

January 4, 2019

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket D-18-34 – In re: City of Pawtucket Rhode Island Municipal
Streetlighting Purchase
National Grid’s Motion to Amend Procedural Schedule**

Dear Ms. Massaro:

Enclosed for filing in the above-referenced docket are five copies of The Narragansett Electric Company d/b/a National Grid’s Motion to Amend Procedural Schedule.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-7415.

Very truly yours,



Robert J. Humm

Enclosures

cc: Docket D-18-34 Service List
John Spirito, Esq. (Hearing Officer)
Christy Hetherington, Esq.
Timothy Chapman, Esq.
Adam Ramos, Esq.

**STATE OF RHODE ISLAND
DIVISION OF PUBLIC UTILITIES AND CARRIERS**

IN RE: CITY OF PAWTUCKET RHODE ISLAND
MUNICIPAL STREETLIGHTING PURCHASE

Docket No.: D-18-34

**THE NARRAGANSETT ELECTRIC COMPANY D/B/A
NATIONAL GRID'S MOTION TO AMEND PROCEDURAL SCHEDULE**

Pursuant to Rule 1.19 of the Rhode Island Division of Public Utilities and Carriers' (the Division) Rules of Practice and Procedure, The Narragansett Electric Company d/b/a National Grid (National Grid) respectfully moves that the Division amend the procedural schedule in this matter. For the reasons set forth in this motion, National Grid requests that the Division establish the following revised procedural schedule:

Event	Date/Deadline
Admit Informal Discovery Responses into Record as Evidence	Immediately Upon Granting Motion
File Motions for Summary Disposition	January 23, 2019
If any Motions for Summary Disposition are Denied	
Parties File Written Direct Testimony	21 Days after Summary Disposition Decision
Evidentiary Hearing	35 Days after Summary Disposition Decision
Post Hearing Brief from National Grid and the City of Pawtucket (if necessary)	21 Days after Receiving Hearing Transcript
Division Advocacy Section Post-Hearing Brief (if necessary)	30 Days after National Grid and City of Pawtucket Post Hearing Briefs are filed

National Grid makes this request for the following reasons:

1. National Grid has responded to informal discovery requests from the Division Advocacy Section. The Division Advocacy Section also issued informal discovery requests to the City of Pawtucket on November 20, 2018 and November 26, 2018.

2. Neither National Grid nor the City of Pawtucket has served any additional discovery requests in this matter. Under the current procedural schedule, the deadline to complete discovery is January 4, 2019.

3. National Grid believes that, including consideration of the information provided in response to the informal discovery requests from the Division Advocacy Section, there are no disputed material facts and this matter can be resolved through a motion for summary disposition.

4. The current procedural schedule directed the parties to choose whether to request an evidentiary hearing or proceed to decide the matter through briefing on January 4, 2019.

5. Through the process of negotiating a statement of agreed-upon facts, it became clear that there are facts about which the parties do not agree, but which may not be material to the resolution of the legal issues presented in this matter.

6. National Grid seeks to preserve (and not waive) its right to an evidentiary hearing if the Division determines there are material facts in dispute that would warrant a hearing.

7. The proposed revised procedural schedule would not unduly delay resolution of this matter.

8. The proposed revised procedural schedule would ensure the rights of all parties are protected and facilitate the most efficient resolution of this dispute.

Additionally, National Grid certifies that it has conferred both with the City of Pawtucket and the Division Advocacy Section regarding this motion. The Division Advocacy Section has indicated that it does not oppose this motion. The City of Pawtucket has indicated that it does oppose this motion.

WHEREFORE, National Grid respectfully requests that the Division grant this motion and enter the requested revised procedural schedule.¹

Respectfully submitted,

The Narragansett Electric Company
d/b/a National Grid
By its Attorneys,

/s/ Adam M. Ramos
Adam M. Ramos (#7591)
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/s/ Robert J. Humm
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Dated: January 4, 2019

¹ If the Division does not grant this motion, National Grid hereby requests an evidentiary hearing pursuant to the original procedural schedule.

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

January 4, 2019

Date

Docket No. D-18-34 The Narragansett Electric Co. d/b/a National Grid Petition for Relief Service List as of 11/8/18

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Original & 4 copies to be filed w/: Luly E. Massaro, Clerk	Luly.massaro@puc.ri.gov ;	401-780-2107

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