

May 31, 2006

**VIA HAND DELIVERY & ELECTRONIC MAIL**

Luly E. Massaro, Division Clerk  
RI Division of Public Utilities & Carriers  
89 Jefferson Boulevard  
Warwick, RI 02888

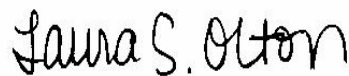
**RE: Docket D-06-13 - Joint Petition of The Narragansett Electric Company and Southern Union Company for Approval of Purchase and Sale of Assets  
Responses to the Town of Tiverton Data Requests – Set 1**

Dear Ms. Massaro:

Enclosed please find five (5) copies of responses from The Narragansett Electric Company, d/b/a National Grid, to the first set of data requests issued by the Town of Tiverton on May 31, 2006, in the above-captioned proceeding.

Thank you for your attention to this matter. If you have any questions, please feel free to contact me at (401) 784-7667.

Very truly yours,



Laura S. Olton

Enclosures

cc: Docket D-06-13 Service List

Town of Tiverton Data Request 1-1

Request:

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

Response:

All documents reflecting internal communications regarding any estimated cost of remediation have been created and exchanged for purposes of obtaining legal advice and/or at the request by counsel as attorney work product. On the basis of attorney client privilege and/or attorney work product, and Division 27(b)(6), National Grid objects to providing copies.

Town of Tiverton Data Request 1-2

Request:

Provide all documents evidencing any and all communications with Southern Union regarding any estimated cost of remediation of contaminated property(ies) in Tiverton

Response:

There are no documents responsive to this request.

Town of Tiverton Data Request 1-3

Request:

Provide the identity of each and every employee and/or agent of Narragansett Electric Company/National Grid who had communications, oral or written, with any employee and/or agent of Southern Union 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:

National Grid objects to this request on the grounds of relevancy, attorney client privilege, attorney work product, and Division Rule 27(b)(6).

## **Certificate of Service**

I hereby certify that a copy of the cover letter and materials accompanying this certificate were mailed or hand-delivered to the parties listed below.



Joanne M. Scanlon

Date: May 31, 2006

### **National Grid & Southern Union - Docket D-06-13 Updated Service List as of 5/15/06**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone/FAX</b>
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For Division of Public Utilities Advocacy: David J. Effron Berkshire Consulting 12 Pond Path North Hampton, NH 03862-2243	<a href="mailto:Djeffron@aol.com">Djeffron@aol.com</a>	
<b>File an original &amp; four (4) copies w/:</b> Luly E. Massaro, Division Clerk Division of Public Utilities & Carriers 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Lmassaro@puc.state.ri.us">Lmassaro@puc.state.ri.us</a>	401-780-2107 401-941-1691