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January 17, 2019

Via Electronic and Hand Delivery

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

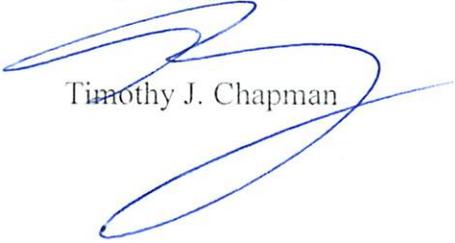
**RE: Docket D-18-34 – In re: City of Pawtucket
Rhode Island Municipal Streetlighting Matter
City of Pawtucket’s Objection to the Narragansett Electric
Company d/b/a National Grid’s Motion to Amend the Procedural Schedule**

Dear Ms. Massaro:

Enclosed for filing in the above-referenced Docket are five (5) copies of City of Pawtucket’s Objection to the Narragansett Electric Company d/b/a National Grid’s Motion to Amend the Procedural Schedule.

Thank you for your attention to this matter.

Very truly yours,


Timothy J. Chapman

TJC: bms
(Enclosures)
xc: John Spritio, Esq. (Hearing Officer)
Christy Hetherington, Esq.
Robert Humm, Esq.
Adam Ramos, ESq.
Docket D-18-34 Service List

STATE OF RHODE ISLAND

DIVISION OF PUBLIC UTILITIES AND CARRIERS

IN RE: CITY OF PAWTUCKET RHODE ISLAND

DOCKET No: D-18-34

MUNICIPAL STREETLIGHTING PURCHASE

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

Now comes the City of Pawtucket and hereby objects to the Narragansett Electric Company d/b/a National Grid's motion to amend the procedural schedule. The City hereby objects based on the following grounds:

1. The discovery process did not, in and of itself, provide all the necessary documents and evidence for the Hearing Officer to make an informed decision;
2. The agreed-upon statement of facts, wherein neither party was allowed to put in all their facts, definitely did not provide all material facts necessary for the Hearing Officer to make an informed decision. There were many facts the City was not allowed to get the other party to agree to;
3. There are significant material facts in dispute, including the City of Pawtucket's \$411,079.91 payment to Direct Energy (see attached) which was and has never been credited to the City of Pawtucket's overall invoice by National Grid. Said invoice is the subject of National Grid's Petition;
4. Another material fact in dispute is the facilities charge by National Grid which should have been eliminated when the City of Pawtucket agreed to purchase the streetlights;
5. Respectfully, this matter is not ripe for a motion for summary disposition.
6. The rights of the City of Pawtucket would not be protected nor would an expedited procedural schedule facilitate the most efficient resolution for the City of Pawtucket;

Respectfully submitted,

City of Pawtucket

By its Attorney,

/s/ Timothy J. Chapman

Timothy J. Chapman #3494

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Riverside, RI 02915

401.433.5200

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INVOICE DATE	INVOICE NUMBER	DESCRIPTION	INVOICE AMOUNT
12/06/2018	1144594 OCT18	PWSB ELEC 10/11-11/8/18	\$1,008.43
12/06/2018	1144599 NOV18	PWSB ELEC 10/23-11/21/18	\$41.41
12/06/2018	1144598 NOV18	PWSB ELEC 10/23-11/21/18	\$13.82
12/06/2018	1144604 NOV18	PWSB ELEC 10/23-11/21/18	\$13.82
12/06/2018	1144608 NOV18	PWSB ELEC 10/23-11/21/18	\$41.41
12/06/2018	1144611 NOV18	PWSB ELEC 10/22-11/20/18	\$118.59
12/06/2018	1144612 NOV18	PWSB ELEC 10/23-11/21/18	\$27.58
12/06/2018	1581382 NOV18	PWSB ELEC 10/22-11/20/18	\$146.18
12/06/2018	1581383 NOV18	PWSB ELEC 10/22-11/20/18	\$15.58
12/06/2018	1581384 NOV18	PWSB ELEC 10/22-11/20/18	\$77.02
12/06/2018	1581385 NOV18	PWSB ELEC 10/22-11/20/18	\$423.62
12/06/2018	1581386 NOV18	PWSB ELEC 10/22-11/20/18	\$47.17
12/06/2018	SETTLEMENT...	SETTLEMENT 2018 FOR ACCT #1144463	\$411,079.91

Vendor No.	Vendor Name	Check No.	Check Date	Check Amount
803	DIRECT ENERGY BUSINESS	3065090	12/11/2018	\$413,054.54

THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW



City of Pawtucket

ACCOUNTS PAYABLE

137 Roosevelt Ave

Pawtucket, RI 02860

(401)728-0500 Fax (401) 727-4820

BANK OF AMERICA
57-1/115

Date 12/11/2018

Check No. 3065090

VOID 90 DAYS FROM DATE OF ISSUE

\$413,054.54

Four Hundred Thirteen Thousand Fifty-four Dollars and 54 Cents

Pay DIRECT ENERGY BUSINESS
To the PO BOX 70220
Order Of PHILADELPHIA, PA 19176-0220

Joanna P. Heeneux
Authorized Signature

MP

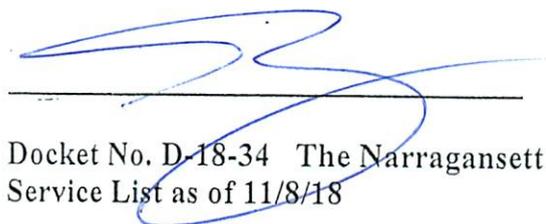
[Signature]
Authorized Signature

MP

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.



January 17, 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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