

December 17, 2018

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4610 – The Narragansett Electric Company d/b/a National Grid
Electric Environmental Response Fund
Unopposed Motion to Withdraw Filing**

Dear Ms. Massaro:

On behalf of National Grid,¹ I enclose for filing with the Public Utilities Commission (PUC) ten (10) copies of the Company's Unopposed Motion to Withdraw Filing. The Division of Public Utilities and Carriers (Division) has authorized the Company to indicate to the PUC that the Division is willing to withdraw its first set of data requests issued on January 10, 2018 in this docket in light of the Company filing the enclosed motion.

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
John Bell, Division
Leo Wold, Esq.
Christy Hetherington, Esq.

¹ 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 hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

December 17, 2018
Date

**Docket No. 4610 – National Grid – Electric Environmental Response Fund
Service List as of 12/14/2018**

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

The Narragansett Electric Company d/b/a National Grid)	
Electric Environmental Response Fund)	Docket No. 4610
Request to Propose an Addition to the List of Sites)	
)	

UNOPPOSED MOTION TO WITHDRAW FILING

Pursuant to Rule 1.15 of the Rhode Island Public Utilities Commission’s (PUC) Rules of Practice and Procedure, National Grid¹ hereby submits an unopposed motion to withdraw the Company’s November 9, 2017 Request (as hereinafter defined) in this docket without prejudice. In support of this motion, the Company states:

1. In this docket, on November 9, 2017, the Company filed a request for PUC approval of the proposed Environmental Response Fund Provision, RIPUC No. 2181, to include an additional environmental site to the list of sites included in the Company’s currently-effective Environmental Response Fund tariff at RIPUC No. 2173. Specifically, the Company requested to include the Apponaug Substation Site to the list of environmental sites contained in the Environmental Response Fund tariff that would provide for recovery of eligible Environmental Response Costs, as defined in the Company’s tariff, through the fund beginning with fiscal year 2018.

2. Since the Company filed its November 9, 2017 Request, the timing of the Company’s planned assessment and remediation activities with respect to the Apponaug Substation Site changed such that the Company no longer anticipated that it would conduct any assessment and remediation activities, and, in fact, did not conduct any such activities, during fiscal year 2018. Also, the Company has not conducted, and does not anticipate conducting, any

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

assessment and remediation activities with respect to the Apponaug Substation Site during fiscal year 2019 and has not yet determined whether it will conduct such activities at the site during fiscal year 2020. Given the foregoing, the Company has concluded that it was premature to request PUC approval to add the Apponaug Substation Site to the list of environmental sites at this time and, therefore, requests that the PUC grant its unopposed motion to withdraw the November 9, 2017 Request in this docket without prejudice.

3. The Division of Public Utilities and Carriers (Division) is the sole intervening party in this docket. Pursuant to PUC Rule of Practice and Procedure 1.15(b), the Company contacted the Division to determine whether it has an objection to the Company's proposed withdrawal of the November 9, 2017 Request in this docket, and the Division indicated that it has no such objection. The Company also requested that the Division withdraw its first set of data requests issued on January 10, 2018 in this docket, and the Division indicated that it was willing to do so in light of the Company filing this motion.

CONCLUSION

For these reasons, the Company respectfully requests that the PUC grant its unopposed motion to withdraw its November 9, 2017 Request in this docket without prejudice.

[SIGNATURE PAGE FOLLOWS]

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID**

By its attorneys,



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Dated: December 17, 2018