

July 19, 2016

**VIA OVERNIGHT COURIER & ELECTRONIC MAIL**

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

**RE: Docket 4610 – Environmental Response Fund Provision, RIPUC No. 2164**  
**Responses to Division Data Requests – Set 1**

Dear Ms. Massaro:

On behalf of National Grid<sup>1</sup>, I enclose ten (10) copies of the Company's responses to the first set of data requests issued by the Rhode Island Division of Public Utilities and Carriers in the above-referenced docket.

Thank you for your attention to this transmittal. If you have any questions concerning this filing, please contact me at 781-907-2153.

Very truly yours,



Celia B. O'Brien

Enclosures

cc: Docket 4610 Service List  
Leo Wold, Esq.  
Steve Scialabba, Division

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

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 delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers by overnight courier.

*Celia B. O'Brien*

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Celia B. O'Brien

July 19, 2016

Date

**Docket No. 4610 – National Grid – Electric Environmental Response Fund  
Service List as of 5/11/16**

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
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<b>File an original &amp; nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a> ;	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4610  
In Re: Electric Environmental Response Fund  
Responses to Division's First Set of Data Requests  
Issued June 22, 2016

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Division 1-1

Request:

In National Grid's Electric Environmental Response Cost Report for Fiscal Year 2015, submitted March 31, 2016, are there any costs associated with the proposed new site, referred alternately as the Chandonnet Site and Kyan Street? Were any costs associated with the Chandonnet Site included in any Environmental Cost Reports for periods prior to FY 15?

Response:

There were no costs associated with the Chandonnet site in National Grid's Electric Environmental Response Cost Report for Fiscal Year 2015, or for any Environmental Response Cost Reports for periods prior to Fiscal Year 2015.

The Narragansett Electric Company  
d/b/a National Grid  
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Division 1-2

Request:

In the Attachment to Company Response to PUC 1-4, National Grid identifies \$234,143 in spending between 4/1/04 and 3/31/16 for Narragansett Electric associated with the Chandonnet Site. How much of this amount was expended in FY 16?

Response:

Of the Company's \$234,143 spending on the Chandonnet Site between April 1, 2004 through March 31, 2016 (a period of 12 years), \$90,484 was expended in Fiscal Year 2016.

Division 1-3

Request:

Is it National Grid's belief that under the proposed Environmental Response Fund tariff provision, R.I.P.U.C No. 2164, that any or all of the \$234,000 spending at the Chandonnet Site will be eligible for recovery through the Environmental Response Fund? If the answer is in the affirmative, will the Company deem the tariff approval in Docket 4610 as the Commission's approval to recover these costs from the fund, or will a future filing seek approval to recover these costs?

Response:

If the PUC approves the Company's request in this docket to include the Chandonnet Site to the list of environmental sites included in the Company's Environmental Response Fund tariff, it is the Company's position that all Environmental Response Costs associated with the Chandonnet Site incurred in the past and to be incurred in the future may be charged to the Environmental Response Fund.

Division 1-4

Request:

If the Company believes that prior period spending is recoverable from the Environmental Response Fund, please explain that contention in light of the tariff language, in both the current and proposed tariff that states in section (C) " The Company will file an annual report with the Commission providing a summary and accounting of all *costs incurred during such year* which have been applied to the fund." (Emphasis supplied).

Response:

It is the Company's belief that, if the PUC approves the Company's request to include the Chandonnet Site in the list of environmental sites included in the Company's Environmental Response Fund tariff, and the PUC also approves the inclusion of Environmental Response Costs in the Environmental Response Fund, then the prior spending as well as future spending on the Chandonnet Site can be charged to the Environmental Response Fund. In its next annual report assuming PUC approval, the Company will include a summary and accounting of eligible Environmental Response Costs, which is defined in the tariff to include all reasonable and prudently incurred costs, that have been incurred regarding this site and charged to the Environmental Response Fund.

This treatment is consistent with the Fiscal Year 2012 annual report that reflected the addition of the Great Lakes Container Corporation Superfund Site. At an open meeting held on September 26, 2012, the PUC approved the Company's request to add the Great Lakes Container site to the list of environmental sites included in the Company's Environmental Response Fund tariff. In its subsequent order,<sup>1</sup> the PUC noted its finding that the Great Lakes Container site "qualifies for inclusion within the Environmental Response Sites for recovery of prudently incurred costs under the Environmental Response Fund" and that the PUC "always retains review of the costs incurred to determine that they qualify within the definition of Environmental Response Costs."

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<sup>1</sup>Order No. 20837 (issued October 5, 2012) in Docket No. 3617.