

July 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 Commission Data Requests - Set 2 - ELEC/GAS**

Dear Ms. Massaro:

Enclosed is an original and ten (10) copies of National Grid's<sup>1</sup> responses to the Commission's Second Set of Data Requests in the above-captioned proceeding.

The responses to the Second 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

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<sup>1</sup> 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

July 20, 2012  
Date

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

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
Celia B. O'Brien, Esq. National Grid 280 Melrose St. Providence, RI 02907	<a href="mailto:Celia.obrien@us.ngrid.com">Celia.obrien@us.ngrid.com</a>	781-907-2153
Thomas R. Teehan, Esq. National Grid 280 Melrose St. Providence, RI 02907	<a href="mailto:Thomas.teehan@us.ngrid.com">Thomas.teehan@us.ngrid.com</a>	401-784-7667
	<a href="mailto:Jennifer.hutchinson@us.ngrid.com">Jennifer.hutchinson@us.ngrid.com</a>	
	<a href="mailto:Joanne.scanlon@us.ngrid.com">Joanne.scanlon@us.ngrid.com</a>	
Cheryl M. Kimball, Esq. (for NGrid) Keegan Werlin LLP 265 Franklin Street Boston, MA 02110	<a href="mailto:ckimball@keeganwerlin.com">ckimball@keeganwerlin.com</a>	617-951-1400
	<a href="mailto:lindas@keeganwerlin.com">lindas@keeganwerlin.com</a>	
Gerald Petros, Esq. Hinckley, Allen & Snyder	<a href="mailto:gpetros@haslaw.com">gpetros@haslaw.com</a>	
	<a href="mailto:aramos@haslaw.com">aramos@haslaw.com</a>	
Leo Wold, Esq. (for Division) Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Lwold@riag.ri.gov">Lwold@riag.ri.gov</a>	401-222-2424
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a>	
	<a href="mailto:Steve.scialabba@ripuc.state.ri.us">Steve.scialabba@ripuc.state.ri.us</a>	
	<a href="mailto:David.stearns@ripuc.state.ri.us">David.stearns@ripuc.state.ri.us</a>	
Michael J. Morrissey, Esq. (for AG) Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Mmorrissey@riag.ri.gov">Mmorrissey@riag.ri.gov</a>	401-274-4400 Ext. 2357
Ellen M. Evans, Sr. Trial Atty. Naval Facilities Engineering Command Litigation Office 720 Kennon St., Bldg. 36, Room 233 Washington Navy Yard, DC 20374-5051	<a href="mailto:ellen.evans@navy.mil">ellen.evans@navy.mil</a>	202-685-2235
Dr. Kay Davoodi, P.E. Utility Rates and Studies Office NAVFACHQ- Building 33 1322 Patterson Ave SE Washington Navy Yard, D.C. 20374-5065	<a href="mailto:Khojasteh.davoodi@navy.mil">Khojasteh.davoodi@navy.mil</a>	202-685-3319
	<a href="mailto:Larry.r.allen@navy.mil">Larry.r.allen@navy.mil</a>	
Robert J. McConnell, Esq. (Wiley Ctr.) Motley Rice LLC	<a href="mailto:bmccconnell@motleyrice.com">bmccconnell@motleyrice.com</a>	401-457-7700

321 South Main St. – 2 <sup>nd</sup> Floor Providence, RI 02903	<a href="mailto:jhowat@nclc.org">jhowat@nclc.org</a>	
Maurice Brubaker Brubaker and Associates, Inc. PO Box 412000 St.Louis, MO 63141-2000	<a href="mailto:mbrubaker@consultbai.com">mbrubaker@consultbai.com</a>	401-724-3600
Ali Al-Jabir Brubaker and Associates, Inc.	<a href="mailto:aaljabir@consultbai.com">aaljabir@consultbai.com</a>	
David Effron Berkshire Consulting 12 Pond Path North Hampton, NH 03862-2243	<a href="mailto:Djeffron@aol.com">Djeffron@aol.com</a>	603-964-6526
Bruce Oliver Revilo Hill Associates 7103 Laketree Drive Fairfax Station, VA 22039	<a href="mailto:Boliver.rha@verizon.net">Boliver.rha@verizon.net</a>	
Alex Cochis Lee Smith LaCapra Associates One Washington Mall 9th Floor Boston, MA 02108	<a href="mailto:acochis@lacapra.com">acochis@lacapra.com</a>	
	<a href="mailto:lees@lacapra.com">lees@lacapra.com</a>	
Thomas Catlin Emma Nicholson Exeter Associates 10480 Little Patuxent Parkway Suite 300 Columbia, Maryland 21044	<a href="mailto:tcatlin@exeterassociates.com">tcatlin@exeterassociates.com</a>	
	<a href="mailto:enicholson@exeterassociates.com">enicholson@exeterassociates.com</a>	
Bruce Gay Monticello Consulting 4209 Buck Creek Court North Charleston, SC 29420	<a href="mailto:bruce@monticelloconsulting.com">bruce@monticelloconsulting.com</a>	
Matthew Kahal c/o Exeter Associates 10480 Little Patuxent Parkway Suite 300 Columbia, MD 21044	<a href="mailto:mkahal@exeterassociates.com">mkahal@exeterassociates.com</a>	
<b>File original &amp; 11 copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Lmassaro@puc.state.ri.us">Lmassaro@puc.state.ri.us</a>	401-780-2107
	<a href="mailto:Anault@puc.state.ri.us">Anault@puc.state.ri.us</a>	
	<a href="mailto:Adalessandro@puc.state.ri.us">Adalessandro@puc.state.ri.us</a>	
	<a href="mailto:Nucci@puc.state.ri.us">Nucci@puc.state.ri.us</a>	
	<a href="mailto:Dshah@puc.state.ri.us">Dshah@puc.state.ri.us</a>	
	<a href="mailto:Sccamara@puc.state.ri.us">Sccamara@puc.state.ri.us</a>	

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
<b>DIVISION SET 1</b>						
Division Set 1	Division 1-1-ELEC	5/9/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 1-1-ELEC	
Division Set 1	Division 1-2-ELEC	5/9/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 1-2-ELEC	
Division Set 1	Division 1-3-ELEC	5/9/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 1-3-ELEC	
Division Set 1	Division 1-4-ELEC	5/9/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 1-4-ELEC	
Division Set 1	Division 1-5-ELEC	5/9/2012	<b>5/25/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-6-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme	Att. DIV 1-6-ELEC	
Division Set 1	Division 1-7-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-8-ELEC	5/9/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 1-8-ELEC	
Division Set 1	Division 1-9-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme	Att. DIV 1-9-ELEC	
Division Set 1	Division 1-10-ELEC	5/9/2012	<b>5/25/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-11-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme	Att. DIV 1-11-ELEC	
Division Set 1	Division 1-12-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-13-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme	Att. DIV 1-13-ELEC	
Division Set 1	Division 1-14-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-15-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-16-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-17-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-18-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-19-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-20-ELEC	5/9/2012	<b>5/25/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-21-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme	Att. DIV 1-21-ELEC	
Division Set 1	Division 1-22-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-23-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme	Att. DIV 1-23-ELEC	
Division Set 1	Division 1-24-ELEC	5/9/2012	<b>5/25/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-25-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-26-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-27-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme	Att. DIV 1-27-ELEC	
Division Set 1	Division 1-28-ELEC	5/9/2012	<b>5/23/2012</b>	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	<b>5/23/2012</b>	Michael D. Laflamme	Att. DIV 1-29-ELEC	
Division Set 1	Division 1-30-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
Division Set 1	Division 1-31-ELEC	5/9/2012	<b>5/23/2012</b>	Michael D. Laflamme		
<b>DIVISION SET 2</b>						
Division Set 2	Division 2-1-GAS	5/14/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 2-1-GAS	
Division Set 2	Division 2-2-GAS	5/14/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 2-2-GAS	
Division Set 2	Division 2-3-GAS	5/14/2012	<b>5/25/2012</b>	Michael D. Laflamme		
Division Set 2	Division 2-4-GAS	5/14/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 2-4-GAS	
Division Set 2	Division 2-5-GAS	5/14/2012	<b>5/25/2012</b>	Michael D. Laflamme		
Division Set 2	Division 2-6-GAS	5/14/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 2-6-GAS	
Division Set 2	Division 2-7-GAS	5/14/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 2-7-GAS	
Division Set 2	Division 2-8-GAS	5/14/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 2-8-GAS	
Division Set 2	Division 2-9-GAS	5/14/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 2-9-GAS	
Division Set 2	Division 2-10-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme		
Division Set 2	Division 2-11-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme		
Division Set 2	Division 2-12-GAS	5/14/2012	<b>5/25/2012</b>	Michael D. Laflamme	Att. DIV 2-12-GAS	
Division Set 2	Division 2-13-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme		
Division Set 2	Division 2-14-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme		
Division Set 2	Division 2-15-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme		
Division Set 2	Division 2-16-GAS	5/14/2012	<b>5/29/2012</b>	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	<b>5/29/2012</b>	Michael D. Laflamme		
Division Set 2	Division 2-18-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme		
Division Set 2	Division 2-19-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme		
Division Set 2	Division 2-20-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme		
Division Set 2	Division 2-21-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme	Att. DIV 2-21-GAS	
Division Set 2	Division 2-22-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme	Att. DIV 2-22-GAS	
Division Set 2	Division 2-23-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme	Att. DIV 2-23-GAS	
Division Set 2	Division 2-24-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme		
Division Set 2	Division 2-25-GAS	5/14/2012	<b>5/29/2012</b>	Michael D. Laflamme		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
<b>DIVISION SET 3</b>						
Division Set 3	Division 3-1-ELEC/GAS	5/30/2012	<b>6/11/2012</b>	Michael D. Laflamme	Att. DIV 3-1-ELEC/GAS	
Division Set 3	Division 3-2-ELEC/GAS	5/30/2012	<b>6/13/2012</b>	Michael D. Laflamme	Att. DIV 3-2-ELEC/GAS	
Division Set 3	Division 3-3-ELEC/GAS	5/30/2012	<b>6/12/2012</b>	Robert B. Hevert	Att. DIV 3-3-ELEC/GAS	
Division Set 3	Division 3-4-ELEC/GAS	5/30/2012	<b>6/12/2012</b>	Robert B. Hevert		
Division Set 3	Division 3-5-ELEC/GAS	5/30/2012	<b>6/12/2012</b>	Robert B. Hevert	Att. DIV 3-5-ELEC/GAS	
Division Set 3	Division 3-6-ELEC/GAS	5/30/2012	<b>6/13/2012</b>	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	<b>6/11/2012</b>	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	<b>6/12/2012</b>	Legal Department and Robert B. Hevert		
Division Set 3	Division 3-9-ELEC/GAS	5/30/2012	<b>6/11/2012</b>	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	<b>6/11/2012</b>	Mustally Husain	Att. DIV 3-10-ELEC/GAS	
Division Set 3	Division 3-11-ELEC/GAS	5/30/2012	<b>6/11/2012</b>	Michael D. Laflamme	Att. DIV 3-11-ELEC/GAS	
Division Set 3	Division 3-12-ELEC/GAS	5/30/2012	<b>6/11/2012</b>	Michael D. Laflamme		
Division Set 3	Division 3-13-ELEC/GAS	5/30/2012	<b>6/11/2012</b>	Michael D. Laflamme		
Division Set 3	Division 3-14-ELEC/GAS	5/30/2012	<b>6/13/2012</b>	Michael D. Laflamme		
Division Set 3	Division 3-15-ELEC/GAS	5/30/2012	<b>6/11/2012</b>	Michael D. Laflamme		
Division Set 3	Division 3-16-ELEC/GAS	5/30/2012	<b>6/11/2012</b>	Michael D. Laflamme		
Division Set 3	Division 3-17-ELEC/GAS	5/30/2012	<b>6/11/2012</b>	Michael D. Laflamme	Att. DIV 3-17-ELEC/GAS	
Division Set 3	Division 3-18-ELEC/GAS	5/30/2012	<b>6/12/2012</b>	Robert B. Hevert		
Division Set 3	Division 3-19-ELEC	5/30/2012	<b>6/12/2012</b>	Robert B. Hevert		
Division Set 3	Division 3-20-ELEC/GAS	5/30/2012	<b>6/12/2012</b>	Robert B. Hevert		
Division Set 3	Division 3-21-ELEC/GAS	5/30/2012	<b>6/12/2012</b>	Robert B. Hevert		
Division Set 3	Division 3-22-ELEC/GAS	5/30/2012	<b>6/12/2012</b>	Robert B. Hevert	Att. DIV 3-22-ELEC/GAS	
Division Set 3	Division 3-23-ELEC/GAS	5/30/2012	<b>6/12/2012</b>	Robert B. Hevert	Att. DIV 3-23-ELEC/GAS	
Division Set 3	Division 3-24-ELEC/GAS	5/30/2012	<b>6/13/2012</b>	Robert B. Hevert	Att. DIV 3-24-ELEC/GAS	
Division Set 3	Division 3-25-ELEC/GAS	5/30/2012	<b>6/12/2012</b>	Robert B. Hevert	Att. DIV 3-25-ELEC/GAS	
Division Set 3	Division 3-26-ELEC/GAS	5/30/2012	<b>6/12/2012</b>	Robert B. Hevert		
Division Set 3	Division 3-27-ELEC/GAS	5/30/2012	<b>6/12/2012</b>	Robert B. Hevert		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
<b>DIVISION SET 4</b>						
Division Set 4	Division 4-1-GAS	6/7/2012	<b>6/29/2012</b>	Paul M. Normand	See Attached Page	See Attached Page
Division Set 4	Division 4-2-GAS	6/7/2012	<b>6/19/2012</b>	Paul M. Normand		
Division Set 4	Division 4-3-GAS	6/7/2012	<b>6/20/2012</b>	Ann E. Leary		
Division Set 4	Division 4-4-GAS	6/7/2012	<b>6/19/2012</b>	Paul M. Normand		
Division Set 4	Division 4-5-GAS	6/7/2012	<b>6/19/2012</b>	Paul M. Normand		
Division Set 4	Division 4-6-GAS	6/7/2012	<b>6/20/2012</b>	Ann E. Leary		
Division Set 4	Division 4-7-GAS	6/7/2012	<b>6/20/2012</b>	Ann E. Leary		
Division Set 4	Division 4-8-GAS	6/7/2012	<b>6/19/2012</b>	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	<b>6/20/2012</b>	Ann E. Leary		
Division Set 4	Division 4-10-GAS	6/7/2012	<b>6/19/2012</b>	Ann E. Leary	Att. DIV 4-10-GAS	
Division Set 4	Division 4-11-GAS	6/7/2012	<b>6/20/2012</b>	Ann E. Leary		
Division Set 4	Division 4-12-GAS	6/7/2012	<b>6/20/2012</b>	Ann E. Leary	Att. DIV 4-12-GAS	
Division Set 4	Division 4-13-GAS	6/7/2012	<b>6/19/2012</b>	Ann E. Leary and Michael D. Laflamme		
<b>DIVISION SET 5</b>						
Division Set 5	Division 5-1-ELEC	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye	Att. DIV 5-1-ELEC	
Division Set 5	Division 5-2-ELEC	6/8/2012	<b>6/29/2012</b>	Evelyn M. Kaye	Att. DIV 5-2-1-ELEC Att. DIV 5-2-2-ELEC Att. DIV 5-2-3-ELEC	
Division Set 5	Division 5-3-ELEC	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye	Att. DIV 5-3-1-ELEC Att. DIV 5-3-2-ELEC	
Division Set 5	Division 5-3-ELEC (Corrected)	6/8/2012	<b>7/2/2012</b>	Evelyn M. Kaye		
Division Set 5	Division 5-4-ELEC	6/8/2012	<b>6/22/2012</b>	Evelyn M. Kaye	Att. DIV 5-4-ELEC	
Division Set 5	Division 5-5-ELEC	6/8/2012	<b>6/22/2012</b>	Evelyn M. Kaye	Att. DIV 5-5-1-ELEC Att. DIV 5-5-2-ELEC	
Division Set 5	Division 5-6-ELEC	6/8/2012	<b>6/22/2012</b>	Evelyn M. Kaye	Att. DIV 5-6-1-ELEC Att. DIV 5-6-2-ELEC Att. DIV 5-6-3-ELEC	
Division Set 5	Division 5-7-ELEC	6/8/2012	<b>6/22/2012</b>	Evelyn M. Kaye		
Division Set 5	Division 5-8-ELEC	6/8/2012	<b>6/22/2012</b>	Evelyn M. Kaye		

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
Division Set 5	Division 5-9-ELEC	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye	Att. DIV 5-9-ELEC	
Division Set 5	Division 5-10-ELEC	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye	Att. DIV 5-10-1-ELEC Att. DIV 5-10-2-ELEC	
Division Set 5	Division 5-11-ELEC	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye	Att. DIV 5-11-1-ELEC Att. DIV 5-11-2-ELEC Att. DIV 5-11-3-ELEC Att. DIV 5-11-4-ELEC	
Division Set 5	Division 5-12-ELEC	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye		
Division Set 5	Division 5-13-ELEC	6/8/2012	<b>6/22/2012</b>	Evelyn M. Kaye		
Division Set 5	Division 5-14-ELEC	6/8/2012	<b>6/22/2012</b>	Evelyn M. Kaye	Att. DIV 5-14-ELEC	
Division Set 5	Division 5-15-ELEC	6/8/2012	<b>6/22/2012</b>	Evelyn M. Kaye	Att. DIV 5-15-ELEC	
Division Set 5	Division 5-16-ELEC	6/8/2012	<b>6/29/2012</b>	Evelyn M. Kaye	Att. DIV 5-16-1-ELEC Att. DIV 5-16-2-ELEC Att. DIV 5-16-3-ELEC Att. DIV 5-16-4-ELEC (REDACTED)	Att. DIV 5-16-2-ELEC Att. DIV 5-16-3-ELEC Att. DIV 5-16-4-ELEC (CONFIDENTIAL)
Division Set 5	Division 5-16-ELEC (Supplemental)	6/8/2012	<b>7/20/2012</b>	Evelyn M. Kaye	Att. DIV 5-16-1-ELEC Att. DIV 5-16-2-ELEC Att. DIV 5-16-3-ELEC Att. DIV 5-16-4-ELEC Supplemental (REDACTED)	Att. DIV 5-16-2-ELEC Att. DIV 5-16-3-ELEC Att. DIV 5-16-4-ELEC Supplemental (CONFIDENTIAL)
<b>DIVISION SET 6</b>						
Division Set 6	Division 6-1-GAS	6/8/2012	<b>7/2/2012</b>	Evelyn M. Kaye	Att. DIV 6-1-GAS	
Division Set 6	Division 6-2-GAS	6/8/2012	<b>7/2/2012</b>	Evelyn M. Kaye	Att. DIV 6-2-1-GAS Att. DIV 6-2-2-GAS	
Division Set 6	Division 6-2(d)-GAS (Supplemental)	6/8/2012	<b>7/20/2012</b>	Evelyn M. Kaye	Att. DIV 6-2(d)-GAS (Supplemental)	
Division Set 6	Division 6-3-GAS	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye	Att. DIV 6-3-GAS	
Division Set 6	Division 6-3-GAS (Supplemental)	6/8/2012	<b>7/20/2012</b>	Evelyn M. Kaye	Att. DIV 6-3-GAS (Supplemental)	
Division Set 6	Division 6-4-GAS	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye	Att. DIV 6-4-1-GAS Att. DIV 6-4-2-GAS	
Division Set 6	Division 6-5-GAS	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye	Att. DIV 6-5-GAS	
Division Set 6	Division 6-6-GAS	6/8/2012	<b>7/2/2012</b>	Evelyn M. Kaye	Att. DIV 6-6-1-GAS Att. DIV 6-6-2-GAS Att. DIV 6-6-3-GAS (REDACTED)	Att. DIV 6-6-2-GAS Att. DIV 6-6-3-GAS (CONFIDENTIAL)
Division Set 6	Division 6-7-GAS	6/8/2012	<b>6/22/2012</b>	Evelyn M. Kaye		
Division Set 6	Division 6-8-GAS	6/8/2012	<b>6/22/2012</b>	Evelyn M. Kaye		
Division Set 6	Division 6-9-GAS	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye		
Division Set 6	Division 6-9-GAS (Supplemental)	6/8/2012	<b>7/20/2012</b>	Evelyn M. Kaye	Att. DIV 6-9-GAS (Supplemental)	
Division Set 6	Division 6-10-GAS	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye	Att. DIV 6-10-1-GAS Att. DIV 6-10-2-GAS	
Division Set 6	Division 6-11-GAS	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye		
Division Set 6	Division 6-12-GAS	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye		
Division Set 6	Division 6-13-GAS	6/8/2012	<b>6/22/2012</b>	Evelyn M. Kaye		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
Division Set 6	Division 6-14-GAS	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye	Att. DIV 6-14-GAS	
Division Set 6	Division 6-15-GAS	6/8/2012	<b>6/26/2012</b>	Evelyn M. Kaye	Att. DIV 6-15-1-GAS Att. DIV 6-15-2-GAS Att. DIV 6-15-3-GAS	
Division Set 6	Division 6-16-GAS	6/8/2012	<b>7/2/2012</b>	Evelyn M. Kaye	Att. DIV 6-16-1-GAS Att. DIV 6-16-2-GAS Att. DIV 6-16-3-GAS Att. DIV 6-16-4-GAS Att. DIV 6-16-5-GAS (REDACTED)	Att. DIV 6-16-1-GAS Att. DIV 6-16-2-GAS Att. DIV 6-16-3-GAS Att. DIV 6-16-4-GAS Att. DIV 6-16-5-GAS (CONFIDENTIAL)

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
<b>COMMISSION SET 1</b>						
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 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		
<b>COMMISSION SET 2</b>						
Commission Set 2	Commission 2-1-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-2-ELEC/GAS	7/10/2012	7/19/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-3-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-4-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-5-ELEC/GAS	7/10/2012	7/19/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-6-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-7-ELEC/GAS	7/10/2012	7/19/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-8-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-9-ELEC/GAS	7/10/2012	7/20/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-10-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-11-ELEC/GAS	7/10/2012	7/19/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-12-ELEC/GAS	7/10/2012	7/19/2012	Maureen P. Heaphy		
Commission Set 2	Commission 2-13-ELEC/GAS	7/10/2012	7/20/2012	Maureen P. Heaphy		

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	ATTACHMENT	CONFIDENTIAL ATTACHMENT
Commission Set 2	Commission 2-14-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-15-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-16-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-17-ELEC/GAS	7/10/2012	<b>7/18/2012</b>	Robert B. Hevert		
Commission Set 2	Commission 2-18-ELEC/GAS	7/10/2012	<b>7/18/2012</b>	Michael D. Laflamme		
Commission Set 2	Commission 2-19-ELEC	7/10/2012	<b>7/16/2012</b>	Michael D. Laflamme		
Commission Set 2	Commission 2-20-GAS	7/10/2012	<b>7/19/2012</b>	Michael D. Laflamme		
Commission Set 2	Commission 2-21-ELEC/GAS	7/10/2012	<b>7/16/2012</b>	Michael D. Laflamme		
Commission Set 2	Commission 2-22-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-23-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-24-GAS	7/10/2012				
Commission Set 2	Commission 2-25-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-26-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-27-GAS	7/10/2012	<b>7/16/2012</b>	Evelyn M. Kaye		
Commission Set 2	Commission 2-28-ELEC/GAS	7/10/2012	<b>7/16/2012</b>	Evelyn M. Kaye		
Commission Set 2	Commission 2-29-ELEC/GAS	7/10/2012	<b>7/16/2012</b>	Evelyn M. Kaye		
Commission Set 2	Commission 2-30-ELEC/GAS	7/10/2012	<b>7/16/2012</b>	Evelyn M. Kaye		
Commission Set 2	Commission 2-31-ELEC	7/10/2012				
Commission Set 2	Commission 2-32-GAS	7/10/2012				
Commission Set 2	Commission 2-33-ELEC	7/10/2012	<b>7/20/2012</b>	Michael R. Hrycin		
Commission Set 2	Commission 2-34-ELEC	7/10/2012	<b>7/20/2012</b>	Michael R. Hrycin		
Commission Set 2	Commission 2-35-ELEC	7/10/2012				
Commission Set 2	Commission 2-36-GAS	7/10/2012				
Commission Set 2	Commission 2-37-ELEC/GAS	7/10/2012	<b>7/19/2012</b>	Jeffrey P. Martin		
Commission Set 2	Commission 2-38-ELEC	7/10/2012	<b>7/16/2012</b>	Michael D. Laflamme		
Commission Set 2	Commission 2-39-GAS	7/10/2012	<b>7/16/2012</b>	A. Leo Silvestrini		
Commission Set 2	Commission 2-40-ELEC/GAS	7/10/2012	<b>7/17/2012</b>	Michael D. Laflamme		
Commission Set 2	Commission 2-41-ELEC	7/10/2012	<b>7/17/2012</b>	Michael D. Laflamme		
Commission Set 2	Commission 2-42-ELEC/GAS	7/10/2012	<b>7/16/2012</b>	Michael D. Laflamme		
Commission Set 2	Commission 2-43-ELEC/GAS	7/10/2012				
Commission Set 2	Commission 2-44-ELEC/GAS	7/10/2012	<b>7/16/2012</b>	Michael D. Laflamme		

<b>DATA SET</b>	<b>DATA REQUEST</b>	<b>DATE ISSUED</b>	<b>DATE FILED</b>	<b>WITNESS</b>	<b>ATTACHMENT</b>	<b>CONFIDENTIAL ATTACHMENT</b>
Commission Set 2	Commission 2-45-ELEC	7/10/2012	<b>7/20/2012</b>	Michael D. Laflamme	Att. COMM 2-45-ELEC	
Commission Set 2	Commission 2-46-ELEC	7/10/2012	<b>7/16/2012</b>	Michael D. Laflamme		
Commission Set 2	Commission 2-47-ELEC	7/10/2012	<b>7/20/2012</b>	Michael D. Laflamme		
Commission Set 2	Commission 2-48-ELEC	7/10/2012				
Commission Set 2	Commission 2-49-ELEC/GAS	7/10/2012	<b>7/18/2012</b>	Michael D. Laflamme	Att. DIV 2-49-ELEC/GAS	

Commission 2-9-ELEC/GAS

Request:

Referring to Maureen Heaphy page 21, when and how frequently are target levels reviewed?

Response:

Target levels of performance for all of the objectives and metrics are established on an annual basis prior to the start of the plan year, which is April 1st. Targets are set based on past performance and regulatory requirements. Payout of variable pay under the Plan is measured based on the achievement of Threshold, Target, or Stretch performance for the fiscal year.

Commission 2-13-ELEC/GAS

Request:

Page 27 of Maureen Heaphy, line 3, states that the Company changed prescription coverage to CVS Caremark "for Local 310 as well." Then the Company says, line 5, that "no changes have been made to the collective bargaining agreements of UWUA Local 310 or Local 310C associated with these benefits" since they have not been subject to renegotiation since the last rate filing. (MH 27, line 7). Please reconcile, or explain how/why prescription coverage for Local 310 was changed if the collective bargaining agreement was not subject to renegotiation since the last rate case.

Response:

The plan design for prescription drug coverage (i.e., co-pays) is contractual and subject to collective bargaining with the unions; however, the administration of the benefits is not collectively bargained. The Company has the discretion to change vendors or plan administrators at any time. As stated in Company Witness Maureen P. Heaphy's Direct Testimony, the administration for the prescription drug coverage was carved out of the medical plans to CVS Caremark, but there were no changes to the prescription drug benefit plan designs. Any changes in prescription drug benefit plan design are subject to collective bargaining and must be negotiated with the unions during contract negotiations.



Commission 2-33-ELEC

Request:

Mr. Hrycin states that the 19 proposed electrical trainees will cost \$1.8 million annually. What is the estimated cost for these employees for each of the next 5 years assuming that they are able to progress in their training and become rated electrical workers at the end of 4 years?

Response:

Although the Company plans on adding 19 additional positions, the \$1.8 million for 2013-2014 calculated for cost of service purposes was mistakenly based on 18 additional positions. The Company based its calculation on the current bargaining unit contract wage and benefit provisions and its best estimate of the costs for these additional employees for the next five years (please see the table below). Please note that bargaining unit contract negotiations will commence in 2013. The outcome of those negotiations may impact the actual wage and benefits calculation associated with the incremental positions.

<b>2013-2014</b>	<b>2014-2015</b>	<b>2015-2016</b>	<b>2016-2017</b>	<b>2017-2018</b>
\$1,875,744	\$1,932,016	\$2,042,141	\$2,690,256	\$2,770,963

Commission 2-34-ELEC

Request:

Why is the Company proposing to hire the 19 new employees as trainees rather than rated electrical workers?

Response:

When the Company posts job openings externally, it receives interest from candidates with various backgrounds and levels of experience as a qualified electrical worker. As discussed on Pages 7-8 of Company Witness Michael R. Hrycin's Direct Testimony, the four-year training period is a Company policy designed to ensure that new hires meet the compliance requirements of the Federal Occupational, Safety and Health Administration ("OSHA") regulations for a qualified electrical worker. OSHA regulations require that a qualified electrical worker have the training and experience to demonstrate the knowledge and skills to perform work on or near energized electrical facilities at voltage levels exceeding 600 volts. The Company's program is designed to provide this comprehensive training over a four-year period. In addition, this training period also helps ensure that all new hires are properly trained and familiar with the Company's electrical network, systems and processes.

Commission 2-45-ELEC

Request:

Please explain how each insurance percent allocator on Schedule MDL-3-Elec was developed.

Response:

Please see Attachment COMM 2-45-ELEC for an explanation of each insurance percent allocator on Schedule MDL-3-ELEC.

Attachment COMM 2-45-ELEC

Explain how each insurance percent allocator on Schedule MDL-3-ELEC was developed.

See column labeled (d) for information on the percent allocators.

Schedule MDL-3-ELEC  
Page 32 of 71

The Narragansett Electric Company d/b/a National Grid  
Adjustments to Operating Expenses  
Test Year Ended December 31, 2011  
Insurance Premium Details

Line of Coverage	Policy Period	Policy Number	Carrier	(a) Current Premium	(b) Allocated %	(a) x (b) (c) Annualized Expense	(d) Source of Percent Allocator: FERC Approved Cost Allocation Unless Otherwise Noted
1 Aviation	4/1/11-3/31/12	10045246	Global Aerospace	\$ 153,740	8.439%	\$ 12,974	Bill pool 00236 - legacy NG utility operating companies, O&M based allocation
2							
3 Business Travel Accident	1/1/12-12/31/12	GTP9132752	AIG Life Ins Co	67,500	4.320%	2,916	Bill pool 00354 - all company, based on number of employees
4							
5 Excess Liability	4/1/11-3/31/12	X5686A1A-11	AEGIS	5,775,000	4.983%	287,768	
6	4/1/11-3/31/12	XCP G22582930A	ACE	716,708	4.983%	35,714	
7	4/1/11-3/31/12		Total	6,491,708		323,482	Bill pool 00382 - all company, O&M based allocation
8							
9 Employment Practices & Fiduciary Liability	11/30/11-10/31/12	01-357-16-65	EPLI - Nat Union Fire Ins (Chartis)	215,000	5.672%	12,195	
10	11/30/11-10/31/12	01-374-18-83	Fiduciary - Nat Union Fire Ins (Chartis)	132,386	5.672%	7,509	
11	11/30/11-10/31/12	FX5040711P	Fiduciary - AEGIS	269,525	5.672%	15,287	
12	11/30/11-10/31/12	272034-11FL	Fiduciary - EIM	223,725	5.672%	12,690	
13	11/30/11-10/31/12	6800-2140	Fiduciary - Chubb	72,500	5.672%	4,112	
14			Total	913,136		51,793	Bill pool 00354 - all company, based on number of employees
15							
16 Fidelity Bond (Crime)	11/30/11-10/31/12	01-374-20-08	Nat Union Fire Ins (Chartis)	85,939	5.672%	4,874	
17	11/30/11-10/31/12	CRP-554-40-90-09	Great American Ins Co	29,790	5.672%	1,690	
18			Total	115,729		6,564	Bill pool 00354 - all company, based on number of employees
19							
20 Surety Bonds	1/1/12-12/31/12	Bond # 104240446	Travelers	68,367	4.320%	2,953	Bill pool 00354 - all company, based on number of employees
21							
22 Workers' Compensation - Excess	7/1/11-6/30/12	EW7-621-004536-511	Liberty Mutual	1,408,185	5.672%	79,872	Bill pool 00354 - all company, based on number of employees
23							
24 Directors & Officers	12/1/11-11/30/12	Various	Various	2,165,914	4.983%	107,928	Bill pool 00382 - all company, O&M based allocation
25							
26 Public (Excess) Liability	4/1/11-3/31/12	Various	NGICL	3,642,319	4.983%	181,497	Bill pool 00382 - all company, O&M based allocation
27							
28 Property	4/1/11-3/31/12	NG/PD/BI/11/001	NGICL	2,543,020	9.303%	236,577	Used property values for basis of cost allocation (total premium less \$2,000 NM Properties charge)
29							
30 Business Interruption	4/1/11-3/31/12	NG/PD/BI/11/001	NGICL	246,101	9.310%	22,912	Used property values for basis of cost allocation
31							
32 Property Terrorism	4/1/11-3/31/12	NG/TE/11/017	NGICL	250,000	9.299%	23,248	Used property values for basis of cost allocation (total premium less \$300 NM Properties charge)
33							
34 Tax on Insurance Premiums						14,423	
35							
36			<b>Grand Total Insurance Premiums</b>			<b>\$ 1,067,139</b>	
37							

**Line Notes**

- 34(c) Insurance premium tax payments are for Federal Excise Tax (FET) owed on insurance premiums paid to certain insurance policies issued by foreign insurers, unless the insurer has obtained an FET exemption.  
36(c) Sum of Line 1(c) through Line 34(c)

**Column Notes**

- (a) From Company Books

Commission 2-47-ELEC

Request:

Page 52 of Mr. Laflamme's direct discusses the customer outreach and education initiative. He states that one of the principal themes is the Benefits of Natural Gas.

- a. What are the proposed costs associated with this aspect of the initiative?
- b. Why are costs associated with educating people about the benefits of natural gas included on the books of the company's electric operations?

Response:

- a. The incremental \$521,453 referred to on Page 52 of Company Witness Laflamme's Direct Testimony does not include any proposed costs associated with Benefits of Natural Gas.
- b. Please refer to Workpaper MDL-13 ELEC. No costs associated with educating people about the benefits of natural gas are included on the books of the Company's electric operations.