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June 1, 2006

VIA EMAIL AND HAND DELIVERY

Luly Massaro, Commission Clerk
Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket No. D-06-13 Joint Petition of Southern Union Company and The
Narragansett Electric Company

Dear Ms. Massaro:

Attached are the responses of Southern Union Company to the First Set of Discovery Requests of the Town of Tiverton in the above-referenced docket.

Thank you for your attention to this matter.

Sincerely,

Cheryl M. Kimball
R.I. Bar # 6458

Cc: Service List

The Narragansett Electric Company d/b/a National Grid
Southern Union Company
Docket D-06-13
Responses to Town of Tiverton Data Requests
Issued on May 31, 2006

Town of Tiverton Data Request 1-1

Request:

Provide all documents evidencing any and all internal communications of New England Gas Company/Southern Union regarding any estimated cost of remediation of contaminated property(ies) in Tiverton.

Response:

Southern Union objects to Town of Tiverton Data Request 1-1 on the basis that it requests information that is not relevant to the issues properly under consideration by the Division, is overly broad, is not reasonably calculated to lead to discovery of evidence relevant to the issues in this proceeding and seeks privileged information. Subject to and without waiving such objections, Southern Union responds as follows:

Please see the responses to Attorney General Data Request 2-7 and Division Data Request 4-4.

Prepared by or under the supervision of: Richard N. Marshall

The Narragansett Electric Company d/b/a National Grid
Southern Union Company
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Town of Tiverton Data Request 1-2

Request:

Provide all documents evidencing any and all communications with Narragansett Electric Company/National Grid regarding any estimated cost of remediation of contaminated property(ies) in Tiverton.

Response:

Southern Union objects to Town of Tiverton Data Request 1-2 on the basis that it requests information that is not relevant to the issues properly under consideration by the Division, is overly broad, is not reasonably calculated to lead to discovery of evidence relevant to the issues in this proceeding and seeks privileged information.

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Town of Tiverton Data Request 1-3

Request:

Provide the identity of each and every employee and/or agent of New England Gas Co./Southern Union who had communications, oral or written, with any employee and/or agent of Narragansett Electric Company/National Grid with regard to the issue of liability for contamination of Tiverton properties. Provide the substance of each communication referenced in your answer, the date and place of each communication, and a copy of any written communication identified above and/or a written memorialization or tape recording of any oral communication referenced above.

Response:

Southern Union objects to Town of Tiverton Data Request 1-3 on the basis that it requests information that is not relevant to the issues properly under consideration by the Division, is overly broad, is not reasonably calculated to lead to discovery of evidence relevant to the issues in this proceeding and seeks privileged information.

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Town of Tiverton Data Request 1-4

Request:

Provide the identity of each and every employee and/or agent of New England Gas Co./Southern Union who had communications, oral or written, with any person or entity with regard to the issue of liability for contamination of Tiverton properties. Provide the substance of each communication referenced in your answer, the date and place of each communication, and a copy of any written communication identified above and/or a written memorialization or tape recording of any oral communication referenced above.

Response:

Southern Union objects to Town of Tiverton Data Request 1-4 on the basis that it requests information that is not relevant to the issues properly under consideration by the Division, is overly broad, is not reasonably calculated to lead to discovery of evidence relevant to the issues in this proceeding and seeks privileged information.

Prepared by or under the supervision of: Richard N. Marshall

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Southern Union Company
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Town of Tiverton Data Request 1-5

Request:

Provide a list of any other legal action (whether federal, state, administrative or otherwise) in which New England Gas/Southern Union and/or any other subsidiary of the parent company has been named a defendant or liable party for environmental contamination. Include in your answer the title of the action, the action docket number, the jurisdiction, the current procedural posture of the action, and any disposition of the action.

Response:

Southern Union objects to Town of Tiverton Data Request 1-5 on the basis that it requests information that is not relevant to the issues properly under consideration by the Division, is overly broad, and is not reasonably calculated to lead to discovery of evidence relevant to the issues in this proceeding.

Prepared by or under the supervision of: Richard N. Marshall