

June 20, 2012

VIA HAND DELIVERY & 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. Sections 39-3-10 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.

The responses to the Fourth Set included with this filing are listed in the enclosed discovery log.

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

Very truly yours,



Thomas R. Teehan

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").

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 20, 2012

Date

**National Grid (NGrid) – Request for Change in Electric & Gas Distribution Rates
Docket No. 4323 – Service List updated on 6/20/12**

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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	
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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	05/09/2012	05/25/2012	Michael D. Laflamme	Att. DIV 1-1-ELEC	
Division Set 1	Division 1-2-ELEC	05/09/2012	05/25/2012	Michael D. Laflamme	Att. DIV 1-2-ELEC	
Division Set 1	Division 1-3-ELEC	05/09/2012	05/25/2012	Michael D. Laflamme	Att. DIV 1-3-ELEC	
Division Set 1	Division 1-4-ELEC	05/09/2012	05/25/2012	Michael D. Laflamme	Att. DIV 1-4-ELEC	
Division Set 1	Division 1-5-ELEC	05/09/2012	05/25/2012	Michael D. Laflamme		
Division Set 1	Division 1-6-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme	Att. DIV 1-6-ELEC	
Division Set 1	Division 1-7-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-8-ELEC	05/09/2012	05/25/2012	Michael D. Laflamme	Att. DIV 1-8-ELEC	
Division Set 1	Division 1-9-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme	Att. DIV 1-9-ELEC	
Division Set 1	Division 1-10-ELEC	05/09/2012	05/25/2012	Michael D. Laflamme		
Division Set 1	Division 1-11-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme	Att. DIV 1-11-ELEC	
Division Set 1	Division 1-12-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-13-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme	Att. DIV 1-13-ELEC	
Division Set 1	Division 1-14-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-15-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-16-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-17-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-18-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-19-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-20-ELEC	05/09/2012	05/25/2012	Michael D. Laflamme		
Division Set 1	Division 1-21-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme	Att. DIV 1-21-ELEC	
Division Set 1	Division 1-22-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-23-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme	Att. DIV 1-23-ELEC	
Division Set 1	Division 1-24-ELEC	05/09/2012	05/25/2012	Michael D. Laflamme		
Division Set 1	Division 1-25-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-26-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-27-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme	Att. DIV 1-27-ELEC	
Division Set 1	Division 1-28-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
Division Set 1	Division 1-29-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme	Att. DIV 1-29-ELEC	
Division Set 1	Division 1-30-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
Division Set 1	Division 1-31-ELEC	05/09/2012	05/23/2012	Michael D. Laflamme		
DIVISION SET 2						
Division Set 2	Division 2-1-GAS	05/14/2012	05/25/2012	Michael D. Laflamme	Att. DIV 2-1-GAS	
Division Set 2	Division 2-2-GAS	05/14/2012	05/25/2012	Michael D. Laflamme	Att. DIV 2-2-GAS	
Division Set 2	Division 2-3-GAS	05/14/2012	05/25/2012	Michael D. Laflamme		
Division Set 2	Division 2-4-GAS	05/14/2012	05/25/2012	Michael D. Laflamme	Att. DIV 2-4-GAS	
Division Set 2	Division 2-5-GAS	05/14/2012	05/25/2012	Michael D. Laflamme		
Division Set 2	Division 2-6-GAS	05/14/2012	05/25/2012	Michael D. Laflamme	Att. DIV 2-6-GAS	
Division Set 2	Division 2-7-GAS	05/14/2012	05/25/2012	Michael D. Laflamme	Att. DIV 2-7-GAS	
Division Set 2	Division 2-8-GAS	05/14/2012	05/25/2012	Michael D. Laflamme	Att. DIV 2-8-GAS	
Division Set 2	Division 2-9-GAS	05/14/2012	05/25/2012	Michael D. Laflamme	Att. DIV 2-9-GAS	
Division Set 2	Division 2-10-GAS	05/14/2012	05/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-11-GAS	05/14/2012	05/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-12-GAS	05/14/2012	05/25/2012	Michael D. Laflamme	Att. DIV 2-12-GAS	
Division Set 2	Division 2-13-GAS	05/14/2012	05/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-14-GAS	05/14/2012	05/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-15-GAS	05/14/2012	05/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-16-GAS	05/14/2012	05/29/2012	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	05/14/2012	05/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-18-GAS	05/14/2012	05/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-19-GAS	05/14/2012	05/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-20-GAS	05/14/2012	05/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-21-GAS	05/14/2012	05/29/2012	Michael D. Laflamme	Att. DIV 2-21-GAS	
Division Set 2	Division 2-22-GAS	05/14/2012	05/29/2012	Michael D. Laflamme	Att. DIV 2-22-GAS	
Division Set 2	Division 2-23-GAS	05/14/2012	05/29/2012	Michael D. Laflamme	Att. DIV 2-23-GAS	
Division Set 2	Division 2-24-GAS	05/14/2012	05/29/2012	Michael D. Laflamme		
Division Set 2	Division 2-25-GAS	05/14/2012	05/29/2012	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	05/30/2012	06/11/2012	Michael D. Laflamme	Att. DIV 3-1-ELEC/GAS	
Division Set 3	Division 3-2-ELEC/GAS	05/30/2012	06/13/2012	Michael D. Laflamme	Att. DIV 3-2-ELEC/GAS	
Division Set 3	Division 3-3-ELEC/GAS	05/30/2012	06/12/2012	Robert B. Hevert	Att. DIV 3-3-ELEC/GAS	
Division Set 3	Division 3-4-ELEC/GAS	05/30/2012	06/12/2012	Robert B. Hevert		
Division Set 3	Division 3-5-ELEC/GAS	05/30/2012	06/12/2012	Robert B. Hevert	Att. DIV 3-5-ELEC/GAS	
Division Set 3	Division 3-6-ELEC/GAS	05/30/2012	06/13/2012	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	05/30/2012	06/11/2012	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	05/30/2012	06/12/2012	Legal Department and Robert B. Hevert		
Division Set 3	Division 3-9-ELEC/GAS	05/30/2012	06/11/2012	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	05/30/2012	06/11/2012	Mustally Husain	Att. DIV 3-10-ELEC/GAS	
Division Set 3	Division 3-11-ELEC/GAS	05/30/2012	06/11/2012	Michael D. Laflamme	Att. DIV 3-11-ELEC/GAS	
Division Set 3	Division 3-12-ELEC/GAS	05/30/2012	06/11/2012	Michael D. Laflamme		
Division Set 3	Division 3-13-ELEC/GAS	05/30/2012	06/11/2012	Michael D. Laflamme		
Division Set 3	Division 3-14-ELEC/GAS	05/30/2012	06/13/2012	Michael D. Laflamme		
Division Set 3	Division 3-15-ELEC/GAS	05/30/2012	06/11/2012	Michael D. Laflamme		
Division Set 3	Division 3-16-ELEC/GAS	05/30/2012	06/11/2012	Michael D. Laflamme		
Division Set 3	Division 3-17-ELEC/GAS	05/30/2012	06/11/2012	Michael D. Laflamme	Att. DIV 3-17-ELEC/GAS	
Division Set 3	Division 3-18-ELEC/GAS	05/30/2012	06/12/2012	Robert B. Hevert		
Division Set 3	Division 3-19-ELEC	05/30/2012	06/12/2012	Robert B. Hevert		
Division Set 3	Division 3-20-ELEC/GAS	05/30/2012	06/12/2012	Robert B. Hevert		
Division Set 3	Division 3-21-ELEC/GAS	05/30/2012	06/12/2012	Robert B. Hevert		
Division Set 3	Division 3-22-ELEC/GAS	05/30/2012	06/12/2012	Robert B. Hevert	Att. DIV 3-22-ELEC/GAS	
Division Set 3	Division 3-23-ELEC/GAS	05/30/2012	06/12/2012	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	05/30/2012	06/13/2012	Robert B. Hevert	Att. DIV 3-24-ELEC/GAS	
Division Set 3	Division 3-25-ELEC/GAS	05/30/2012	06/12/2012	Robert B. Hevert	Att. DIV 3-25-ELEC/GAS	
Division Set 3	Division 3-26-ELEC/GAS	05/30/2012	06/12/2012	Robert B. Hevert		
Division Set 3	Division 3-27-ELEC/GAS	05/30/2012	06/12/2012	Robert B. Hevert		
DIVISION SET 4						
Division Set 4	Division 4-1-GAS	06/07/2012		Paul M. Normand		
Division Set 4	Division 4-2-GAS	06/07/2012	06/19/2012	Paul M. Normand		
Division Set 4	Division 4-3-GAS	06/07/2012	06/20/2012	Ann E. Leary		
Division Set 4	Division 4-4-GAS	06/07/2012	06/19/2012	Paul M. Normand		
Division Set 4	Division 4-5-GAS	06/07/2012	06/19/2012	Paul M. Normand		
Division Set 4	Division 4-6-GAS	06/07/2012	06/20/2012	Ann E. Leary		
Division Set 4	Division 4-7-GAS	06/07/2012	06/20/2012	Ann E. Leary		
Division Set 4	Division 4-8-GAS	06/07/2012	06/19/2012	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	06/07/2012	06/20/2012	Ann E. Leary		
Division Set 4	Division 4-10-GAS	06/07/2012	06/19/2012	Ann E. Leary	Att. DIV 4-10-GAS	
Division Set 4	Division 4-11-GAS	06/07/2012	06/20/2012	Ann E. Leary		
Division Set 4	Division 4-12-GAS	06/07/2012	06/20/2012	Ann E. Leary	Att. DIV 4-12-GAS	
Division Set 4	Division 4-13-GAS	06/07/2012	06/19/2012	Ann E. Leary and Michael D. Laflamme		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
COMMISSION SET 1						
Commission Set 1	Commission 1-1-ELEC/GAS	05/24/2012	06/06/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-2-ELEC/GAS	05/24/2012	06/07/2012	Maureen P. Heaphy		
Commission Set 1	Commission 1-3-ELEC/GAS	05/24/2012	06/07/2012	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	05/24/2012	06/07/2012	Timothy F. Horan		
Commission Set 1	Commission 1-5-ELEC/GAS	05/24/2012	06/06/2012	Maureen P. Heaphy		
Commission Set 1	Commission 1-6-ELEC	05/24/2012	06/07/2012	Stephen F. Doucette and Maureen P. Heaphy		
Commission Set 1	Commission 1-7-ELEC	05/24/2012	06/07/2012	Stephen F. Doucette and Maureen P. Heaphy		
Commission Set 1	Commission 1-8-ELEC	05/24/2012	06/06/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-9-ELEC	05/24/2012	06/07/2012	Stephen F. Doucette and Maureen P. Heaphy		
Commission Set 1	Commission 1-10-ELEC	05/24/2012	06/06/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-11-ELEC	05/24/2012	06/06/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-12-ELEC	05/24/2012	06/06/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-13-ELEC/GAS	05/24/2012	06/04/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-14-ELEC/GAS	05/24/2012	06/04/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-15-ELEC/GAS	05/24/2012	06/06/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-16-ELEC/GAS	05/24/2012	06/04/2012	Evelyn M. Kaye and Michael D. Laflamme		
Commission Set 1	Commission 1-17-ELEC/GAS	05/24/2012	06/04/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-18-ELEC/GAS	05/24/2012	06/04/2012	Evelyn M. Kaye		
Commission Set 1	Commission 1-19-ELEC/GAS	05/24/2012	06/04/2012	Evelyn M. Kaye	Att. COMM 1-19-ELEC/GAS	
Commission Set 1	Commission 1-20-ELEC	05/24/2012	06/06/2012	Michael R. Hrycin	Att. COMM 1-20-1-ELEC Att. COMM 1-20-2-ELEC	
Commission Set 1	Commission 1-21-ELEC	05/24/2012	06/06/2012	Michael R. Hrycin	Att. COMM 1-21-ELEC	
Commission Set 1	Commission 1-22-ELEC	05/24/2012	06/06/2012	Michael R. Hrycin	Att. COMM 1-22-ELEC	
Commission Set 1	Commission 1-23-ELEC	05/24/2012	06/07/2012	Michael R. Hrycin		
Commission Set 1	Commission 1-24-ELEC	05/24/2012	06/07/2012	Michael R. Hrycin		
Commission Set 1	Commission 1-25-ELEC	05/24/2012	06/06/2012	Michael R. Hrycin		
Commission Set 1	Commission 1-26-ELEC	05/24/2012	06/06/2012	Michael R. Hrycin		
Commission Set 1	Commission 1-27-GAS	05/24/2012	06/06/2012	Jeffrey P. Martin		
Commission Set 1	Commission 1-28-GAS	05/24/2012	06/06/2012	Jeffrey P. Martin		
Commission Set 1	Commission 1-29-ELEC	05/24/2012	06/04/2012	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	05/24/2012	06/04/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-31-ELEC	05/24/2012	06/04/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-32-ELEC	05/24/2012	06/04/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-33-ELEC	05/24/2012	06/07/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-34-ELEC	05/24/2012	06/07/2012	Alfred P. Morrissey		
Commission Set 1	Commission 1-35-ELEC/GAS	05/24/2012	06/06/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-36-ELEC/GAS	05/24/2012	06/07/2012	Michael D. Laflamme	Att. COMM 1-36-ELEC/GAS	
Commission Set 1	Commission 1-37-GAS	05/24/2012	06/07/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-38-ELEC	05/24/2012	06/06/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-39-ELEC/GAS	05/24/2012	06/07/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-40-ELEC/GAS	05/24/2012	06/07/2012	Ann E. Leary and Jeanne A. Lloyd	Att. COMM 1-40-ELEC/GAS	
Commission Set 1	Commission 1-41-ELEC/GAS	05/24/2012	06/06/2012	Robert B. Hevert		
Commission Set 1	Commission 1-42-ELEC/GAS	05/24/2012	06/06/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-43-ELEC/GAS	05/24/2012	06/06/2012	Michael D. Laflamme		
Commission Set 1	Commission 1-44-ELEC/GAS	05/24/2012	06/07/2012	Maureen P. Heaphy	Att. COMM 1-44-ELEC/GAS	
Commission Set 1	Commission 1-45-ELEC/GAS	05/24/2012	06/06/2012	Stephen F. Doucette		
Commission Set 1	Commission 1-46-GAS	05/24/2012	06/07/2012	Ann E. Leary		

Division 4-3-GAS

Request:

Please provide the data and analyses upon which the Company relies to support the levels of each of the gas marketer charges included in its proposed gas tariff.

Response:

The Company did not update any of its Gas Marketer Charges included in its proposed gas tariff. The only change the Company proposed was to eliminate the Aggregation Pool Charge. These charges included the cost associated with the development of the Electronic Bulletin Board. The Company has proposed to eliminate this charge because these costs have been recovered from marketers over the past 15 years.

The Company has recently submitted proposed revisions to its Marketer Tariffs in Docket No. 4270. Please note that the changes proposed in Docket No. 4270 have not been reflected in the proposed tariff set forth in Schedule AEL-4.

Division 4-6-GAS

Request:

Re: the Direct Testimony of witness Leary at pages 8-9, please:

- a. Indicate whether it is the intent of the Company to set rates for non-firm transportation service on the basis of costs of service for that class.
 - i. If it is the Company's intent to set rates for non-firm transportation service on the basis of costs of service, please identify and provide a complete copy of the cost data and cost of service analysis upon the Company relies to determine its costs of providing non-firm (with all supporting workpapers, including electronic spreadsheet files with all cell formulas and cell references intact);
 - ii. If it is not the Company's intent to set rates for non-firm transportation service on the basis of costs of service, explain and fully document (with all supporting workpapers, including electronic spreadsheet files with all cell formulas and cell references intact) the basis on which the Company proposes to set its rates for non-firm transportation service in this proceeding.
- b. Provide the witness' understanding of the derivation of the "\$1.6 million revenue requirement" which the witness asserts was attributed to non-firm customers at the time of the 2008 Gas Rate Case, and explain the relevance of that \$1.6 million amount in this proceeding.
- c. Verify that at the time of the 2008 Gas Rate Case, service to the Company's non-firm transportation customers was billed on a value of service basis.

Response:

- a. The Company set rates for non-firm transportation service by applying a 20 percent discount off firm pricing. This is the same methodology approved by the Commission in Docket No. 3943 (the "2008 Gas Rate Case"). Please see Schedule PMN-7, Page 5, for the actual calculation of the Non-Firm Rates. See also the Company's response to Division 4-4-GAS.
- b. According to the Stipulation Regarding Reconciliation of Revenues from Firm and Non Firm Dual-Fuel Customers in Docket No. 3943 filed with the Commission on November 5, 2008, the \$1.6 million is attributed to the 46 customer accounts that, as of January 2008, were taking non-firm service under the Company's rate tariffs, Non-Firm Sales Service Rate 60 or Non Firm Transportation Service Rate 61 and one which is under a

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special contract. The \$ 1.6 million represented the base-rate credit level at the time of the filing. The Company did not propose any change in the base-rate credit for non-firm revenues in the 2008 Gas Rate Case. In this filing, the Company has updated the base-rate credit to equal \$1,512,209, which is the amount of the actual non-firm margin experienced during the test year. On page 8 of Ms. Leary's testimony, Ms. Leary is pointing out that the test year amount of \$1,512,209 is very similar to the \$1.6 million base-rate credit included in the 2008 Gas Rate Case.

- c. Service to the Company's non-firm transportation customers was billed on a value of service basis at the time of the 2008 Gas Rate Case.

Division 4-7-GAS

Request:

Re: the Direct Testimony of witness Leary at page 8, lines 13-15, please provide the actual amounts credited or surcharged through the DAC for Dual Fuel customer margins for each year since the conclusion of Docket No. 3943.

Response:

The Total Dual Fuel customer margins credited through the DAC since the conclusion of Docket No. 3943 in November 2008 were as follows:

- \$410,365 for the period November 2008 through June 2009 (Docket No. 4077);
- \$592,566 for the period July 2009 through June 2010 (Docket No. 4196); and
- \$778,043 for the period July 2010 through June 2011 (Docket No. 4269).

Division 4-9-GAS

Request:

Re: the Direct Testimony of witness Leary at page 8, lines 13-15, please provide the actual amounts credited or surcharged through the DAC for Dual Fuel customer margins for each year since the conclusion of Docket No. 3943.

Response:

Please refer to the Company's response to Division 4-7-GAS.

Division 4-11-GAS

Request:

Re: the Direct Testimony of witness Leary at page 9, lines 5-6, please:

- a. Explain the manner in which adjustments to the threshold will be computed for a customer that transfers between firm and non-firm rate classifications in the middle of a DAC reconciliation period.
- b. Explain and provide a numeric example or examples to demonstrate the manner in which revenue decoupling adjustments otherwise applicable to a Firm Service Dual Fuel customer will be billed if the customer migrates to Non-Firm Service.
- c. Explain and provide all analyses and workpapers (including electronic spreadsheet files with all cell formulas and cell references intact), to support the appropriateness of the \$1,512,209 threshold for Non-Firm revenue the Company proposes to use in setting rates in this case.
- d. Document the determination of any and all weather normalization adjustments or other normalization adjustments made to test year throughput and revenue for non-firm customers to arrive at the proposed \$1,512,209 threshold. If no normalization adjustments were made, please explain why such adjustments are not necessary and appropriate.

Response:

- a. Please see Attachment DIV 4-10-GAS for an illustration of how the Company will adjust the threshold for those customers that switch between firm and non-firm rate classifications in the middle of the DAC reconciliation period.
- b. If a customer moves from firm to non-firm service, the customer will no longer be billed the DAC and therefore will no longer be paying the Revenue Decoupling Adjustment ("RDA") Factor. Since the Company reconciles the RDA each year, the Company will bill firm customers any under recovery (or over recovery) in the subsequent year.
- c. Please see Attachment DIV 4-8-1-GAS for a listing of the margin from the non-firm customers that comprise the \$1,512,209 threshold.
- d. The Company did not make any normalizing adjustments to the non-firm margin. This amount represents the actual test year non-firm margin. No weather adjustments are

Division 4-11-GAS, page 2

necessary because the Company is including the actual test year margin as a base-rate credit and plans on reconciling that amount with the actual amount each year through its On-System Margin Factor. The Company will adjust that threshold for customers that migrate between the firm and non-firm service.

Division 4-12-GAS

Request:

Re: the Direct Testimony of witness Leary at page 9, lines 14-21, please: Provide a numeric example of the manner in which the proposed Property Tax Adjustment would be allocated or assigned to rate classes as part of the determination of DAC charges by rate class.

Response:

The proposed Property Tax Adjustment ("PTA") factor calculation as set forth in Paragraph 3.9, Section 3, Schedule A, Sheet 10 of RIPUC NG-GAS No. 101 Tariff (see Schedule AEL-15, Page 196) is a uniform \$/therm applicable to all firm service rates. As stated in the Tariff, the PTA is calculated as follows:

$$PTA = \frac{(PTA_A - PTA_{EMB})}{Dt_T}$$

Where:

PTA = Property tax adjustment factor

PTA_A = Actual property tax expense for the most recent twelve month period ended March 31

PTA_{EMB} = Property tax allowance from the most recent base rate proceeding

Dt_T = Forecasted annual firm throughput

Please see Attachment DIV 4-12-GAS for a numerical illustrative calculation of the proposed PTA factor in the format used in the annual DAC filing.

**The Narragansett Electric Company d/b/a National Grid
Property Tax Adjustment Factor
Illustrative Calculation**

1	Property Tax Expense (YE 03/31/20xx)	\$15,159,326
2	Property Tax Allowance in Base Rates	\$13,994,652
3	Total	\$1,164,674
4	Firm Thru-put	34,420,710 dths
5	PTA Factor per dth	\$0.0338 per dth
6	PTA Factor per therm	\$0.0034 per therm