's customers than would otherwise be achievable.

The Company's strategic use of vendor pricing information is considered to be proprietary, confidential, and competitively sensitive. Indeed, the confidential and privileged information contained in the Confidential Documents is of the type that the Company would not ordinarily make public. Disclosure on the public record of this information will negatively affect the Company's future bargaining position and could



impair the Company's ability to obtain advantageous pricing in the future, thereby causing substantial competitive harm. Accordingly, the Company seeks protection for the confidential and competitively sensitive information.

#### **IV. CONCLUSION**

For the reasons set forth above, the Company respectfully requests that the PUC grant its Motion for Protective Treatment as stated herein.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC COMPANY  
d/b/a NATIONAL GRID**

By its attorney,

A handwritten signature in blue ink that reads "Celia B. O'Brien".

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

Dated: November 27, 2017