

June 29, 2012

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

RE: Docket 4323 – Application for Approval of a Change in Electric and Gas Base Distribution Rates Pursuant to R.I.G.L. Section 39-3-19 and 39-3-11 Responses to Division Data Requests – Set 4 – GAS

Dear Ms. Massaro:

Enclosed is an original and ten (10) copies of National Grid's¹ responses to the Division's Fourth Set of Data Requests in the above-captioned proceeding.

Please be advised that the Company is seeking protective treatment of the confidential version of Excel Attachment DIV 4-1-GAS entitled "NGRI-GCOS Rate Year Revised 4-16-12 WITH ISR & RDA Revenues PRO.xls" provided in response to Division 4-1-GAS, as permitted by Commission Rule 1.2(g) and by R.I.G.L. § 38-2-2(5)(i)(B). The Company is submitting herewith a Motion for Protective Treatment along with a copy of confidential Excel Attachment DIV 4-1-GAS on CD-ROM to the Commission pending a determination on the Company's Motion. The Company is also providing to the Commission three (3) CD-ROMs containing the public version of this attachment. In addition, the Company is providing a copy of the confidential attachments noted herein to the Division.

The enclosed responses complete the Fourth Set, as indicated on the attached discovery log.

Thank you for your attention to this transmittal. If you have any questions, please feel free to contact me at (781) 907-2153.

Very truly yours,



Celia B. O'Brien

Enclosures

cc: Docket 4323 Service List
Leo Wold, Esq.
Steve Scialabba, Division

¹ The Narragansett Electric Company d/b/a National Grid (herein referred to as "National Grid" or the "Company").

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
RHODE ISLAND PUBLIC UTILITIES COMMISSION

National Grid)
Docket 4323 - Application for Approval)
of a Change in Electric and Gas)
Base Distribution Rates)
_____)

Docket No. 4323

**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY,
D/B/A NATIONAL GRID
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

Now comes The Narragansett Electric Company, d/b/a National Grid (“Company”) and hereby requests that the Rhode Island Public Utilities Commission (“Commission”) grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by Commission Rule 1.2(g) and R.I.G.L. § 38-2-2(5)(i)(B).

I. BACKGROUND

On June 29, 2012, the Company filed with the Commission responses to the fourth set of data requests issued by the Rhode Island Division of Public Utilities and Carriers (“Division”) in the above-referenced proceeding. In Division 4-1-GAS, the Division requests the Company provide a working copy of the Company’s allocated cost of service study (“ACOSS”) model with all cell references and cell formulas intact. As part of its response to Division 4-1-GAS, the Company is providing the live Excel document entitled “NGRI-GCOS Rate Year Revised 4-16-12 WITH ISR & RDA Revenues PRO.xls,” for which the Company seeks protection. This

document contains proprietary information regarding the cost of service model and, if released publicly, could harm the competitive business position of the Company, its customers and consultants. Therefore, the Company seeks protection for “NGRI-GCOS Rate Year Revised 4-16-12 WITH ISR & RDA Revenues PRO.xls.”

II. LEGAL STANDARD

Rule 1.2(g) of the Commission’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.G.L. §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.G.L. §38-2-2(5)(i). Therefore, to the extent that information provided to the Commission falls within one of the designated exceptions to the public records law, the Commission 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.G.L. §38-2-2(5)(i)(B) provides that the following 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 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.

In addition, the Court has held that the agencies making determinations as to the disclosure of information under APRA may apply the balancing test established by the Court in Providence Journal v. Kane, 577 A.2d 661 (R.I.1990). Under this balancing test, the Commission may protect information from public disclosure if the benefit of such protection outweighs the public interest in disclosure of information pending before regulatory agencies.

III. BASIS FOR CONFIDENTIALITY

The Division requests the Company provide a working copy of the Company’s allocated cost of service study (“ACOSS”) model with all cell references and cell formulas intact. As part of its response, the Company included the live Excel document entitled “NGRI-GCOS Rate Year Revised 4-16-12 WITH ISR & RDA Revenues PRO.xls,” which includes the Company’s ACOSS model prepared by its consultant, Management Applications Consulting, Inc. (“MAC”).

The ACOSS was developed by MAC as a strategic asset over several years and represents proprietary work product. If the models supporting the ACOSS are made available for public review, MAC will be placed at a competitive disadvantage vis-à-vis its competitors that perform similar studies. Moreover, to the extent that MAC is competitively disadvantaged by its participation in this proceeding due to the release of data that it deems proprietary, MAC may determine that its business interests would be best served by not providing its services to regulated gas and electric companies in Rhode Island, thereby depriving the Company and its customers of valuable expertise in future rate proceedings. Accordingly, the Commission should protect information regarding MAC’s models from public disclosure to protect MAC’s competitively-sensitive work product and the Company’s interests in obtaining expert assistance

in future proceedings. To the Company's knowledge, this information is not otherwise available in the public domain.

IV. CONCLUSION

In light of the foregoing, the Company respectfully requests that the Commission grant its Motion for Protective Treatment as stated herein.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY**

By its attorney,



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

Dated: June 29, 2012

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically submitted, hand delivered and mailed to the individuals listed below.

/S/
Janea Dunne

June 29, 2012
Date

**National Grid (NGrid) – Request for Change in Electric & Gas Distribution Rates
Docket No. 4323 – Service List updated on 6/22/12**

Name/Address	E-mail Distribution	Phone
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Dr. Kay Davoodi, P.E. Utility Rates and Studies Office NAVFACHQ- Building 33 1322 Patterson Ave SE Washington Navy Yard, D.C. 20374-5065	Khojasteh.davoodi@navy.mil	202-685-3319
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Robert J. McConnell, Esq. (Wiley Ctr.) Motley Rice LLC	bmccconnell@motleyrice.com	401-457-7700

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Bruce Gay Monticello Consulting 4209 Buck Creek Court North Charleston, SC 29420	bruce@monticelloconsulting.com	
Matthew Kahal c/o Exeter Associates 10480 Little Patuxent Parkway Suite 300 Columbia, MD 21044	mkahal@exeterassociates.com	
File original & 11 copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Lmassaro@puc.state.ri.us	401-780-2107
	Anault@puc.state.ri.us	
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	Nucci@puc.state.ri.us	
	Dshah@puc.state.ri.us	
	Sccamara@puc.state.ri.us	

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
DIVISION SET 1						
Division Set 1	Division 1-1-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme	Att. DIV 1-1-ELEC	
Division Set 1	Division 1-2-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme	Att. DIV 1-2-ELEC	
Division Set 1	Division 1-3-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme	Att. DIV 1-3-ELEC	
Division Set 1	Division 1-4-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme	Att. DIV 1-4-ELEC	
Division Set 1	Division 1-5-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme		
Division Set 1	Division 1-6-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-6-ELEC	
Division Set 1	Division 1-7-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-8-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme	Att. DIV 1-8-ELEC	
Division Set 1	Division 1-9-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-9-ELEC	
Division Set 1	Division 1-10-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme		
Division Set 1	Division 1-11-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-11-ELEC	
Division Set 1	Division 1-12-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-13-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-13-ELEC	
Division Set 1	Division 1-14-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-15-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-16-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-17-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-18-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-19-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-20-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme		
Division Set 1	Division 1-21-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-21-ELEC	
Division Set 1	Division 1-22-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-23-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-23-ELEC	
Division Set 1	Division 1-24-ELEC	5/9/2012	5/25/2012	Michael D. Laflamme		
Division Set 1	Division 1-25-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-26-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-27-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-27-ELEC	
Division Set 1	Division 1-28-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
Division Set 1	Division 1-29-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme	Att. DIV 1-29-ELEC	
Division Set 1	Division 1-30-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-31-ELEC	5/9/2012	5/23/2012	Michael D. Laflamme		
DIVISION SET 2						
Division Set 2	Division 2-1-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-1-GAS	
Division Set 2	Division 2-2-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-2-GAS	
Division Set 2	Division 2-3-GAS	5/14/2012	5/25/2012	Michael D. Laflamme		
Division Set 2	Division 2-4-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-4-GAS	
Division Set 2	Division 2-5-GAS	5/14/2012	5/25/2012	Michael D. Laflamme		
Division Set 2	Division 2-6-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-6-GAS	
Division Set 2	Division 2-7-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-7-GAS	
Division Set 2	Division 2-8-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-8-GAS	
Division Set 2	Division 2-9-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-9-GAS	
Division Set 2	Division 2-10-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-11-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-12-GAS	5/14/2012	5/25/2012	Michael D. Laflamme	Att. DIV 2-12-GAS	
Division Set 2	Division 2-13-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-14-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-15-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-16-GAS	5/14/2012	5/29/2012	Michael D. Laflamme	Att. DIV 2-16-1-GAS Att. DIV 2-16-2-GAS Att. DIV 2-16-3-GAS	
Division Set 2	Division 2-17-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-18-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-19-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-20-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-21-GAS	5/14/2012	5/29/2012	Michael D. Laflamme	Att. DIV 2-21-GAS	
Division Set 2	Division 2-22-GAS	5/14/2012	5/29/2012	Michael D. Laflamme	Att. DIV 2-22-GAS	
Division Set 2	Division 2-23-GAS	5/14/2012	5/29/2012	Michael D. Laflamme	Att. DIV 2-23-GAS	
Division Set 2	Division 2-24-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-25-GAS	5/14/2012	5/29/2012	Michael D. Laflamme		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
DIVISION SET 3						
Division Set 3	Division 3-1-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme	Att. DIV 3-1-ELEC/GAS	
Division Set 3	Division 3-2-ELEC/GAS	5/30/2012	6/13/2012	Michael D. Laflamme	Att. DIV 3-2-ELEC/GAS	
Division Set 3	Division 3-3-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert	Att. DIV 3-3-ELEC/GAS	
Division Set 3	Division 3-4-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert		
Division Set 3	Division 3-5-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert	Att. DIV 3-5-ELEC/GAS	
Division Set 3	Division 3-6-ELEC/GAS	5/30/2012	6/13/2012	Michael D. Laflamme	Att. DIV 3-6-ELEC/GAS (Redacted)	Att. DIV 3-6-ELEC/GAS (Confidential)
Division Set 3	Division 3-7-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme	Att. DIV 3-7-1-ELEC/GAS Att. DIV 3-7-2-ELEC/GAS Att. DIV 3-7-3-ELEC/GAS	
Division Set 3	Division 3-8-ELEC/GAS	5/30/2012	6/12/2012	Legal Department and Robert B. Hevert		
Division Set 3	Division 3-9-ELEC/GAS	5/30/2012	6/11/2012	Mustally Hussain	Att. DIV 3-9-1-ELEC/GAS Att. DIV 3-9-2-ELEC/GAS Att. DIV 3-9-3-ELEC/GAS Att. DIV 3-9-4-ELEC/GAS Att. DIV 3-9-5-ELEC/GAS Att. DIV 3-9-6-ELEC/GAS Att. DIV 3-9-7-ELEC/GAS Att. DIV 3-9-8-ELEC/GAS Att. DIV 3-9-9-ELEC/GAS	
Division Set 3	Division 3-10-ELEC/GAS	5/30/2012	6/11/2012	Mustally Husain	Att. DIV 3-10-ELEC/GAS	
Division Set 3	Division 3-11-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme	Att. DIV 3-11-ELEC/GAS	
Division Set 3	Division 3-12-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme		
Division Set 3	Division 3-13-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme		
Division Set 3	Division 3-14-ELEC/GAS	5/30/2012	6/13/2012	Michael D. Laflamme		
Division Set 3	Division 3-15-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme		
Division Set 3	Division 3-16-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme		
Division Set 3	Division 3-17-ELEC/GAS	5/30/2012	6/11/2012	Michael D. Laflamme	Att. DIV 3-17-ELEC/GAS	
Division Set 3	Division 3-18-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert		
Division Set 3	Division 3-19-ELEC	5/30/2012	6/12/2012	Robert B. Hevert		
Division Set 3	Division 3-20-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert		
Division Set 3	Division 3-21-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert		
Division Set 3	Division 3-22-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert	Att. DIV 3-22-ELEC/GAS	
Division Set 3	Division 3-23-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert	Att. DIV 3-23-ELEC/GAS	

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
Division Set 3	Division 3-24-ELEC/GAS	5/30/2012	6/13/2012	Robert B. Hevert	Att. DIV 3-24-ELEC/GAS	
Division Set 3	Division 3-25-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert	Att. DIV 3-25-ELEC/GAS	
Division Set 3	Division 3-26-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert		
Division Set 3	Division 3-27-ELEC/GAS	5/30/2012	6/12/2012	Robert B. Hevert		
DIVISION SET 4						
Division Set 4	Division 4-1-GAS	6/7/2012	6/29/2012	Paul M. Normand	See Attached Page	See Attached Page
Division Set 4	Division 4-2-GAS	6/7/2012	6/19/2012	Paul M. Normand		
Division Set 4	Division 4-3-GAS	6/7/2012	6/20/2012	Ann E. Leary		
Division Set 4	Division 4-4-GAS	6/7/2012	6/19/2012	Paul M. Normand		
Division Set 4	Division 4-5-GAS	6/7/2012	6/19/2012	Paul M. Normand		
Division Set 4	Division 4-6-GAS	6/7/2012	6/20/2012	Ann E. Leary		
Division Set 4	Division 4-7-GAS	6/7/2012	6/20/2012	Ann E. Leary		
Division Set 4	Division 4-8-GAS	6/7/2012	6/19/2012	Ann E. Leary	Att. DIV 4-8-1-GAS Att. DIV 4-8-2-GAS Att. DIV 4-8-3-GAS Att. DIV 4-8-4-GAS Att. DIV 4-8-5-GAS	
Division Set 4	Division 4-9-GAS	6/7/2012	6/20/2012	Ann E. Leary		
Division Set 4	Division 4-10-GAS	6/7/2012	6/19/2012	Ann E. Leary	Att. DIV 4-10-GAS	
Division Set 4	Division 4-11-GAS	6/7/2012	6/20/2012	Ann E. Leary		
Division Set 4	Division 4-12-GAS	6/7/2012	6/20/2012	Ann E. Leary	Att. DIV 4-12-GAS	
Division Set 4	Division 4-13-GAS	6/7/2012	6/19/2012	Ann E. Leary and Michael D. Laflamme		

Division Set 4

Division 4-1-GAS

ATTACHMENT

CONFIDENTIAL ATTACHMENT

- 1-18 Design Winter Sales RATE YEAR Rev 4-2-12.xls
- Att DIV 5-12 Meter Cost Detail MAC_B.xls
- Attach 1-2B(Test Year PLT ACCUMDEPR Acct) with Rate Year Adj 4-6.xls
- Attach 1-17 with Back-up (CY11_Charge_off (W Philibin 02 15 12)).xls
- Attach 1-24 (Services Inv Allocator) MAC.xls
- Attach 1-26 RATE YEAR (REG ACCNT 903000 CustRecordsColl Exp).xls
- Attach 1-27 RATE YEAR (ACCNT 908000 Cust Assistance Exp).xls
- Attach 1-29 with backup (6967 RI GAS SALES REPORT DEC11) MAC.xls
- Attachment to 1-11 (Rev Proof & Bill Detm)_A.xls
- Bill Impact-(2014 Base Rates and ISR for Rate Year template)_H AEL_1.xls
- NG RI Design Day Rate Year Rev 3-20-12 (LS).xls
- NG RI Gas Rate Design 4-16-12 B PMN - 7.xls
- Ngrid No 1-28 (Deposits) (3).docx
- RDA & ISR Adj by Rate Class.xls
- RI Gas Allocated COS 4-13-12 MAC.xlsx

NGRI-GCOS Rate Year Revised 4-16-12 WITH ISR & RDA Revenues PRO.xls

NGRI-GCOS Rate Year Revised 4-16-12 WITH ISR & RDA Revenues PRO.xls

(REDACTED)

(CONFIDENTIAL)

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
COMMISSION SET 1						
Commission Set 1	Commission 1-1-ELEC/GAS	5/24/2012	6/6/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-2-ELEC/GAS	5/24/2012	6/7/2012	Maureen P. Heaphy		
Commission Set 1	Commission 1-3-ELEC/GAS	5/24/2012	6/7/2012	Michael D. Laflamme	Att. COMM 1-3-1-ELEC/GAS Att. COMM 1-3-2-ELEC/GAS	
Commission Set 1	Commission 1-4-ELEC/GAS	5/24/2012	6/7/2012	Timothy D. Horan		
Commission Set 1	Commission 1-5-ELEC/GAS	5/24/2012	6/6/2012	Maureen P. Heaphy		
Commission Set 1	Commission 1-6-ELEC	5/24/2012	6/7/2012	Stephen F. Doucette and Maureen P. Heaphy		
Commission Set 1	Commission 1-7-ELEC	5/24/2012	6/7/2012	Stephen F. Doucette and Maureen P. Heaphy		
Commission Set 1	Commission 1-8-ELEC	5/24/2012	6/6/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-9-ELEC	5/24/2012	6/7/2012	Stephen F. Doucette and Maureen P. Heaphy		
Commission Set 1	Commission 1-10-ELEC	5/24/2012	6/6/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-11-ELEC	5/24/2012	6/6/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-12-ELEC	5/24/2012	6/6/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-13-ELEC/GAS	5/24/2012	6/4/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-14-ELEC/GAS	5/24/2012	6/4/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-15-ELEC/GAS	5/24/2012	6/6/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-16-ELEC/GAS	5/24/2012	6/4/2012	Evelyn M. Kaye and Michael D. Laflamme		
Commission Set 1	Commission 1-17-ELEC/GAS	5/24/2012	6/4/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-18-ELEC/GAS	5/24/2012	6/4/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-19-ELEC/GAS	5/24/2012	6/4/2012	Evelyn M. Kaye	Att. COMM 1-19-ELEC/GAS	
Commission Set 1	Commission 1-20-ELEC	5/24/2012	6/6/2012	Michael R. Hrycin	Att. COMM 1-20-1-ELEC Att. COMM 1-20-2-ELEC	
Commission Set 1	Commission 1-21-ELEC	5/24/2012	6/6/2012	Michael R. Hrycin	Att. COMM 1-21-ELEC	
Commission Set 1	Commission 1-22-ELEC	5/24/2012	6/6/2012	Michael R. Hrycin	Att. COMM 1-22-ELEC	
Commission Set 1	Commission 1-23-ELEC	5/24/2012	6/7/2012	Michael R. Hrycin		
Commission Set 1	Commission 1-24-ELEC	5/24/2012	6/7/2012	Michael R. Hrycin		
Commission Set 1	Commission 1-25-ELEC	5/24/2012	6/6/2012	Michael R. Hrycin		
Commission Set 1	Commission 1-26-ELEC	5/24/2012	6/6/2012	Michael R. Hrycin		
Commission Set 1	Commission 1-27-GAS	5/24/2012	6/6/2012	Jeffrey P. Martin		
Commission Set 1	Commission 1-28-GAS	5/24/2012	6/6/2012	Jeffrey P. Martin		
Commission Set 1	Commission 1-29-ELEC	5/24/2012	6/4/2012	Alfred P. Morrissey		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
COMMISSION SET 1						
Commission Set 1	Commission 1-30-ELEC	5/24/2012	6/4/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-31-ELEC	5/24/2012	6/4/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-32-ELEC	5/24/2012	6/4/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-33-ELEC	5/24/2012	6/7/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-34-ELEC	5/24/2012	6/7/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-35-ELEC/GAS	5/24/2012	6/6/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-36-ELEC/GAS	5/24/2012	6/7/2012	Michael D. Laflamme	Att. COMM 1-36-ELEC/GAS	
Commission Set 1	Commission 1-37-GAS	5/24/2012	6/7/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-38-ELEC	5/24/2012	6/6/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-39-ELEC/GAS	5/24/2012	6/7/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-40-ELEC/GAS	5/24/2012	6/7/2012	Ann E. Leary & Jeanne Lloyd	Att. COMM 1-40-ELEC/GAS	
Commission Set 1	Commission 1-41-ELEC/GAS	5/24/2012	6/6/2012	Robert B. Hevert		
Commission Set 1	Commission 1-42-ELEC/GAS	5/24/2012	6/6/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-43-ELEC/GAS	5/24/2012	6/6/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-44-ELEC/GAS	5/24/2012	6/7/2012	Maureen P. Heaphy	Att. COMM 1-44-ELEC/GAS	
Commission Set 1	Commission 1-45-ELEC/GAS	5/24/2012	6/6/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-46-GAS	5/24/2012	6/7/2012	Ann E. Leary		

Division 4-1-GAS

Request:

Please provide a working copy of the Company's class cost of service study model with all cell references and cell formulas intact, as well as all other workpapers and electronic spreadsheet files relied upon to support witness Normand's Schedules PMN-2 through PMN-8.

Response:

Attached are the following files:

1-18 Design Winter Sales RATE YEAR Rev 4-2-12.xls
Att DIV 5-12 Meter Cost Detail MAC_B.xls
Attach 1-2B(Test Year PLT ACCUMDEPR Acct) with Rate Year Adj 4-6.xls
Attach 1-17 with Back-up (CY11_Charge_off (W Philibin 02 15 12)).xls
Attach 1-24 (Services Inv Allocator) MAC.xls
Attach 1-26 RATE YEAR (REG ACCNT 903000 CustRecordsColl Exp).xls
Attach 1-27 RATE YEAR (ACCNT 908000 Cust Assistance Exp).xls
Attach 1-29 with backup (6967 RI GAS SALES REPORT DEC11) MAC.xls
Attachment to 1-11 (Rev Proof & Bill Detm)_A.xls
Bill Impact-(2014 Base Rates and ISR for Rate Year template)_H AEL_1.xls
NG RI Design Day Rate Year Rev 3-20-12 (LS).xls
NG RI Gas Rate Design 4-16-12 B PMN - 7.xls
Ngrid No 1-28 (Deposits) (3).docx
RDA & ISR Adj by Rate Class.xls
RI Gas Allocated COS 4-13-12 MAC.xlsx

Also attached is the proprietary cost of service model which is protected by a Protective Order:

NGRI-GCOS Rate Year Revised 4-16-12 WITH ISR & RDA Revenues PRO.xls

Noted, below, is a cross reference of the above files to Schedules, Filing Numbering, and the Workpapers Index.

FILES CROSS REFERENCE

<u>FILENAME</u>	<u>SCHEDULE NUMBER</u>	<u>SCHEDULE PAGE NUMBER</u>	<u>FILING BOOK 9 OF 11 PAGE NUMBER</u>	<u>WORKPAPERS OF PAUL M. NORMAND PAGE NUMBER</u>	<u>FILING BOOK 11 OF 11 PAGE NUMBER</u>
1-18 Design Winter Sales RATE YEAR Rev 4-2-12.xls				26 thru 39 of 53	100 thru 113
Att DIV 5-12 Meter Cost Detail MAC_B.xls				50 of 53	124
Attach 1-2B(Test Year PLT ACCUMDEPR Acct) with Rate Year Adj 4-6.xls				45 of 53	119
Attach 1-17 with Back-up (CY11_Charge_off (W Philibin 02 15 12)).xls				53 of 53	127
Attach 1-24 (Services Inv Allocator) MAC.xls				49 of 53	123
Attach 1-26 RATE YEAR (REG ACCNT 903000 CustRecordsColl Exp).xls				51 of 53	125
Attach 1-27 RATE YEAR (ACCNT 908000 Cust Assistance Exp).xls				52 of 53	126
Attach 1-29 with backup (6967 RI GAS SALES REPORT DEC11) MAC.xls				46 of 53	120
Attachment to 1-11 (Rev Proof & Bill Detm)_A.xls				40 of 53	114
Bill Impact-(2014 Base Rates and ISR for Rate Year template)_H AEL_1.xls	PMN-8	1 thru 5 of 5	243 thru 247		
NG RI Design Day Rate Year Rev 3-20-12 (LS).xls				1 thru 11 of 53	75 thru 85
NG RI Gas Rate Design 4-16-12 B PMN - 7.xls	PMN-7	1 thru 5 of 5	237 thru 241		
Ngrid No 1-28 (Deposits) (3).docx				47 and 48 of 53	121 and 122
RDA & ISR Adj by Rate Class.xls				41 and 42 of 53	115 and 116
RI Gas Allocated COS 4-13-12 MAC.xlsx				43 and 44 of 53	117 and 118
NGRI-GCOS Rate Year Revised 4-16-12 WITH ISR & RDA Revenues PRO.xls	PMN-2	1 thru 5 of 5	33 thru 37		
	PMN-3	1 thru 74 of 74	39 thru 112		
	PMN-4	1 thru 74 of 74	114 thru 187		
	PMN-5	1 thru 8 of 8	189 thru 196		
	PMN-6	9 thru 17 of 38	206 thru 214		

Prepared by or under the supervision of: Paul M. Normand