

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
17929	4/26/2011	1.2 MGT		Termination
100046352	4/27/2011	6.4 MGT		Termination
17677	4/27/2011	1.7 MGT		Termination
100034301	4/29/2011	36.9 MGT		Retirement
100033599	4/29/2011	38.9 MGT		Retirement
100030599	4/29/2011	35.6 MGT		Retirement
100028472	4/29/2011	25.2 MGT		Retirement
100027580	4/29/2011	34.6 MGT		Retirement
100021426	4/29/2011	51.8 MGT		Retirement
100016603	4/29/2011	28.8 MGT		Retirement
100015615	4/29/2011	37.9 MGT		Retirement
100011869	4/29/2011	30.8 MGT		Retirement
100010084	4/29/2011	31.8 MGT		Retirement
100008650	4/29/2011	40.6 MGT		Retirement
100006408	4/29/2011	21.3 MGT		Retirement
100005572	4/29/2011	42.3 MGT		Retirement
100003063	4/29/2011	30.8 MGT		Retirement
100000062	4/29/2011	41.8 MGT		Retirement
100711667	4/29/2011	1.1 MGT		Termination
100048717	4/29/2011	14.0 MGT		Termination
100048691	4/29/2011	33.0 MGT		Termination
100046830	4/29/2011	5.7 MGT		Termination
100034425	4/29/2011	11.7 MGT		Termination
100021228	4/29/2011	21.9 MGT		Termination
100021110	4/29/2011	25.9 MGT		Termination
100019914	4/29/2011	7.7 MGT		Termination
100019573	4/29/2011	13.5 MGT		Termination
100019151	4/29/2011	9.0 MGT		Termination
100008629	4/29/2011	26.9 MGT		Termination
100001467	4/29/2011	24.7 MGT		Termination
100000414	4/29/2011	24.7 MGT		Termination
24842	4/29/2011	22.3 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
24233	4/29/2011	13.3 MGT		Termination
17477	4/29/2011	2.4 MGT		Termination
17364	4/29/2011	1.7 MGT		Termination
16709	4/29/2011	2.7 MGT		Termination
16050	4/29/2011	3.2 MGT		Termination
13911	4/29/2011	6.9 MGT		Termination
100048537	4/30/2011	38.0 MGT		Retirement
100048286	4/30/2011	17.2 MGT		Retirement
100024579	4/30/2011	40.1 MGT		Retirement
100023894	4/30/2011	37.7 MGT		Retirement
100019330	4/30/2011	32.9 MGT		Retirement
100010056	4/30/2011	30.7 MGT		Retirement
100007470	4/30/2011	32.2 MGT		Retirement
100005966	4/30/2011	25.0 MGT		Retirement
22326	4/30/2011	38.9 MGT		Retirement
21653	4/30/2011	40.6 MGT		Retirement
16146	4/30/2011	42.8 MGT		Retirement
13308	4/30/2011	43.8 MGT		Retirement
10000	4/30/2011	37.4 MGT		Retirement
08257	4/30/2011	39.7 MGT		Retirement
03322	4/30/2011	30.4 MGT		Retirement
01764	4/30/2011	32.9 MGT		Retirement
01442	4/30/2011	34.7 MGT		Retirement
100711620	4/30/2011	1.2 MGT		Termination
100052925	5/1/2011	3.1 MGT		Termination
100007820	5/3/2011	22.2 MGT		Termination
100050849	5/4/2011	4.0 MGT		Termination
100711451	5/6/2011	1.7 MGT		Termination
100046981	5/6/2011	5.3 MGT		Termination
18730	5/6/2011	11.9 MGT		Termination
16672	5/9/2011	2.8 MGT		Termination
16716	5/12/2011	2.7 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100030637	5/13/2011	12.9 MGT		Termination
100020063	5/16/2011	26.9 MGT		Termination
100017862	5/18/2011	11.0 MGT		Termination
100004089	5/18/2011	23.8 MGT		Termination
17106	5/18/2011	2.7 MGT		Termination
100711301	5/19/2011	2.0 MGT		Termination
11721	5/19/2011	9.6 MGT		Termination
100713368	5/20/2011	1.8 MGT		Termination
100029525	5/20/2011	9.9 MGT		Termination
100711693	5/23/2011	1.1 MGT		Termination
100017569	5/23/2011	30.7 MGT		Termination
25253	5/23/2011	13.1 MGT		Termination
20344	5/23/2011	20.4 MGT		Termination
100034426	5/24/2011	33.8 MGT		Retirement
100713124	5/24/2011	2.4 MGT		Termination
100034939	5/24/2011	4.0 MGT		Termination
12415	5/24/2011	8.6 MGT		Termination
08455	5/24/2011	24.9 MGT		Termination
100002964	5/26/2011	17.7 MGT		Retirement
100055112	5/26/2011	2.6 MGT		Termination
100019695	5/26/2011	30.3 MGT		Termination
100011061	5/26/2011	26.0 MGT		Termination
18019	5/26/2011	1.2 MGT		Termination
17593	5/26/2011	2.1 MGT		Termination
16495	5/26/2011	2.7 MGT		Termination
100001866	5/27/2011	41.1 MGT		Retirement
100000881	5/27/2011	29.9 MGT		Retirement
100053476	5/27/2011	3.0 MGT		Termination
63899	5/31/2011	33.6 MGT		Death
100046576	5/31/2011	6.4 MGT		Retirement
100021364	5/31/2011	28.9 MGT		Retirement
100009386	5/31/2011	20.9 MGT		Retirement

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100006252	5/31/2011	22.2 MGT		Retirement
100005763	5/31/2011	24.6 MGT		Retirement
96430	5/31/2011	43.0 MGT		Retirement
49092	5/31/2011	19.5 MGT		Retirement
43358	5/31/2011	42.0 MGT		Retirement
35265	5/31/2011	46.8 MGT		Retirement
21593	5/31/2011	41.6 MGT		Retirement
21510	5/31/2011	40.2 MGT		Retirement
04058	5/31/2011	29.4 MGT		Retirement
03914	5/31/2011	21.8 MGT		Retirement
100711719	5/31/2011	1.1 MGT		Termination
100052341	5/31/2011	3.4 MGT		Termination
100019741	5/31/2011	8.3 MGT		Termination
16231	5/31/2011	3.1 MGT		Termination
100019418	6/1/2011	32.4 MGT		Termination
92479	6/1/2011	20.7 MGT		Termination
100046720	6/2/2011	6.0 MGT		Termination
10574	6/3/2011	11.3 MGT		Death
100002697	6/3/2011	22.2 MGT		Termination
16752	6/3/2011	2.6 MGT		Termination
01299	6/5/2011	35.2 MGT		Termination
10281	6/6/2011	32.7 MGT		Retirement
18638	6/6/2011	0.8 MGT		Termination
100711494	6/7/2011	1.7 MGT		Termination
100025849	6/7/2011	22.7 MGT		Termination
100713264	6/8/2011	2.1 MGT		Termination
100711537	6/8/2011	1.6 MGT		Termination
100051521	6/10/2011	3.8 MGT		Termination
100046648	6/10/2011	6.2 MGT		Termination
100711391	6/13/2011	1.9 MGT		Termination
100711460	6/15/2011	1.8 MGT		Termination
100713122	6/17/2011	2.6 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100054447	6/17/2011	2.8 MGT		Termination
15711	6/20/2011	3.0 MGT		Termination
100713538	6/22/2011	1.3 MGT		Termination
18225	6/23/2011	1.0 MGT		Termination
07769	6/23/2011	25.7 MGT		Termination
100713725	6/24/2011	1.1 MGT		Termination
18430	6/24/2011	1.0 MGT		Termination
100046263	6/27/2011	6.7 MGT		Termination
100019579	6/28/2011	13.4 MGT		Retirement
17565	6/29/2011	22.7 MGT		Termination
14190	6/29/2011	5.3 MGT		Termination
13744	6/29/2011	6.0 MGT		Termination
04747	6/29/2011	21.7 MGT		Termination
100033235	6/30/2011	28.6 MGT		Retirement
67192	6/30/2011	31.0 MGT		Retirement
66960	6/30/2011	18.7 MGT		Retirement
20650	6/30/2011	21.6 MGT		Retirement
17599	6/30/2011	2.2 MGT		Retirement
10444	6/30/2011	31.8 MGT		Retirement
01927	6/30/2011	32.6 MGT		Retirement
100711173	6/30/2011	2.5 MGT		Termination
100054831	6/30/2011	2.7 MGT		Termination
100046615	6/30/2011	6.3 MGT		Termination
100046401	6/30/2011	6.6 MGT		Termination
100046019	6/30/2011	7.3 MGT		Termination
100002748	6/30/2011	26.9 MGT		Termination
17418	6/30/2011	1.8 MGT		Termination
100053747	7/1/2011	3.1 MGT		Termination
100024094	7/1/2011	21.4 MGT		Termination
100020865	7/1/2011	11.5 MGT		Termination
14277	7/1/2011	6.5 MGT		Termination
17412	7/4/2011	2.6 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100055117	7/5/2011	2.7 MGT		Termination
100050032	7/5/2011	4.5 MGT		Termination
100046889	7/5/2011	5.7 MGT		Termination
18311	7/5/2011	1.3 MGT		Termination
100711782	7/8/2011	1.0 MGT		Termination
100711717	7/8/2011	1.2 MGT		Termination
100711705	7/8/2011	1.2 MGT		Termination
100053461	7/8/2011	3.1 MGT		Termination
10144	7/10/2011	11.6 MGT		Termination
100019809	7/12/2011	8.0 MGT		Termination
18198	7/12/2011	1.4 MGT		Termination
07895	7/13/2011	12.7 MGT		Termination
100015337	7/14/2011	11.8 MGT		Death
100711495	7/15/2011	1.8 MGT		Termination
100046418	7/15/2011	6.6 MGT		Termination
17598	7/15/2011	2.2 MGT		Termination
16733	7/15/2011	2.8 MGT		Termination
16239	7/15/2011	3.3 MGT		Termination
81533	7/19/2011	25.7 MGT		Termination
100713126	7/21/2011	2.6 MGT		Termination
100016980	7/22/2011	24.4 MGT		Death
100711356	7/22/2011	2.1 MGT		Termination
38205	7/27/2011	19.8 MGT		Termination
16092	7/27/2011	3.5 MGT		Termination
45777	7/28/2011	24.0 MGT		Termination
100048856	7/29/2011	34.1 MGT		Retirement
100048806	7/29/2011	25.9 MGT		Retirement
100048726	7/29/2011	34.9 MGT		Retirement
100048545	7/29/2011	29.6 MGT		Retirement
100048518	7/29/2011	23.9 MGT		Retirement
100048478	7/29/2011	22.9 MGT		Retirement
100048321	7/29/2011	33.2 MGT		Retirement

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100048288	7/29/2011	33.0 MGT		Retirement
100048276	7/29/2011	37.1 MGT		Retirement
100034786	7/29/2011	21.6 MGT		Retirement
100034438	7/29/2011	40.5 MGT		Retirement
100034266	7/29/2011	34.3 MGT		Retirement
100034265	7/29/2011	39.6 MGT		Retirement
100034258	7/29/2011	29.6 MGT		Retirement
100034163	7/29/2011	39.1 MGT		Retirement
100034144	7/29/2011	37.6 MGT		Retirement
100034090	7/29/2011	42.4 MGT		Retirement
100034059	7/29/2011	37.7 MGT		Retirement
100033886	7/29/2011	31.3 MGT		Retirement
100033833	7/29/2011	28.3 MGT		Retirement
100033757	7/29/2011	38.4 MGT		Retirement
100033497	7/29/2011	38.3 MGT		Retirement
100032801	7/29/2011	30.5 MGT		Retirement
100032680	7/29/2011	30.6 MGT		Retirement
100032447	7/29/2011	44.8 MGT		Retirement
100031870	7/29/2011	37.2 MGT		Retirement
100031027	7/29/2011	19.4 MGT		Retirement
100031017	7/29/2011	32.3 MGT		Retirement
100030603	7/29/2011	44.4 MGT		Retirement
100030575	7/29/2011	39.9 MGT		Retirement
100030440	7/29/2011	48.8 MGT		Retirement
100030073	7/29/2011	29.6 MGT		Retirement
100030068	7/29/2011	28.6 MGT		Retirement
100030063	7/29/2011	33.3 MGT		Retirement
100030045	7/29/2011	44.3 MGT		Retirement
100029434	7/29/2011	38.9 MGT		Retirement
100029027	7/29/2011	35.1 MGT		Retirement
100028522	7/29/2011	23.0 MGT		Retirement
100027781	7/29/2011	32.9 MGT		Retirement

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100027324	7/29/2011	31.5 MGT		Retirement
100026092	7/29/2011	36.7 MGT		Retirement
100025773	7/29/2011	26.3 MGT		Retirement
100025346	7/29/2011	31.6 MGT		Retirement
100024467	7/29/2011	30.2 MGT		Retirement
100024409	7/29/2011	42.2 MGT		Retirement
100023795	7/29/2011	39.4 MGT		Retirement
100023777	7/29/2011	33.0 MGT		Retirement
100023487	7/29/2011	29.3 MGT		Retirement
100022598	7/29/2011	38.1 MGT		Retirement
100022372	7/29/2011	32.4 MGT		Retirement
100022356	7/29/2011	30.8 MGT		Retirement
100022317	7/29/2011	35.0 MGT		Retirement
100022274	7/29/2011	39.2 MGT		Retirement
100022132	7/29/2011	32.4 MGT		Retirement
100020974	7/29/2011	35.2 MGT		Retirement
100020961	7/29/2011	39.2 MGT		Retirement
100020913	7/29/2011	37.2 MGT		Retirement
100020883	7/29/2011	29.1 MGT		Retirement
100020756	7/29/2011	29.9 MGT		Retirement
100020691	7/29/2011	28.5 MGT		Retirement
100019549	7/29/2011	32.2 MGT		Retirement
100019427	7/29/2011	37.0 MGT		Retirement
100019327	7/29/2011	37.8 MGT		Retirement
100019323	7/29/2011	32.1 MGT		Retirement
100019320	7/29/2011	29.0 MGT		Retirement
100019246	7/29/2011	31.0 MGT		Retirement
100019017	7/29/2011	9.7 MGT		Retirement
100017743	7/29/2011	13.0 MGT		Retirement
100017609	7/29/2011	20.7 MGT		Retirement
100017531	7/29/2011	41.3 MGT		Retirement
100017474	7/29/2011	32.5 MGT		Retirement



**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100017433	7/29/2011	21.2 MGT		Retirement
100017103	7/29/2011	19.0 MGT		Retirement
100016877	7/29/2011	25.3 MGT		Retirement
100016559	7/29/2011	29.2 MGT		Retirement
100016447	7/29/2011	30.9 MGT		Retirement
100016217	7/29/2011	46.0 MGT		Retirement
100015820	7/29/2011	31.7 MGT		Retirement
100011816	7/29/2011	25.1 MGT		Retirement
100011062	7/29/2011	31.0 MGT		Retirement
100011006	7/29/2011	31.0 MGT		Retirement
100010995	7/29/2011	42.7 MGT		Retirement
100010551	7/29/2011	17.1 MGT		Retirement
100010276	7/29/2011	29.3 MGT		Retirement
100010116	7/29/2011	37.3 MGT		Retirement
100009846	7/29/2011	43.8 MGT		Retirement
100009839	7/29/2011	40.8 MGT		Retirement
100009763	7/29/2011	29.9 MGT		Retirement
100009415	7/29/2011	28.4 MGT		Retirement
100008622	7/29/2011	16.9 MGT		Retirement
100008609	7/29/2011	40.1 MGT		Retirement
100008401	7/29/2011	23.9 MGT		Retirement
100008274	7/29/2011	39.0 MGT		Retirement
100007665	7/29/2011	12.8 MGT		Retirement
100007426	7/29/2011	41.9 MGT		Retirement
100007167	7/29/2011	37.9 MGT		Retirement
100006690	7/29/2011	42.1 MGT		Retirement
100006673	7/29/2011	37.3 MGT		Retirement
100006136	7/29/2011	45.9 MGT		Retirement
100006027	7/29/2011	40.5 MGT		Retirement
100005914	7/29/2011	31.3 MGT		Retirement
100005852	7/29/2011	29.8 MGT		Retirement
100005463	7/29/2011	27.5 MGT		Retirement

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100005087	7/29/2011	42.4 MGT		Retirement
100004643	7/29/2011	38.8 MGT		Retirement
100004554	7/29/2011	32.9 MGT		Retirement
100004416	7/29/2011	40.1 MGT		Retirement
100003702	7/29/2011	24.1 MGT		Retirement
100003579	7/29/2011	40.9 MGT		Retirement
100003246	7/29/2011	40.6 MGT		Retirement
100002861	7/29/2011	30.3 MGT		Retirement
100002524	7/29/2011	30.4 MGT		Retirement
100002517	7/29/2011	20.2 MGT		Retirement
100002477	7/29/2011	39.1 MGT		Retirement
100001600	7/29/2011	22.6 MGT		Retirement
100000431	7/29/2011	21.0 MGT		Retirement
100000408	7/29/2011	17.7 MGT		Retirement
100000264	7/29/2011	28.4 MGT		Retirement
100713570	7/29/2011	1.1 MGT		Termination
100713441	7/29/2011	1.8 MGT		Termination
100713421	7/29/2011	1.8 MGT		Termination
100713402	7/29/2011	1.8 MGT		Termination
100713115	7/29/2011	2.7 MGT		Termination
100711781	7/29/2011	1.0 MGT		Termination
100711659	7/29/2011	1.4 MGT		Termination
100711650	7/29/2011	1.4 MGT		Termination
100711646	7/29/2011	1.5 MGT		Termination
100711573	7/29/2011	1.6 MGT		Termination
100711513	7/29/2011	1.8 MGT		Termination
100711461	7/29/2011	2.0 MGT		Termination
100711332	7/29/2011	2.2 MGT		Termination
100711254	7/29/2011	2.3 MGT		Termination
100711225	7/29/2011	2.3 MGT		Termination
100711210	7/29/2011	2.4 MGT		Termination
100711209	7/29/2011	2.4 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100054585	7/29/2011	2.9 MGT		Termination
100053836	7/29/2011	3.1 MGT		Termination
100053550	7/29/2011	2.7 MGT		Termination
100053475	7/29/2011	3.2 MGT		Termination
100053263	7/29/2011	3.2 MGT		Termination
100052703	7/29/2011	3.4 MGT		Termination
100052102	7/29/2011	3.7 MGT		Termination
100051491	7/29/2011	4.0 MGT		Termination
100051470	7/29/2011	4.0 MGT		Termination
100051042	7/29/2011	4.2 MGT		Termination
100048139	7/29/2011	5.2 MGT		Termination
100048136	7/29/2011	5.2 MGT		Termination
100047037	7/29/2011	5.4 MGT		Termination
100047000	7/29/2011	5.5 MGT		Termination
100046835	7/29/2011	5.1 MGT		Termination
100046729	7/29/2011	6.2 MGT		Termination
100046636	7/29/2011	6.4 MGT		Termination
100046150	7/29/2011	7.1 MGT		Termination
100046027	7/29/2011	7.4 MGT		Termination
100045933	7/29/2011	6.6 MGT		Termination
100034344	7/29/2011	21.4 MGT		Termination
100034118	7/29/2011	10.8 MGT		Termination
100034115	7/29/2011	26.3 MGT		Termination
100034070	7/29/2011	12.2 MGT		Termination
100033966	7/29/2011	19.7 MGT		Termination
100033360	7/29/2011	22.7 MGT		Termination
100032341	7/29/2011	18.9 MGT		Termination
100029007	7/29/2011	19.5 MGT		Termination
100027705	7/29/2011	26.2 MGT		Termination
100027041	7/29/2011	28.2 MGT		Termination
100025934	7/29/2011	10.9 MGT		Termination
100023560	7/29/2011	9.7 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100022921	7/29/2011	8.3 MGT		Termination
100021879	7/29/2011	24.8 MGT		Termination
100021278	7/29/2011	14.2 MGT		Termination
100020744	7/29/2011	22.5 MGT		Termination
100020627	7/29/2011	22.0 MGT		Termination
100020406	7/29/2011	19.0 MGT		Termination
100019606	7/29/2011	25.2 MGT		Termination
100019597	7/29/2011	21.0 MGT		Termination
100019521	7/29/2011	10.9 MGT		Termination
100018419	7/29/2011	10.6 MGT		Termination
100018283	7/29/2011	11.0 MGT		Termination
100017238	7/29/2011	22.7 MGT		Termination
100016925	7/29/2011	24.9 MGT		Termination
100016760	7/29/2011	26.9 MGT		Termination
100011901	7/29/2011	31.3 MGT		Termination
100011347	7/29/2011	30.1 MGT		Termination
100009362	7/29/2011	21.3 MGT		Termination
100008567	7/29/2011	27.4 MGT		Termination
100008045	7/29/2011	21.1 MGT		Termination
100007217	7/29/2011	26.1 MGT		Termination
100006917	7/29/2011	25.4 MGT		Termination
100006558	7/29/2011	21.8 MGT		Termination
100005750	7/29/2011	12.1 MGT		Termination
100004385	7/29/2011	22.2 MGT		Termination
100004105	7/29/2011	13.0 MGT		Termination
100003663	7/29/2011	9.6 MGT		Termination
100003589	7/29/2011	15.1 MGT		Termination
100003550	7/29/2011	15.1 MGT		Termination
100002275	7/29/2011	20.5 MGT		Termination
100001301	7/29/2011	24.7 MGT		Termination
100000782	7/29/2011	21.2 MGT		Termination
100000596	7/29/2011	23.2 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100000572	7/29/2011	17.7 MGT		Termination
100000400	7/29/2011	23.9 MGT		Termination
95135	7/29/2011	22.2 MGT		Termination
79440	7/29/2011	21.2 MGT		Termination
70273	7/29/2011	9.9 MGT		Termination
24282	7/29/2011	12.8 MGT		Termination
24067	7/29/2011	5.1 MGT		Termination
23321	7/29/2011	23.5 MGT		Termination
22868	7/29/2011	29.8 MGT		Termination
21187	7/29/2011	14.4 MGT		Termination
20366	7/29/2011	20.2 MGT		Termination
20340	7/29/2011	24.8 MGT		Termination
20308	7/29/2011	22.8 MGT		Termination
20243	7/29/2011	25.4 MGT		Termination
18822	7/29/2011	24.8 MGT		Termination
18220	7/29/2011	1.1 MGT		Termination
17988	7/29/2011	1.7 MGT		Termination
17669	7/29/2011	1.9 MGT		Termination
17609	7/29/2011	2.2 MGT		Termination
17482	7/29/2011	1.9 MGT		Termination
17195	7/29/2011	1.9 MGT		Termination
17075	7/29/2011	2.1 MGT		Termination
17070	7/29/2011	2.7 MGT		Termination
16948	7/29/2011	2.5 MGT		Termination
16841	7/29/2011	2.8 MGT		Termination
16661	7/29/2011	3.0 MGT		Termination
16026	7/29/2011	3.5 MGT		Termination
15465	7/29/2011	4.5 MGT		Termination
14957	7/29/2011	1.9 MGT		Termination
14559	7/29/2011	6.1 MGT		Termination
14087	7/29/2011	5.5 MGT		Termination
14036	7/29/2011	5.7 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
14005	7/29/2011	6.8 MGT		Termination
13873	7/29/2011	5.9 MGT		Termination
13872	7/29/2011	6.0 MGT		Termination
13793	7/29/2011	6.1 MGT		Termination
13015	7/29/2011	6.9 MGT		Termination
12764	7/29/2011	9.0 MGT		Termination
12519	7/29/2011	9.0 MGT		Termination
12461	7/29/2011	9.1 MGT		Termination
07896	7/29/2011	12.7 MGT		Termination
07821	7/29/2011	20.1 MGT		Termination
07353	7/29/2011	19.1 MGT		Termination
06021	7/29/2011	10.5 MGT		Termination
04006	7/29/2011	21.9 MGT		Termination
02686	7/29/2011	3.4 MGT		Termination
01736	7/29/2011	17.7 MGT		Termination
00153	7/29/2011	23.1 MGT		Termination
100033940	7/31/2011	28.2 MGT		Retirement
100019474	7/31/2011	34.2 MGT		Retirement
100019467	7/31/2011	14.2 MGT		Retirement
100016524	7/31/2011	29.8 MGT		Retirement
100011918	7/31/2011	32.7 MGT		Retirement
100003349	7/31/2011	24.6 MGT		Retirement
88899	7/31/2011	20.1 MGT		Retirement
88898	7/31/2011	22.7 MGT		Retirement
85115	7/31/2011	38.1 MGT		Retirement
84330	7/31/2011	30.6 MGT		Retirement
81483	7/31/2011	31.3 MGT		Retirement
80352	7/31/2011	39.8 MGT		Retirement
79069	7/31/2011	19.3 MGT		Retirement
78311	7/31/2011	44.1 MGT		Retirement
76070	7/31/2011	24.0 MGT		Retirement
75640	7/31/2011	26.3 MGT		Retirement

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
65052	7/31/2011	24.7	MGT	Retirement
61900	7/31/2011	20.6	MGT	Retirement
61761	7/31/2011	38.0	MGT	Retirement
56326	7/31/2011	21.2	MGT	Retirement
54187	7/31/2011	21.3	MGT	Retirement
52697	7/31/2011	45.7	MGT	Retirement
49587	7/31/2011	38.4	MGT	Retirement
46540	7/31/2011	31.1	MGT	Retirement
42625	7/31/2011	29.5	MGT	Retirement
41900	7/31/2011	30.3	MGT	Retirement
38304	7/31/2011	26.6	MGT	Retirement
37211	7/31/2011	23.8	MGT	Retirement
33066	7/31/2011	26.3	MGT	Retirement
29550	7/31/2011	24.6	MGT	Retirement
28577	7/31/2011	37.4	MGT	Retirement
27096	7/31/2011	37.5	MGT	Retirement
26038	7/31/2011	9.3	MGT	Retirement
24578	7/31/2011	43.6	MGT	Retirement
24570	7/31/2011	44.0	MGT	Retirement
24568	7/31/2011	44.1	MGT	Retirement
24563	7/31/2011	21.1	MGT	Retirement
24420	7/31/2011	26.5	MGT	Retirement
24041	7/31/2011	17.4	MGT	Retirement
23997	7/31/2011	17.6	MGT	Retirement
23677	7/31/2011	21.2	MGT	Retirement
22856	7/31/2011	30.0	MGT	Retirement
22736	7/31/2011	31.7	MGT	Retirement
22710	7/31/2011	31.9	MGT	Retirement
22709	7/31/2011	32.0	MGT	Retirement
22693	7/31/2011	32.0	MGT	Retirement
22674	7/31/2011	32.1	MGT	Retirement
22665	7/31/2011	32.4	MGT	Retirement

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
22566	7/31/2011	33.6	MGT	Retirement
22563	7/31/2011	33.7	MGT	Retirement
22506	7/31/2011	35.6	MGT	Retirement
22501	7/31/2011	35.5	MGT	Retirement
22461	7/31/2011	37.4	MGT	Retirement
22402	7/31/2011	45.9	MGT	Retirement
22366	7/31/2011	38.9	MGT	Retirement
22362	7/31/2011	45.5	MGT	Retirement
22276	7/31/2011	42.3	MGT	Retirement
22264	7/31/2011	42.9	MGT	Retirement
21961	7/31/2011	42.8	MGT	Retirement
21959	7/31/2011	41.5	MGT	Retirement
21937	7/31/2011	38.8	MGT	Retirement
21903	7/31/2011	37.8	MGT	Retirement
21885	7/31/2011	38.4	MGT	Retirement
21782	7/31/2011	43.5	MGT	Retirement
21732	7/31/2011	39.9	MGT	Retirement
21701	7/31/2011	40.2	MGT	Retirement
21695	7/31/2011	40.3	MGT	Retirement
21635	7/31/2011	41.1	MGT	Retirement
21628	7/31/2011	37.7	MGT	Retirement
21462	7/31/2011	19.3	MGT	Retirement
20694	7/31/2011	35.3	MGT	Retirement
20071	7/31/2011	32.7	MGT	Retirement
19962	7/31/2011	35.0	MGT	Retirement
16745	7/31/2011	2.8	MGT	Retirement
15879	7/31/2011	29.7	MGT	Retirement
14583	7/31/2011	5.7	MGT	Retirement
12909	7/31/2011	19.6	MGT	Retirement
12746	7/31/2011	35.0	MGT	Retirement
12420	7/31/2011	37.2	MGT	Retirement
10292	7/31/2011	29.8	MGT	Retirement



**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
10269	7/31/2011	30.7 MGT		Retirement
10064	7/31/2011	26.3 MGT		Retirement
10010	7/31/2011	37.7 MGT		Retirement
09660	7/31/2011	37.6 MGT		Retirement
09407	7/31/2011	36.4 MGT		Retirement
09144	7/31/2011	38.2 MGT		Retirement
09014	7/31/2011	38.3 MGT		Retirement
08945	7/31/2011	38.5 MGT		Retirement
08857	7/31/2011	38.7 MGT		Retirement
08283	7/31/2011	39.8 MGT		Retirement
07977	7/31/2011	40.2 MGT		Retirement
07894	7/31/2011	40.3 MGT		Retirement
07513	7/31/2011	40.5 MGT		Retirement
07195	7/31/2011	26.3 MGT		Retirement
06333	7/31/2011	21.7 MGT		Retirement
05458	7/31/2011	42.7 MGT		Retirement
05059	7/31/2011	28.5 MGT		Retirement
04068	7/31/2011	29.6 MGT		Retirement
04053	7/31/2011	29.7 MGT		Retirement
03591	7/31/2011	30.0 MGT		Retirement
02855	7/31/2011	31.1 MGT		Retirement
02443	7/31/2011	31.9 MGT		Retirement
02427	7/31/2011	23.6 MGT		Retirement
02369	7/31/2011	32.0 MGT		Retirement
01337	7/31/2011	35.2 MGT		Retirement
01231	7/31/2011	35.4 MGT		Retirement
01167	7/31/2011	35.5 MGT		Retirement
00989	7/31/2011	36.0 MGT		Retirement
00973	7/31/2011	36.0 MGT		Retirement
00943	7/31/2011	36.0 MGT		Retirement
00415	7/31/2011	36.7 MGT		Retirement
00326	7/31/2011	33.7 MGT		Retirement

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
00321	7/31/2011	33.7	MGT	Retirement
00266	7/31/2011	36.8	MGT	Retirement
00210	7/31/2011	36.9	MGT	Retirement
00152	7/31/2011	33.9	MGT	Retirement
00047	7/31/2011	33.9	MGT	Retirement
100054858	7/31/2011	2.8	MGT	Termination
100046865	7/31/2011	5.9	MGT	Termination
100046722	7/31/2011	3.7	MGT	Termination
100019931	7/31/2011	7.9	MGT	Termination
100011771	8/1/2011	21.8	MGT	Death
05813	8/2/2011	27.9	MGT	Retirement
100020817	8/2/2011	21.7	MGT	Termination
100019496	8/2/2011	19.7	MGT	Termination
100019360	8/2/2011	16.4	MGT	Termination
63572	8/2/2011	18.0	MGT	Termination
10551	8/2/2011	21.7	MGT	Termination
13330	8/3/2011	20.2	MGT	Termination
100711424	8/5/2011	2.0	MGT	Termination
100711379	8/5/2011	2.1	MGT	Termination
100711204	8/5/2011	2.4	MGT	Termination
15930	8/7/2011	3.7	MGT	Termination
100034419	8/8/2011	21.5	MGT	Retirement
100033544	8/8/2011	13.9	MGT	Retirement
100020745	8/8/2011	11.6	MGT	Retirement
100019613	8/8/2011	10.8	MGT	Retirement
100019525	8/8/2011	14.2	MGT	Retirement
100019518	8/8/2011	19.1	MGT	Retirement
100019384	8/8/2011	22.1	MGT	Retirement
100019361	8/8/2011	11.1	MGT	Retirement
100004302	8/8/2011	13.0	MGT	Retirement
100003669	8/8/2011	13.9	MGT	Retirement
100002151	8/8/2011	16.3	MGT	Retirement

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
84307	8/8/2011	32.3 MGT		Retirement
54978	8/8/2011	26.3 MGT		Retirement
02697	8/8/2011	12.5 MGT		Retirement
100713367	8/8/2011	2.0 MGT		Termination
100051607	8/8/2011	3.9 MGT		Termination
100049696	8/8/2011	4.9 MGT		Termination
100046940	8/8/2011	5.7 MGT		Termination
100046756	8/8/2011	6.1 MGT		Termination
100034277	8/8/2011	15.6 MGT		Termination
100034174	8/8/2011	11.3 MGT		Termination
100034129	8/8/2011	12.0 MGT		Termination
100034064	8/8/2011	11.1 MGT		Termination
100031210	8/8/2011	19.2 MGT		Termination
100028780	8/8/2011	14.5 MGT		Termination
100026974	8/8/2011	19.1 MGT		Termination
100024925	8/8/2011	12.9 MGT		Termination
100021208	8/8/2011	10.6 MGT		Termination
100021139	8/8/2011	23.4 MGT		Termination
100021026	8/8/2011	11.3 MGT		Termination
100020442	8/8/2011	12.0 MGT		Termination
100020259	8/8/2011	11.7 MGT		Termination
100019746	8/8/2011	8.4 MGT		Termination
100019626	8/8/2011	12.9 MGT		Termination
100019621	8/8/2011	10.9 MGT		Termination
100019620	8/8/2011	12.0 MGT		Termination
100019617	8/8/2011	12.2 MGT		Termination
100019608	8/8/2011	12.3 MGT		Termination
100019578	8/8/2011	15.1 MGT		Termination
100019569	8/8/2011	24.4 MGT		Termination
100019537	8/8/2011	11.4 MGT		Termination
100019506	8/8/2011	13.8 MGT		Termination
100019453	8/8/2011	11.1 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100018848	8/8/2011	10.1 MGT		Termination
100015301	8/8/2011	9.5 MGT		Termination
100011871	8/8/2011	32.8 MGT		Termination
100011005	8/8/2011	22.7 MGT		Termination
100009956	8/8/2011	14.0 MGT		Termination
100005594	8/8/2011	13.1 MGT		Termination
100003728	8/8/2011	23.7 MGT		Termination
100001593	8/8/2011	14.5 MGT		Termination
100001518	8/8/2011	16.6 MGT		Termination
92550	8/8/2011	13.8 MGT		Termination
67158	8/8/2011	13.3 MGT		Termination
52132	8/8/2011	13.2 MGT		Termination
24225	8/8/2011	13.8 MGT		Termination
24219	8/8/2011	13.7 MGT		Termination
23492	8/8/2011	22.6 MGT		Termination
16120	8/8/2011	19.0 MGT		Termination
15678	8/8/2011	13.7 MGT		Termination
15080	8/8/2011	21.2 MGT		Termination
15019	8/8/2011	5.2 MGT		Termination
15016	8/8/2011	5.2 MGT		Termination
15015	8/8/2011	5.2 MGT		Termination
13946	8/8/2011	5.8 MGT		Termination
12547	8/8/2011	9.0 MGT		Termination
08623	8/8/2011	24.7 MGT		Termination
08136	8/8/2011	21.3 MGT		Termination
08010	8/8/2011	21.3 MGT		Termination
07838	8/8/2011	12.9 MGT		Termination
07498	8/8/2011	25.9 MGT		Termination
05773	8/8/2011	10.6 MGT		Termination
05702	8/8/2011	13.7 MGT		Termination
04603	8/8/2011	5.3 MGT		Termination
03602	8/8/2011	15.4 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
03372	8/8/2011	22.3	MGT	Termination
02484	8/8/2011	23.6	MGT	Termination
02367	8/8/2011	23.5	MGT	Termination
02284	8/8/2011	23.6	MGT	Termination
01623	8/8/2011	24.0	MGT	Termination
01191	8/8/2011	11.1	MGT	Termination
00751	8/8/2011	24.7	MGT	Termination
00058	8/8/2011	18.5	MGT	Termination
00051	8/8/2011	18.5	MGT	Termination
100046725	8/9/2011	6.2	MGT	Termination
100017259	8/9/2011	22.4	MGT	Termination
100053797	8/12/2011	3.2	MGT	Termination
18431	8/14/2011	1.2	MGT	Termination
100055073	8/15/2011	2.8	MGT	Termination
100713413	8/19/2011	1.9	MGT	Termination
100046775	8/19/2011	6.1	MGT	Termination
16681	8/21/2011	3.0	MGT	Termination
100711358	8/23/2011	2.1	MGT	Termination
100033812	8/25/2011	10.2	MGT	Termination
18050	8/25/2011	1.2	MGT	Termination
100026929	8/26/2011	21.7	MGT	Termination
100019543	8/26/2011	11.4	MGT	Termination
100019359	8/26/2011	15.1	MGT	Termination
100008131	8/26/2011	24.1	MGT	Termination
08404	8/26/2011	12.1	MGT	Termination
01198	8/26/2011	11.3	MGT	Termination
18432	8/28/2011	1.2	MGT	Termination
15941	8/28/2011	3.7	MGT	Termination
100063957	8/29/2011	0.0	MGT	Termination
100048405	8/31/2011	32.3	MGT	Retirement
100033823	8/31/2011	39.5	MGT	Retirement
100026934	8/31/2011	32.3	MGT	Retirement

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100024135	8/31/2011	32.0	MGT	Retirement
100023692	8/31/2011	32.1	MGT	Retirement
100022037	8/31/2011	32.4	MGT	Retirement
100021312	8/31/2011	18.7	MGT	Retirement
100020425	8/31/2011	27.4	MGT	Retirement
100019321	8/31/2011	34.3	MGT	Retirement
100007561	8/31/2011	19.5	MGT	Retirement
100000709	8/31/2011	24.4	MGT	Retirement
74938	8/31/2011	21.4	MGT	Retirement
67930	8/31/2011	21.1	MGT	Retirement
66588	8/31/2011	21.1	MGT	Retirement
62813	8/31/2011	5.0	MGT	Retirement
27897	8/31/2011	24.8	MGT	Retirement
26089	8/31/2011	19.8	MGT	Retirement
24612	8/31/2011	42.3	MGT	Retirement
14963	8/31/2011	5.4	MGT	Retirement
14857	8/31/2011	5.4	MGT	Retirement
13232	8/31/2011	22.4	MGT	Retirement
12240	8/31/2011	9.2	MGT	Retirement
11988	8/31/2011	9.4	MGT	Retirement
10624	8/31/2011	30.2	MGT	Retirement
09850	8/31/2011	37.5	MGT	Retirement
08281	8/31/2011	25.4	MGT	Retirement
07907	8/31/2011	25.8	MGT	Retirement
04509	8/31/2011	21.9	MGT	Retirement
03065	8/31/2011	31.0	MGT	Retirement
01791	8/31/2011	33.2	MGT	Retirement
00873	8/31/2011	24.7	MGT	Retirement
00743	8/31/2011	36.5	MGT	Retirement
100054884	8/31/2011	2.9	MGT	Termination
100051412	8/31/2011	4.1	MGT	Termination
100019209	8/31/2011	26.2	MGT	Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100012045	8/31/2011	16.1 MGT		Termination
18301	8/31/2011	1.1 MGT		Termination
02479	8/31/2011	23.6 MGT		Termination
100046747	9/2/2011	6.2 MGT		Termination
100029802	9/2/2011	11.8 MGT		Termination
100020622	9/2/2011	30.5 MGT		Termination
16444	9/2/2011	3.1 MGT		Termination
17444	9/5/2011	2.8 MGT		Termination
100004586	9/6/2011	26.6 MGT		Retirement
100046614	9/6/2011	6.5 MGT		Termination
100008563	9/6/2011	30.0 MGT		Termination
100711492	9/8/2011	2.0 MGT		Termination
14558	9/8/2011	6.2 MGT		Termination
100007648	9/9/2011	37.8 MGT		Retirement
100711809	9/9/2011	1.0 MGT		Termination
100711752	9/9/2011	1.3 MGT		Termination
100050770	9/9/2011	4.4 MGT		Termination
100048445	9/9/2011	16.1 MGT		Termination
100007156	9/9/2011	15.2 MGT		Termination
12543	9/9/2011	9.1 MGT		Termination
100713273	9/12/2011	2.3 MGT		Termination
17060	9/13/2011	2.7 MGT		Termination
100022889	9/14/2011	31.5 MGT		Retirement
05642	9/14/2011	10.6 MGT		Termination
100020967	9/15/2011	11.8 MGT		Retirement
00201	9/15/2011	33.9 MGT		Retirement
100711439	9/15/2011	2.1 MGT		Termination
67244	9/15/2011	22.2 MGT		Termination
20682	9/15/2011	31.9 MGT		Termination
17672	9/16/2011	2.0 MGT		Termination
100053725	9/19/2011	3.3 MGT		Termination
100023767	9/19/2011	11.4 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100017360	9/19/2011	22.0 MGT		Termination
17401	9/19/2011	2.9 MGT		Termination
100019679	9/20/2011	7.6 MGT		Termination
70000	9/20/2011	8.8 MGT		Termination
100711665	9/23/2011	1.5 MGT		Termination
100054624	9/23/2011	3.0 MGT		Termination
17245	9/23/2011	2.8 MGT		Termination
16963	9/25/2011	2.8 MGT		Termination
100021526	9/26/2011	11.1 MGT		Retirement
100711293	9/26/2011	2.4 MGT		Termination
100054930	9/26/2011	3.0 MGT		Termination
100054317	9/26/2011	3.2 MGT		Termination
100052606	9/26/2011	3.6 MGT		Termination
100022789	9/26/2011	22.9 MGT		Termination
100021036	9/26/2011	11.7 MGT		Termination
16625	9/26/2011	3.3 MGT		Termination
16241	9/26/2011	3.5 MGT		Termination
16223	9/26/2011	3.5 MGT		Termination
100010840	9/27/2011	21.1 MGT		Retirement
100711818	9/27/2011	1.0 MGT		Termination
100711483	9/27/2011	2.1 MGT		Termination
100711405	9/27/2011	2.2 MGT		Termination
100054304	9/27/2011	3.2 MGT		Termination
100053013	9/27/2011	3.5 MGT		Termination
100052924	9/27/2011	3.5 MGT		Termination
100051457	9/27/2011	4.2 MGT		Termination
100051367	9/27/2011	4.2 MGT		Termination
100046902	9/27/2011	5.9 MGT		Termination
100046723	9/27/2011	6.3 MGT		Termination
100045964	9/27/2011	7.6 MGT		Termination
100019789	9/27/2011	8.4 MGT		Termination
16663	9/27/2011	3.2 MGT		Termination



**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
16389	9/27/2011	3.3 MGT		Termination
14317	9/27/2011	6.5 MGT		Termination
07368	9/27/2011	13.2 MGT		Termination
03212	9/27/2011	12.7 MGT		Termination
100027939	9/28/2011	28.3 MGT		Retirement
100025810	9/28/2011	34.3 MGT		Retirement
100021005	9/28/2011	23.0 MGT		Retirement
100019696	9/28/2011	38.5 MGT		Retirement
100711430	9/28/2011	2.2 MGT		Termination
100711116	9/28/2011	2.9 MGT		Termination
100054136	9/28/2011	3.2 MGT		Termination
100052721	9/28/2011	3.6 MGT		Termination
100048661	9/28/2011	10.2 MGT		Termination
100048388	9/28/2011	8.0 MGT		Termination
100048341	9/28/2011	7.6 MGT		Termination
100046593	9/28/2011	6.7 MGT		Termination
100028733	9/28/2011	25.3 MGT		Termination
05004	9/28/2011	14.4 MGT		Termination
00489	9/28/2011	11.6 MGT		Termination
100016156	9/29/2011	39.0 MGT		Retirement
100006711	9/29/2011	21.6 MGT		Retirement
100005040	9/29/2011	28.0 MGT		Retirement
41762	9/29/2011	26.3 MGT		Retirement
100711208	9/29/2011	2.6 MGT		Termination
100047934	9/29/2011	5.5 MGT		Termination
100019659	9/29/2011	8.8 MGT		Termination
100009336	9/29/2011	25.7 MGT		Termination
100005613	9/29/2011	27.1 MGT		Termination
18074	9/29/2011	1.3 MGT		Termination
17863	9/29/2011	2.2 MGT		Termination
14503	9/29/2011	6.2 MGT		Termination
11828	9/29/2011	9.7 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
15064	9/30/2011	4.2 MGT		Divestiture
14725	9/30/2011	5.0 MGT		Divestiture
05692	9/30/2011	13.8 MGT		Divestiture
100048771	9/30/2011	28.1 MGT		Retirement
100048627	9/30/2011	37.4 MGT		Retirement
100034198	9/30/2011	37.7 MGT		Retirement
100033837	9/30/2011	38.7 MGT		Retirement
100033295	9/30/2011	37.9 MGT		Retirement
100027302	9/30/2011	29.1 MGT		Retirement
100020054	9/30/2011	38.4 MGT		Retirement
100019456	9/30/2011	37.3 MGT		Retirement
100019369	9/30/2011	33.0 MGT		Retirement
100016502	9/30/2011	30.2 MGT		Retirement
100009109	9/30/2011	28.4 MGT		Retirement
100007663	9/30/2011	39.7 MGT		Retirement
100005486	9/30/2011	17.5 MGT		Retirement
100003705	9/30/2011	32.9 MGT		Retirement
100002843	9/30/2011	21.3 MGT		Retirement
100002068	9/30/2011	30.7 MGT		Retirement
100000568	9/30/2011	28.2 MGT		Retirement
78521	9/30/2011	37.4 MGT		Retirement
73730	9/30/2011	27.3 MGT		Retirement
70999	9/30/2011	17.4 MGT		Retirement
69445	9/30/2011	23.4 MGT		Retirement
68651	9/30/2011	36.1 MGT		Retirement
44172	9/30/2011	20.9 MGT		Retirement
35275	9/30/2011	46.2 MGT		Retirement
34436	9/30/2011	27.5 MGT		Retirement
25132	9/30/2011	9.0 MGT		Retirement
23185	9/30/2011	18.3 MGT		Retirement
23004	9/30/2011	26.9 MGT		Retirement
21935	9/30/2011	41.6 MGT		Retirement

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
21737	9/30/2011	40.0 MGT		Retirement
20219	9/30/2011	38.8 MGT		Retirement
18790	9/30/2011	26.8 MGT		Retirement
17179	9/30/2011	3.0 MGT		Retirement
16333	9/30/2011	20.9 MGT		Retirement
15997	9/30/2011	26.8 MGT		Retirement
15181	9/30/2011	27.0 MGT		Retirement
15017	9/30/2011	5.3 MGT		Retirement
12190	9/30/2011	21.5 MGT		Retirement
10770	9/30/2011	21.1 MGT		Retirement
09878	9/30/2011	37.5 MGT		Retirement
09842	9/30/2011	37.6 MGT		Retirement
08819	9/30/2011	38.2 MGT		Retirement
08642	9/30/2011	39.2 MGT		Retirement
04174	9/30/2011	15.1 MGT		Retirement
02717	9/30/2011	31.4 MGT		Retirement
01992	9/30/2011	30.6 MGT		Retirement
01991	9/30/2011	32.7 MGT		Retirement
01346	9/30/2011	35.4 MGT		Retirement
01214	9/30/2011	35.6 MGT		Retirement
00615	9/30/2011	33.7 MGT		Retirement
100713814	9/30/2011	1.0 MGT		Termination
100713167	9/30/2011	2.7 MGT		Termination
100048683	9/30/2011	7.4 MGT		Termination
100019644	9/30/2011	8.9 MGT		Termination
100019417	9/30/2011	20.2 MGT		Termination
100018297	9/30/2011	11.1 MGT		Termination
100004647	9/30/2011	26.6 MGT		Termination
14966	9/30/2011	5.5 MGT		Termination
13091	9/30/2011	7.1 MGT		Termination
10272	10/1/2011	17.7 MGT		Termination
05288	10/1/2011	28.3 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
17705	10/3/2011	2.1 MGT		Divestiture
17130	10/3/2011	3.0 MGT		Divestiture
17006	10/3/2011	3.1 MGT		Divestiture
16934	10/3/2011	3.2 MGT		Divestiture
15327	10/3/2011	4.8 MGT		Divestiture
15244	10/3/2011	5.0 MGT		Divestiture
15227	10/3/2011	5.1 MGT		Divestiture
14265	10/3/2011	6.8 MGT		Divestiture
05267	10/3/2011	5.6 MGT		Divestiture
01305	10/3/2011	7.3 MGT		Divestiture
01161	10/3/2011	7.3 MGT		Divestiture
01151	10/3/2011	7.3 MGT		Divestiture
01144	10/3/2011	7.3 MGT		Divestiture
01116	10/3/2011	7.3 MGT		Divestiture
01026	10/3/2011	7.3 MGT		Divestiture
00969	10/3/2011	7.3 MGT		Divestiture
00893	10/3/2011	7.3 MGT		Divestiture
00891	10/3/2011	7.3 MGT		Divestiture
00881	10/3/2011	7.3 MGT		Divestiture
00848	10/3/2011	7.3 MGT		Divestiture
00834	10/3/2011	7.3 MGT		Divestiture
00719	10/3/2011	7.3 MGT		Divestiture
00710	10/3/2011	7.3 MGT		Divestiture
00660	10/3/2011	7.3 MGT		Divestiture
00645	10/3/2011	7.3 MGT		Divestiture
00611	10/3/2011	7.3 MGT		Divestiture
00475	10/3/2011	7.3 MGT		Divestiture
00474	10/3/2011	7.3 MGT		Divestiture
00471	10/3/2011	7.3 MGT		Divestiture
00469	10/3/2011	7.3 MGT		Divestiture
00466	10/3/2011	7.3 MGT		Divestiture
00464	10/3/2011	7.3 MGT		Divestiture

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
100005146	10/3/2011	24.7 MGT		Retirement
22827	10/3/2011	30.5 MGT		Termination
13977	10/3/2011	7.2 MGT		Termination
13018	10/3/2011	9.0 MGT		Termination
06637	10/3/2011	13.3 MGT		Termination
06232	10/3/2011	21.0 MGT		Termination
42090	10/4/2011	35.1 MGT		Retirement
21458	10/4/2011	11.1 MGT		Termination
18320	10/4/2011	1.4 MGT		Termination
18194	10/4/2011	1.7 MGT		Termination
100026390	10/5/2011	22.4 MGT		Retirement
01349	10/5/2011	18.1 MGT		Termination
100046768	10/6/2011	6.3 MGT		Termination
18357	10/6/2011	1.3 MGT		Termination
100711360	10/7/2011	2.3 MGT		Termination
100046954	10/7/2011	5.8 MGT		Termination
21556	10/7/2011	4.6 MGT		Termination
100711472	10/14/2011	2.1 MGT		Termination
100711725	10/15/2011	1.4 MGT		Termination
100711575	10/21/2011	1.9 MGT		Termination
100046688	10/28/2011	6.5 MGT		Termination
01189	10/30/2011	11.2 MGT		Termination
100034667	10/31/2011	47.5 MGT		Retirement
100019404	10/31/2011	39.5 MGT		Retirement
100015517	10/31/2011	39.0 MGT		Retirement
88780	10/31/2011	26.9 MGT		Retirement
82346	10/31/2011	24.8 MGT		Retirement
80349	10/31/2011	33.2 MGT		Retirement
75550	10/31/2011	24.8 MGT		Retirement
72700	10/31/2011	44.3 MGT		Retirement
46526	10/31/2011	32.5 MGT		Retirement
45612	10/31/2011	31.0 MGT		Retirement

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
38674	10/31/2011	38.3 MGT		Retirement
37290	10/31/2011	25.0 MGT		Retirement
31255	10/31/2011	28.3 MGT		Retirement
30912	10/31/2011	34.9 MGT		Retirement
16571	10/31/2011	3.4 MGT		Retirement
16321	10/31/2011	3.5 MGT		Retirement
13627	10/31/2011	7.9 MGT		Retirement
10376	10/31/2011	22.2 MGT		Retirement
05608	10/31/2011	14.2 MGT		Retirement
01114	10/31/2011	35.9 MGT		Retirement
00282	10/31/2011	34.0 MGT		Retirement
100711331	10/31/2011	2.4 MGT		Termination
100054986	10/31/2011	3.0 MGT		Termination
100054785	10/31/2011	3.1 MGT		Termination
100053999	10/31/2011	3.3 MGT		Termination
100051057	10/31/2011	4.4 MGT		Termination
100016983	10/31/2011	24.6 MGT		Termination
100016672	10/31/2011	27.3 MGT		Termination
100008778	10/31/2011	22.4 MGT		Termination
100006485	10/31/2011	23.7 MGT		Termination
18281	10/31/2011	1.3 MGT		Termination
13896	11/3/2011	6.2 MGT		Termination
16847	11/7/2011	3.0 MGT		Termination
17066	11/8/2011	2.6 MGT		Termination
15215	11/8/2011	4.2 MGT		Termination
100006086	11/10/2011	28.2 MGT		Death
100711837	11/10/2011	0.9 MGT		Termination
17625	11/11/2011	2.4 MGT		Termination
13953	11/14/2011	7.4 MGT		Termination
100048662	11/15/2011	33.3 MGT		Retirement
100713782	11/15/2011	1.4 MGT		Termination
22944	11/15/2011	27.5 MGT		Termination

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
03283	11/15/2011	8.9 MGT		Termination
100005247	11/18/2011	15.5 MGT		Termination
14442	11/20/2011	6.6 MGT		Termination
100001754	11/24/2011	22.0 MGT		Death
17304	11/25/2011	2.4 MGT		Termination
100034657	11/30/2011	38.8 MGT		Retirement
100033606	11/30/2011	25.5 MGT		Retirement
100029439	11/30/2011	33.4 MGT		Retirement
100027663	11/30/2011	32.9 MGT		Retirement
100021756	11/30/2011	31.6 MGT		Retirement
100019699	11/30/2011	34.8 MGT		Retirement
100019414	11/30/2011	35.0 MGT		Retirement
16440	12/9/2011	3.4 MGT		Termination
100011436	12/12/2011	13.0 MGT		Termination
21219	12/12/2011	0.0 MGT		Termination
21204	12/12/2011	0.0 MGT		Termination
100711532	12/16/2011	2.2 MGT		Termination
17849	12/16/2011	2.5 MGT		Termination
15114	12/16/2011	4.4 MGT		Termination
100019477	12/21/2011	23.8 MGT		Termination
100711834	12/30/2011	1.0 MGT		Termination
60003	12/30/2011	7.8 MGT		Termination
100048265	12/31/2011	37.1 MGT		Retirement
100020652	12/31/2011	26.7 MGT		Retirement
100019375	12/31/2011	26.2 MGT		Retirement
100019208	12/31/2011	26.3 MGT		Retirement
100010499	12/31/2011	28.5 MGT		Retirement
100008900	12/31/2011	44.5 MGT		Retirement
100004819	12/31/2011	30.6 MGT		Retirement
70904	12/31/2011	49.3 MGT		Retirement
50246	12/31/2011	24.0 MGT		Retirement
47025	12/31/2011	29.5 MGT		Retirement

**National Grid Management Terminations and Retirements 2007 - 2011**

Employee ID	Termination/Retirement Date	Years of Service	Union/Mgmt Code	Reason for Leaving
03763	12/31/2011	30.4 MGT		Retirement
02640	12/31/2011	31.9 MGT		Retirement
02463	12/31/2011	24.0 MGT		Retirement
01352	12/31/2011	33.2 MGT		Retirement
00104	12/31/2011	37.5 MGT		Retirement
17660	12/31/2011	2.4 MGT		Termination



Date of Request: May 15, 2012  
Due Date: May 25, 2012

Request No. DPS-58(RES-3)  
NMPC Req. No. NM 58

NIAGARA MOHAWK POWER CORPORATION

Case No. 12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation d/b/a  
National Grid - Electric and Gas Rates

Request for Information

FROM: Rick Schuler  
TO: Human Resources Panel  
SUBJECT: Composition of Management and Union Peer Groups

Request: Regarding page 17, line 5, page 39 lines 4 – 5 and page 40, lines 7 - 11 of the testimony of the Human Resources Panel, please explain why different companies were included in the peer groups used to analyze the competitiveness of Niagara Mohawk's base pay, variable pay and benefits packages. Please separately list the peer companies used for the comparative analyses for base salary, variable pay and benefits, and discuss why each company that was not included in each and every peer group, could not have been included in all peer groups. Please also explain why these peer groups differ from the peer group identified in Exhibit MPH-5, page 3 of 44 from the company's last rate case 10-E-0050.

Response:

The following tables provide an overview of the companies that are included in the peer groups for the comparative analyses for base salary, variable pay and benefits. A total of three distinct peer groups were developed. The variation between the peer groups was necessary in order to differentiate the peers that National Grid competes against for its workforce attraction and retention.

Management BENVAL and Compensation Peer Group:

This peer group was developed to determine the competitiveness of the total compensation and benefits package offered to management employees at National Grid. This peer group comprises thirty-eight (38) companies across the energy industry and general industry. The peer group includes companies both inside and outside of the energy services industry as National Grid competes with all companies in an effort to attract and retain key talent for its management positions. Most recently, National Grid has hired employees from several companies included in the peer group including Consolidated Edison, Verizon, Fidelity, Constellation Energy and IBM, to name a few.

The peer group includes organizations of varying revenue size including investor owned utilities in the New York and Northeast regions.

The use of a consistent peer group allowed for a comprehensive analysis of data between all elements of compensation (salary and variable) and benefits and enabled the average total cash compensation (salary and variable) to be combined with benefit value results in order to assess the overall competitiveness of the total rewards package.

Companies were selected from Towers Watson's Benefits and Compensation databases. The databases have over 1,000 participants and contain market data for 35 industries. The database covers retirement, health and welfare, paid time off, lifestyle and flexible benefits and compensation elements such as base salary, target annual variable pay and target total cash.

The current peer group was expanded from the group used in the previous rate filing in order to provide a broader sample of energy and general industry employers. The only companies not included from the prior study were Colgate Palmolive and FPL. Colgate Palmolive was excluded from the current peer group because the information retained by Towers Watson was dated and FPL was excluded because there was no compensation data available in the Towers Watson database.

Union BENVAL Peer Group:

This peer group was developed in order to determine the competitiveness of the benefits package offered to members of IBEW Local 97. The peer group comprises twenty-one (21) companies in the energy industry and includes investor owned utilities in New York and, to the extent possible, energy industry companies used in the management peer group with a union presence. The energy industry was chosen because National Grid competes with other utilities in filling its union positions. National Grid has hired union employees from companies in the peer group such as Constellation Energy and Entergy.

The Union BENVAL peer group used in the last filing overlaps to some degree with the Union peer group used in the current case. However, because the 2012 study used only the energy industry companies included in the management peer group that have a union presence, the 2012 Union BENVAL study does not use the same group as the study presented in the Company's previous base rate case.

Union Compensation Peer Group:

A separate peer group had to be developed to assess the competitiveness of the union compensation package. Survey guidelines require a minimum of 5 data points to present the average or median of any data set and there was insufficient compensation information in the Towers Watson database for union positions in the peer group used in the union BENVAL analysis.

The peer group that was chosen represents the entire energy services participant group in the Towers Watson survey which comprises 124 companies including investor owned utilities in New York.

Management BENVAL & Compensation Peer Group (n=38)		Union BENVAL Peer Group (n=21)
<ul style="list-style-type: none"> <li>• 3M</li> <li>• Ameren Corporation</li> <li>• American Electric Power System</li> <li>• American Express Company</li> <li>• American International Group, Inc.</li> <li>• American Water</li> <li>• CenterPoint Energy, Inc.</li> <li>• Citigroup</li> <li>• Consolidated Edison Company of New York, Inc.</li> <li>• Constellation Energy Group, Inc.</li> <li>• DTE Energy</li> <li>• Duke Energy Corporation</li> <li>• Energy Future Holdings Corp.</li> <li>• Entergy Corporation</li> <li>• Exelon Corporation</li> <li>• FedEx Ground</li> <li>• Fidelity Investments</li> <li>• Hess Corporation</li> <li>• Integrys Energy Group, Inc.</li> <li>• International Business Machines Corporation</li> <li>• ISO New England</li> <li>• MasterCard Worldwide</li> <li>• MDU Resources Group, Inc.</li> <li>• Northeast Utilities Service Company</li> <li>• NSTAR</li> <li>• ONEOK, Inc.</li> <li>• Pacific Gas and Electric Company</li> <li>• Pitney Bowes Inc.</li> <li>• PPL</li> <li>• Progress Energy, Inc.</li> <li>• Public Service Enterprise Group</li> <li>• Sempra Energy</li> </ul>	<ul style="list-style-type: none"> <li>• Southern California Edison</li> <li>• TransCanada USA Services Inc</li> <li>• United States Steel Corporation</li> <li>• United Technologies Corporation</li> <li>• Verizon</li> <li>• NYISO</li> </ul>	<ul style="list-style-type: none"> <li>• Ameren Corporation</li> <li>• American Electric Power System</li> <li>• CenterPoint Energy, Inc.</li> <li>• Consolidated Edison Company of New York, Inc.</li> <li>• Constellation Energy Group, Inc. - NMP Union</li> <li>• DTE Energy – Union</li> <li>• Duke Energy Corporation</li> <li>• Energy Future Holdings Corp.</li> <li>• Entergy Corporation</li> <li>• Exelon West</li> <li>• MDU Resources Group, Inc.</li> <li>• Northeast Utilities Service Company</li> <li>• NSTAR</li> <li>• NSTAR - Gas Union</li> <li>• ONEOK, Inc.</li> <li>• Pacific Gas and Electric Company</li> <li>• PPL</li> <li>• Progress Energy, Inc.</li> <li>• Public Service Enterprise Group</li> <li>• Southern California Edison</li> <li>• Integrys Energy Group, Inc. - PEC Union</li> </ul>

### Union Compensation Peer Group (n=124)

<ul style="list-style-type: none"> <li>• Acciona</li> <li>• AEI Services</li> <li>• AGL Resources</li> <li>• Allete</li> <li>• Alliance Pipeline</li> <li>• Alliant Energy</li> <li>• Alyeska Pipeline Service</li> <li>• Ameren Corporation</li> <li>• American Electric Power System</li> <li>• ATC Management</li> <li>• Avista</li> <li>• Bechtel Marine Propulsion - Bettis</li> <li>• BG US Services</li> <li>• Black Hills</li> <li>• Brookfield Renewable Energy</li> <li>• Calpine</li> <li>• Capital Power Corporation</li> <li>• CenterPoint Energy, Inc.</li> <li>• Central Vermont Public Service</li> <li>• Chelan County Public Utility District</li> <li>• CH Energy Group</li> <li>• Cheniere Energy</li> <li>• City of Garland</li> <li>• Cleco</li> <li>• CMS Energy</li> <li>• Colorado Springs Utilities</li> <li>• Consolidated Edison Company of New York, Inc.</li> <li>• Constellation Energy Group, Inc.</li> <li>• Covanta Holdings</li> <li>• CPS Energy</li> <li>• Crosstex Energy</li> <li>• DCP Midstream</li> <li>• Dominion Resources</li> <li>• DPL</li> <li>• DTE Energy</li> <li>• Duke Energy Corporation</li> <li>• EDP Renewables North America LLC</li> </ul>	<ul style="list-style-type: none"> <li>• El Paso Corporation</li> <li>• El Paso Electric</li> <li>• EQT Corporation</li> <li>• Enbridge Energy</li> <li>• Energy Future Holdings Corp.</li> <li>• Energy Northwest</li> <li>• Entergy Corporation</li> <li>• EPCO</li> <li>• Exelon Corporation</li> <li>• FirstEnergy</li> <li>• First Solar</li> <li>• GenOn Energy</li> <li>• Granite Services Inc.</li> <li>• Great River Energy</li> <li>• Hawaiian Electric</li> <li>• Iberdrola Renewables</li> <li>• IDACORP</li> <li>• Idaho National Laboratory</li> <li>• Integrys Energy Group, Inc.</li> <li>• IPR - GDF SUEZ North America</li> <li>• Kinder Morgan</li> <li>• LES</li> <li>• LG&amp;E and KU Energy Services</li> <li>• Lower Colorado River Authority</li> <li>• MGE Energy</li> <li>• MidAmerican Holdings</li> <li>• Nebraska Public Power District</li> <li>• Newport News Shipbuilding</li> <li>• New York Power Authority</li> <li>• NextEra Energy</li> <li>• Nicor</li> <li>• NiSource</li> <li>• Northeast Utilities Service Company</li> <li>• NorthWestern Energy</li> <li>• NRG Energy</li> <li>• NSTAR</li> <li>• Nuscale Power</li> </ul>	<ul style="list-style-type: none"> <li>• NV Energy</li> <li>• NW Natural</li> <li>• Oak Ridge National Laboratory</li> <li>• OGE Energy</li> <li>• Oglethorpe Power</li> <li>• Old Dominion Electric</li> <li>• Omaha Public Power</li> <li>• ONEOK, Inc.</li> <li>• Orlando Utilities Commission</li> <li>• Pacific Gas &amp; Electric Company</li> <li>• Pepco Holdings</li> <li>• Pinnacle West Capital</li> <li>• PNM Resources</li> <li>• Portland General Electric</li> <li>• PPL</li> <li>• Progress Energy, Inc.</li> <li>• Proliance Holdings</li> <li>• Public Service Enterprise Group</li> <li>• Puget Energy</li> <li>• Questar</li> <li>• Regency Energy Partners LP</li> <li>• RES Americas</li> <li>• SAIC</li> <li>• Salt River Project</li> <li>• Santee Cooper</li> <li>• SCANA</li> <li>• SemGroup</li> <li>• Sempra Energy</li> <li>• Southern California Edison</li> <li>• Southern Company Services</li> <li>• Southern Union Company</li> <li>• Southwestern Energy</li> <li>• Spectra Energy</li> <li>• STP Nuclear Operating</li> <li>• TECO Energy</li> <li>• Tennessee Valley Authority</li> <li>• TransAlta Corporation</li> </ul>	<ul style="list-style-type: none"> <li>• Trans Bay Cable</li> <li>• TransCanada USA Services Inc.</li> <li>• UIL Holdings</li> <li>• UniSource Energy</li> <li>• Unitil</li> <li>• USEC</li> <li>• Vectren</li> <li>• Westar Energy</li> <li>• Westinghouse Electric</li> <li>• Williams Companies</li> <li>• Wisconsin Energy</li> <li>• Wolf Creek Nuclear</li> <li>• Xcel Energy</li> </ul>
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Name of Respondent:

Lori Santoro

Date of Reply:

May 25, 2012

Date of Request: May 15, 2012  
Due Date: May 25, 2012

Request No. DPS-60(RES-5)  
NMPC Req. No. 60

NIAGARA MOHAWK POWER CORPORATION

Case No. 12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation d/b/a  
National Grid - Electric and Gas Rates

Request for Information

FROM: Rick Schuler  
TO: Human Resources Panel  
SUBJECT: Compensation Plan Evaluation

Request: Regarding the attainment of targeted performance mentioned on page 32, lines 16 - 20 and page 41 lines 13 - 14 of the testimony of the Human Resources Panel, and the overall reasonableness of the company's compensation expense discussed on page 34, lines 8 - 10, please provide all information that was reviewed and approved by the company's senior management and Board of Directors. Please also provide, in a useable electronic file, the company's tracking of performance against its targeted objectives and metrics.

Response:

The information that was reviewed and approved by senior management in April 2012 relative to the targeted levels of performance included in the 2012/2013 Annual Performance Plan is provided in Attachment 1 to RES-5. These metrics are customer focused and comprise Stewardship, Customer Responsiveness, Safety & Reliability and Cost Competitiveness.

National Grid will track and report on the Company's performance against targeted objectives and metrics on a monthly basis. The mechanism for tracking these metrics is currently under development and will be available for monthly reporting beginning in July 2012. A draft version of the template that will be used for reporting is provided in Attachment 2 to RES-5. Once finalized, an electronic file will be provided.

With respect to the statement made on page 34, lines 8 – 10, this statement is based on the information provided in the Human Resources Panel testimony.

Name of Respondent:

Lori Santoro

Date of Reply:

May 25, 2012

## FY13 Performance Targets

### Annual Performance Targets

**Our Annual Performance Plan metrics are consistent with the customer value areas for Elevate 2015.**



### Elevate 2015 Performance Metrics

Customer Value	Stewardship	Customer Responsiveness	Safety & Reliability	Cost Competitiveness
12/13 Line of Sight Priorities	We will expand our influence and position ourselves as stewards in the communities we serve by deepening our relationships with key jurisdiction stakeholders and helping them achieve their local economic and environmental goals.	We will deliver significant improvements in how we meet our customer commitments.	We will focus on process excellence and investments to modernize our networks to provide safe, reliable, and efficient operations.	We will position ourselves as a cost leader in the delivery of utility services to customers through continuous improvement, cost transparency, and clear accountability.
Measure	<i>A measure of Alva and JD Power – Corporate Citizen performance</i>	<i>A measure of Transaction Surveys, Web Surveys, and JD Power performance.</i>	<i>A measure of reduction of RTCs, LTIs, OSHA Recordables (safety), and meeting Regulatory Goals (reliability).</i>	<i>A measure of controllable costs to ensure that we are efficient and our costs have clear transparency and justification.</i>

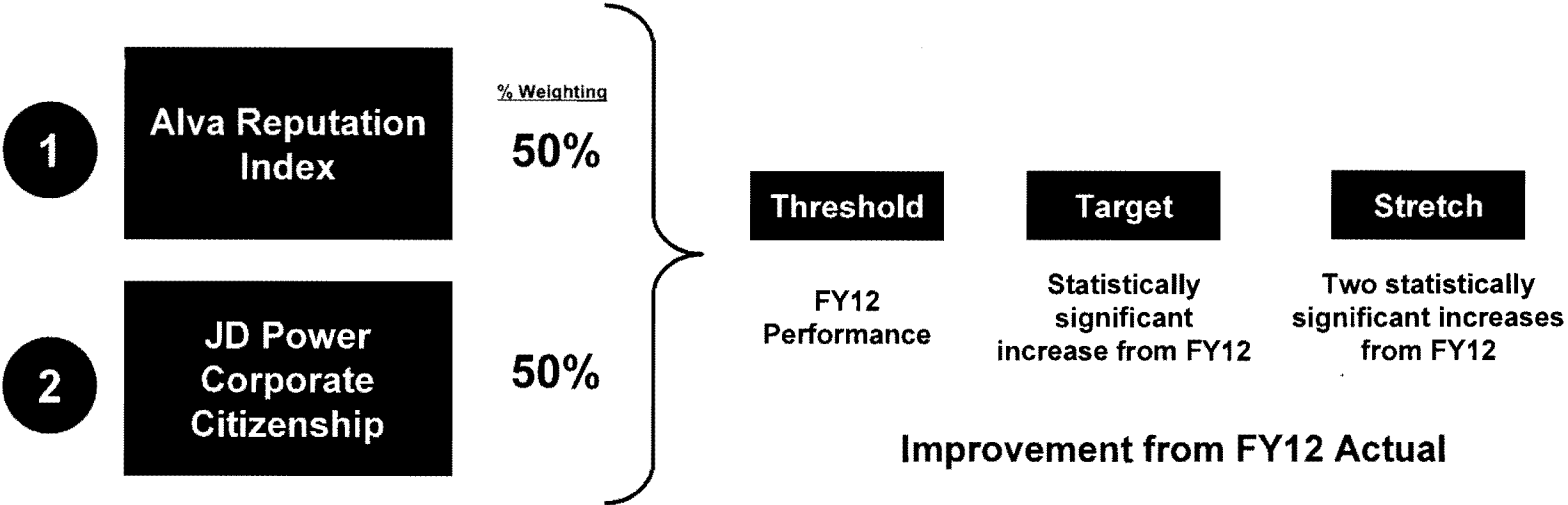
1



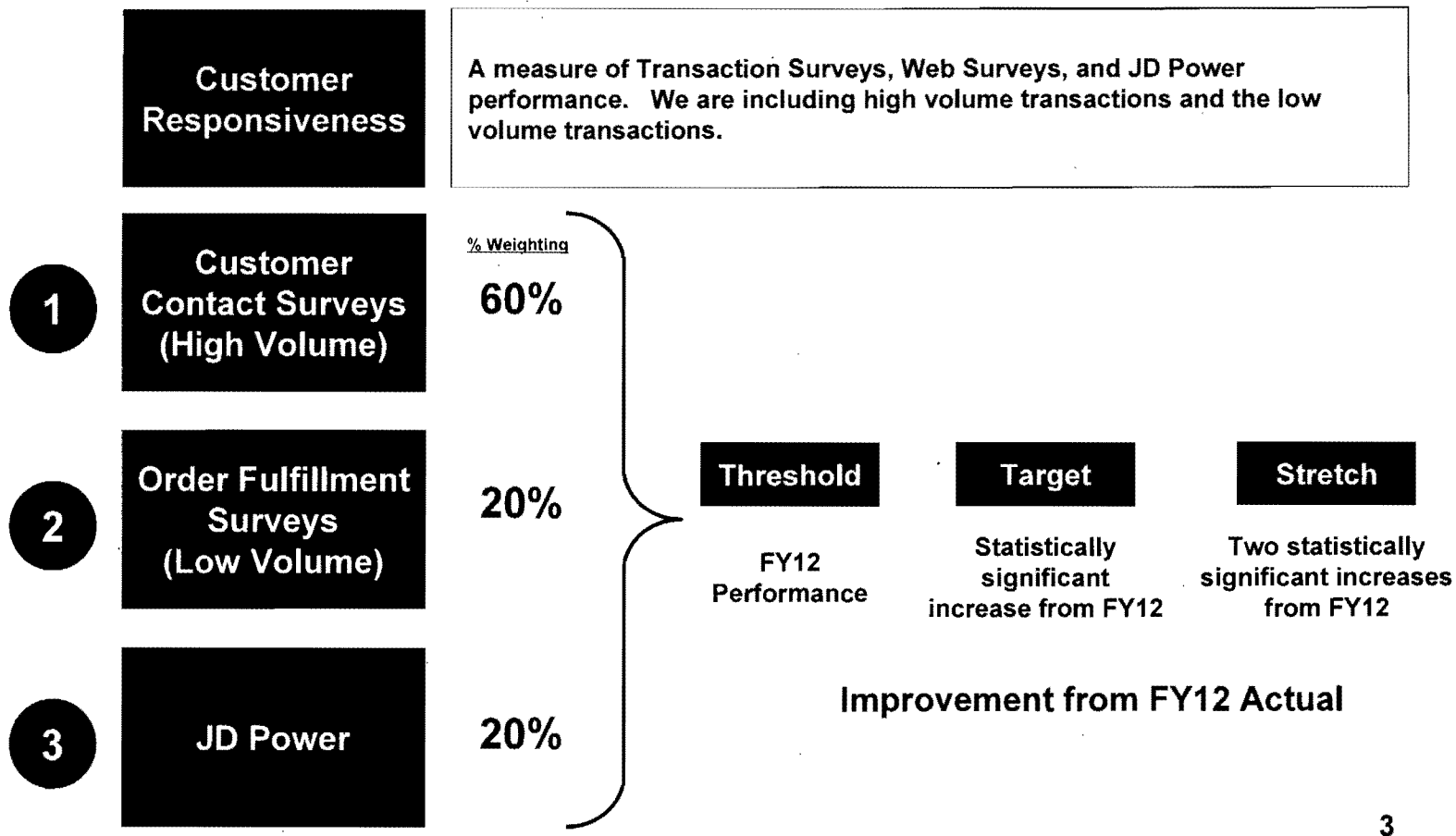
# Stewardship

Stewardship

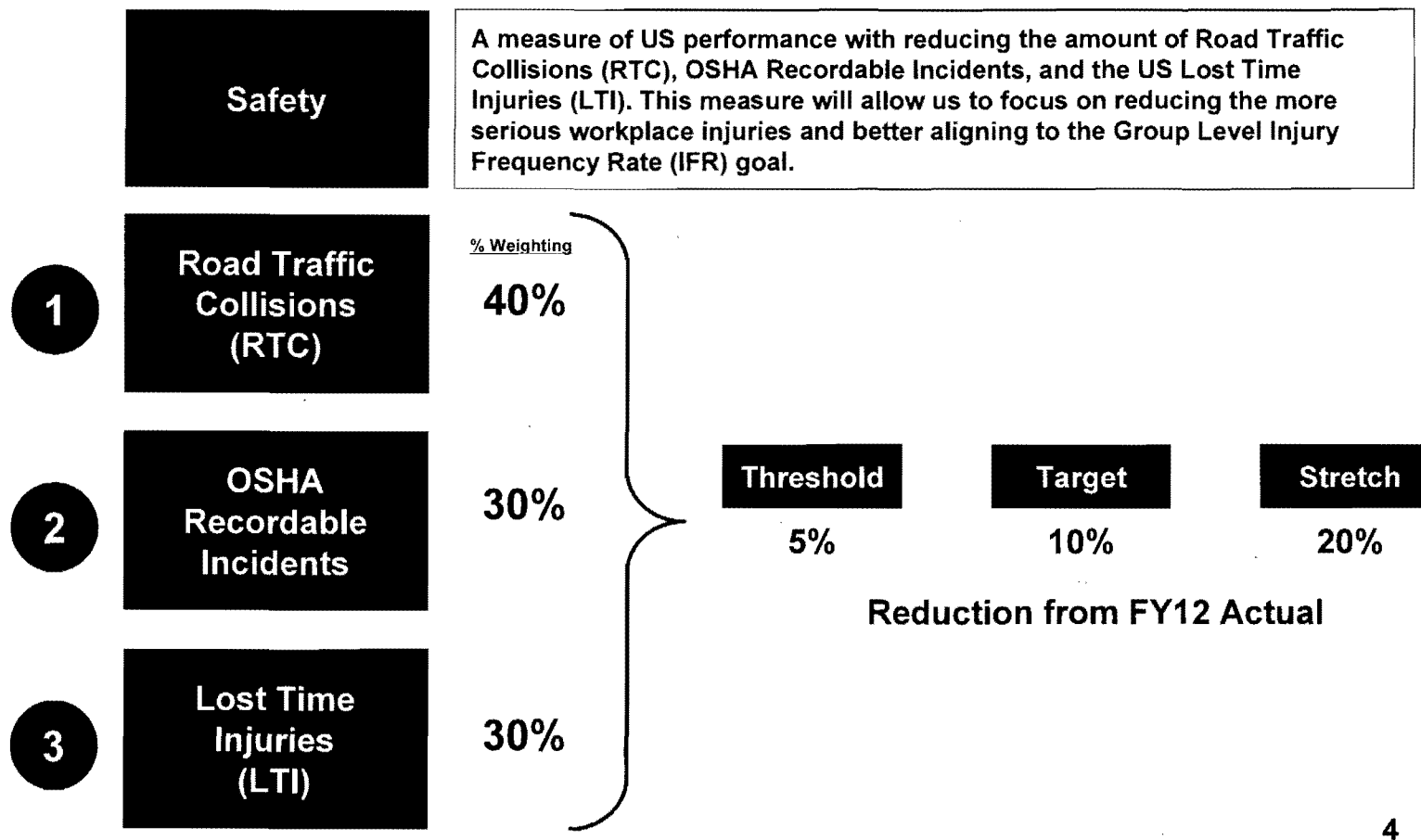
A measure of Alva and JD Power – Corporate Citizen performance. Alva is a proprietary daily web-crawling text analysis on National Grid sentiment within a peer set. We are also using the Corporate Citizenship measure in JD Power.



# Customer Responsiveness

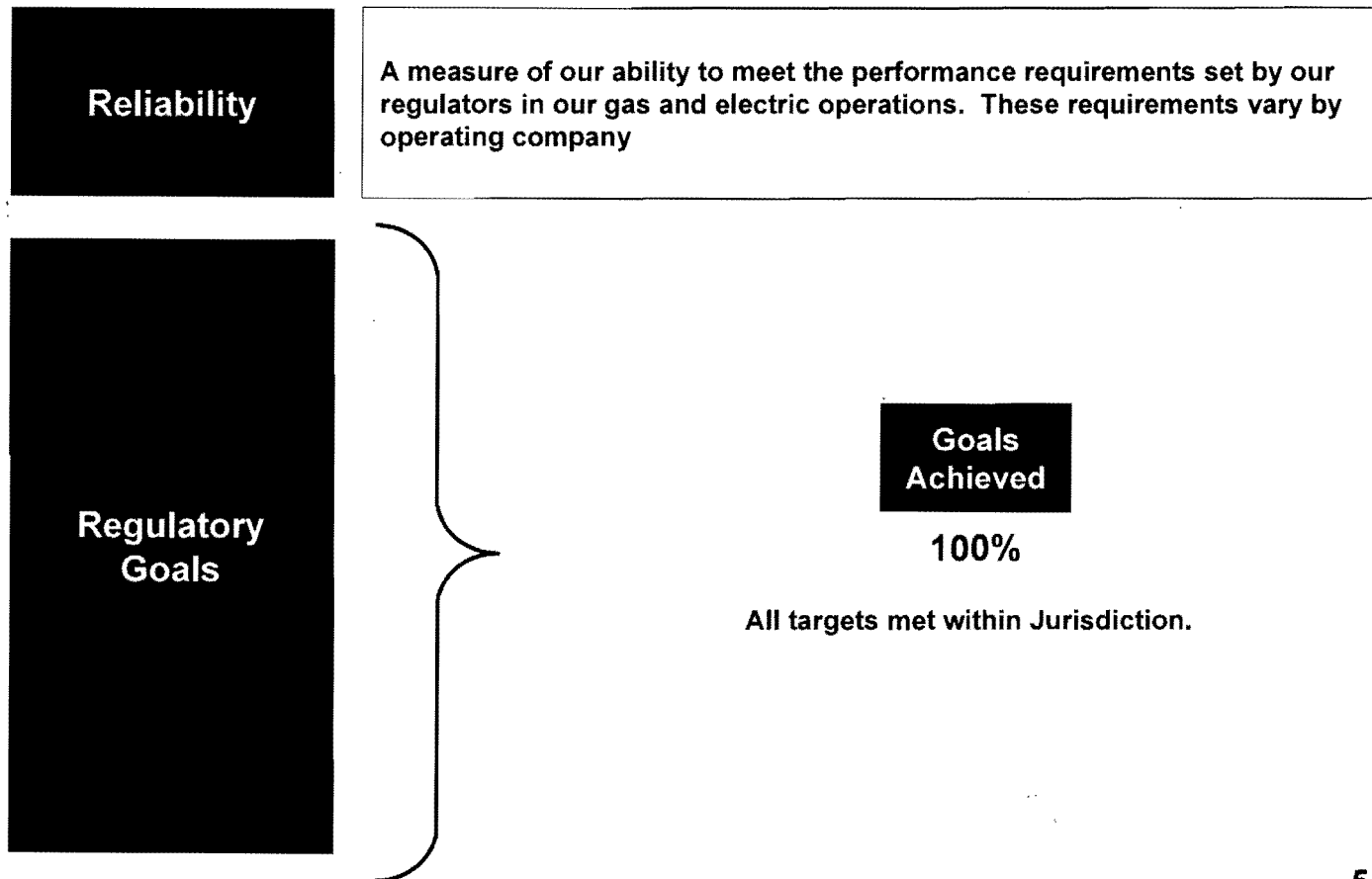


# Safety

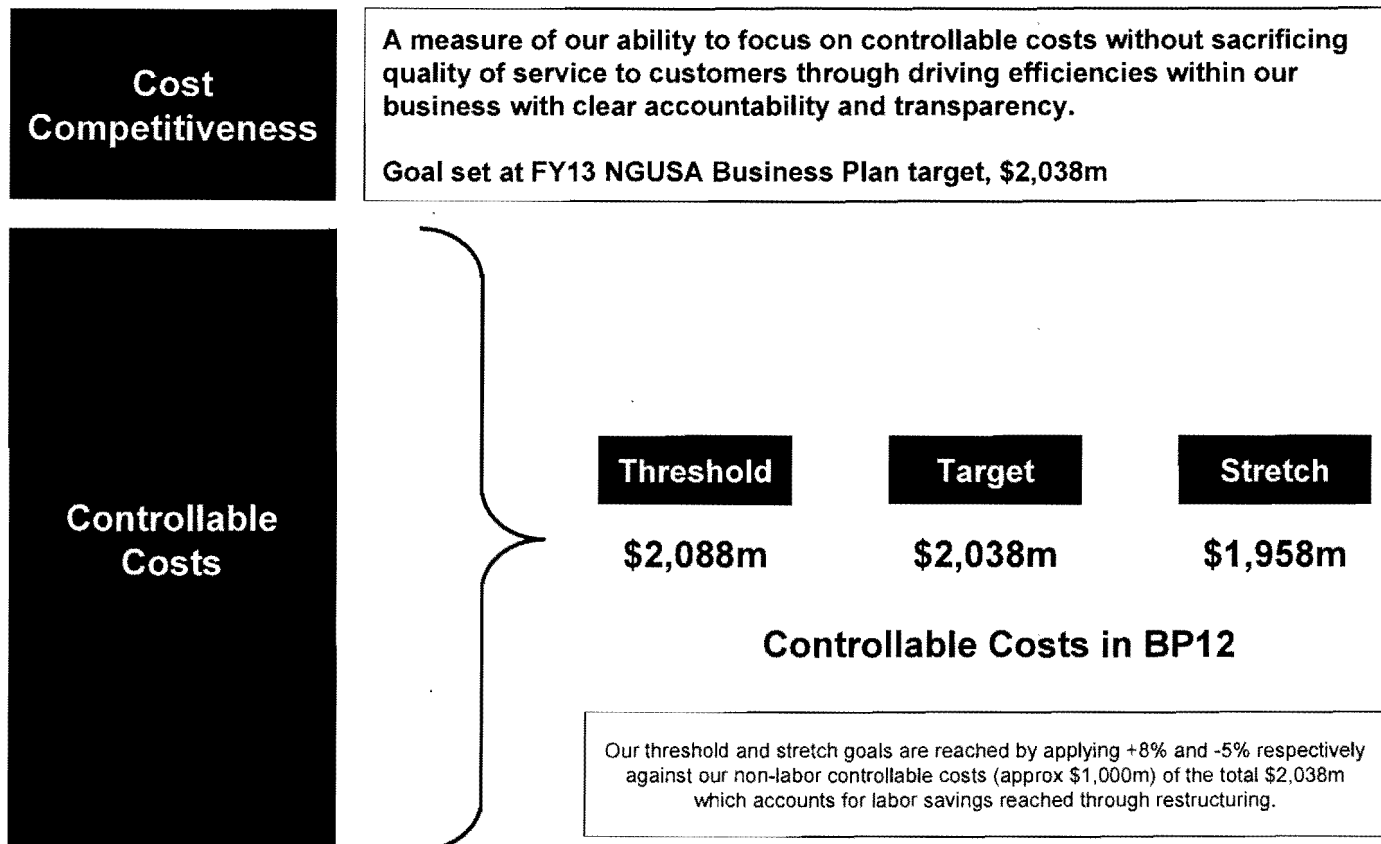


4

# Reliability



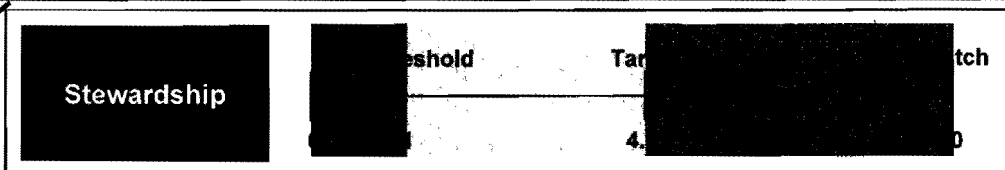
# Cost Competitiveness



These metrics will be cascaded down by Functions and Jurisdictions to drive improved performance.

**nationalgrid**  
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**PERFORMANCE RESULTS**

	Result	Performance
25% Alva Ranking		2.5
25% Alva Performance		2.5
8% Elec Residential Ranking (out of 17 peers)		0.3
8% Elec Residential Performance		0.4
5% Elec Business ranking (out of 13 peers)		BELOW THRESHOLD
4% Elec Business Performance		BELOW THRESHOLD
8% Gas Residential Ranking (out of 10 peers)		0.1
8% Gas Residential Performance		0.2
5% Gas Business Performance Ranking (out of 11 peers)		BELOW THRESHOLD
4% Gas Business Performance		BELOW THRESHOLD
	<b>US PERFORMANCE</b>	<b>6.0</b>

Performance at Stretch for Alva

Performance at Target for Electric Res.

Performance at Threshold for Gas Res

Total US Stewardship Performance = 6.0  
Translates into meeting Target for Stewardship metric.

Areas requiring most focus.

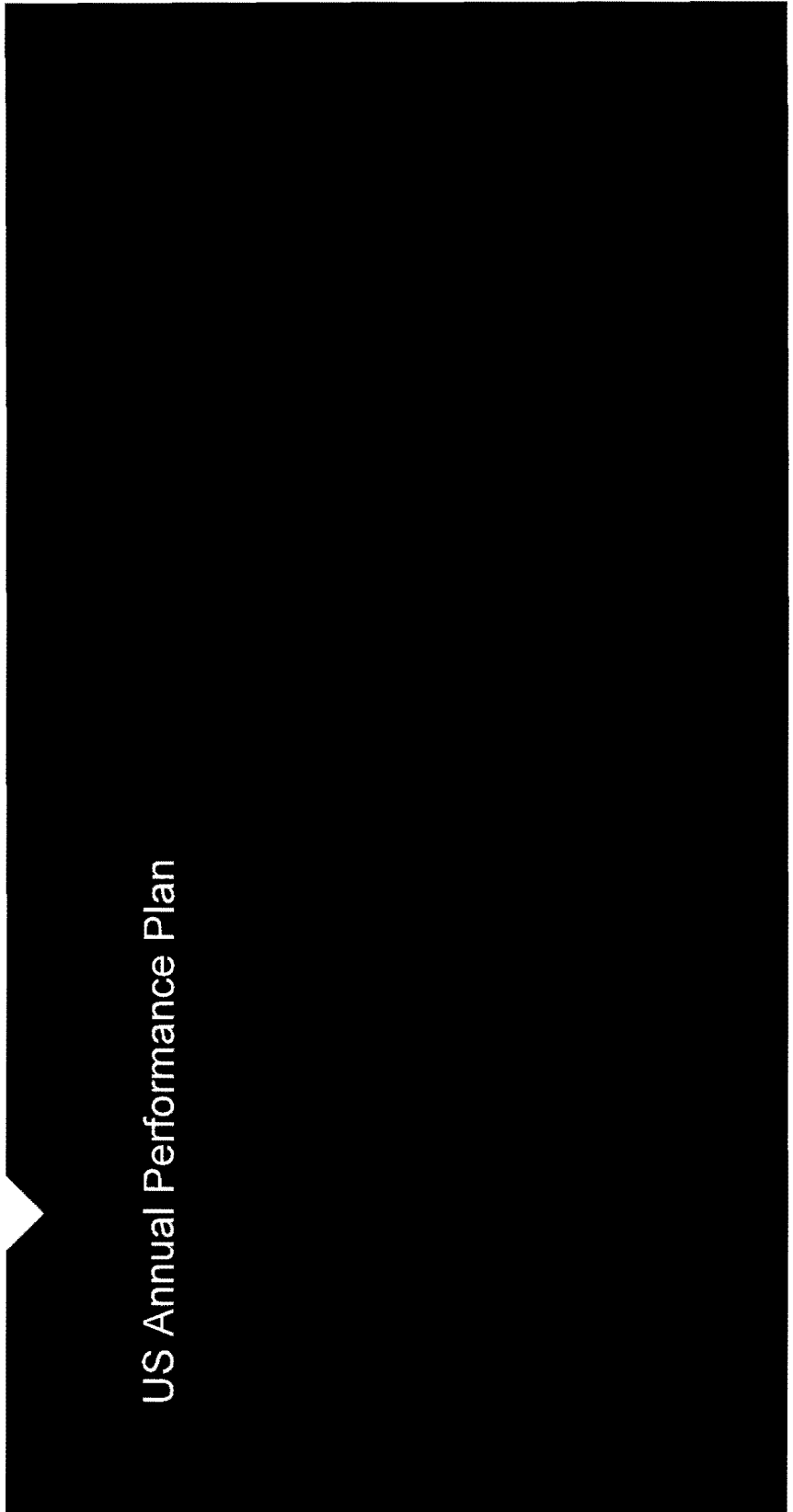
25% Alva Ranking	4th	9th	7th	5th
25% Alva Performance	7.02	6.27	6.52	6.94
8% Elec Residential Ranking (out of 17 peers)	9th	11th	8th	5th
8% Elec Residential Performance	543	536	542	548
5% Elec Business ranking (out of 13 peers)	6th	5th	4th	3rd
4% Elec Business Performance	596	602	608	620
8% Gas Residential Ranking (out of 10 peers)	6th	6th	4th	2nd
8% Gas Residential Performance	578	575	581	587
5% Gas Business Performance Ranking (out of 11 peers)	6th	5th	4th	3rd
4% Gas Business Performance	596	602	608	620

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## Appendix – US FY13 Targets

US Annual Performance Plan



## Goal Setting Methodology for Stewardship & Customer Responsiveness



Stewardship Metrics	Alva Reputation	Proprietary daily web-crawling text analysis on National Grid sentiment within a peer set. Using a two-tiered approach: performance and ranking. Threshold is set to the most recent cumulative performance and ranking data for National Grid US with consistent and statistically significant increases in goal level for both Target and Stretch.
	JDP Corporate Citizenship	Using a two-tiered approach: performance and ranking. Threshold is set on a statistically significant improvement over the prior year.
Responsiveness Metrics	Customer Service	10 point scale Net Satisfaction Score, monthly telephone survey. Threshold is set to prior year performance with consistent and statistically significant increases in goal level for both Target and Stretch. There is adequate resolution in this study to allow individual goals at the jurisdictional level.
	Website	Top 2 box score on a 5 point scale, pop-up web survey (was annual, moving to quarterly). Threshold is set to prior year performance with consistent and statistically significant increases for both Target and Stretch.
	Gas Conversion	Both 10 point scale Net Satisfaction Score. Threshold is set to prior year performance with consistent statistically significant increases in performance for Target and Stretch. Gas Conversion is conducted among customers converting to gas in the prior month; Electric Operations order fulfillment conducted among Trade Allies.
	Electric Order Fulfillment	
	DG Interconnect	Actual metric: % On-Time Interconnections (within 10 days in UNY, mandated. Within 15 days NE, not mandated)
	JDP Power Studies	Opt-in web surveys, 4 times per year residential, 2 times per year business. Using a two-tiered approach: performance and ranking. Threshold is set to prior year ranking and performance with statistically significant increases in goal levels for both Target and Stretch.



# Stewardship

Primary Category Weights	Study Component Weights			Benchmark Performance*	FY13 Recommended Rankings		
					Threshold	Target	Score
ALVA Reputation Index 50%	25%	Alva Ranking (out of 12 peers)		10th	10th	8th	8th
	25%	Alva Performance		6.19	6.19	6.42	6.42
JD Power Corporate Citizenship 50%	8%	Electric Residential	Ranking (out of 17 peers)	13th	13th	11th	11th
	8%		Performance	530	530	536	536
	5%	Electric Business	Ranking (out of 12 peers)	6th	6th	5th	5th
	4%		Performance	596	596	602	602
	8%	Gas Residential	Ranking (out of 10 peers)	8th	8th	6th	6th
	8%		Performance	569	569	575	575
	5%	Gas Business	Ranking (out of 11 peers)	9th	9th	4th	4th
	4%		Performance	631	631	645	645

\* ALVA Benchmark Performance is based on the most recent cumulative period for National Grid US. All JD Power results are based on the most recent full year study results for the Corporate Citizenship Factor.

# Customer Responsiveness

Primary Category Weights	Study Component Weights		Benchmark Performance*	FY13 Recommended Goal Levels		
				Threshold	Target	
High Volume Customer Contact 60%	40%	Customer Service (formerly Contactor)	79.9	79.9	81.5	
	20%	Website Overall Satisfaction	47.9	47.9	53.8	
Low Volume Order Fulfillment 20%	8%	Gas Conversion Process Satisfaction	67.7	67.7	69.5	
	8%	Electric Order Fulfillment Satisfaction	64.5	64.5	66.7	
	4%	Distributed Generation On-Time Interconnects	82.8	82.8	85.0	
Image, JD Power Overall Score 20%	3%	JD Power Electric Residential	Ranking (out of 17 peers)	12th	12th	10th
	3%		Performance	602	602	608
	2%	JD Power Electric Business	Ranking (out of 12 peers)	5th	5th	4th
	2%		Performance	641	641	651
	3%	JD Power Gas Residential	Ranking (out of 10 peers)	7th	7th	5th
	3%		Performance	601	601	607
	2%	JD Power Gas Business	Ranking (out of 11 peers)	7th	7th	3rd
	2%		Performance	660	660	673

\* Customer Contact and Order Fulfillment Benchmark Performance are based on the most recent 12 consecutive months of data which takes seasonality into consideration. All JD Power results are based on the most recent full year study results.

## Reliability Goals by Jurisdiction

		New York			Rhode Island	LIPA	LI Generation	US Wide
		NYC	LI	Upstate NY				
Electric Reliability	SAIFI	-	-	1.13	1.05	1.00	Summer DMNC: 3,625 - 3,659 MW Summer Availability: 94.1 - 96.5% Heat Rate Savings: >\$0 Opacity Compliance: 99.0 - 99.5% NOx Reduction: >0 - 5%	Rolled up target of all jurisdictions weighted by the size of customer base.
	SAIDI	-	-	-	71.90	88.88		
	CAIDI	-	-	123.00	-	75.88		
	Storm CAIDI	-	-	-	-	221.18		
	MAIFI	-	-	-	-	4.28		
		<75	<75	<45	<45	-		
		75%	75%	75%	Day 94.38% / Other 96.27% (July to June) (Daytime 30 mins or less All other 45 mins or less)	-		
		90%	90%	90%		-		
		95%	95%	95%		-		
Jurisdiction Targets		8	12	14	5	5	5	

MA	No payout for less than 8 targets achieved.	No payout for less than 8 targets achieved.	Achieve 8 out of 8 targets for SAIDI, SAIFI, CAIDI, Leak Backlog & Emergency Response Time.
NH	No payout for less than 12 targets achieved.	No payout for less than 12 targets achieved.	Achieve 12 out of 12 targets for SAIDI, SAIFI, CAIDI, Leak Backlog & Emergency Response Time.
NY	No payout for less than 14 targets achieved.	No payout for less than 14 targets achieved.	Achieve 14 out of 14 targets for SAIDI, SAIFI, CAIDI, Leak Backlog & Emergency Response Time.
RI	No payout for less than 5 targets achieved.	No payout for less than 5 targets achieved.	Achieve 5 out of 5 targets for SAIDI, SAIFI, CAIDI, Leak Backlog & Emergency Response Time.
LIPA	No payout for less than 5 targets achieved.	No payout for less than 5 targets achieved.	Achieve all 5 reliability performance target levels, plus no net financial penalty for all ten operational metrics.
US Gen	No payout for less than 6 targets achieved.	No payout for less than 6 targets achieved.	Achieve 6 out of 6 targets for Fleet Availability, EFORD, DMNC Testing, Heat Rate Incentive, Opacity, and NOx Compliance.
US Wide	Rolled up by jurisdictions achieving stretch performance. (Jurisdictional weighting based on size of customer base)		

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# US Safety Goals



	FY2012 Actual Rates		10% Reduction	Target Values	20% Reduction	Stretch Values
CR	7.42		6.68	536	5.94	478
CR	4.46		4.01	628	3.57	558
CR	0.81		0.73	114	0.66	101

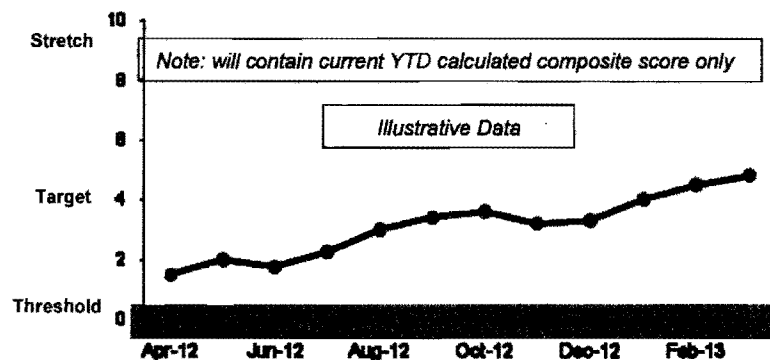
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**Templates**

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# Stewardship

## Current Composite Score



## Most Powerful Levers

- Review specific metrics (JD Power Citizenship, Alva) that comprise the overall Stewardship score to identify problem areas or positive changes that drove the most recent change in score
- <Insert>** - commentary on what drove the score to change or not change in the month – add specific examples (e.g. JD Power negatively impacted because of drop in...)

## Metrics Summary

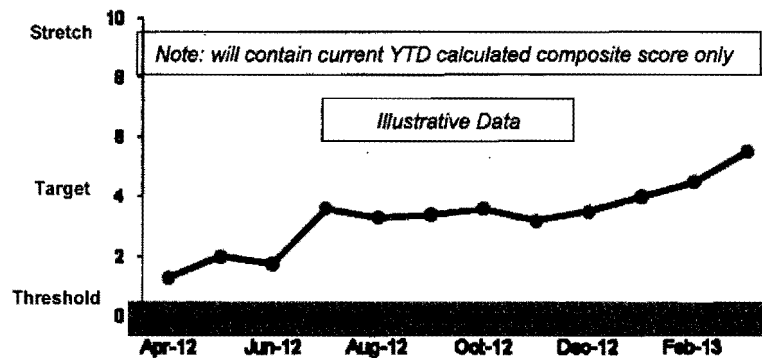
APP Metrics		NG USA	Jurisdictions			Thresh	Target	Stretch	Prior Mo
			MA	NY	RI				
50%	Alva Reputation Index	Ranking (25%)	10 <sup>th</sup>	10 <sup>th</sup>	8 <sup>th</sup>	10 <sup>th</sup>	8 <sup>th</sup>	8 <sup>th</sup>	
		Performance (25%)	6.25	6.19	6.72	6.19	6.42	6.88	
	Electric Residential (16%)	Ranking (8%)	13 <sup>th</sup>			13 <sup>th</sup>	11 <sup>th</sup>	8 <sup>th</sup>	
		Performance (8%)	530	Illustrative Data			530	536	542
	Electric Business (9%)	Ranking (5%)	6 <sup>th</sup>			6 <sup>th</sup>	5 <sup>th</sup>	4 <sup>th</sup>	
		Performance (4%)	596	Data not available by Jurisdiction			596	602	608
50%	Gas Residential (16%)	Ranking (8%)	8 <sup>th</sup>			8 <sup>th</sup>	6 <sup>th</sup>	4 <sup>th</sup>	
		Performance (8%)	569			569	575	581	
	Gas Business (9%)	Ranking (5%)	9 <sup>th</sup>			9 <sup>th</sup>	4 <sup>th</sup>	3 <sup>rd</sup>	
		Performance (4%)	631			631	645	659	

## Initiatives to Improve Performance

- Identify top actions planned to improve performance including cost, functions and jurisdictions impacted
- Review progress from previous actions and highlight trends or improvements achieved

# Customer Responsiveness

## Current Composite Score



## Metrics Summary

APP Metrics		NG USA	Jurisdictions			Thresh	Target	Stretch	Prior Mo.
			MA	NH	RI				
60%	Customer Service (40%)	79.9	80.1		80.1	79.9	81.5	83.1	
	Website Overall Satisfaction (20%)	47.9	55.1	48.2	55.4	47.9	53.8	56.2	
	Gas Conversion Process Satisfaction (8%)	67.7		67.9		67.7	69.5	71.3	
20%	Electric Order Fulfillment Satisfaction (8%)	64.5	67.9	69.7		64.5	66.7	68.9	
	Distributed Generation On-Time Interconnects (4%)	82.8		86.4	82.9	82.8	85.0	87.3	
	Electric Residential (6%) Ranking (3%)	12 <sup>th</sup>				12 <sup>th</sup>	10 <sup>th</sup>	7 <sup>th</sup>	
	Performance (3%)	602	Illustrative Data			602	608	614	
	Electric Business (4%) Ranking (2%)	5 <sup>th</sup>	Data not available by Jurisdiction			5 <sup>th</sup>	4 <sup>th</sup>	3 <sup>rd</sup>	
	Performance (2%)	641				641	651	661	
	Gas Residential (6%) Ranking (3%)	7 <sup>th</sup>				7 <sup>th</sup>	5 <sup>th</sup>	4 <sup>th</sup>	
	Performance (3%)	601				601	607	613	
	Gas Business (4%) Ranking (2%)	7 <sup>th</sup>				7 <sup>th</sup>	3 <sup>rd</sup>	2 <sup>nd</sup>	
	Performance (2%)	660				660	673	686	

## Most Powerful Levers

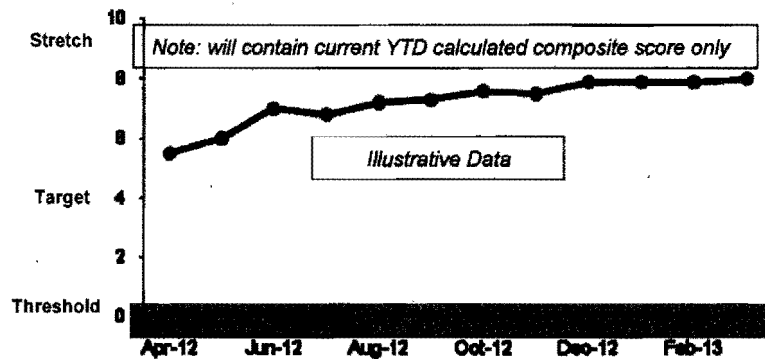
- Review specific metrics that comprise the overall Customer Responsiveness score to identify problem areas or positive changes that drove the most recent change in score
- <Insert>** - commentary on what drove the score to change or not change in the month – add specific examples. (e.g. website satisfaction was down this month because of unexpected downtime which impacted online billpay...)

## Initiatives to Improve Performance

- Identify top actions planned to improve performance including cost, functions and jurisdictions impacted
- Review progress from previous actions and highlight trends or improvements achieved

## Safety & Reliability

### Current Composite Score



For metrics summary see  
Safety & Reliability Detail pages

### Most Powerful Levers

- Review specific metrics that comprise the overall Safety & Reliability score to identify problem areas or positive changes that drove the most recent change in score
- **<Insert>** - commentary on what drove the score to change or not change in the month – add specific examples. (e.g. Gas leak backlog decreased due to newly implemented response process ...)

### Initiatives to Improve Performance

- Identify top actions planned to improve performance including cost, functions and jurisdictions impacted
- Review progress from previous actions and highlight trends or improvements achieved

<sup>1</sup>Rolled up metric of all electric & gas scores reported monthly by jurisdictions, weighted according to the size of customer base



# Safety Detail

## Metrics Summary

APP Metrics	NGUSA	FY12 Actuals	Reduction from FY12 Actual			Prior Mo.
			5%↓	10%↓	20%↓	
Thresh.	Target	Stretch				
Road Traffic Collisions (RTC) (20%)	7.04	7.42	7.05	6.68	5.94	
OSHA Recordable Incidents (15%)	4.23	4.46	4.24	4.01	3.57	
Lost Time Injuries (LTI) (15%)	.75	0.81	0.77	0.73	0.65	

*Illustrative Data*

## Most Powerful Levers

- Review specific changes that occurred during the month resulting in a change in Safety metric results
- <Insert>** - commentary on what drove the score to change or not change in the month – add specific examples. (e.g. Implementation of safe driving program led to reduction of RTCs ...)

## Initiatives to Improve Performance

- Identify top actions planned to improve performance including cost, functions and jurisdictions impacted
- Review progress from previous actions and highlight trends or improvements achieved

<sup>1</sup>Rolled up metric of all electric & gas scores reported monthly by jurisdictions, weighted according to the size of customer base

# Reliability Detail

## Reliability Results

		Massachusetts		New Hampshire	New York		Rhode Island	LIPA	LI Generation	US Wide
		MA	Nantucket		NYC	LI	Upstate NY			
Electric Reliability	SAIFI	1.431	0.678	1.00			1.13	1.06	1.00	1. Summer O&M: 3,625 - 3,668 MW 2. Summer Availability: 96.1 - 96.8% 3. Heat Rate Savings: >65 4. Opacity Compliance: 99.0 - 99.5% 5. NOx Reduction: >6 - 6%
	SAIDI	183.96	39.00	126.00				71.90	69.90	
	CAIDI						123.90		76.56	
	Storm CAIDI								221.15	
	MAIFI								4.60	
Gas Leak Backlog		<235		0	<75	<75	<45	<45		Rolled up target of all jurisdictions weighted by the size of customer base.
Gas Emergency Response Time	30 min target	75%		1. Daytime 80% 2. Aft hrs 80% 3. Weekends Holidays 75%	75%	75%	75%	1. Day 84.38% 2. Other 86.27% (July to June) (Daytime 30 mins or less 28 other 45 mins or less)		
	45 min target	90%		1. Daytime 90% 2. Aft hrs 90% 3. Weekends Holidays 84%	90%	90%	90%			
	60 min target	95%		1. Daytime 97% 2. Aft hrs 98% 3. Weekends Holidays 94%	95%	95%	95%			
Jurisdiction Targets		8		12		14		5	5	5

Key	
<span style="background-color: #d3d3d3; border: 1px solid black; display: inline-block; width: 20px; height: 10px;"></span>	Performance meets or exceeds Target
<span style="background-color: #f0f0f0; border: 1px solid black; display: inline-block; width: 20px; height: 10px;"></span>	Performance below Target
<span style="background-color: #ffffff; border: 1px solid black; display: inline-block; width: 20px; height: 10px;"></span>	Not applicable

*Illustrative Data – these are the FY13 Targets for each Jurisdiction*

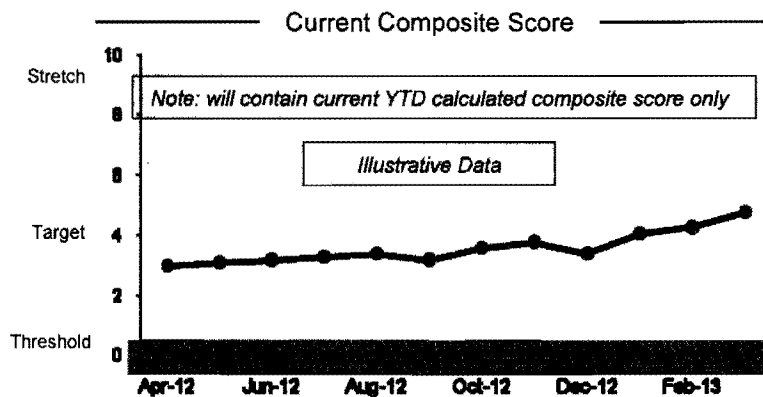
### Most Powerful Levers

- Review specific metrics that fell short of target for the period
- <Insert>** - commentary on what drove the exceed or fall short of Target in the month – add specific examples. (e.g. Gas leak backlog decreased due to newly implemented response process ...)

### Initiatives to Improve Performance

- Identify top actions planned to improve performance including cost, functions and jurisdictions impacted
- Review progress from previous actions and highlight trends or improvements achieved

# Cost Competitiveness



Metrics Summary

APP Metrics	Actuals	Thresh.	Target	Stretch	Prior Mo.
Total Controllable Costs	\$2,045M	\$2,088M	\$2,038M	\$1,958M	

## Most Powerful Levers

- Review specific metrics that comprise the overall Cost Competitiveness score to identify problem areas or positive changes that drove the most recent change in score
- <Insert> - commentary on what drove the score to change or not change in the month – add specific examples. (e.g. Total Controllable Costs higher due to increased O&M OPEX Spend ...)

## Initiatives to Improve Performance

- Identify top actions planned to improve performance including cost, functions and jurisdictions impacted
- Review progress from previous actions and highlight trends or improvements achieved

Date of Request: May 15, 2012  
Due Date: May 25, 2012

Request No. DPS-61(RES-6)  
NMPC Req. No. NM-61

NIAGARA MOHAWK POWER CORPORATION

Case No.12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation d/b/a National  
Grid- Electric and Gas Rates

Request for Information

FROM: Rick Schuler  
TO: Human Resources Panel  
SUBJECT: BLS Information

Request: Regarding the Bureau of Labor Statistics related analysis discussed on page 40 of the testimony of the Human Resources Panel, please indicate whether the company has, in the last ten years, provided data, for both union and management positions, to the Bureau of Labor Statistics in response to the BLS's data collection effort for its National Compensation Survey (NCS).<http://www.bls.gov/ncs/collection.htm>. If so, indicate how the duties and responsibilities of the job titles for which the company provided the BLS data correspond to the Standard Occupational Classifications listed in Appendix B of the BLS Bulletin titled "National Compensation Survey: Occupational Earnings in the United States, 2010"<http://www.bls.gov/ncs/ocs/sp/ncbl0841.pdf>. Also indicate how the Standard Occupational Classifications listed in Appendix B of the BLS Bulletin correspond to the job titles in shown on Schedule 1, page 1 of Exhibit HRP-5.

Response:

The Company has not provided any data in the last ten years to the Bureau of Labor Statistics for either union or management positions in response to the BLS data collection efforts for the National Compensation Survey.

Attachment 1 to RES-6 details how the Standard Occupational Classifications (SOC) listed in Appendix B of the BLS Bulletin correspond to the job titles show on Schedule 1, page 1 of Exhibit HRP-5. It should be noted that the SOC System does not distinguish between individual jobs; rather, it provides a "collective description of a number of individual jobs performed, with minor variations, in many establishments" (*Dictionary of Occupational Titles, Revised 4<sup>th</sup> edition*, Vol. 1, p. xvii, U.S. Department of Labor, Employment and Training Administration, 1991). To illustrate, in the attachment, the job titles, "Cable Splicer" and "Line Mechanic" fall under the same SOC. However, the compensation data provided by Towers Watson was able to distinguish among individual jobs specific to the utility industry.

Name of Respondent:  
Janet Fuersich

Date of Reply:  
May 22, 2012

## National Grid

### Union Positions Standard Occupational Classification

Job Title Shown on Exhibit HRP-5, Schedule 1	Standard Occupational Classification (SOC)1		
	Code	Title	Description
Cable Splicer	49-9051	Electrical Power-Line Installers and Repairers	Install or repair cables or wires used in electrical power or distribution systems. May erect poles and light or heavy duty transmission towers.
Customer Service Rep	43-4051	Customer Service Representatives	Interact with customers to provide information in response to inquiries about products and services and to handle and resolve complaints. Excludes individuals whose duties are primarily installation, sales, or repair.
Dispatcher	43-5032	Dispatchers, Except Police, Fire, and Ambulance	Schedule and dispatch workers, work crews, equipment, or service vehicles for conveyance of materials, freight, or passengers, or for normal installation, service, or emergency repairs rendered outside the place of business. Duties may include using radio, telephone, or computer to transmit assignments and compiling statistics and reports on work progress.
Line Mechanic	49-9051	Electrical Power-Line Installers and Repairers	Install or repair cables or wires used in electrical power or distribution systems. May erect poles and light or heavy duty transmission towers.
Fleet Technician	49-3023	Automotive Service Technicians and Mechanics	Diagnose, adjust, repair, or overhaul automotive vehicles.
Relay Tester	49-2095	Electrical and Electronics Repairers, Powerhouse, Substation, and Relay	Inspect, test, repair, or maintain electrical equipment in generating stations, substations, and in-service relays.
Stock Handler	43-5061	Production, Planning, and Expediting Clerks	Coordinate and expedite the flow of work and materials within or between departments of an establishment according to production schedule. Duties include reviewing and distributing production, work, and shipment schedules; conferring with department supervisors to determine progress of work and completion dates; and compiling reports on progress of work, inventory levels, costs, and production problems.

#### Notes:

(1) Data sources:

U.S. Department of Labor, Bureau of Labor Statistics, "Appendix B. Standard Occupational Classification System." Last modified date: December 31, 2011, available at [\[http://www.bls.gov/nsc/ocs/sp/ncbl0841.pdf\]](http://www.bls.gov/nsc/ocs/sp/ncbl0841.pdf).

U.S. Department of Labor, Bureau of Labor Statistics, On behalf of the Standard Occupational Classification Policy Committee (SOPC), "2010 SOC Definitions," February 2010, available at [\[http://www.bls.gov/soc/soc\\_2010\\_definitions.pdf\]](http://www.bls.gov/soc/soc_2010_definitions.pdf).

Date of Request: June 5, 2012      Supplemental Request No. DPS-66(CAS-2)(1B) Extension  
Due Date: June 15, 2012      NMPC Req. No. 66

NIAGARA MOHAWK POWER CORPORATION

Case No. 12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation d/b/a  
National Grid - Electric and Gas Rates

Request for Information

FROM:      Cathy Shippey  
TO:      Revenue Requirement Panel  
SUBJECT:      Rent Expense

Request:

The following questions relate to Exhibit RRP-3, Schedule 8, pages 11-12.

1. For each new project included in this schedule, please provide the following:
  - B. The related cost benefit analysis supporting the Company's position to pursue the project

Response:

1.B. An noted in the Company's initial response to DPS-66(CAS-2), the Company is answering this question for each project listed in Exhibit RRP-3, Schedule 8, pages 11 and 12, lines 10-29, and for each project over \$50,000 that is included in line 30 that will incur costs during the Rate Year. In this response, the Company has excluded projects completed prior to the Historic Test Year.

The Company provides a table that summarizes savings estimates from the sanction papers in Attachment 17 to this response.

As explained in the Company's initial response, IS projects are undertaken for a number of reasons including creating functional capabilities that are necessary to run a utility business. Although certain IS projects may enable economic benefits, many projects are selected for other factors that do not create cost savings but are necessary to run the business. In the following paragraphs, the Company explains how the savings from each project are reflected in the Company's initial filing.

The savings associated with certain projects are embedded in the Historic Test Year. These are Intranet Design (INVP 2210), Smallworld GIS Upgrade (INVP 0953), Equip

Computers (Mainframe Servers – INVP 2673), and Equip Computers (INVP 1389). The savings from these programs reduced costs in the Historic Test Year.

The US Foundation Program is enabling savings that are identified in the US Restructuring Program. The specific savings are identified in the workpapers to RRP-3, Schedule 48.

The US Retail Web project creates savings from E-Billing and E-Payment capabilities with customers accessing the Company's website for bills and payments. As discussed in the testimony of the Shared Services and Customer panel, the Company proposes to credit the savings to customers opting for E-Billing. Thus any savings from US Retail Web capabilities will be received by the customer who creates the savings if the Company's proposal for E-Billing credits is approved in this case. Please note that the Web Initiatives (DPS-94, DAG-10, Attachment 19) and Global Web Strategy were precursors to the US Retail Web initiative. Both of these papers discussed the same savings from E-billing and E-payments. The Company is providing the Global Web Strategy sanction paper in this response as Attachment 18. Also, the Company is providing an additional sanction paper for US Retail Web that clearly links the work completed in Global Web project to the work finished as part of the US Retail Web project as Attachment 19.

The remaining projects have neither been included as part of US Restructuring savings nor reduced costs in the historic test year. These projects result in net savings post March 31, 2013. These include:

Implementation of HR SAS;  
Intelligent Mail Bar Code;  
Energy Trading;  
US VTL Replacement;  
GIS Consolidation;  
Outage Management; and  
Enterprise Services (including Server Transformation, Virtual Desktop, SAN Deployment, Mainframe Migration).

The incremental savings in each year from these projects are provided on P. 3 of Attachment 17. The increased operating costs for those projects are also included on p. 3 of Attachment 17.

Please note, the Company has updated its savings estimate for Enterprise Services and the revised savings estimate are provided in Attachment 17.

Name of Respondent:  
Thomas F. Gill

Date of Reply:  
June 15, 2012

Niagara Mohawk Power Company

Presentation of Savings from National Grid USA Service Company IS Projects

Page One: Total Savings from Sanction Papers

Business Savings	INVP No.	In-Service	Estimated Annual Savings as of March 2012	Estimated Annual Savings to be Achieved as of March 2013	Estimated Annual Savings to be Achieved as of March 2014	Estimated Annual Savings to be Achieved as of March 2015	Estimated Annual Savings to be Achieved as of March 2016
US Retail Web	1356A	Jan-2012		814,000	814,000	1,462,000	2,156,000
Intranet	2210	Feb-2011	321,975	396,705	444,405	444,405	444,405
Enterprise Services					6,000,000	8,000,000	10,100,000
Implementation of HR SAS	3124				142,000	142,000	142,000
Web initiatives	980	May-2010	6,695,814	6,695,814	6,695,814	6,695,814	6,695,814
Intelligent Mail Barcode	2630			288,000	288,000		288,000
Annual Business Savings			7,017,789	8,194,519	14,384,219	17,032,219	19,826,219

Information Services Operation Savings	INVP No.	In-Service	Estimated Annual Savings as of March 2012	Estimated Annual Savings to be Achieved as of March 2013	Estimated Annual Savings to be Achieved as of March 2014	Estimated Annual Savings to be Achieved as of March 2015	Estimated Annual Savings to be Achieved as of March 2016
US Retail Web	1356A	Jan-2012		(426,000)	(484,000)	(484,000)	(484,000)
Energy Trading	2330			283,000	283,000	283,000	283,000
Mainframe Upgrades	2673	Nov-2010	1,118,000	1,118,000	1,118,000	1,118,000	1,118,000
Equip Computers	1389	Sep-2010	43,000	43,000	43,000	43,000	43,000
US VTL Replacement	2522	Jan-2012	100,000	300,000	300,000	300,000	300,000
GIS Consolidation	2577			30,000	255,000	285,000	285,000
Smallworld Upgrade	953		(151,000)	(151,000)	(151,000)	(151,000)	(151,000)
Outage Management	1185			(184,000)	(1,492,000)	(969,000)	(350,000)
Annual IS Savings			1,110,000	1,013,000	(128,000)	425,000	1,044,000

Notes:

- 1) Web Initiatives, Global Web and US Retail Web state similar source for savings. E-billing, E-payments and Transactions. The savings are reflected in US Retail Web
- 2) Intranet savings are calculated by taking the total savings in pounds from the Paper dividing by 2 to reflect allocation to US and multiplying by \$1.59 per pound.
- 3) The estimate of savings from Enterprise Services provided in this response is an updated forecast and differs from the amount estimated in the sanction paper.



Niagara Mohawk Power Company  
Presentation of Savings from National Grid USA Service Company IS Projects  
Page Two: Annual incremental Savings from Sanction Papers

Business Savings	INVP No	In-Service	Estimated Incremental Savings as of March 2012	Estimated Incremental Savings to be Achieved as of March 2013	Estimated Incremental Savings to be Achieved as of March 2014	Estimated Incremental Savings to be Achieved as of March 2015	Estimated Incremental Savings to be Achieved as of March 2016
US Retail Web Intranet	1356A 2210	Jan-2012 Feb-2011	96,195	814,000 74,730	47,700 6,000,000 142,000	648,000 2,000,000	694,000 2,100,000
Enterprise Services Implementation of HR SAS Web initiatives	3124 980	May-2010	2,574,841	288,000			
Intelligent Mail Barcode	2630						
Annual Incremental Business Savings			2,671,036	1,176,730	6,189,700	2,648,000	2,794,000

Information Services Operation Savings	INVP No	In-Service	Estimated Incremental Savings as of March 2012	Estimated incremental Savings to be Achieved as of March 2013	Estimated incremental Savings to be Achieved as of March 2014	Estimated incremental Savings to be Achieved as of March 2015	Estimated incremental Savings to be Achieved as of March 2016
US Retail Web	1356A	Jan-2012		(426,000)	(58,000)		
Energy Trading	2330			283,000	-	-	-
Mainframe Upgrades	2673	Nov-2010	172,000	-	-	-	-
Equip Computers	1389	Sep-2010	43,000	-	-	-	-
US VTL Replacement	2522	Jan-2012	100,000	-	-	-	-
GIS Consolidation	2577			30,000	255,000	-	-
Smallworld Upgrade	953		(151,000)				
Outage Management	1185			(184,000)	(1,492,000)	(969,000)	(350,000)
Annual Incremental IS Savings			164,000	(297,000)	(1,295,000)	(969,000)	(350,000)

Niagara Mohawk Power Company

Presentation of Savings from National Grid USA Service Company IS Projects

Page Three: Unaccounted for IS Savings and Costs

Savings not Found in US Restructuring or by Historic Test Year	INVP No	In-Service	Estimated Incremental Savings as of March 2012	Estimated Incremental Savings to be Achieved as of March 2013	Estimated Incremental Savings to be Achieved as of March 2014	Estimated Incremental Savings to be Achieved as of March 2015	Estimated Incremental Savings to be Achieved as of March 2016
Implementation of HR SAS	3124				142,000		
Intelligent Mail Barcode	2630			288,000			
Energy Trading	2330			283,000			
US VTL Replacement	2522	Jan-2012	100,000				
GIS Consolidation	2577			30,000	255,000		
Outage Management	1185			(184,000)	(1,492,000)	(969,000)	(350,000)
Enterprise Services					6,000,000	2,000,000	2,100,000
US Retail Web	1356A	Jan-2012		(426,000)	(58,000)		
Smallworld Upgrade	953		(151,000)				
Annual Incremental IS Savings			(51,000)	(9,000)	4,705,000	1,031,000	1,750,000
Cumulative IS Savings			(51,000)	(60,000)	4,645,000	5,676,000	7,426,000

Date of Request: May 16, 2012  
Due Date: May 29, 2012

Request No. DPS-68(JSC-1)  
NMPC Req. No. 68

NIAGARA MOHAWK POWER CORPORATION

Case No. 12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation d/b/a  
National Grid - Electric and Gas Rates

Request for Information

FROM: John Cary  
TO: Electric Infrastructure and Operations Panel  
SUBJECT: Transmission Capital Investment

Request:

1. Please provide the Transmission Capital Investment Plan Exhibit \_\_ (EIOP-5), for Fiscal Years 2013-2017 in Excel Format with formulas unlocked.
2. In the Excel spreadsheet provided in response to question 1 above, please provide the following information (adding columns to the spreadsheet as necessary):
  - a) Provide the actual capital expenditures for fiscal years 2008, 2009, 2010, 2011 and 2012 for each transmission strategy/major program listed in Exhibit \_\_ (EIOP-5). Note that only the subtotals are requested here and not the individual spending per project listed.
  - b) For each project listed in Exhibit \_\_ (EIOP-5), provide the project cost estimate grade (investment, conceptual, etc.).
  - c) For each project listed in Exhibit \_\_ (EIOP-5), provide the current project phase (initiation, construction, preliminary engineering, etc.).
  - d) For each project listed in Exhibit \_\_ (EIOP-5), provide the construction start date.
  - e) For each project listed in Exhibit \_\_ (EIOP-5), provide the percentage of project completed.
  - f) For each project listed in Exhibit \_\_ (EIOP-5), provide the estimated in-service date or proposed closing rule.
  - g) For each project listed in Exhibit \_\_ (EIOP-5), provide the associated strategy paper number and sanction paper number.
3. For each project listed in Exhibit \_\_ (EIOP-5), provide the sanction paper if the project is not discussed in Exhibit \_\_ (EIOP-6).

Response:

1. The Transmission Capital Investment Plan Exhibit \_\_ (EIOP-5) is included in Excel format with formulas unlocked in JSC-1 Attachment 1 (EIOP-5 in Excel Format).xls.

- 2a. The actual capital expenditures for fiscal years 2008 – 2012 for each major Transmission strategy/program listed in Exhibit EIOP-5 is included in JSC-1\_Attachment 2 (Transmission Program CAPEX FY08 – FY12).xls. “Completed Strategies” note work that was completed in the respective fiscal year that are no longer being utilized.
- 2b-g. Refer to JSC-1\_Attachment 3 (Transmission Project Details).xls, Exhibits 1 and 2, for the estimate grade, current project phase, construction start dates, completion percentage, estimated in-service date and strategy/sanction paper numbers for all projects listed in Exhibit \_\_ (EIOP-5).

Regarding the project completion percentages included for question 2e, the following translation table describes the assigned percentages listed in Attachment 3:

Phase Complete	Weight	Cumulative Percent Complete	Comments
Initiated/Preliminary Eng	5%	5%	
Final Eng	15%	20%	
Construction Band 1	15%	35%	Construction > 0% and < 25% Complete
Construction Band 2	20%	55%	Construction > = 25% and < 50% Complete
Construction Band 3	20%	75%	Construction > = 50% and < 75% Complete
Construction Band 4	20%	95%	Construction > 75% Complete
Close Out	5%	100%	
Cancelled	0%	0%	

Regarding the strategy/sanction papers included for projects in question 2g, there are some projects where strategy or sanction paper numbers do not exist for one of the following reasons:

- The project is not mature enough for a strategy or sanction paper to have been written.
  - Reimbursable generation projects do not require strategy papers, but do require a sanction paper once a facility study is done in preparation for negotiating an interconnection agreement. Only four generator projects are at the stage where an interconnection agreement has been negotiated. These are; Nine Mile, Tug Hill, Green Power-Cody Rd and St. Lawrence Wind. The remainder of the projects have not reached this stage.
  - Projects that can be completed for less than \$100,000 do not require a strategy or sanction paper.
3. Sanction papers for projects not discussed in Exhibit \_\_ (EIOP-6) are included on a CD labeled JSC-1\_Attachment 4 (Sanction Papers not Discussed in EIOP-6). One of the sanction papers contains confidential information. The Company will submit a motion for confidential protection to the Administrative Law Judges in this proceeding requesting protection for this information. Confidential copies of the response will be provided to Staff and UIU. Staff and UIU should protect the confidential information pursuant to the Commission's regulations and await further direction from the Judges. A redacted version of the response will be made available to all parties.

Name of Respondent:  
Al Chieco

Date of Reply:  
May 25, 2012

JSC-1 2a

Spending Rationale	Program	FY08	FY09	FY10	FY11	FY12
Asset Condition	Battery Strategy	\$ 135,901	\$ 368,450	\$ 318,098	\$ 166,631	\$ 276,450
	Flying Ground Strategy			\$ 46,513	\$ 470	\$ 78,654
	Oil Circuit Breaker Strategy					\$ 297,155
	Other Asset Condition	\$ 507,350	\$ 7,019,685	\$ 7,416,860	\$ 17,572,019	\$ 2,755,512
	Overhead Line Refurbishment Program - Asset Condition	\$ 445,165	\$ 1,008,434	\$ 23,152,125	\$ 30,281,413	\$ 15,145,594
	Relay Replacement Strategy			\$ 161,029	\$ 73,982	\$ 69,920
	Reserve - Asset Condition					
	Shieldwire Strategy	\$ 74,502	\$ 1,350,376	\$ 7,418,043	\$ 5,227,141	\$ 5,625,133
	Steel Tower Strategy	\$ 7,235,277	\$ 2,097,847	\$ 83,544	\$ 604,485	\$ 5,763,977
	Substation Rebuild		\$ 27,645	\$ 758,841	\$ 1,044,769	\$ 2,477,306
	Transformer Replacement Program				\$ 17,292	\$ 4,467,596
	U-Series Relay Strategy	\$ 144,426	\$ 20,348	\$ 205,691	\$ 133,134	\$ 722,208
	Completed Strategies	\$ 6,141,954	\$ 2,516,714	\$ 3,162,782	\$ 102,671	\$ 858,807
<b>Asset Condition Total</b>		<b>\$ 14,684,574</b>	<b>\$ 14,409,499</b>	<b>\$ 42,723,525</b>	<b>\$ 55,224,007</b>	<b>\$ 38,538,312</b>
Damage Failures	NY Inspections	\$ 2,170	\$ 290,945	\$ 1,506,939	\$ 1,413,244	\$ 4,091,729
	Other Damage Failure	\$ 11,773,173	\$ 13,743,528	\$ 8,968,317	\$ 6,473,391	\$ 7,014,387
	Woodpole Strategy	\$ 127,095	\$ 107,107	\$ 528,482	\$ 4,067,393	\$ 6,249,285
	Completed Strategies				\$ 61,209	
<b>Damage Failures Total</b>		<b>\$ 11,902,438</b>	<b>\$ 14,141,580</b>	<b>\$ 11,003,738</b>	<b>\$ 12,015,237</b>	<b>\$ 17,355,400</b>
Non - Infrastructure	Physical Security				\$ 23,831	\$ 5,891,053
	Completed Strategies	\$ 14,184	\$ 601,051	\$ 12,504,942	\$ 941,723	\$ 1,285,396
<b>Non - Infrastructure Total</b>		<b>\$ 14,184</b>	<b>\$ 601,051</b>	<b>\$ 12,504,942</b>	<b>\$ 965,553</b>	<b>\$ 7,176,450</b>
Statutory Regulatory	Clay Station Rebuild	\$ 15,265,327	\$ 6,048,328	\$ 239,204	\$ (306,847)	\$ 30,560
	Clearance Strategy	\$ 1,385,621	\$ 188,520	\$ 418,503	\$ 579,396	\$ 7,541,849
	Generation	\$ 644,531	\$ (347,098)	\$ 82,528	\$ 1,501,503	\$ 135,945
	Northeast Region Reinforcement		\$ 4,526	\$ 7,322,237	\$ 6,566,291	\$ 25,924,114
	Other Statutory Regulatory	\$ 768,001	\$ 861,135	\$ 1,387,835	\$ 128,143	\$ 407,075
	Reserve - Statutory Regulatory					
	RTU Strategy	\$ 2,252,929	\$ 3,381,353	\$ 2,501,302	\$ 1,807,840	\$ 1,551,717
	Station NPCC Upgrade		\$ 127,853	\$ 885,853	\$ 3,068,604	\$ 11,993,254
	Completed Strategies	\$ 4,513,131	\$ 9,863,140	\$ 7,374,500	\$ 3,957,552	\$ 2,874,265
<b>Statutory Regulatory Total</b>		<b>\$ 24,829,541</b>	<b>\$ 20,127,757</b>	<b>\$ 20,211,962</b>	<b>\$ 17,302,480</b>	<b>\$ 50,458,777</b>
System Capacity & Performance	Load	\$ (548,125)		\$ (250,878)	\$ 15,253	\$ (28,317)
	Other Syst Capacity & Performance	\$ 1,127,519	\$ 3,128,488	\$ 6,056,354	\$ 4,022,571	\$ 11,753,965
	Overhead Line Refurbishment Program - System Capacity & Performance	\$ 9,027	\$ 149,277	\$ 258,208	\$ 273,827	\$ 3,182,584
	Reliability Criteria Compliance	\$ 30,772	\$ 15,418	\$ 2,003,650	\$ 857,060	\$ 602,132
	Reserve - System Capacity & Performance					
	Completed Strategies	\$ 9,854,030	\$ 14,412,475	\$ (66,376)		\$ 6,772
<b>System Capacity &amp; Performance Total</b>		<b>\$ 10,473,225</b>	<b>\$ 17,705,658</b>	<b>\$ 8,000,958</b>	<b>\$ 5,168,711</b>	<b>\$ 15,517,136</b>
<b>Benefit True-Up Adjustment</b>		<b>\$ 172,094</b>		<b>\$ (72,419)</b>	<b>\$ 122,623</b>	

<b>Grand Total</b>	\$	62,076,056	\$	66,985,546	\$	94,372,705	\$	90,798,611	\$	129,046,075
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Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 12-E-0201 and 12-G-0202  
Attachment 2 to JSC-1  
Page 1 of 1

Date of Request: May 18, 2012  
Due Date: May 29, 2012

Request No. DPS-85(LMR-2)  
NMPC Req. No. NM 85

NIAGARA MOHAWK POWER CORPORATION

Case No. 12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation d/b/a  
National Grid - Electric and Gas Rates

Request for Information

FROM: Lisa Rosi

TO: Charles Willard

SUBJECT: DEC Work Schedule and Projected Expenses

Request:

1. Exhibit CFW-3 depicts the NYSDEC 2012 Work Schedule. Does NIMO have other site remediation projects that are being addressed but are not listed in the DEC approved schedule? If so, please provide a list of such projects and the associated work schedules.
2. On page 12 company witness Willard states that "shareholders bear 20 percent of any overspend" – a mechanism that came from the 2010 electric rate order. Did the company overspend on any of the sites? If so, what was the overspend amount? What was the amount for which the shareholders were responsible? Name the sites that were subject to the overspending and list the main reasons for the overspending.
3. Exhibit CFW-6 lists HTY construction delays where scheduled spending associated with remedial construction projects was less than the DEC schedule. Identify the procedures that are in place to ensure that the remediation activities will not be delayed as they have been during the HTY.
4. Exhibit CFW-2 is an example of a New York Department of Environmental Conservation Order on Consent and lists penalty per day for periods of non-compliance (Exhibit CFW-2 page 88 of Willard's testimony). Has NIMO been subject to these fines? If so, identify the sites that the fines are associated with, the reason that NIMO was non-compliant, and the total amount that was fined per site.

Response:

1. The NYS Department of Environmental Conservation's ("DEC's") 2012 work schedule provided in Exhibit CFW-3 only depicts the MGP sites. Niagara Mohawk does have other active site projects (which account for a relatively small portion of the company's annual spending) and these sites were included in Attachment 1 to DPS-12 (identified as Niagara Mohawk Operating Properties ("OPR") and multi-industrial party or Potentially Responsible Parties ("PRP"))



sites as defined in the environmental regulations). A description of the associated work schedules are as follows:

Operating Sites ("OPR")

Dewey Ave – This facility initially serviced polychlorinated biphenyl ("PCB")-containing transformer and other electrical equipment. Following passage of the Toxic Substances Control Act, the facility was permitted as a Transportation, Storage and Disposal ("TSD") to centrally collect, drain, and ship (in larger quantities) this equipment and oil for treatment and/or disposal. The equipment was collected from service from the western Niagara Mohawk division. To close the DEC permit after the equipment removal was completed, an investigation and remediation of residual PCBs was required under a DEC Order on Consent. This site is currently in the SIR operation and maintenance phase ("O&M"). Niagara Mohawk conducts groundwater level measurement and sampling on a semi-annual basis and provides DEC with an annual report.

East Utica Substation (Old Erie Canal) – This site is not under a prescribed work schedule. Niagara Mohawk's involvement is related to its alleged nexus to the site.

Hudson Substation – This site was in O&M but has recently been closed by DEC. The Company plans to complete the basin decommissioning this year.

Old Gardenville Substation – This site is not under a prescribed schedule. The site remains active in the event the substation is renovated or improved at which point SIR involvement is required.

Seventh North Street TSD & Service Center – This site is similar to the Dewey Ave site, servicing the Central Niagara Mohawk division. This site is currently awaiting a DEC Post Closure Permit following a Resource Conservation and Recovery Act ("RCRA") Corrective Action measures completed at the site. Activities at the site currently include biota monitoring every other year.

Solvay TSD Facility & Service Center – This site permit was similar to the Dewey Ave and Seventh North site, but it was a smaller scale, short-term operation for PCB mineral oil collection. The site is not under a prescribed work schedule. The site remains active in the event the substation is renovated or improved at which point SIR involvement is required.

Teall Avenue Substation – This site is not under a prescribed work schedule. Niagara Mohawk is the site owner and is prepared to oversee remedial construction associated with this site. However, impacts to the site were caused by another party that DEC is pursuing.

Terminal D FTS & Electric Substation/Terminal Station C – These facilities are not under prescribed work schedules; however, the sites remain active in the event that the facilities are decommissioned or renovated in the future at which point SIR involvement is required.

### Potentially Responsible Party ("PRP")

Alltft/Fort Edward Dam (Hudson River NPL)/Frontier Chemical – Royal Ave/Ley Creek PCB Dredging Site/Maxey Flats/Sealand Restoration/Ward Transformer – These sites are not under prescribed work schedules. Niagara Mohawk's involvement is related to its alleged nexus to each site.

Airco Carbon/Vanadium ROW – The site is located beneath a contaminated right of way ("ROW") in Buffalo. A prior settlement was negotiated with other responsible parties. The site schedule is pending the bid and contract award process.

Cherry Farm (River Road) – This site property is owned by Niagara Mohawk, but was contaminated by other parties. A prior settlement was negotiated. This site is in O&M. The prescribed work schedule with DEC includes monthly self-monitoring reports (documenting the treatment and discharge results) and semi-annual cap inspection reports (documenting the condition of the site cap system).

DVL, Inc. v. GE, NMPC, et al. – This site is not under a prescribed work schedule. Niagara Mohawk's involvement is related to its alleged nexus to the site. NIMO is a defendant in a "Comprehensive Environmental Response, Compensation and Liability Act" or CERCLA legal action regarding this site.

PAS Main – The site is under an EPA Order. The site was operated as a 3<sup>rd</sup> party PCB oil collection and treatment facility which subsequently declared bankruptcy. NIMO sent material to the site, along with other parties, prior to the enactment of relevant environmental laws. A prior settlement was negotiated with other responsible parties. The site is currently in O&M. Niagara Mohawk conducts long-term sediment and fish monitoring and submits an annual report to EPA.

Wallace & Son – This site is under a DEC Order. Niagara Mohawk sent PCB-oil filled equipment to the oil recovery and scrap dealer, prior to the enactment of relevant environmental laws. A prior settlement was negotiated with other responsible parties. The site is in O&M. Niagara Mohawk conducts routine water sampling (influent and treated discharge) and treatment/recovery system inspections and provides DEC with an annual report.

Waste-Stream Inc. – This site was under a DEC Order for the Remedial Investigation/Feasibility Study ("RI/FS"). Niagara Mohawk sent PCB-oil filled equipment to the oil recovery and scrap dealer, prior to the enactment of relevant environmental laws. A cost sharing agreement was negotiated with other responsible parties for the RI/FS phase. The DEC has issued a Record of Decision ("ROD") for this site, and it is anticipated that DEC will seek to enter into a Consent Order with the PRPs for the implementation of the ROD

prescribed remedy. NIMO's involvement is related to its alleged nexus to the site.

2. Niagara Mohawk has not exceeded the rate year allowance of \$30 million since the 2010 electric rate order.
3. Niagara Mohawk has plans in place to meet the DEC schedule. Niagara Mohawk works directly with the DEC staff on project planning and reports on progress and planned milestones to the DEC in bi-monthly reports. Niagara Mohawk project managers regularly communicate with the consultants to ensure timely delivery of work plans, designs and reports. Weekly meetings are held to discuss progress at active sites as well as bi-weekly meetings with Niagara Mohawk project managers and bi-weekly meetings with management to discuss progress. Monthly meetings are held to discuss spending to date, progress, and projections. Niagara Mohawk project managers regularly discuss progress with the DEC project managers.

The delays noted in Exhibit CFW-6 were outside of Niagara Mohawk's control. They were due to unscheduled delays encountered by the factors identified in the DEC Order on Consent as normal SIR delays mentioned in Exhibit CFW-2 (, pg. 102). These factors delayed work in the prior years as well. For example, Niagara Mohawk could not bid the Harbor Point sediment capping project until DEC accepted the design. DEC Fish and Wildlife requested modifications to the cap design which were incompatible with NYS Canal Corp's future use of the Harbor. Specifically, the cap required structural components to allow for future dredging. Niagara Mohawk worked with DEC remediation division to broker a solution, which took over a year. The final design required a cap modification. Bidding prior to receiving the final comments would have resulted in a change order from the contractor.

Niagara Mohawk is, however, making significant progress on remediation projects this year. Three construction projects are underway or completed (Syracuse (Hiawatha), Oneida (Sconondoa) and Schenectady (Broadway)), one is pending (Schenectady (Clinton)) and a fifth is pending receipt of bids (Harbor Point sediment capping).

4. Niagara Mohawk has not been penalized by DEC or EPA under any Order.

Name of Respondent:  
Charles Willard  
Brian Stearns

Date of Reply:  
May 25, 2012

Date of Request: 5/21/12

Request No. DPS-87 (DAG-7)  
(everything except last sentence of section 3)  
NMPC Req. No. 87

Due Date: 5/31/12

NIAGARA MOHAWK POWER CORPORATION

Case No. 12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation d/b/a  
National Grid - Electric and Gas Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirement Panel (RRP)

SUBJECT: US Restructuring Savings

Request:

- (1) Exhibit RRP-11, Schedule 48, Workpaper 4 shows total US Restructuring FTE reductions of 1,381. The RRP testimony at page 72 concludes that 100% of the labor cost reductions are reflected in the rate year, with a reference to Exhibit RRP-3, Schedule 31. Please provide a roadmap showing explicitly how the reduction of 1,381 is reflected in the labor forecast, both in FTE numbers and savings, allocated to Niagara Mohawk. Cite all exhibits, workers, schedules, etc in the filing and provide all source documents if not included in the filing.
- (2) Provide a reconciliation and verifiable savings calculation, with a cite to source documents, between the FTE reductions of 1,381 as shown on Schedule 48, workpaper 4, to the labor savings amount of \$102.4 million (Nat Grid at 100%) shown in RRP-11, Schedule 48, workpaper 1, of \$102.4 (NGrid at 100%).
- (3) For each non-labor US Restructuring savings initiative shown on Exhibit RRP-11, Schedule 48, Workpaper 2, pages 2 through 6, provide the backup calculations for the (a) aggregate run rate through March 31, 2013, and (b) aggregate run rate through December 31, 2011. These calculations should include how the savings were calculated, and the various cost components the savings are expected to affect.
- (4) Are all US Restructuring savings expected to be achieved by the end of FY '13 (i.e. 3/31/2013)? If no, please provide a schedule in the same format as Exhibit RRP-11, Schedule 48, Workpaper 2, pages 2 through 6, that identifies the expected date of final savings achievement, with the aggregate run rate amount.
- (5) Exhibit RRP-11, Schedule 35, Workpaper 3, shows the additional cost the Company is requesting in the RYE 3/14 for 26 additional staff to support US Foundations. Included in the calculated cost is labor costs plus the added benefit costs for FAS 106, FAS 112, health care, group life insurance, pension, thrift plan, workers comp, variable pay, and payroll taxes, otherwise known as labor overhead loadings.

- (a) Please identify, for each separate employee benefit, where the Company has reflected the reduction in these same benefit costs, due to the reverse situation caused by the 1,381 FTE reductions the Company indicates it will achieve.
- (b) If the Company has not reflected the reduction in employee benefits expense (i.e. overhead loadings), please explain why not.
- (c) If the Company has not reflected the reduction in employee benefits expense (i.e. overhead loadings), please provide the amount each employee benefit expense item (the allocated Niagara Mohawk share) should be reduced by for the RYE 3/14, electric and gas expense separately, if the Commission were to determine that the adjustment is applicable to the 1,381 FTE reductions, and should be made. Provide all calculations and supporting documentation.

Response:

1. See Attachment 1
2. See Attachment 2 . Page 1 of Attachment 2 provides a summary by department of savings and the associated headcount. The total savings of \$102m equates to a total headcount reduction of 1,262. Attachment 2 provides a detailed listing by employee ID of how the labor savings under US Restructuring was derived.

The difference between the 1,262 and the reported 1,381 of FTE reduction is largely associated with IT. Any savings associated with IT transformation including FTE reductions were reported in total as non-labor savings for purposes of tracking and reporting savings under the US Restructuring program.

In preparing this response, the Company identified that certain savings amounts were misallocated between labor and non-labor as initially presented in Exhibit RRP-11, Schedule 48, Workpaper 3 page 2. A spreadsheet linking error resulted in certain errors noted in Attachments 2, 3, and 4 of this response and will be included in the Company's corrections and updates filing.

It is important to note that the US restructuring reported labor savings of \$102 million was not directly used in determining the labor costs included in the Company's rate year revenue requirement. The revenue requirement labor forecast was based on the employees of National Grid as of December 31, 2011. Adjustments were made for employees in non-enduring roles who have yet to leave the Company as a result of US Restructuring and vacancies established through the future organization design. Vacancies attributable to natural attrition were not included in the forecast as the Company determined these would be present at any given time.

As shown in Attachment 1, the adjusted headcount as of December 2011, which was used for purposes of determining the Company's rate year labor forecast, reflects a reduction of 1,381 off of the adjusted November 2010 US Restructuring baseline. The rate year labor expense thus reflects the reduction of the 1,381 employees.

3. a.) Please see Attachment 3 for the monthly back up calculations on the non-labor savings aggregate run rate through March 2013 (reflective of total annual run-rate savings achieved each month through March 2013).

b) Please see Attachment 4 for the monthly back up calculations on the non-labor savings aggregate fiscal run-rate through December 2011 (reflective of actual monthly savings achieved in the test year).

The savings initiative values will be refined when the Company submits its corrections and updates filing to reflect the latest information available regarding the savings initiatives. Those refinements are not expected to be significant.

In accordance with the Company's notice of extension, details on each initiative will be provided by close of business June 13.

4. Yes, all U.S. Restructuring savings are forecast to be achieved on a run-rate basis by the end of FY 13.
- 5.
- a. Below are explanations for how the Company reflected U.S. Restructuring FTE reductions in the preparation of employee benefit costs:
    - i. FAS 106: Aon Hewitt Consulting prepared actuarial estimates of OPEB costs for the company utilizing post-US Restructuring FTE counts.
    - ii. FAS 112: Long-term disability costs were developed by applying an inflation factor to historic test year costs. These costs were not explicitly adjusted for US Restructuring FTE reductions.
    - iii. Healthcare: Healthcare costs were developed by applying an inflation factor to historic test year costs. These costs were not explicitly adjusted for US Restructuring FTE reductions.
    - iv. Group life insurance: Group life insurance costs were developed by applying an inflation factor to historic test year costs. These costs were not explicitly adjusted for US Restructuring FTE reductions.
    - v. Pension: Aon Hewitt Consulting prepared actuarial estimates of Pension costs for the company utilizing post-US Restructuring FTE counts.
    - vi. Thrift Plan: Thrift Plan costs were developed by applying an inflation factor to historic test year costs. These costs were not explicitly adjusted for US Restructuring FTE reductions.
    - vii. Worker's Comp: Worker's compensation costs were developed by applying an inflation factor to historic test year costs. These costs were not explicitly adjusted for US Restructuring FTE reductions.
    - viii. Variable Pay: Variable pay costs were developed by the Company using December 31, 2011 FTE counts adjusted for non-enduring roles and vacancies.

ix. Payroll Taxes: Payroll tax costs were developed by the Company using December 31, 2011 FTE counts adjusted for non-enduring roles and vacancies.

b. and c. In order to align FAS 112, Healthcare, Group Life Insurance, Thrift Plan and Worker's compensation costs for both Gas and Electric with post-US Restructuring FTE counts, the Company will make a rate year adjustment of an estimated total of \$2.3 million in its correction and updates filing. See attachment 5 for details.

Name of Respondent:

Mark Stiner

Stephen Heywood

Date of Reply:

May 31, 2012

Exhibit \_\_\_\_\_ (RRP-11)  
Worksheet to Exhibit RRP-3  
Schedule 48  
Worksheet 4  
Page 1 of 1

	FTE's
<b>1 US Restructuring Baseline</b>	<b>6,382</b>
2 Test Year Payroll	5,103
3 Adjustments:	-
4 Less: Non-Ending	(137)
5 Plus: Vacancies	118
6 Less: Liberty	(55)
7 Less: Long Term Disability	(100)
8 Rate Year FTE's	4,929
	-
9 FTE Management Reductions	1,453
10 Plus: Union Reductions	111
11 Less: Normal Labor Float	(183)
	-
<b>12 Total US Restructuring FTE Reductions</b>	<b>1,381</b>

**Sources/References:**

1 Actual Management FTE at Nov. 2010	6,074
Plus: vacancies at Nov. 2010 that were held into new structure:	168
Plus: increased FTE's for out of scope areas	140
	<u>6,382</u>

- 2 5,103 test year payroll is created from 4,318 Dec 31, 2011 payroll (513 NiMo, 2062 National Grid USA Svc Co, 1743 Keyspan Svc Co - RRP-3 Schedule 31 p. 36) + 785 "Other" FTEs (i.e. employees that do not allocate time to NiMo)
- 4-7 Exhibit RRP-11, Worksheet to RRP-3, Schedule 31, Worksheet 12, page 1 of 1 / Attachment 1 to DPS-42 (RMD-6) Line 8 (exhibits include "Other" category of FTEs)
- 8 Sum of lines 2 through 7
- 9 Line 1 less line 8
- 10 Union adjustments included in US Restructuring headcount
- 11 Total approved management positions under US Restructuring of 5112, less total headcount included in rate year of 4,929
- 12 FTE Reductions included in rate year (Sum of lines 9 through 11)



Date of Request: 5/21/12  
Due Date: 5/31/12

Request No. DPS-88 (DAG-8)  
NMPC Req. No. 88

NIAGARA MOHAWK POWER CORPORATION

Case No. 12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation d/b/a  
National Grid - Electric and Gas Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirement Panel (RRP)

SUBJECT: Consultants (#100) and Contractors (#110)

Request:

- (1) Consultants, expense type #100 - Exhibit RRP-3, Schedule 1, Page 5 shows total HTY normalizing adjustments of -\$18.804 million (-\$16.674 million electric expense; -\$2.130 million gas expense). However, the workpapers supporting the consultant expense for the HTY, Exhibit RRP-11, Schedule 1, workpaper 5, pages 1 through 37, do not specifically identify the items the company is removing or reclassifying. Please separate out and breakdown down the information provided on pages 1 through 37, but provide the same level of detail, for each of the following:
  - (a) The total HTY accounting expenses of -\$3.540 million (-\$2.965 million electric expense; -\$0.575 million gas expense) that are reclassified
  - (b) The total HTY legal expenses of -\$4.081 million (-\$3.524 million electric expense; -\$0.557 million gas expense) that are reclassified
  - (c) The total HTY energy efficiency expenses of -\$0.233 million (-\$0.658 million electric expense; +\$0.425 million gas expense) that are reclassified
  - (d) The total HTY vegetation management expenses of -\$0.0044 million (all electric expense) that are reclassified
  - (e) The total HTY analysis adjustments of -\$10.908 million (-\$9.485 million electric expense; -\$1.423 million gas expense) that are adjusted out
  - (f) The total HTY site investigation and remediation adjustments of -\$10.685 million (-\$8.846 million electric expense; -\$1.839 million gas expense) that are adjusted out and reclassified
  - (g) The resulting HTY costs that remain after the HTY normalizing adjustments and reclassifications are made. This should be a total amount of \$10.578 million (\$9.352 million electric expense; \$1.225 million gas expense)
- (2) Contractors expense type #110 - Exhibit RRP-3, Schedule 2, Page 5 shows total HTY normalizing adjustments of -\$121.818 million (-\$119.259 million electric expense; -\$2.559 million gas expense). However, the workpapers supporting the contractor expense for the HTY, Exhibit RRP-11, Schedule 1, workpaper 8, pages 1 through 120, do not specifically identify the items the company is removing or reclassifying. Please separate out and breakdown down the information provided

on pages 1 through 120, but provide the same level of detail, for each of the following:

- (a) The total HTY accounting expenses of -\$0.499 million (-\$0.397 million electric expense; -\$0.102 million gas expense) that are reclassified
  - (b) The total HTY legal expenses of -\$0.398 million (-\$0.328 million electric expense; -\$0.071 million gas expense) that are reclassified
  - (c) The total HTY energy efficiency expenses of -\$27.886 million (-\$26.321 million electric expense; +-\$1.545 million gas expense) that are reclassified
  - (d) The total HTY vegetation management expenses of -\$51.245 million (-\$50.822 million electric expense; -\$0.424 million gas expense) that are reclassified
  - (e) The total HTY analysis adjustments of -\$2.985 million (-\$2.567 million electric expense; -\$0.418 million gas expense) that are adjusted out
  - (f) The total HTY electric major storm incremental costs of -\$38.538 million (all electric expense) that are removed and instead used in the storm fund calculation
  - (g) The total HTY RDV write-off costs of -\$0.287 million (all electric expense) that are removed
  - (h) The total HTY site investigation and remediation adjustments of -\$5.778 million (-\$4.796 million electric expense; -\$0.982 million gas expense) that are adjusted out and reclassified
  - (i) The resulting HTY costs that remain after the HTY normalizing adjustments and reclassifications are made. This should be a total amount of \$70.098 million (\$58.808 million electric expense; \$11.290 million gas expense)
3. The RDV write-off of \$287,429 is summarized on Exhibit RRP-11, Schedule 2, workpaper 6, page 1. Please separately identify where in the Company's filing, through either exhibits or workpapers (identify page #s), it can be shown that all RDV related costs incurred in the HTY 2011, have been removed or normalized out, and if all costs have not been removed, please explain why not. Provide all supporting documentation for your answer.

Response:

- 1a. Please see Attachment 1 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY accounting expense reclass of \$3.540 million.
- 1b. The total HTY legal expense that was reclassified was -\$4.080 million (-\$3.523 million electric expense; -\$0.557 million gas expense). Please see Attachment 2 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY legal expense reclass of \$4.080 million.
- 1c. Please see Attachment 3 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY energy efficiency expense reclass of \$0.233 million.
- 1d. Please see Attachment 4 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY vegetation management expense reclass of \$0.0044 million.
- 1e. Please see Attachment 5 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY Analysis Adjustments of \$10.908 million.

- 1f. Please see Attachment 6 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY Site Investigation and Remediation reclass of \$10.685 million.
- 1g. Please see Attachment 7 to DPS-88 (DAG-8) for the requested detail workpapers for the remaining HTY costs of \$10.578 million. Please note that portions of the project adjustments included in Exhibit\_(RRP-2) related to legal and accounting expense. These costs should have been removed from legal and accounting expense rather than expense type 100. The Company will reclass the adjustments to legal and accounting expense in Corrections and Updates.
- 2a. Please see Attachment 8 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY accounting expenses reclass of \$0.499 million.
- 2b. Please see Attachment 9 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY legal expenses reclass of \$0.398 million.
- 2c. Please see Attachment 10 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY energy efficiency reclass of \$27.886 million.
- 2d. Please see Attachment 11 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY vegetation management expenses reclass of \$51.245 million.
- 2e. Please see Attachment 12 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY Analysis adjustments of \$2.985 million. Please note that two (2) of the adjustments were misallocated between the electric and gas segments. The Company will adjust the split between electric and gas in Corrections and Updates.
- 2f. Please see Attachment 13 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY electric major storm incremental costs of \$38.538 million.
- 2g. Please see Attachment 14 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY RDV write-off costs of \$0.287 million.
- 2h. Please see Attachment 15 to DPS-88 (DAG-8) for the requested detail workpapers for the HTY site investigation and remediation reclass of \$5.778 million.
- 2i. Please see Attachment 16 to DPS-88 (DAG-8) for the requested detail workpapers for the remaining HTY costs of \$70.098 million. Please note that portions of the project adjustments included in Exhibit\_(RRP-2) related to accounting expense. These costs should have been removed from accounting expense rather than expense type 100. The Company will reclass the adjustments to accounting expense in Corrections and Updates.
3. As part of the Stipulation and Agreement of Certain Matters Relating to Capital Investment and Operating & Maintenance Spending ("Stipulation") in Case 10-E-0050, the Company agreed to transition from the Regional Delivery Venture ("RDV") as the means of delivering its transmission capital work. As part of the Stipulation, the Company agreed to charge to shareholders the unamortized RDV start-up related

costs (e.g. prepaid insurance premiums and transition services agreement costs), as well as demobilization costs. The majority of the costs disallowed per the Stipulation were written off to expense in calendar year 2010; however, \$287,429 of the costs were written off in the historic test year. The Company reduced the historic test year for \$287,429 in Exhibit RRP-3, Schedule 2, Page 5 on the line labeled RDV Write-off.

There were other RDV overhead related costs such as annual core team costs and annual Owner Controlled Insurance Program (OCIP) premiums/deductibles that were not part of the disallowed costs specified in the Stipulation. These costs were included in the capital project CZZ036 and allocated as an overhead to capital projects, as discussed in response to DAG-3.

Additionally, the calendar year 2010 and 2011 RDV write-offs were excluded from the transmission three year historic percentage developed for forecasting opex associated with capex. This is illustrated in Exhibit RRP\_ 11, Workpapers for Exhibit RRP\_ 3, Schedule 35, Workpaper 1, Page 2, Lines 2 and 6.

Name of Respondent:

Stephanie Briggs

Date of Reply:

May 30, 2012

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)

Charges to Co 36 - Electric (SUMMARY)

Historic Year Ending December 31, 2011

Expense Type 100 & 105 - Consultants

Adjusted Historic Test Year Costs

	Electric	Gas	Total
99 AP (see List)	5,862,860	771,573	6,634,432
36 AP (see List)	1,070,641	314,200	1,384,842
99 On Line JE	(968,196)	(131,646)	(1,099,842)
36 On Line JE	2,314,225	308,471	2,622,695
Total	<b>8,279,529</b>	<b>1,262,598</b>	<b>9,542,127</b>
**** HTY Adj - legal	1,236,438	(6,378)	1,230,060
**** HTY Adj - accounting	(163,826)	(30,820)	(194,646)
Total Remaining HTY Costs	<b>9,352,141</b>	<b>1,225,400</b>	<b>10,577,541</b>

\*\*\*\* - These are legal and accounting costs that were part of the HTY Analysis Project Adjustment. Since legal and accounting costs had been separately removed from expense types 100 and 105, this amount of the HTY project adjustment should be made to legal and accounting expense rather than expense type 100. The Company will reclass these adjustments from expense type 100 to legal and accounting expense in Corrections and Updates.

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Indirect Charges to Co 36 - (AP Detail)  
Historic Year Ending December 31, 2011  
Expense Type 100 & 105 - Consultants  
Adjusted Historic Test Year Costs  
Part G

IR Category OTHER

Org Business Unit	Activity	Activity Descr	Vendor	Data	
				Sum of NIMO Electric	Sum of NIMO Gas
00036	TO9000	Supv&Adm Trans Misc Ops	QUANTA TECHNOLOGY LLC	28,002	-
00036 Total				28,002	-
00099	AG0040	Employee Communications	BONFIRE COMMUNICATIONS	18,475	3,784
	AG0085	Provide Regulatory Support	PHASE TWO DESIGN	932	-
			ENERGYTOOLS LLC	23,172	4,704
			SAUL EWING LLP	12,491	2,160
			EMPIRE ADVOCATES LLC	13,390	2,329
			OCI RESOURCES INC	147,553	25,212
	AG0270	Audit Operations	GOLDSTEIN & LEE PC	7,836	1,339
			DELOITTE CONSULTING LLP	-	-
			COLDEN CORPORATION	238	-
			KPMG LLP	41,813	5,701
			ERNST & YOUNG LLP	91,838	-
			THE INSTITUTE OF INTERNAL AUDITORS	14,784	2,526
	AG0295	Sourcing	PRO UNLIMITED INC	1,944	398
			THE HACKETT GROUP INC	4,408	753
			WEBSAN SOLUTIONS INC	5,194	887
	AG0299	Process Payments	PRO UNLIMITED INC	2,911	506
	AG0465	HR Transactional Services	PRO UNLIMITED INC	73,017	14,954
			CREATIVE SERVICES INC	1,342	275
			MELLON INVESTOR SERVICES LLC	35,711	7,314
			MERCER HUMAN RESOURCE CONSULTING INC	633,850	129,814
			NEPC LLC	12,474	2,555
			TALX CORPORATION	5,322	1,090
			TOWERS WATSON DELAWARE INC	3,936	806
			TOWERS WATSON PENNSYLVANIA INC	3,904	799
			T ROWE PRICE	419,493	85,913
	AG0485	Provide Safety & Health Service	SIGMA CONSULTANTS INC	12,796	2,621
	AG0493	Provide Administrative & Gener	NUANCE COMMUNICATIONS INC	601	113
			YOUNG SAMUEL CHAMBERS LTD	1,929	330
			AT&T	4	1
			PHASE TWO DESIGN	1,116	194
			THERESA JELFO	61	18
			PRO UNLIMITED INC	61,285	1,242
			NETCOM LEARNING	44,487	664
			VERIZON	52,929	9,489
			ERNST & YOUNG LLP	55,294	9,448
			THE LEADER'S EDGE	10,676	1,857
			CORPORATE EXECUTIVE BOARD	32,767	5,598
			FACILITY ISSUES	977	167
			JONES LANG LASALLE AMERICAS INC	75,824	12,955
			REVENUEW INTERNATIONAL LLC	67,035	11,453
			AIGNER/PRENSKY MARKETING GROUP	-	-
			TRANSACTION ASSOCIATES INC	869	108
	AG0760	Operations Executive Services	YOUNG SAMUEL CHAMBERS LTD	8,385	1,611
			CAPGEMINI TECHNOLOGIES LLC	123,521	-
			PRO UNLIMITED INC	3,069	-
			RUSSELL REYNOLDS ASSOCIATES INC	780	-
			ALPHA CONSTRUCTION AND ENGINEERING CORP	2,634	-
			PA CONSULTING GROUP INC	93,755	16,017
			ANALYSIS GROUP INC	35,116	-
			ALLENBAUGH ASSOCIATES INC	15,666	-
			ORACLE AMERICA INC	5,037	1,032
			OLIVER WYMAN INC - MERCER MANAGEMENT	338,553	66,740
	AG0775	Transmission Financial Service	PRO UNLIMITED INC	4,435	-
	AG0780	Electric Distribution Financial	PA CONSULTING GROUP INC	6,748	-
	AG0844	IS Development A&G	IBM CORPORATION	5,012	-
			ITRON INCORPORATED	23,768	4,685
			ADTECH-GESI LLC	266	46
			ORACLE AMERICA INC	67,018	-
	AG0847	IS Support A&G	IBM CORPORATION	651,115	109,141
			WIPRO LTD	18,873	3,635
	AG0851	IS Development - Distribution	KEMA INC	13,253	-
			NOISE CONSULTING GROUP INC	-	-
	AG0855	Maintenance & Support	IBM CORPORATION	69,105	-
			NETCOM LEARNING	6,035	92
	AG0860	IT Executive Management & Over	PRO UNLIMITED INC	8,720	1,490

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)

Direct Charges to Co 36 - (SUMMARY)

Historic Year Ending December 31, 2011

Expense Type 100 & 105 - Consultants

Adjusted Historic Test Year Costs

Part I

00099	TO9120	PP99902770	(1,996)	-
		PP99905293	1,996	-
		PP99909607	-	-
	AG0990	99618DS15	42,316	-
	AG0493	99618DS18	29,866	6,117
	AG0100	PP999O F99	-	-
	GO9096	9943IDS	-	(5,704)
	AG0480	991128 KS	1,015	-
	AG0270	99404DO5	106,050	18,444
	AG0060	9943IDS	(7,749)	-
	AG0236	99618DS15	22,774	-
		99618DS18	(22,774)	-
	DO9030	9943IDS	(64)	-
	AG0290	99614-03EB	45,288	5,729
		99614-21EB	(1,461)	-
		99614-06EB	107,713	19,362
		99614-09EB	11,639	79
		99614-24EB	14,555	-
		99614-26EB	28,917	3,998
		99614-32EB	25,105	542
		99614-33EB	(2,375)	-
	AG1010	99614-03EB	(41,206)	(8,440)
	AG0844	99614-23EB	(28,454)	-
		99614-05EB	2,885	-
		99614-02EB	-	-
	AG0860	99614-05EB	153	-
		99614-07	(1,185)	-
	AG0847	99614-13EB	10,936	-
	AG0275	99618DS15	13,759	2,818
		99618DS17	27,163	-
	AG0495	99618DS15	72,818	-
		99618DS18	27,724	-
	AG0250	99618DS17	(27,163)	-
	AG0992	99618DS18	36,590	7,494
	TM1100	FAILPP99W	2,970	-
	TM3000	PP99913461	9,526	-
00099 Total			705,994	50,439
00431	921000	KSA0010598	96,960	16,977
		KSA0011253	(84,531)	(34,329)
		KSA0011556	477,284	95,122
		KSA0012895	(25,789)	(1,852)
		KSA0013596	206,102	63,862
		KSA0014315	8,127	1,216
		KSA0015212	130,919	24,331
		KSA0015486	(26,544)	8,395
		KSA0016536	(16,147)	(846)
		KSA0016820	16,839	3,150
		KSA0017082	384,622	106,425

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)

Direct Charges to Co 36 - (SUMMARY)

Historic Year Ending December 31, 2011

Expense Type 100 & 105 - Consultants

Adjusted Historic Test Year Costs

Part I

00431	921000	KSA0018097	171,002	29,255
		KSA0019344	286,324	45,995
	GM0140	KSA0010598	-	836
		KSA0011253	-	299
		KSA0011556	-	(2,034)
		KSA0012895	-	2,138
		KSA0014315	-	8
		KSA0015486	-	17
		KSA0016536	-	80
		KSA0017082	-	3
		KSA0018097	-	(185)
		KSA0019344	-	425
	GM0141	KSA0010598	-	98
		KSA0011253	-	35
		KSA0011556	-	(239)
		KSA0012895	-	252
		KSA0014315	-	1
		KSA0015486	-	2
		KSA0016536	-	9
		KSA0017082	-	0
		KSA0018097	-	(22)
		KSA0019344	-	50
	GO0200	KSA0010598	-	344
		KSA0011253	-	123
		KSA0011556	-	(838)
		KSA0012895	-	880
		KSA0014315	-	3
		KSA0015486	-	7
		KSA0016536	-	33
		KSA0017082	-	1
		KSA0018097	-	(76)
		KSA0019344	-	175
	GO0210	KSA0010598	-	98
		KSA0011253	-	35
		KSA0011556	-	(239)
		KSA0012895	-	252
		KSA0014315	-	1
		KSA0015486	-	2
		KSA0016536	-	9
		KSA0017082	-	0
		KSA0018097	-	(22)
		KSA0019344	-	50
	GO5030	KSA0010598	-	295
		KSA0011253	-	106
		KSA0011556	-	(718)
		KSA0012895	-	755
		KSA0014315	-	3
		KSA0015486	-	6



NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)

Direct Charges to Co 36 - (SUMMARY)

Historic Year Ending December 31, 2011

Expense Type 100 & 105 - Consultants

Adjusted Historic Test Year Costs

Part I

00431	GO5030	KSA0016536	-	28
		KSA0017082	-	1
		KSA0018097	-	(65)
		KSA0019344	-	150
	GO9070	KSA0010598	-	492
		KSA0011253	-	176
		KSA0011556	-	(1,197)
		KSA0012895	-	1,258
		KSA0014315	-	5
		KSA0015486	-	10
		KSA0016536	-	47
		KSA0017082	-	2
		KSA0018097	-	(109)
		KSA0019344	-	250
	GO9086	KSA0010598	-	1,967
		KSA0011556	-	(4,787)
		KSA0012895	-	5,031
		KSA0014315	-	20
		KSA0015486	-	39
		KSA0016536	-	188
		KSA0018097	-	(434)
		KSA0019344	-	1,000
	GO9001	KSA0011253	-	704
		KSA0017082	-	8
	923001	KSA0010598	(29,524)	4,046
		KSA0011253	222,196	52,591
		KSA0011556	(51,158)	(7,340)
		KSA0012895	(52,941)	768
		KSA0013596	(62,299)	(14,015)
		KSA0014315	107,391	19,243
		KSA0015212	73,718	15,056
		KSA0015486	118,095	25,583
		KSA0016536	112,103	22,325
		KSA0017082	(74,532)	(2,197)
		KSA0018097	34,451	1,153
		KSA0019344	69,209	16,501
		KSA0010869	32,700	6,116
		KSA0011129	-	34
		KSA0011478	2,230	1,191
		KSA0012012	(32,675)	(6,111)
		KSA0013166	3,508	984
		KSA0013785	1,434	335
		KSA0014527	407	83
		KSA0015432	70	12
		KSA0015643	13	6
		KSA0017015	-	109
		KSA0018517	1,502	308
902000		KSA0010598	14	3

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)

Direct Charges to Co 36 - (SUMMARY)

Historic Year Ending December 31, 2011

Expense Type 100 & 105 - Consultants

Adjusted Historic Test Year Costs

Part I

00431	902000	KSA0011253	15	4
		KSA0011556	4	1
		KSA0012895	3	1
		KSA0014315	9	2
		KSA0015486	42	8
		KSA0016536	84	16
		KSA0017082	26	7
		KSA0018097	14	3
		KSA0019344	9	2
00431 Total			2,101,283	502,374
00005	AG0109	05681B	(106)	(22)
	DO9000	05617KA 26	(6,662)	-
	DO9130	05617KA 26	27,564	-
00005 Total			20,796	(22)
Grand Total			2,314,225	308,471

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Indirect Charges to Co 36 - (SUMMARY)  
Historic Year Ending December 31, 2011  
Expense Type 100 & 105 - Consultants  
Adjusted Historic Test Year Costs  
Part J

IR Category	OTHER
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Orig Business Unit	Activity	Activity Descr	Jml Id	Period	Data	
					Sum of NIMO Electric	Sum of NIMO Gas
00099	AG0493	Provide Administrative & Gener	99618DS12	1	(4,145)	(66)
				12	3,894	65
			99618DS14	10	2,240	183
				11	(2,240)	(183)
			99618DS17	11	2,014	187
				12	(2,014)	(187)
			99618DS18	10	(1,783)	-
				11	(7,940)	(2,353)
			99618DS2	8	5,286	561
				9	(5,286)	(561)
			99618DS3	9	3,482	281
			99618DS4	6	5,308	-
				7	(5,308)	-
			99618DS8	1	4,145	66
				2	(4,145)	(66)
				7	1,076	-
				8	(1,076)	-
	AG0844	IS Development A&G	99614-01	1	(30,466)	-
			99614-11EB	9	(5,012)	-
			99614-29EB	5	(2,464)	(421)
			99614-37EB	8	(297)	-
			99618DS21	10	(245,639)	(42,721)
			99405DO1	3	1,337	274
			99614-19CW	10	6,203	-
				11	(6,203)	-
	AG0847	IS Support A&G	99614-21JV	11	6,203	-
				12	(6,203)	-
			99614-17EB	6	662,793	113,193
				7	(662,500)	(113,193)
			99614-22EB	7	30,209	555
				8	(30,209)	(555)
			99614-28EB	7	33,076	5,651
				8	(33,076)	(5,651)
			99614-06EB	9	897,806	153,428
			99614-13EB	9	21,781	299
			99614-14EB	7	804,164	137,398
				8	(804,164)	(137,398)
				9	(301,542)	(51,531)
	AG0880	Telecom & Network (Voice/Data)	99614-19EB	8	862,911	147,435
				9	(862,911)	(147,465)
			99614-26EB	6	31,980	5,462
				7	(31,965)	(5,462)
			99614-35EB	8	22,107	487
				9	(22,107)	(487)
			99614-36EB	5	261,764	44,724
				6	(261,880)	(44,724)
			99614-38EB	5	24,635	4,209
				6	(24,646)	(4,209)
	DO9140	Eng/Devl Mtring Schemes-Dist		12	5,596	1,146
			99614-23EB	4	116,104	19,837
				5	(116,104)	(19,837)
			99614-29EB	3	(733)	(125)
			99614-31EB	5	-	-
			99614-32EB	4	-	-
			99614-39EB	8	233,910	39,965
				9	(233,910)	(39,973)
			99404DO2R	10	(44,263)	-

Date of Request: 5/21/12  
Due Date:

Request No. DPS-89 (DAG-9)  
NMPC Req. No. 89

NIAGARA MOHAWK POWER CORPORATION  
Case No. 12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation d/b/a  
National Grid - Electric and Gas Rates

Request for Information

FROM: Denise Gerbsch  
TO: Revenue Requirement Panel (RRP)  
SUBJECT: Exhibit \_\_ (RRP-2), Schedules 9-10 and 16-17

Request:

1. Schedule 9 – Exp Type #A10 – AFUDC Debt – Even though the HTY costs have been normalized out in forecasting the RYE 3/14 expense, please explain why the costs for AFUDC debt are booked to an O&M expense account.
2. Schedule 10 - Exp Type #A20 – Service Company Equity Credits
  - (a) Please provide a detailed explanation of what this expense type is and how it is calculated.
  - (b) Please provide the calculation of any fixed return that was booked to this expense type for the service company equity in the HTY, and provide the allocators used to distribute the costs to the various National Grid affiliates.
  - (c) Please describe the tax benefits and provide the calculation of any tax benefits the service company received during the HTY that were booked to this expense type, and provide the allocators used to distribute the costs to the various National Grid affiliates.
  - (d) Please provide the calculation of any other cost or benefit that is booked to this expense type for the HTY, and provide the allocators used to distribute the costs to the various National Grid affiliates.
  - (e) Please explain how these costs and benefits are accounted for the KeySpan service companies, and if the treatment of costs or benefits is similar to the treatment of expense type #A20 costs and benefits. If the KeySpan service companies costs or benefits are reflected elsewhere in the filing, please provide a cite to where in the Company's filing they can be found.
  - (f) Please explain the impact on the costs or benefits reflected in this expense type, and the change from the HTY to the RYE 3/14 in service company owned or leased assets (e.g. additional asset expected in the RYE 3/14 for the US Foundations Program). Have these expected changes been reflected in the RYE 3/14 service company equity credit projection? If yes, please explain. If not, why not.

3. Schedule 16 – Expense Type # A60 - Supervision and Administration
  - (a) Please provide a detailed explanation of what (i) the expense cost is supposed to encompass and represent, (ii) how the cost is calculated, and on what basis does the charge come through to Niagara Mohawk (Co 36).
  - (b) The RYE 3/14 projection of this expense type contained no normalizing adjustment, except for the inflation adjustment. Please explain and provide the analysis the Company undertook to determine the actual historic test year amounts were reasonable and needed no adjustments, in forecasting the rate year.
  - (c) Please explain why the supervision and administration costs as described in the Company's response to 3(a) above are not reflected in other expense type components such as the company's projection of labor, accounting, finance, human resources, etc, or in the cost of capital projects. How are these costs not a doublecount of costs reflected elsewhere?
  - (d) If these costs are billed to associated companies or third parties, where are the revenues reflected that are received from the associated companies or third parties?
  
4. Schedule 17 – Expense Type # A65 – Service Company Operating Costs
  - (a) Please provide a detailed explanation of what (i) the expense cost is supposed to encompass and represent, (ii) how the cost is calculated, and on what basis does the charge come through to Niagara Mohawk (Co 36).
  - (b) Please explain and provide the analysis the Company undertook to determine if the actual historic test year amounts needed to be normalized for this expense item, in forecasting the rate year expense.
  - (c) Please explain why the service company operating costs (supervision and administration costs) as described in the Company's response to 4(a) above are not reflected in other expense type components such as the company's projection of labor, accounting expense, finance, human resources, etc, or in the cost of capital projects. How are these costs not a doublecount of costs reflected elsewhere?
  - (d) If these costs are billed to associated companies or third parties, where are the revenues reflected that are received from the associated companies or third parties?

Response:

1. Normally, a write-off related to plant should be cleared against the associated plant account charged. However, for the AFUDC expense type (A10), if a project is not capitalized, it will reverse from plant and hit an O&M expense account, typically TM, DM, DO, and TO activities. Therefore, the Company has removed these expenses to below the line for the HTY.
  
2. Exp Type #A20
  - (a) Exp Type #A20 is the expense type used to identify the clearing of National Grid USA Service Company net income that is charged to bill pool 00694. The charges to this bill pool are detailed below. There are two items, the fixed return on

Service Company equity (Service Company Income) and the tax expense the Service Company recorded during the test year (Service Company Tax Calc).

Billing Pool	00694	
Sum of Posted Jnl \$		
JE category	JE type	Total
- MANUAL JE	MISC	(199;
	Service Company Income	525 000
	Service Company Tax Calc	(5 431 107;
MANUAL JE Total		(4,906,306)
Grand Total		(4,906,306)

These amounts are allocated to the operating companies through the burdening process – the cost follows Service Company labor. Peoplesoft was designed to clear these amounts in total each month based on a system calculation of the rate to be applied. There is not a rate set by the Accounting department or a clearing account involved as there is with other burdens – all costs get charged out every month. The chart at left below shows the total post allocated amounts by affiliate, which in total agrees to the amounts charged to bill pool 00694. The chart at right is just O&M. The difference is the amounts charged to Service Company billable work orders - Regulatory Account 174.

Post Allocation to all sources

Expense Type	A20	
JE Cat	(All)	
O&M	(All)	
Sum of Posted Jnl \$		
Business Unit	Bus Unit Descr	Total
- 00001	National Grid USA	(29 454;
- 00004	Nantucket Electric Company	(9 112;
- 00005	Massachusetts Electric Company	(1 373 946;
- 00006	NE Hydro - Trans Electric Co	(36 050;
- 00008	New England Hydro - Trans Corp	(3 106;
- 00010	New England Power Company	(787 706;
- 00020	New England Electric Trans Co	(4 091;
- 00021	National Grid Trans Services	(326;
- 00035	Niagara Mohawk Holdings Inc	0
- 00036	Niagara Mohawk Power Corp	(1 285 127;
- 00037	Opinac North America Inc	(7;
- 00041	Granite State Electric Company	(63 681;
- 00048	Narragansett Gas Company	(97 277;
- 00049	Narragansett Electric Company	(532 124;
- 00070	Wayfinder Group Inc	(3;
- 00071	Valley Appliance & Merchandise	3
- 00072	National Grid Billing Entity	17 270
- 00085	NEES Energy Inc	(0;
- 00086	EUA Energy Investment	(0;
- 00095	Metrowest Realty LLC	39
- 00099	National Grid USA Service Co	235 689
- 01401	Boston Gas Company Billing BU	(365 295;
- 01402	Essex Gas Company Billing BU	(13 413;
- 01403	Colonial Lowell Div Billing BU	(49 640;
- 01404	Colonial Cape Cod Billing BU	(587;
- 01406	EnergyNorth Nat Gas Billing BU	(40 603;
- 01431	KeySpan Corp Serv Billing BU	-
- 01434	KeySpan Electric Srv BillingBU	(127 962;
- 01435	KeySpan Generation Billing BU	(58 841;
- 01436	KeySpan Energy Dev Billing BU	(824;
- 01437	KS Gas East Corp KEDLI Bill BU	(94 322;
- 01438	Brklyn Union Gas KEDNY Bill BU	(181 678;
- 01444	KS Energy Trading Billing BU	(96;
- 01446	KS Glenwood Energy Billing BU	(919;
- 01448	KS Port Jeff Energy Billing BU	(1 014;
- 01459	KS Services Billing BU	(98;
- 01471	Seneca Upshur Billing BU	(1 731;
- 01554	KS LNG RegulatedEntity Bill BU	(57;
Grand Total		(4,906,089);(1;

Post Allocation - O&M only

Expense Type	A20	
JE Cat	(All)	
O&M	O&M	
Sum of Post		
Business	Bus Unit Descr	Total
- 00001	National Grid USA	(29 454;
- 00004	Nantucket Electric Company	(9 112;
- 00005	Massachusetts Electric Company	(1 373 946;
- 00006	NE Hydro - Trans Electric Co	(36 050;
- 00008	New England Hydro - Trans Corp	(3 106;
- 00010	New England Power Company	(787 706;
- 00020	New England Electric Trans Co	(4 091;
- 00021	National Grid Trans Services	(326;
- 00035	Niagara Mohawk Holdings Inc	0
- 00036	Niagara Mohawk Power Corp	(1 285 127);(2;
- 00037	Opinac North America Inc	(7;
- 00041	Granite State Electric Company	(63 681;
- 00048	Narragansett Gas Company	(97 277;
- 00049	Narragansett Electric Company	(532 124;
- 00070	Wayfinder Group Inc	(3;
- 00071	Valley Appliance & Merchandise	3
- 00072	National Grid Billing Entity	17 270
- 00085	NEES Energy Inc	(0;
- 00086	EUA Energy Investment	(0;
- 00095	Metrowest Realty LLC	39
- 00099	National Grid USA Service Co	(160;
- 01401	Boston Gas Company Billing BU	(365 295;
- 01402	Essex Gas Company Billing BU	(13 413;
- 01403	Colonial Lowell Div Billing BU	(49 640;
- 01404	Colonial Cape Cod Billing BU	(587;
- 01406	EnergyNorth Nat Gas Billing BU	(40 603;
- 01431	KeySpan Corp Serv Billing BU	-
- 01434	KeySpan Electric Srv BillingBU	(127 962;
- 01435	KeySpan Generation Billing BU	(58 841;
- 01436	KeySpan Energy Dev Billing BU	(824;
- 01437	KS Gas East Corp KEDLI Bill BU	(94 322;
- 01438	Brklyn Union Gas KEDNY Bill BU	(181 678;
- 01444	KS Energy Trading Billing BU	(96;
- 01446	KS Glenwood Energy Billing BU	(919;
- 01448	KS Port Jeff Energy Billing BU	(1 014;
- 01459	KS Services Billing BU	(98;
- 01471	Seneca Upshur Billing BU	(1 731;
- 01554	KS LNG RegulatedEntity Bill BU	(57;
Grand Total		(5,141,938)

(1) Agrees to amounts charged to Service Co bill pool 00694 - variance \$217 - immaterial

(2) Agrees to testimony - NIMO portion

- (b) National Grid USA Service Company was authorized by the Securities and Exchange Commission on January 5, 2001 to earn a rate of return equal to 10.50% of contributed common equity. The Company's contributed common equity is \$5,000,000. The total return of \$525,000 is calculated as follows:  $\$5,000,000 \times 10.50\% = \$525,000$ . The allocator used to distribute the cost is 00694 as described above in part (a).
- (c) The tax expense recorded by Service Company is the tax liability of the stand alone Service Company net income of \$525,000 plus the effect of the various schedule M adjustments, which are primarily tax timing issues related to employee benefits. When taxes booked to 00694 are allocated, they are charged to the operating companies as Regulatory Account 921. A subsequent entry was done each month to reclassify the tax amounts at the regulated utilities from Regulatory Account 921 back to Regulatory Accounts 409 and 410. This reclass charged to cost type 400 – Other.
- (d) There are not any other costs booked to this expense type in the HTY other than Service Company net income and Service Company taxes, as described above in parts (a) thru (c)
- (e) Similar to NGUSA Services Inc, the legacy KeySpan Service Companies are permitted to earn a return on common equity and record associated income taxes. However, unlike legacy National Grid, the service company design inherent in the Oracle financial system does not require all P&L balances to be cleared to zero and allocated to affiliates each month. Accordingly, the legacy KeySpan Service Companies do not apply an allocation mechanism similar to the A20 expense type utilized by NGUSA Services Inc. The legacy KeySpan Service Companies do not allocate their return on equity or their income taxes but rather retain those amounts in the Service Company and report them on each Service Company's stand alone income statements. Specific details associated with the return on equity and income taxes are as follows:
  - (i) Equity: National Grid Corporate Services LLC earns a return on common equity, which is calculated each month based on the prior month's balance of common stock plus retained earnings multiplied by the monthly pre-tax rate of the highest outstanding promissory note, set at 1.12% in calendar year 2011 (or 13.45% per annum pre-tax, 7.25% after-tax) Similarly, National Grid Engineering & Survey Inc. earns a minimal return that is also calculated each month based on the prior month's balance of common stock plus retained earnings multiplied by the monthly pre-tax money pool rate of .03% (or .37% per annum pre-tax, 0.20% after-tax). National Grid Utility Services LLC does not have positive common equity and accordingly does not earn a return. Returns are recovered from the appropriate legacy KeySpan operating affiliates as a component of the Servco Asset Recovery Charge, which charges the affiliates for their use of common service company owned assets. NMPC is not considered a beneficiary of the legacy KeySpan common assets and therefore does not receive a Servco Asset Recovery Charge. As such, there are no related amounts included in the filing.
  - (ii) Income Taxes: Legacy KeySpan files a consolidated federal income tax return with the Parent and there is a tax sharing agreement between the parent and its subsidiaries that provides for the allocation of a realized tax liability or benefit based on separate return contributions of each subsidiary to the consolidated

taxable income or loss in the consolidated return. Accordingly, the legacy KeySpan Service Companies do not allocate their associated income taxes.

- (f) Expense Type A20 is allocated to Service Company billable work orders (Regulatory Account 174) where the costs of assets to be sold to Bankers Leasing were collected prior to that arrangement being terminated. However, this expense type is not allocated to Service Company owned assets (Regulatory Account 107) where the costs of Service Company assets are currently being collected.

Therefore, there is no impact on additions to assets in the HTY or in RYE 13/14

- 3. (a) Expense Type A60 represents the allocated cost of Supervision and Administration that is to recover operating company only supervision and administrative charges supporting employees working in the field. This covers functions such as Accounting, Finance, Human Resources, Information Technology, Facilities, Legal, etc. for each Originating Business Unit that has employees. The charge is applied to payroll (regular pay and overtime base pay for monthly and weekly employees) billed to associated companies or third parties during month end accounting close processing. Accounting Services reviews the rates monthly and adjusts them as needed. This is the method between all of the operating companies with one exception. At Niagara Mohawk, third party work is charged at a PSC stated rate of 21.62% applied to all charges excluding payments received. The charge is applied during month end accounting close process.

(b) The Company reviewed this expense type as part of its comprehensive review of Historic Test Year O&M expense to determine whether normalizing adjustments should be made, such as, for example, any non-recurring, misallocated, or out of period charges. A complete description of the Company's review process and analysis is described in the testimony of the Service Company Panel at pages 29 to 47 (and the exhibits referenced therein). This review did not identify any non-recurring or other charges that should be normalized.

(c) There is no double count of expense type A60 Supervision and Administration charges. Expense type A60 includes only Supervision and Administration charges allocated from other operating companies that would not have otherwise been directly charged or allocated through a bill pool to Niagara Mohawk.

(d) For Gas, the revenues for Supervision and Administration are reflected in Exhibit\_\_\_(G-RDP-1), page 1 of 1 and for Electric, the revenues for Supervision and Administration are reflected in Exhibit\_\_\_(E-RDP-4), Schedule 1, Page 1 of 1.

4.

- (a)
  - (i) Expense type #A65 is the expense type used to identify the clearing of National Grid USA Service Operating Cost that is charged to bill pool 00999. The charges to this bill pool, totaling a credit of \$825,303 for the HTY are detailed below. Primarily, these costs are from the monthly journal entries posted to reflect the intercompany interest expense related to the Service Company's debt and income and income and expense from investments related to employee deferred compensation. This calendar year analysis also includes a reversal done in March 2011 of some Service Company taxes that



were incorrectly booked to this bill pool earlier in the fiscal year. The amounts marked "MISC" are related to small write offs resulting from the balance sheet reconciliation process. The AP payments are primarily penalties paid to taxing authorities related to employment taxes.

Billing Pool		00999
Sum of Posted Jml \$		
JE category	JE type	Total
ALLOCATION	Op Cost Allocation	1,999,161
	Over Under Op Cost	(1,173,858)
ALLOCATION Total		<u>825,303</u>
- MANUAL JE	Dividends - Rabbi Trust	(1,006,614)
	Intercompany Note Interest	4,706,878
	Interest - Rabbi Trust	(3,272,937)
	MISC	132,205
	Misc Non Moneypool interest	(1,133,222)
	Moneypool interest	121,820
	Realized Gain/Loss - Rabbi Tru	(1,382,192)
	Service Company Tax Calc	982,678
MANUAL JE Total		<u>(851,385)</u>
- MISC	AP Payments	25,811
	MISC	806
	MISC BILLING	(534)
MISC Total		<u>26,082</u>
Grand Total		<u>(0)</u>

- a.
- (ii) These amounts are allocated to the operating companies through the monthly burdening process – the cost follows Service Company labor. The Accounting department calculates a burden rate to be applied based on forecasted amounts for the fiscal year and any over/under goes to a clearing account. The table included in part (i) shows that \$825,303 went into bill pool 00999 (the sum of MANUAL JE and MISC), \$1,999,161 was allocated out to the operating companies and \$1,173,858 was charged back to the over/under clearing account 186802 (detailed in JE category ALLOCATION). The clearing to each company is shown below. The table at left shows all the allocations of A65, the one at right shows just the amounts allocated to O&M accounts, which aggress to the amount in the filing.

Post Allocation to all sources

Expense Type A65  
O&M (All)

Sum of Posted Jmt \$ Business Unit	Bus Unit Descr	Total
- 00001	National Grid USA	(18,485)
- 00004	Nantucket Electric Company	(2,972)
- 00005	Massachusetts Electric Company	(590,806)
- 00006	NE Hydro - Trans Electric Co	(11,544)
- 00008	New England Hydro - Trans Corp	(1,019)
- 00010	New England Power Company	(282,512)
- 00020	New England Electric Trans Co	(1,325)
- 00021	National Grid Trans Services	(7)
- 00035	Niagara Mohawk Holdings, Inc.	(0)
- 00036	Niagara Mohawk Power Corp	(510,531)
- 00037	Opinac North America, Inc	2
- 00041	Granite State Electric Company	(17,452)
- 00048	Narragansett Gas Company	(103,771)
- 00049	Narragansett Electric Company	(231,052)
- 00070	Wayfinder Group Inc.	(53)
- 00071	Valley Appliance & Merchandise	(18)
- 00072	National Grid Billing Entity	(8,196)
- 00085	NEES Energy, Inc.	0
- 00086	EUA Energy Investment	0
- 00095	Metrowest Realty LLC	(231)
- 00099	National Grid USA Service Co.	(68,047)
- 01401	Boston Gas Company Billing BU	(40,413)
- 01402	Essex Gas Company Billing BU	(1,511)
- 01403	Colonial Lowell Div Billing BU	(8,248)
- 01404	Colonial Cape Cod Billing BU	(47)
- 01406	EnergyNorth Nat Gas Billing BU	(6,410)
- 01431	KeySpan Corp Serv Billing BU	(946)
- 01434	KeySpan Electric Srv Billing BU	(23,781)
- 01435	KeySpan Generation Billing BU	(11,223)
- 01436	KeySpan Energy Dev Billing BU	(464)
- 01437	KS Gas East Corp KEDLI Bill BU	(19,341)
- 01438	Brklyn Union Gas KEDNY Bill BU	(32,862)
- 01444	KS Energy Trading Billing BU	(22)
- 01446	KS Glenwood Energy Billing BU	(212)
- 01448	KS Port Jeff Energy Billing BU	(190)
- 01459	KS Services Billing BU	(154)
- 01471	Seneca Upshur Billing BU	(529)
- 01554	KS LNG Regulated Entity Bill BU	(75)
<b>Grand Total</b>		<b>(1,994,426) (1)</b>

Post Allocation - O&M only

Expense Type A65  
O&M O&M

Sum of Post Business Unit	Bus Unit Descr	Total
- 00001	National Grid USA	(18,485)
- 00004	Nantucket Electric Company	(2,104)
- 00005	Massachusetts Electric Company	(468,230)
- 00006	NE Hydro - Trans Electric Co	(10,778)
- 00008	New England Hydro - Trans Corp	(611)
- 00010	New England Power Company	(159,282)
- 00020	New England Electric Trans Co	(1,317)
- 00021	National Grid Trans Services	(7)
- 00035	Niagara Mohawk Holdings, Inc.	(0)
- 00036	Niagara Mohawk Power Corp	(393,744) (2)
- 00037	Opinac North America, Inc	2
- 00041	Granite State Electric Company	(13,900)
- 00048	Narragansett Gas Company	(83,260)
- 00049	Narragansett Electric Company	(156,961)
- 00070	Wayfinder Group Inc.	(53)
- 00071	Valley Appliance & Merchandise	(0)
- 00072	National Grid Billing Entity	(8,196)
- 00085	NEES Energy, Inc.	0
- 00086	EUA Energy Investment	0
- 00095	Metrowest Realty LLC	(228)
- 00099	National Grid USA Service Co.	0
- 01401	Boston Gas Company Billing BU	(39,052)
- 01402	Essex Gas Company Billing BU	(1,501)
- 01403	Colonial Lowell Div Billing BU	(7,869)
- 01404	Colonial Cape Cod Billing BU	(47)
- 01406	EnergyNorth Nat Gas Billing BU	(6,333)
- 01434	KeySpan Electric Srv Billing BU	(23,139)
- 01435	KeySpan Generation Billing BU	(11,223)
- 01436	KeySpan Energy Dev Billing BU	(464)
- 01437	KS Gas East Corp KEDLI Bill BU	(18,925)
- 01438	Brklyn Union Gas KEDNY Bill BU	(32,271)
- 01444	KS Energy Trading Billing BU	(22)
- 01446	KS Glenwood Energy Billing BU	(211)
- 01448	KS Port Jeff Energy Billing BU	(190)
- 01459	KS Services Billing BU	(154)
- 01471	Seneca Upshur Billing BU	(528)
- 01554	KS LNG Regulated Entity Bill BU	(75)
<b>Grand Total</b>		<b>(1,459,167)</b>

(1) Agrees to amounts charged to Service Co bill pool 00999 - variance \$4,735 manual journals - immaterial

(2) Agrees to testimony - NIMO portion

- (b) The Company did not normalize any components included in this expense type. The total O&M component was included. To the extent this expense type was allocated to other excluded groups of costs, this cost type was also excluded.
- (c) These costs are not included in labor, accounting expense, etc. They are as described above in part a – interest, dividends and other costs associated with Service Company's investments not accounted for elsewhere
- (d) The revenues from Service Co billings to non-affiliates are reported on the Service Company's Form 60 in account 458.

Name of Respondent:

Date of Reply:

Colleen Dowling – Part 2 and 4  
John O Shaughnessy – Part 2e

May 31, 2012

Date of Request: May 21, 2012  
Due Date: May 31, 2012

Request No. DPS-90(HTC-1)  
NMPC Req. No. 90

NIAGARA MOHAWK POWER CORPORATION

Case No. 12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation d/b/a  
National Grid - Electric and Gas Rates

Request for Information

FROM: Hieu Cam  
TO: Charles F. Willard  
SUBJECT: SIR Program

Request:

1. Please list, in excel spreadsheet format, all completed SIR projects in the last 5 years. Please include the following information.
  - a. Budgeted amount
  - b. Actual amount spent
  - c. If actual cost variance is more than  $\pm 10\%$  of amount budgeted, please provide a detailed explanation of the causes of the variance.
  - d. Please explain the actions the company has taken to prevent future cost overruns.
  - e. Original expected completion date.
  - f. Actual completion date.
2. For the past 5 fiscal and calendar years, please provide the amount budgeted and expended on all SIR projects.
3. Please list, in excel spreadsheet format, all current and future SIR projects. Please include the following information for each project:
  - a. Original budgeted amount
  - b. Amount spent to date
  - c. Expected amount to be spent by project completion
    - i. If expected total amount to be expended is over/under by 10% of the original budgeted amount, please provide a detailed explanation of the causes of the variance.
    - ii. Please explain the actions the company has taken, or will take, to prevent future cost overruns and to reduce costs for the remainder of the project.
  - d. Original expected completion date.
  - e. Current expected completion date.
4. Please explain the value engineering techniques the company implemented in order to reduce costs? What was the result? What were some other techniques that were considered but not implemented? Why they were not implemented? Were there any instances where the value engineering techniques results in cost-overruns? Please explain in detail.

5. On average, how many value engineering methods does the company consider for each SIR project? In total, how many value engineering ideas has the company implemented in the past 5 years? Please provide the amount saved for each.
6. For the most recent SIR project completed at costs 10% higher than originally estimated, how many bids did the Company acquire? Was the lowest bidder selected? If not, why not? Please provide a copy of the construction contract.
7. For the past 5 years, what percentages of cost overruns are due to weather delays, change in scope of work due to unexpected field conditions, DEC related, or others (please specify).

Response:

Requests 1-7 refer to SIR project budgets. NIMO tracks project budgets in three categories:

- (a) Annual site budget
- (b) Site budget (or reserve)
- (c) Project budgets (individual site investigations, designs, constructions, etc.)

In our responses, we have assumed that all requests but request 2 refer to a subset of (c), specifically construction project budgets. Our assumption is based on references to value engineering and under/over 10% of project budget, which are commonly associated with construction projects. We assumed request 2 refers to (a) annual site budgets. For clarity and reference in response to the requests, a description of the three budget types are provided below. The descriptions also provide insight regarding budgeting and forecast challenges:

Annual Site Budgets

Annual site budgets are based on a fiscal year (April – March), estimated based on a meeting with the NYS Department of Environmental Conservation (DEC) in the preceding year, typically in December. The DEC requires schedules based on the fiscal year to correspond to the DEC operating calendar. The DEC schedules are based on an “early start” or the earliest possible date tasks may begin as required by the DEC. The corresponding NIMO site budgets are estimated based on this early start schedule. As described in the Direct Testimony of Charles F. Willard (p. 11), many factors may delay the work which is not known at the time the annual budget is established. This typically results in a budget under run.

Site Budget

Site budgeting is summarized below. The initial cost estimate or budget for a site (also known as the reserve) is established following site discovery based on limited information prior to investigation. The estimate is adjusted as work progresses from the initial site discovery phase into the investigation and remediation phases (if necessary), as more information is available.

Beyond the initial discovery, the SIR process consists of five primary steps: 1) investigation; 2) remedial alternative screening, evaluation and recommendation; 3)

remedial design; 4) remediation; and 5) post remediation monitoring and maintenance of installed remedial systems (for example groundwater treatment systems). The highest-cost step is site remediation. Site remediation scopes (and corresponding cost) vary based on several factors: the vertical and/or horizontal extent of contamination; contaminant concentration; potential for human or environmental exposure; and media impacted (soil, groundwater, or sediment).

The first step of the investigation phase is the Site Characterization (SC). The purpose of the Site Characterization is to determine if remediation is required. Two MGP sites were closed following the SC (Attica and Mohawk) and one only requires future use restrictions (Cohoes (Sargeant St.)). If the DEC determines remediation is necessary, the next phase, the Remedial Investigation (RI), determines the nature and extent of contamination. More than one phase of investigation is typically required to complete the RI. Investigations begin at the source area (plant or former disposal area(s)) and progress outward. Investigations may progress beyond the former plant property, requiring sometimes lengthy negotiation of access terms to third party properties. In addition, the plant site may be owned by a third party as many former gas plant properties were divested after the plant ceased operations. Each work plan and investigation report requires DEC approval prior to the next phase. RIs which progress to sediment investigations in nearby water bodies substantially increase scopes in cost and duration..

A rough engineering estimate of the remediation is not available until after the RI. Feasibility Study (FS) includes an evaluation of technologies and screening of a range of potential remediation scenarios. Cost estimates are developed for the scenarios that are retained. Cost scenarios range from limited action to removal of all contamination to pre-use conditions. The latter scenario can range into the hundreds of millions of dollars, depending on contaminant distribution (depth & aerial extent), concentrations and property use/ restoration. Early EPA guidance for precision was +50/-30%; however, this estimate is typically not met in the environmental industry as explained in a presentation ("Estimation of MGP Site Investigation and Remediation Costs") discussing utility and insurance industry difficulties in meeting cost estimation tolerances dated July 12, 2011 by Timothy W. Devitt of Gnarus Advisors, LLC in Case 11-M-0034 (see Attachment 1 to DPS-90). The purpose of the FS estimate is to compare between the retained remedy scenarios. Cost is one of 9 criteria which is considered when comparing between remedies. The DEC does not consider cost the driving factor for remedy selection.

DEC may select a remedy developed in the FS, modify one of the FS remedies or select a remedy not presented in the FS in the remedy selection document or Record of Decision. Following remedy selection, pre-design investigations (PDIs) are usually performed. The pre-FS investigations are conducted without knowledge of the remedy to be implemented. The post-FS or PDIs focus on remedy construction. The investigations provide sufficient information to bid; however, due to the nature of the contamination and/or subsurface conditions, flexibility is needed in the contracts to adjust to unanticipated field variations. The DEC typically requires the removal of all visible tar in the field. The DEC or its representative are present onsite during remedial construction. DEC's ability to require removal of visually impacted material in the field was tested during an Article 78 challenge for the Harbor Point MGP OU-1 remedy and was upheld. Conducting soil borings at very close spacing to determine small scale

features is not cost-feasible; therefore, unit cost items are included in bid sheets where estimated items may vary.

Site budgets are updated once the cost estimate is available from the FS. It may be updated following the PDI or after DEC comments on the proposed design. It should also be noted that the pre-construction estimate is not used to decide if the work should proceed, as the remediation is non-discretionary. The estimate is later updated when the bids are received and the low qualified bidder is selected. Additional updates are made when new conditions are identified (for example when excavation faces are exposed or when obstructions are encountered during excavation support installation or during excavation).

In addition to the environmental aspects of the SIR construction projects, the complex civil engineering aspects of the projects make estimating costs within +/- 10% difficult. Examples of complex civil engineering issues include complex terrain such as unstable hillsides, challenging locations such as aquatic environments, substantial soil moisture conditions (which increases stabilization and treatment costs), and sub-water table excavations. Subsurface construction projects are also inherently subject to more cost uncertainty than conventional above-surface construction projects especially at former industrial sites where subsurface obstructions (fill, concrete foundations, buried storage tanks) are typically present. Estimation of remediation costs is difficult given these circumstances. As described in the presentation "Estimation of MGP Site Investigation and Remediation Costs" in Case 11-M-0034 (and included in Attachment 1 to DPS-90), cost cap insurance for remediation projects was initially offered in the early 2000's. Today, cost cap insurance is no longer available.

If the remediation does not completely eliminate the need for future controls to eliminate potential exposure to site residuals, a site management plan with periodic certification is required by DEC. If future groundwater treatment and/or monitoring is required by the DEC in the remedy selection, NIMO prepares and implements the required plans. Costs for post remediation Operation, Monitoring and Maintenance (OM&M) Plans are estimated for 30 years. Adjustment to the estimate may be made following a trial period, as DEC requirements decrease, and/or contractors change.

1. Construction projects awarded and completed in the last 5 years and responses to Questions 1a, 1b, 1c, 1e, and 1f are provided in Attachment 2 to DPS-90. For Question 1a, the budgeted amount consists of the contractor bid price only and does not include applicable New York State (NYS) sales tax. For Question 1b, the actual amount spent includes project costs plus applicable NYS sales tax minus early payment discounts (if applicable). For Question 1d, the company continually evaluates measures to mitigate future project cost increases by conducting thorough site investigations and preparing detailed remedial designs which also take into account "lessons learned" from previous projects within NIMO, National Grid and other utilities. For remedial construction projects, the company typically retains a third party construction manager to oversee the contractual details of larger and more complex projects. The construction manager is tasked with providing strict management of the project contract including management of project change orders. For Question 1e, please note that the original expected completion dates presented are the dates from the awarded

contractor proposal. These dates are sometimes shifted as a result of delays prior to contractor mobilization (such as contract procurement delays or obtaining site access) which then delays the construction initiation and hence shifts the project completion. In addition, depending on the nature of the work to be conducted, projects may be halted during the winter months (or early spring snowmelt and rains) and resumed when weather is more favorable.

2. Prior to company fiscal year (FY) 2012, the company did not budget by calendar year (CY) but rather only by company fiscal year. This aligns with the DEC fiscal planning year approach. Beginning in FY12, the company prepared budgets both by FY as well as CY. Note that the FY12 budget includes 3 quarters in CY11 and one quarter in CY12. As mentioned in the Direct Testimony of Charles F. Willard, pp. 13-15, two budgets estimates are provided annually. The “schedule” (sch) budget reflects the cost to complete all of the work in the DEC schedule. The “estimated” (est) budget reflects the refined estimate for the upcoming year as discussed in the Direct Testimony of Charles F. Willard, pp. 13-15.

Year	FY Sch Budget (\$M)	CY Sch Budget (\$M)	FY Est Budget (\$M)	CY Est Budget (\$M)	FY Spend (\$M)	CY Spend (\$M)
FY08	\$26.9	NA	NA	NA	\$14.7	NA
FY09	\$32.9	NA	NA	NA	\$33.7	NA
FY10	\$52.1	NA	NA	NA	\$38.4	NA
FY11	\$50.8	NA	NA	NA	\$35.2	NA
FY12/ CY11	\$43.7	\$34.0	\$34.9	\$34.0	\$13.0	\$19.5

3. Responses to Questions 3a, 3b, and 3ci (as applicable), 3d, and 3e are provided in Attachment 3 to DPS-90. For Question 3a, the budgeted amount consists of the contractor bid price only and does not include applicable New York State (NYS) sales tax. For Question 3ci, none of the sites are currently projecting spending over or under 10% of the original budgeted amount. For Question 3cii, the actions the company has taken or will take to mitigate future project cost increases are the same as described in response to Question 1d above.
4. NIMO considers value engineering throughout the SIR process described above. A description of specific value engineering technique outcomes is provided below. Although value engineering is routinely considered, NIMO does not record techniques that were not implemented.

#### Glens Falls – Sewer Relocation

NIMO completed a value engineering technique at the Glens Falls MGP that resulted in a savings (\$900,000). The savings required a property swap with the City of Glens Falls and a payment to the city of Glens Falls to re-routing a sewer outside of the remediation area.

#### Harbor Point – Lee Street Outfall

The original excavation shoring design appeared to be inadequate so the remedial construction contractor (already onsite) conducted a constructability review of the design. The contractor provided an alternative design that was easier to build and eliminated the need to enter into and disturb the Mohawk River shoreline. DEC approved the alternative design.

#### Harbor Point – MVO Soil Removal Area

As originally conceived, the Mohawk Valley Oil (MVO) Soil Removal project was an upland excavate/dispose/backfill project. As the design for this project was nearing completion, the project manager evaluated the consolidation of the soil removal project with an upcoming phase of work, the Utica Harbor Dredge project. The dredged sediment was originally scheduled for offsite transportation and disposal which was a significant portion of the project costs. Instead NIMO proposed to DEC that, since the company had to excavate a significant volume of contaminated soil (i.e. above required clean-up levels) out of MVO, why not backfill the excavation with the dredge sediments from the Utica Harbor Dredge project that were only slightly impacted (i.e., well below clean-up levels). The DEC agreed and a modified design was prepared to combine the MVO Soil Removal project and Utica Harbor Dredge project into a single project.

#### Rome (Kingsley Ave) – Water Treatment

Based on past experience, the design team realized we were spending money to 1) design permanent water treatment systems and 2) constructing those systems only to have them require significant modification after operating them post completion. The significant modification post completion was due to the groundwater quality having changed significantly from pre-remediation to post-remediation conditions (i.e. the sources of contamination were removed). At the Rome site, NIMO required the Contractor to operate a “temporary” treatment system for a period of up to two years to allow the site groundwater hydrology to stabilize. At the end of the two year period, the intent was to re-evaluate groundwater quality and design a “permanent” treatment system based on stabilized field conditions. The approach was very successful because, after only one year of operation, the site hydrology stabilized such that SIR complied with the industrial discharge limits to the public sanitary system without any on-site pre-treatment. As a result, SIR was able to terminate the Contractor’s requirement to operate the treatment system one year ahead of schedule and avoided the need to design, construct, and operate a permanent treatment system on a long term basis.

#### Saratoga Springs – Old Red Spring Area

After submittal of the draft Feasibility Study, the EPA and DEC gave an early indication that they favored the “total removal by excavation” option. SIR evaluated and recommended an alternative approach utilizing in-situ stabilization. In-situ stabilization was determined to be as effective in protecting human health and more protective of the environment.

#### SIR Upstate OM&M Program

Through consolidation of numerous individual sites in OM&M into one program administered by one contractor, the OM&M contractor has been able to produce



significant cost savings. This includes a range of methods from reduction in field labor, utilization of online operations systems to operate treatment systems remotely, and uniformity in compliance reporting, as well as site-specific system improvements that reduce downtime and future maintenance and repair.

For NIMO to consider and ultimately implement value engineering techniques the techniques must be compliant with regulatory requirements and provide a cost savings to the project. There may be initial value engineering techniques considered but they do not get implemented if they do not meet the above requirements. NIMO does not keep track of value engineering techniques that are not implemented. NIMO does not consider value engineering techniques that would create an increase in project costs.

5. There is no specified number of value engineering methods that the company considers for each project. Rather due to the complex, unique nature of the SIR projects, value engineering is continually considered for each project throughout the FS to remedial design, remedial construction, and ultimately post-remediation OM&M where applicable and will provide a cost savings. In the past 5 years, the company has implemented the following value engineering ideas with the corresponding estimated cost savings:

Harbor Point – Lee Street Outfall – \$2M savings  
Harbor Point – MVO Soil Removal Area - \$3M savings  
Rome (Kingsley Ave) - Water Treatment - \$590,000 savings  
Saratoga Springs – Old Red Spring Area - \$3M savings  
SIR Upstate OM&M Program - \$780,000 annual savings

6. The most recent SIR construction project completed above 10% of the estimated amount (assuming the estimated amount refers to the original contract award amount) is the Fort Plain former MGP site remediation. Remedial construction at this site was completed in 2011 at a final cost of \$1,471,247. The original contract award was \$1,242,975. The company acquired 6 bids for the project and awarded the contract to the lowest bidder. A copy of the construction contract is provided in Attachment 4 to DPS-90, Attachment 5 to DPS-90 (technical specifications), and Attachment 6 to DPS-90 (design drawings). Construction difficulties were encountered due to its location adjacent to the unstable slope of a hill located immediately adjacent to the excavation area and a substantial subsurface till unit that made installation of excavation support extremely difficult.
7. For the past 5 years, the percentage of cost overruns due to weather are 0.5%, due to unexpected field conditions are 32%, DEC related are 7.5%, and “other” are 60%. Project cost increases in the other category include a variety of items which were difficult to classify into distinct additional categories.

The largest change order assigned to the other category (43% of the category) was the additional excavation and disposal of soil to achieve the Harbor Point “MVO Soil Removal Area” value engineering described in 4 (above). When the MVO project initiated, DEC had not approved of the alternative approach allowing

sediment disposal in the MVO. However, once DEC approved of the approach, it was prudent to utilize the existing contractor since they were already onsite and had established unit rates. As a result, although for the specific contract it appeared as a substantial project cost increase, because one construction project became two construction projects, the effort resulted in substantial future cost savings as explained in Question 4.

The second largest "other" category item (22%) was associated with the Harbor Point slurry wall construction project. NIMO terminated its contract with the original contractor citing safety, performance and project delays. NIMO then retained a second contractor to complete the unfinished tasks following the termination of the initial contractor. Following termination of the initial contractor, it was determined that a portion of the barrier wall did not meet project specifications. As such, the second contractor was subsequently tasked with repairing the slurry wall where necessary. These efforts resulted in a cost overrun to the original project contract.

Some other examples of costs in the other category include project bonding increases that result when the project contract cost increases, repair to adjacent facilities (sidewalks, paved areas) damaged as a result of construction, or modifications to a project resulting from work adjacent to overhead or underground utilities.

Name of Respondent:

Charles Willard

Brian Stearns

Michael Bogan

Date of Reply:

May 31, 2012

Date of Request: May 22, 2012  
Due Date: June 1, 2012

Request No. DPS-100(ACL-7)  
NMPC Req. No. NM-100

NIAGARA MOHAWK POWER CORPORATION

Case No. 12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation d/b/a  
National Grid - Electric and Gas Rates

Request for Information

FROM: Andrew Leung  
TO: Revenue Requirements Panel  
SUBJECT: Inflation

Request:

1. On Pages 163-164 of Exhibit\_\_(RRP-1), Book 11, please identify the items that are affected by the 4.2785% general inflation rate adjustment for RYE 3/31/2014.
2. On Page 191 of Exhibit\_\_(RRP-3), Book 11, please identify the items that are affected by the 4.2785% general inflation rate adjustment for RYE 3/31/2014.
3. On Pages 192-193 of Exhibit\_\_(RRP-3), Book 11, please identify the items that are affected by the 2.1252% general inflation rate adjustment for Data Year 3/31/2015.
4. On Pages 192-193 of Exhibit\_\_(RRP-3), Book 11, please identify the items that are affected by the 2.2000% general inflation rate adjustment for Data Year 3/31/2016.

Notes: Please provide the information in an Excel spreadsheet, not a pdf file.

Response:

1. On Pages 163-164 of Book 11, the general inflation rate is not applied to the general line items. However, on the individual schedules that support these line items, there are various items that are affected by general inflation (as is shown in the response to Part 2 below supporting the Operation & Maintenance Expense line).
2. Please see Attachment 1 to DPS-100 (ACL-7) for the items on Page 191 of Book 11 that are affected by the general inflation rate for RYE 3/31/2014.

3. Please see Attachment 1 to DPS-100 (ACL-7) for the items on Page 192-193 of Book 11 that are affected by the general inflation rate for Data Year 3/31/2015.
4. Please see Attachment 1 to DPS-100 (ACL-7) for the items on Page 192-193 of Book 11 that are affected by the general inflation rate for Data Year 3/31/2016.

Name of Respondent:

Stephanie Briggs

Date of Reply:

May 30, 2012

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Operating Expenses by Component  
Summary

Expense Type	Schedule Reference	RYE 3/31/14	Data Year 3/31/15	Data Year 3/31/16
<b>Operation &amp; Maintenance Expenses:</b>				
<b>Departmental Items:</b>				
Consultants	100	1	General Inflation	General Inflation
Contractors	110	2	General Inflation	General Inflation
Donations	150	3	N/A - removed from Rate Year	N/A
Employee Expenses	200	4	General Inflation	General Inflation
Hardware	300	5	General Inflation	General Inflation
Software	350	6	General Inflation	General Inflation
Other	400	7	General Inflation	General Inflation
Rents	500	8	(1) General Inflation and Specific Forecast	General Inflation and Specific Forecast
AFUDC - Debt	A10	9	N/A - removed from Rate Year	N/A
Service Co. Equity	A20	10	General Inflation	General Inflation
Conservation Load Management	A30	11	General Inflation	General Inflation
Construction Reimbursement	A40	12	General Inflation	General Inflation
Co Contributions/Cr to Jobs	A41	13	General Inflation	General Inflation
Bill Interface Expense Type	A42	14	General Inflation	General Inflation
Capital Overheads	A50	15	General Inflation	General Inflation
Supervision & Admin	A60	16	General Inflation	General Inflation
Service Co Operating Costs	A65	17	General Inflation	General Inflation
Sales Tax	A70	18	General Inflation	General Inflation
FAS 106	B01	19	Specific Forecast	Specific Forecast
FAS 112	B02	20	General Inflation	General Inflation
Health Care	B03	21	General Inflation	General Inflation
Group Life Insurance	B04	22	General Inflation	General Inflation
Other Benefits	B05	23	General Inflation	General Inflation
Pension	B06	24	Specific Forecast	Specific Forecast
Thrift Plan	B07	25	General Inflation	General Inflation
Workers Comp	B08	26	General Inflation	General Inflation
Payroll Taxes	B09	27	N/A - reclassified from Rate Year	N/A
Materials Outside Vendor	M10	28	(2) General Inflation and Postage Inflation	General Inflation
Materials From Inventory	M20	29	General Inflation	General Inflation
Materials Stores Handling	M50	30	General Inflation	General Inflation
Total Labor	All P's	31	Payroll Inflation	Payroll Inflation
Transportation	T10	32	(3) General Inflation and Specific Forecast	General Inflation and Specific Forecast
Energy Efficiency Program		33	Specific Forecast	Specific Forecast
Injuries & Damages		34	General Inflation	General Inflation
Other Initiatives		35	Specific Forecast	Specific Forecast
Productivity Adjustment		36	Specific Forecast	Specific Forecast
Rate Case Expense		37	Specific Forecast	Specific Forecast
Regulatory Assessment Fees		38	(4) General Inflation and Specific Forecast	General Inflation and Specific Forecast
Renewable Portfolio Standard		39	Specific Forecast	Specific Forecast
Site Investigation & Remediation Expenses		40	Specific Forecast	Specific Forecast
Storm Fund		41	Specific Forecast	Specific Forecast
Synergy Savings		42	General Inflation	General Inflation
System Benefits Charge		43	Specific Forecast	Specific Forecast
Uncollectible Accounts		44	Specific Forecast	Specific Forecast
Legal (Exp 100, 110 or 400)		45	General Inflation	General Inflation
Accounting (Exp 100, 110, or 400)		46	General Inflation	General Inflation
Vegetation (Exp 100, 110, or 400)		47	(5) General Inflation and Specific Forecast	General Inflation and Specific Forecast
US Restructuring (Savings)		48	(6) General Inflation and Specific Forecast	General Inflation and Specific Forecast
E&Y Analysis		49	General Inflation	General Inflation
Ex Pat Proxy		50	General Inflation	General Inflation
Allocation Reclass		51	General Inflation	General Inflation
Sub Total - Departmental				
<b>Non-Departmental Items:</b>				
Purchased Power		Specific Forecast	Specific Forecast	Specific Forecast
Purchased Gas		Specific Forecast	Specific Forecast	Specific Forecast
Sub Total - Non-Departmental				
TOTAL				

- Note 1 - Certain facility and IS items in the rate and data year forecasts are based on specific forecasts. For the remaining items, the general inflation rate was applied.
- Note 2 - Postage expense in the rate year was forecasted using postage inflation rate. All other materials used general inflation
- Note 3 - Lease and fuel costs in the rate and data years were forecasted using specific forecasts. For the remaining items, the general inflation rate was applied.
- Note 4 - Temporary Assessments (18A) for the rate and data years were forecasted using specific forecasts. For the General and ERDA expenses, the general inflation rate was applied.
- Note 5 - General inflation rate was applied to the historic test year costs. Rate Year and Data Year 2015 also included specific forecast for additional work.
- Note 6 - The Rate Year was adjusted for specific forecast and general inflation was then applied to the rate and data years

Date of Request: May 21, 2012  
Due Date: May 31, 2012

Request No. DPS-103 (DAG-11)  
NMPC Req. No. 103

NIAGARA MOHAWK POWER CORPORATION  
Case No. 12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation  
d/b/a National Grid - Electric and Gas Rates

Request for Information

FROM: Denise Gerbsch  
TO: Mustally A. Hussain  
SUBJECT: National Grid plc equity ratio at March 31, 2011

Request:

On page 15 of your testimony you state that National Grid plc's US GAAP based equity ratio at March 31, 2011 is 44.6%. Later in your testimony on page 16 you state that due to the use of the Regulatory Asset Value in UK rate regulation and the dividend rights issue in 2010 the equity ratio should be adjusted to 51.1%.

- 1.) Provide the calculation of the National Grid plc US GAAP based equity ratio at March 31, 2011 of 44.6%. Show all steps in the calculation and provide the financial statements and any other documents that were the sources relied to perform the calculation.
- 2.) Provide the calculation of the 51.1% equity ratio. Show the development of each adjustment and provide the source documents relied upon in calculating each adjustment.

Response:

1. National Grid plc's US GAAP based equity ratio is 44.1% after incorporating final GAAP tax adjustments, which revised the equity figure from \$14,329m to \$14,019m. The Company will correct this in the Corrections and Updates filing. Attachment 1 to DPS-103(DAG-11) provides the calculation. Attachment 2 to DPS-103(DAG-11) provides the source documents relied upon to perform the calculation.
2. National Grid plc's US GAAP based equity ratio adjusted for RAV is 50.7% after incorporating final US GAAP tax adjustments. The Company will correct Mr. Hussain's testimony concerning this matter. Attachment 1 to DPS-103(DAG-11) provides the calculation. Attachment 2 to DPS-103(DAG-11) provides the source documents relied upon to perform the calculation.

Name of Respondent:  
Mustally Hussain

Date of Reply:  
May 30, 2012

	<u>FY 2011</u>	<u>Source of information</u>
	<u>£m</u>	
<b>NG plc consolidated Equity - US GAAP</b>	<b>14,019</b>	<b>A - NY PSC filing (12 October 2011) Item (vi) National Grid plc Consolidated Financial Information [EXHIBIT 1 - page 2 of 24]</b>
Less NG Gas consolidated reported equity - US GAAP	(9,883)	B - Management working papers - US GAAP reconciliation NG Gas
Add back NGG intercompany balance	5,511	C - National Grid Gas plc Annual Report and Accounts 2010/11 (p 74)
Add back NGG net debt excluding derivatives	(7,644)	D 1-3 National Grid Gas plc Annual Report and Accounts 2010/11 (p 55, 50, 52)
Add back NGG Derivatives	507	D 1 National Grid Gas plc Annual Report and Accounts 2010/11 (p 55)
Less NG Gas equity pre intercompany and net debt	(11,409)	Z1=Sum (B-D)
Less NGET consolidated reported equity - UK GAAP/IFRS	(1,024)	E - National Grid Electricity Transmission plc Annual Report and Accounts 2010/11 (p 33)
Less NGET US GAAP adjustments	49	F - Management working papers - US GAAP reconciliation NGET
Add back NGET intercompany	(72)	G 1-2 National Grid Electricity Transmission plc Annual Report and Accounts 2010/11 (p 45, 46)
Add back NGET net debt excluding derivatives	(4,862)	H - National Grid Electricity Transmission plc Annual Report and Accounts 2010/11 (p 33)
Add back NGET derivatives	92	H - National Grid Electricity Transmission plc Annual Report and Accounts 2010/11 (p 33)
Less NGET equity pre intercompany and net debt	(5,617)	Z2=Sum (E-H)
Add NGG Transmission and Distribution RV (T only post 2005)	4,889	I - National Grid plc Annual Report and Accounts 2010/11 (p 31)
Add NGG Distribution RV (post 2005)	7,520	I - National Grid plc Annual Report and Accounts 2010/11 (p 31)
Add NGG Metering and other assets	498	J 1-2 Management accounts per Hyperion - NG Metering + reserve
Add NGET RV	8,388	I - National Grid plc Annual Report and Accounts 2010/11 (p 31)
<b>NG plc adjusted Equity</b>	<b>18,288</b>	<b>Z3=sum(A,Z1,Z2,I,J)</b>
<b>NG plc reported Net Debt</b>	<b>18,942</b>	<b>K - NY PSC filing (12 October 2011) Item (vi) National Grid plc Consolidated Financial Information [EXHIBIT 1 - page 2 of 24]</b>
<b>NG plc derivatives related to debt</b>	<b>(1,144)</b>	<b>L - National Grid plc Annual Report and Accounts 2010/11 (p 151)</b>
<b>Total Net Debt</b>	<b>17,798</b>	<b>Z4=sum(K,L)</b>
<b>US GAAP Equity Ratio</b>	<b>44.1%</b>	<b>Z5=A/(A+Z4)</b>
<b>US GAAP Equity Ratio Adjusted for RAV</b>	<b>50.7%</b>	<b>Z5=Z3/(Z3+Z4)</b>

Consolidating schedules  
as at March 31, 2011

	National Grid plc IFRS company	National Grid USA IFRS consolidated (section 2)	National Grid Gas plc IFRS consolidated (section 3)	National Grid Elect. Trans. plc IFRS consolidated (section 3)	Other major subsidiaries IFRS aggregated (section 4)	Total of non-major subsidiaries IFRS aggregated	Consol- idation adjustments IFRS	National Grid plc IFRS consolidated	National Grid plc US GAAP adjustments	National Grid plc US GAAP consolidated
	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m
<b>Condensed balance sheet</b>										
Goodwill	-	7,671	-	-	-	-	5	7,675	3,410	11,085
Other intangible assets	-	383	309	80	35	-	-	805	(313)	492
Property, plant & equipment	-	18,882	18,130	12,239	2,179	(3)	(74)	51,353	2,104	53,457
Investments in subsidiaries	12,678	(0)	-	-	183,280	23,889	(219,858)	-	-	-
Investments	-	560	-	-	2	392	-	953	5	958
Non-current regulatory assets	-	0	-	-	-	-	-	-	6,177	6,177
Other non-current assets	926	461	866	254	646	(2)	-	3,151	-	3,151
Intercompany receivables	16,546	3	9,085	59	52,671	25,788	(104,126)	-	-	-
Inventories	-	357	84	45	48	-	-	514	2	516
Receivables and other current assets	403	2,795	489	326	378	18	(101)	4,387	(34)	4,273
Regulatory assets	-	0	-	-	-	-	-	-	280	280
Financial and other investments	2,288	1,545	357	-	490	43	-	4,723	(4,016)	707
Cash and cash equivalents	321	77	133	-	39	47	-	617	4,062	4,680
Assets of businesses held for sale	-	466	-	-	-	-	-	466	-	466
<b>Total assets</b>	<b>33,164</b>	<b>33,198</b>	<b>29,413</b>	<b>12,997</b>	<b>239,768</b>	<b>50,182</b>	<b>(324,154)</b>	<b>74,565</b>	<b>11,676</b>	<b>86,241</b>
Borrowings (including bank overdrafts)	(1,804)	(860)	(667)	(93)	(1,313)	-	(3)	(4,744)	482	(4,292)
Current liabilities	(366)	(2,325)	(1,242)	(1,077)	(437)	(35)	66	(5,417)	(355)	(5,772)
Current tax liabilities	-	(824)	(37)	-	86	(13)	-	(808)	440	(368)
Intercompany payables	(12,787)	(1,147)	(718)	(492)	(82,423)	(7,823)	105,389	-	-	-
Non-current borrowings	(5,830)	(7,886)	(11,439)	(7,076)	(452)	2	145	(32,535)	1,008	(31,528)
Other non-current liabilities	(407)	(2,861)	(2,108)	(641)	(297)	(6)	-	(6,121)	(1,961)	(8,082)
Deferred tax liabilities	-	(1,476)	(3,010)	(1,223)	(349)	3	-	(6,052)	(3,227)	(9,279)
Pensions and other post-retirement benefits	-	(3,347)	-	(750)	(40)	-	-	(4,136)	(22)	(4,159)
Liabilities of businesses held for sale	-	(177)	-	-	-	-	-	(177)	-	(177)
<b>Total liabilities</b>	<b>(21,798)</b>	<b>(20,793)</b>	<b>(19,221)</b>	<b>(11,352)</b>	<b>(85,245)</b>	<b>(7,873)</b>	<b>105,596</b>	<b>(59,991)</b>	<b>(3,866)</b>	<b>(63,856)</b>
Shareholders' equity	(11,965)	(12,495)	(10,188)	(1,646)	(154,523)	(42,311)	218,580	(14,559)	(7,974)	(22,533)
Minority interests	-	(11)	(3)	-	-	2	(2)	(14)	(37)	(61)
<b>Total liabilities and equity</b>	<b>(33,164)</b>	<b>(33,198)</b>	<b>(29,413)</b>	<b>(12,997)</b>	<b>(239,768)</b>	<b>(50,182)</b>	<b>324,154</b>	<b>(74,565)</b>	<b>(11,676)</b>	<b>(86,241)</b>

AT GBP:USD RATE OF 1.607  
 = £14,019 million



US GAAP Balance Sheet Reconciliation  
Year ended 31 March 2011  
NG Gas

**SALES & SUPPORT**

Balance sheet also contains

$$\begin{aligned} \text{Sulfuric acid} &= 20 \\ \text{Sulfuric acid} &= 20 \end{aligned}$$

25-May-13 2:00pm

25-MAY-13 2:05pm

IFRS	Analysis of US GAAP adjustments by category										Subtotal	Reconciliations	US GAAP	Total US GAAP adjustments
	Acquisition of equity instruments	Recognition of equity instruments	Financial instruments	Revisions and other non-recurring items	Goodwill	Provisions and other non-recurring items	Headstock	Non-reversal provisions	Cost of sales	Other - provide explanation				
Balance Sheet														
Equity	48.0	-	-	-	-	-	-	-	-	-	48.0	48.0	48.0	
Liabilities	231.0	-	-	-	-	-	-	-	-	-	231.0	231.0	231.0	
Assets	342.0	-	-	-	-	-	-	-	-	-	342.0	342.0	342.0	
Income Statement														
Equity	55.0	-	-	-	-	-	-	-	-	-	55.0	55.0	55.0	
Liabilities	674.0	-	-	-	-	-	-	-	-	-	674.0	674.0	674.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Liabilities	2,451.0	-	-	-	-	-	-	-	-	-	2,451.0	2,451.0	2,451.0	
Assets	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	
Income Statement														
Equity	1,375.0	-	-	-	-	-	-	-	-	-	1,375.0	1,375.0	1,375.0	

**Manual input costs**

(C)

## 6. Investments

	Shares in subsidiary undertakings £m
Cost and net book value at 31 March 2010 and 31 March 2011	17

The names of the principal subsidiary undertakings are included in note 31 to the consolidated financial statements.

The directors believe that the carrying value of the investments is supported by their underlying net assets.

## 7. Stock

	2011 £m	2010 £m
Raw materials and consumables	40	43

## 8. Debtors

	2011 £m	2010 £m
Amounts falling due within one year:		
Trade debtors	36	58
Amounts owed by fellow subsidiary undertakings	16	24
Corporation tax	-	10
Other debtors	8	5
Prepayments and accrued income	173	200
	232	297
Amounts falling due after more than one year:		
Other debtors	10	8
Amounts owed by immediate parent undertaking	5,811	5,811
	5,821	5,819
Total debtors	5,853	5,916

## 9. Derivative financial instruments

The fair value of derivative financial instruments shown on the balance sheet is as follows:

	2011			2010		
	Assets £m	Liabilities £m	Total £m	Assets £m	Liabilities £m	Total £m
Amounts falling due in one year	80	(22)	58	72	(30)	42
Amounts falling due after more than one year	536	(86)	449	585	(121)	444
	616	(108)	507	637	(151)	486

For each class of derivative the notional contract amounts\* are as follows:

	2011 £m	2010 £m
Interest rate swaps	(5,188)	(3,154)
Cross-currency interest rate swaps	(1,578)	(1,748)
Foreign exchange forward contracts	(4)	(39)
Forward rate agreements	(1,832)	(1,730)
	(8,613)	(8,671)

\*The notional contract amounts of derivatives indicate the gross nominal value of transactions outstanding at the balance sheet date

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## 22. Share capital

	Number of shares 2011 millions	Number of shares 2010 millions	2011 £m	2010 £m
At 31 March 2010 and 2011 - ordinary shares of 1 <sup>2</sup> / <sub>15</sub> p each Allotted, called up and fully paid	3,944	3,944	45	45

## 23. Consolidated cash flow statement

### a) Reconciliation of net cash flow to movement in net debt

	2011 £m	2010 £m
Movement in cash and cash equivalents	63	(4)
Decrease in financial investments	(84)	(883)
(Increase)/decrease in borrowings and derivatives	(58)	725
Net interest paid on the components of net debt	262	268
Change in net debt resulting from cash flows	183	308
Changes in fair value of financial assets and liabilities	10	(33)
Net interest charge on the components of net debt	(404)	(252)
Movement in net debt (net of related derivative financial instruments) in the year	(211)	21
Net debt (net of related derivative financial instruments) at the start of the year	(6,859)	(6,880)
Net debt (net of related derivative financial instruments) at the end of the year	(7,070)	(6,859)

### b) Analysis of changes in net debt

	Cash and cash equivalents £m	Bank overdrafts £m	Net cash £m	Financial investments £m	Borrowings £m	Derivatives £m	Total debt £m
At 1 April 2009	-	(10)	(10)	1,009	(8,662)	783	(8,880)
Cash flow	1	(5)	(4)	(686)	1,100	(104)	308
Fair value gains and losses	-	-	-	-	202	(235)	(33)
Interest charges	-	-	-	3	(297)	42	(252)
At 31 March 2010	1	(15)	(14)	326	(7,657)	488	(6,859)
Cash flow	82	(19)	63	(86)	275	(89)	183
Fair value gains and losses	-	-	-	-	(9)	19	10
Interest charges	-	-	-	2	(477)	71	(404)
At 31 March 2011	83	(34)	49	242	(7,868)	507	(7,070)
Balances at 31 March 2011 comprise:							
Non-current assets	-	-	-	-	-	535	535
Current assets	83	-	83	242	-	80	405
Current liabilities	-	(34)	(34)	-	(750)	(22)	(806)
Non-current liabilities	-	-	-	-	(7,118)	(89)	(7,204)
	83	(34)	49	242	(7,868)	507	(7,070)

LESS DERIVATIVES (507)

TOTAL DEBT EXCLUDING DERIVATIVES (7,577)

AMOUNTS OWED BY FELLOW SUBSIDIARIES 11

AMOUNTS OWED TO FELLOW SUBS.

(78)

NGG NET DEBT EXCLUDING DERIVATIVES 7,644

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### 13. Inventories and other intangible assets

	2011 £m	2010 £m
Raw materials and consumables	25	28
Other intangible assets - emission allowances	15	15
	40	43

### 14. Trade and other receivables

	2011 £m	2010 £m
Trade receivables	17	59
Amounts owed by fellow subsidiaries	11	22
Prepayments and accrued income	175	202
Other receivables	8	5
	231	288

Trade receivables are non-interest bearing and generally have a 30-90 day term. Due to their short maturities, the fair value of trade and other receivables approximates to their book value. All other receivables are recorded at amortised cost.

#### Provision for impairment of receivables

	£m
At 1 April 2009	3
Additions net of recoveries	15
At 31 March 2010	18
Recoveries net of additions	(17)
At 31 March 2011	1

As at 31 March 2011, trade receivables of £23m (2010: £2m) were past due but not impaired. The ageing analysis of these trade receivables is as follows:

	2011 £m	2010 £m
Up to 3 months past due	19	-
3 to 6 months past due	3	1
Over 6 months past due	1	1
	23	2

For further information about wholesale credit risk refer to note 28(c).

## 17. Borrowings

	2011 £m	2010 £m
<b>Current</b>		
Bank loans	278	243
Bonds	101	115
Other loans	2	2
Borrowings from fellow subsidiaries	389	74
Bank overdrafts (note 18)	34	15
	<b>784</b>	<b>449</b>
<b>Non-current</b>		
Bank loans	984	659
Bonds	5,984	6,165
Other loans	180	149
Borrowings from fellow subsidiaries	-	250
	<b>7,118</b>	<b>7,223</b>
<b>Total borrowings</b>	<b>7,902</b>	<b>7,672</b>
Total borrowings are repayable as follows:		
	2011 £m	2010 £m
Less than 1 year	784	449
In 1 - 2 years	224	261
In 2 - 3 years	501	222
In 3 - 4 years	133	730
In 4 - 5 years	-	134
In more than 5 years by instalments	51	-
In more than 5 years other than by instalments	6,209	5,886
	<b>7,902</b>	<b>7,672</b>

The fair value of borrowings at 31 March 2011 was £8,081m (2010: £7,785m). Market values, where available, have been used to determine fair values. Where market values are not available, fair values have been calculated by discounting cash flows at prevailing interest rates.

The notional amount outstanding of the debt portfolio as at 31 March 2011 was £8,048m (2010: £7,819m).

Collateral is placed with or received from any counterparty where we have entered into a credit support annex to the ISDA Master Agreement once the current mark-to-market valuation of the trades between the parties exceeds an agreed threshold. Included in current bank loans is £275m (2010: £240m) in respect of cash received under collateral agreements. No cash has been placed under collateral agreements.

As at 31 March 2011, the Company had committed credit facilities of £425m (2010: £700m) of which £425m was undrawn (2010: £700m undrawn). These undrawn facilities expire within three to four years.

All of the unused facilities at 31 March 2011 and at 31 March 2010 were held as back-up to commercial paper and similar borrowings.

None of the Company's borrowings are secured by charges over assets of the Company.

## 18. Trade and other payables

	2011 £m	2010 £m
Trade payables	411	439
Amounts owed to fellow subsidiaries	78	125
Deferred income	147	136
Social security and other taxes	67	72
Other payables	44	34
	<b>747</b>	<b>806</b>

Due to their short maturities, the fair value of trade and other payables (excluding deferred income) approximates to their book value. All trade and other payables are recorded at amortised cost.

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## Consolidated balance sheet

at 31 March

	Notes	2011 £m	2010 £m
<b>Non-current assets</b>			
Intangible assets	8	50	43
Property, plant and equipment	9	7,616	6,769
Derivative financial assets	10	168	134
<b>Total non-current assets</b>		<b>7,824</b>	<b>6,946</b>
<b>Current assets</b>			
Inventories	11	28	33
Trade and other receivables	12	204	161
Financial investments	13	4	67
Derivative financial assets	10	20	17
Cash and cash equivalents	14	-	326
<b>Total current assets</b>		<b>256</b>	<b>604</b>
<b>Total assets</b>		<b>8,080</b>	<b>7,550</b>
<b>Current liabilities</b>			
Borrowings	15	(263)	(334)
Derivative financial liabilities	10	(10)	(11)
Trade and other payables	16	(729)	(604)
Provisions	20	(13)	(10)
<b>Total current liabilities</b>		<b>(1,015)</b>	<b>(959)</b>
<b>Non-current liabilities</b>			
Borrowings	15	(4,403)	(4,332)
Derivative financial liabilities	10	(76)	(89)
Other non-current liabilities	17	(261)	(246)
Deferred tax liabilities	18	(761)	(766)
Pension obligations	19	(467)	(493)
Provisions	20	(83)	(10)
<b>Total non-current liabilities</b>		<b>(6,041)</b>	<b>(5,926)</b>
<b>Total liabilities</b>		<b>(7,056)</b>	<b>(6,885)</b>
<b>Net assets</b>		<b>1,024</b>	<b>665</b>
<b>Equity</b>			
Called up share capital	21	44	44
Retained earnings		1,006	656
Cash flow hedge reserve		(26)	(35)
<b>Total shareholders' equity</b>		<b>1,024</b>	<b>665</b>

These financial statements, comprising the consolidated income statement, consolidated statement of comprehensive income, consolidated balance sheet, consolidated statement of changes in equity, consolidated cash flow statement, accounting policies, adoption of new accounting standards and notes to the consolidated financial statements 1 to 30 were approved by the Board of Directors on 20 July 2011 and were signed on its behalf by:

Paul Whittaker Director

Stuart Humphreys Director

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## 11. Inventories

	2011 £m	2010 £m
Raw materials and consumables	28	33

The above table includes a £15m provision for obsolescence against raw materials and consumables at 31 March 2011 (2010: £12m).

## 12. Trade and other receivables

	2011 £m	2010 £m
Trade receivables	18	13
Amounts owed by fellow subsidiaries	29	17
Prepayments and accrued income	186	128
Other receivables	3	3
	204	161

Trade receivables are non-interest bearing and generally have a 30-90 day term. Due to their short maturities, the fair value of trade and other receivables approximates to their book value. All other receivables are recorded at amortised cost.

### Provision for impairment of receivables

	£m
At 31 March 2010 and 31 March 2011	1

As at 31 March 2011, trade receivables of £2m (2010: £nil) were past due but not impaired.

For further information about our wholesale credit risk, refer to note 27c).

## 13. Financial investments

	2011 £m	2010 £m
Current		
Loans and receivables - amounts due from fellow subsidiaries	4	3
Available-for-sale investments	-	64
Total financial and other investments	4	67

Available-for-sale investments are recorded at fair value. Due to their short maturities, the carrying value of loans and receivables approximates to their fair value.

## 14. Cash and cash equivalents

	2011 £m	2010 £m
Short-term deposits	-	326
Cash and cash equivalents excluding bank overdrafts	-	326
Bank overdrafts	(8)	(13)
Net cash and cash equivalents	(8)	313

The carrying amounts of cash and cash equivalents and bank overdrafts approximate to their fair value.

Cash at bank earns interest at floating rates based on daily bank deposit rates. Short-term deposits are made for various periods of between one day and three months, depending on immediate cash requirements, and earn interest at the respective short-term deposit rates.



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## 15. Borrowings

	2011 £m	2010 £m
<b>Current</b>		
Bank overdrafts	8	13
Bank loans	8	5
Bonds	42	300
Borrowings from fellow subsidiaries	206	16
	<b>263</b>	<b>334</b>
<b>Non-current</b>		
Bank loans	400	400
Bonds	4,003	3,932
	<b>4,403</b>	<b>4,332</b>
<b>Total borrowings</b>	<b>4,666</b>	<b>4,668</b>
Total borrowings are repayable as follows:		
	2011 £m	2010 £m
Less than 1 year	263	334
In 1 - 2 years	200	-
In 2 - 3 years	538	200
In 3 - 4 years	-	552
In 4 - 5 years	164	-
More than 5 years	3,501	3,580
	<b>4,666</b>	<b>4,668</b>

The fair value of borrowings at 31 March 2011 was £4,998m (2010: £5,068m). Market values, where available, have been used to determine fair values. Where market values are not available, fair values have been calculated by discounting cash flows at prevailing interest rates.

The notional amount outstanding of the debt portfolio as at 31 March 2011 was £4,584m (2010: £4,577m).

Collateral is placed with or received from any counterparty where we have entered into a credit support annex to the ISDA Master Agreement once the current mark-to-market valuation of the trades between the parties exceeds an agreed threshold. Included in current bank loans is £8m (2010: £5m) in respect of cash received under collateral agreements.

As at 31 March 2011, the Company had committed credit facilities of £715m (2010: £425m) of which £715m was undrawn (2010: £425m undrawn). These undrawn facilities expire within three to four years.

All of the unused facilities at 31 March 2011 and at 31 March 2010 were held as back-to-commercial paper and similar borrowings.

None of the Company's borrowings are secured by charges over assets of the Company.

## 16. Trade and other payables

	2011 £m	2010 £m
Trade payables	448	362
Amounts owed to fellow subsidiaries	101	99
Deferred income	85	77
Social security and other taxes	43	39
Other payables	32	27
	<b>729</b>	<b>604</b>

Due to their short maturities, the fair value of trade and other payables (excluding deferred income) approximates to their book value. All trade and other payables are recorded at amortised cost.

## 17. Other non-current liabilities

	2011 £m	2010 £m
Deferred income	241	234
Other payables	10	12
	<b>251</b>	<b>246</b>

The fair value of other payables approximates to their book value. All other non-current liabilities are recorded at amortised cost.

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## 22. Consolidated cash flow statement

### (a) Reconciliation of net cash flow to movement in net debt

	2011 £m	2010 £m
Decrease in cash and cash equivalents	(321)	(70)
Decrease in financial investments	(83)	(283)
Decrease/(increase) in borrowings and derivatives	104	(14)
Net interest paid on the components of net debt	179	184
Change in net debt resulting from cash flows	(101)	(193)
Changes in fair value of financial assets and liabilities	22	24
Net interest charge on the components of net debt	(289)	(177)
Movement in net debt (net of related derivative financial instruments) in the year	(348)	(348)
Net debt (net of related derivative financial instruments) at start of year	(4,222)	(3,878)
Net debt (net of related derivative financial instruments) at end of year	(4,570)	(4,222)

### (b) Analysis of changes in net debt

	Cash and cash equivalents £m	Bank overdrafts £m	Net cash and cash equivalents £m	Financial investments £m	Borrowings £m	Derivatives £m	Total £m
At 1 April 2009	387	(4)	383	360	(4,708)	89	(3,878)
Cash flow	(61)	(9)	(70)	(297)	198	(22)	(193)
Fair value gains and losses	-	-	-	-	41	(17)	24
Interest charges	-	-	-	4	(182)	1	(177)
At 31 March 2010	326	(13)	313	67	(4,653)	51	(4,222)
Cash flow	(328)	5	(321)	(85)	303	(18)	(101)
Fair value gains and losses	-	-	-	-	(15)	37	22
Interest charges	-	-	-	2	(293)	22	(269)
At 31 March 2011	-	(8)	(8)	4	(4,658)	92	(4,570)
Balances at 31 March 2011:							
Non-current assets	-	-	-	-	-	158	158
Current assets	-	-	-	4	-	20	24
Current liabilities	-	(8)	(8)	-	(255)	(10)	(273)
Non-current liabilities	-	-	-	-	(4,403)	(76)	(4,479)
At 31 March 2011	-	(8)	(8)	4	(4,658)	92	(4,570)

(92)

NET DEBT EXCLUDING DERIVATIVES (4,662)



### Current price controls

The key elements of the current price controls for both gas and electricity transmission are that we are allowed to earn a 4.4% post-tax real return on our RAV, equivalent to a 5.05% vanilla return, with a £4.4 billion baseline five year capex allowance and a £1.2 billion five year controllable opex allowance.

In addition, we are subject to a number of incentives that can adjust our transmission network revenue. For electricity transmission, these include incentives for network reliability, sulphur hexafluoride losses, efficiency and balancing services. For gas transmission, our incentive schemes cover areas such as the cost of investment for additional capacity to facilitate new connections to the system.

The key elements of the current price controls for gas distribution are that we are allowed to earn a 4.3% post-tax real rate of return on our RAV, equivalent to a 4.94% vanilla return, with a £2.5 billion baseline five year capex allowance and a £1.6 billion five year controllable opex allowance.

	RAV	Allowed vanilla return	Actual vanilla return	Return on equity
Electricity transmission	£8,388m	5.05%	6.40%	13.6%
Gas transmission	£1,839m	5.05%	7.20%	15.8%
Gas distribution	£2,520m	4.94%	5.64%	12.1%
Total	£20,797m			13.6%

### Ofgem's review of price controls: RPI-X@20

Since privatisation, the RPI-X mechanism has provided the industry with strong incentives to be more efficient. The level of opex costs has decreased over the years, transforming previously inefficient nationalised industries. However, over the past few years new challenges, such as Great Britain's transition to lower carbon emissions and the requirement to renew ageing networks, have caused Ofgem to review the continuing appropriateness of the RPI-X approach.

In March 2008, Ofgem announced the RPI-X@20 review, which was a two year project to review the workings of the current approach to regulating Great Britain's energy networks and develop future policy recommendations.

Ofgem's RPI-X@20 review aims were to: drive improvements in quality of service and efficiency; ensure that the regulatory framework is flexible to adapt to structural changes in the energy industry; and enable efficient network companies to finance themselves efficiently.

To allow the lessons of the review to be accommodated in full, Ofgem extended the current transmission price control from its scheduled end in March 2012 by one year to March 2013.

Following the RPI-X@20 review, Ofgem has identified a modified price control approach, designated as RIIO, to deliver and meet the changing future needs of the energy market. The fundamental building block approach shown in the diagram opposite will still be at the heart of the model.

### The RIIO model

Ofgem's revised RIIO regulatory framework will be implemented in the next round of gas distribution and gas and electricity transmission price controls, which will start in April 2013.

RIIO refers to the formula:

$$\text{Revenue} = \text{Incentives} + \text{Innovation} + \text{Outputs}$$

To attract the efficient investment needed for the industry, Ofgem's RIIO model is intended to incentivise network companies to deliver the outputs demanded by consumers and network users in an efficient and innovative way.

The key features of the RIIO model are:

- a longer price control, lasting eight years, to provide stronger incentives for networks to manage costs;
- encouraging network companies to work more closely with stakeholders to identify what they want from energy network companies. This should help networks to identify, and so better meet, the developing needs of the energy market;
- rewarding network companies with higher returns where they meet the needs of the network users and consumers in innovative and efficient ways. However, network companies that perform poorly can expect to receive lower returns;
- encouraging network companies to become actively involved in delivering a sustainable energy sector;
- supporting the development and delivery of a network service that provides long-term value for money to existing and future consumers; and
- providing clarity to future investors to ensure that network companies can raise the finance needed in a timely manner and at a reasonable cost to consumers.

### Impact on National Grid

The RIIO model will not only reward us for increased efficiency but also encourage us to engage more openly and effectively with our stakeholders. This will allow us to develop more robust commercial relationships with current and future network users to help us fulfil our vital role in the delivery of a sustainable future energy sector. It will also help us to respond and adapt our delivery plans to provide long-term value for money to network users.

Output measures in future price controls will give stakeholders a clear understanding of what we will deliver in return for the revenue that we receive from our customers. The proposed output categories are: customer satisfaction; reliability and availability; safe network services; connection terms; environmental impact; and social obligations. These outputs will cover both primary and secondary deliverables. We will be required to demonstrate in price controls that the primary outputs are material, controllable, measurable, comparable and legally compliant. The secondary deliverables will be evidenced through our business plans to demonstrate the costs required to deliver the primary outputs. Four years into the eight year price control, there will be an interim review of the outputs that we were required to deliver, to ensure that they remain relevant.

As the energy landscape evolves, Ofgem's RIIO model should encourage us in our gas distribution and electricity and gas transmission roles to play a full part in the delivery of a sustainable energy sector and to deliver network services offering long-term value for money to existing and future consumers.

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25/05/2012  
National Grid  
Entity code: NGGMETERING.T

02:31 PM  
Application : NG Financial Reporting 10/11 (NgRep)  
Report : BCYR01

Summary IFRS balance sheet report  
National Grid Gas Metering

ACT1011 March 2011 YTD £'000		
8810 Goodwill	-	
8811 Other intangible assets	-	
8812 Property, plant and equipment	585,776	
8813 Investments in group undertakings	-	
8814 Investments in joint ventures/assocs	-	
8815 Own shares	-	
8816 Deferred tax assets	-	
8817 Derivative assets - non-current	-	
8818 Interco loans receivable - non-current	-	
8819 Other receivables	-	
8820 Available for sale investments	-	
8821 Pension asset	-	
8825 Non-current assets	585,776	
8826 Businesses/assets held for resale	-	
8827 Inventories	-	
8828 Derivative assets - current	-	
8829 Interco loans receivable - current	1,111,495	
8830 Trade and other receivables	27,074	
8831 Financial investments	-	
8832 Cash and cash equivalents	(38,924)	
8834 Current emissions	-	
8835 Current assets	1,099,846	
8839 Total assets	1,685,422	
8840 Bank overdrafts	-	
8841 Borrowings - current	-	
8842 Derivative liabilities - current	-	
8843 Trade and other payables	(32,041)	
8844 Current tax liabilities	-	
8845 Intercompany loans - current	-	
8846 Provisions - current	(12,197)	
8847 Current account payables	(18,818)	
8848 Liabilities held for resale	-	
8855 Current liabilities	(61,056)	
8856 Borrowings - non-current	-	
8857 Derivative liabilities - non-current	-	
8858 Other non-current liabilities	(60,638)	
8859 Intercompany loans - non-current	-	
8860 Deferred tax liabilities	-	
8861 Provisions - non-current	(6,882)	
8862 Retirement and oth post-ret'mnt obligns	-	
8865 Non-current liabilities	(67,520)	
8869 Total liabilities	(128,576)	
8802 Balance sheet unbalanced by	0	
8879 Net assets	1,556,845	
8880 Share capital	-	
8881 Share premium	-	
8882 Retained earnings	(1,556,845)	
8883 Capital redemption reserve	-	
8886 Other reserves	-	
8889 Equity shareholders' funds	(1,556,845)	
8890 Minority interest	-	
8899 Capital and reserves	(1,556,845)	

£613 m

£(112) m

613  
(112)

19 - J.2  
(24) - J.2

4.96

Printed By : harrinc  
315

2

25/05/2012  
National Grid  
Entity code: XOSERVE.T

02:31 PM  
Application : NG Financial Reporting 10/11 (NgRep)  
Report : BCYR01

Summary IFRS balance sheet report  
Xoserve Limited

	ACT1011 March 2011 YTD £'000	
8810 Goodwill	-	
8811 Other intangible assets	3,762	
8812 Property, plant and equipment	13,180	
8813 Investments in group undertakings	-	
8814 Investments in joint ventures/assocs	-	
8815 Own shares	-	
8816 Deferred tax assets	-	
8817 Derivative assets - non-current	-	
8818 Interco loans receivable - non-current	-	
8819 Other receivables	304	
8820 Available for sale investments	-	
8821 Pension asset	-	
8825 Non-current assets	17,246	
8826 Businesses/assets held for resale	-	
8827 Inventories	-	
8828 Derivative assets - current	-	
8829 Interco loans receivable - current	16,519	
8830 Trade and other receivables	1,364	
8831 Financial investments	-	
8832 Cash and cash equivalents	(980)	
8834 Current emissions	-	
8835 Current assets	16,923	
8839 Total assets	34,169	
8840 Bank overdrafts	-	
8841 Borrowings - current	-	
8842 Derivative liabilities - current	-	
8843 Trade and other payables	(8,167)	
8844 Current tax liabilities	(106)	
8845 Intercompany loans - current	-	
8846 Provisions - current	-	
8847 Current account payables	(3,791)	
8848 Liabilities held for resale	-	
8855 Current liabilities	(11,974)	
8856 Borrowings - non-current	-	
8857 Derivative liabilities - non-current	-	
8858 Other non-current liabilities	(14,057)	
8859 Intercompany loans - non-current	-	
8860 Deferred tax liabilities	(807)	
8861 Provisions - non-current	(214)	
8862 Retirement and oth post-ret'mnt obligns	(268)	
8865 Non-current liabilities	(15,346)	
8869 Total liabilities	(27,320)	
8802 Balance sheet unbalanced by	(306)	
8879 Net assets	6,543	
8880 Share capital	(199)	
8881 Share premium	(801)	
8882 Retained earnings	(5,543)	
8883 Capital redemption reserve	-	
8886 Other reserves	-	
8889 Equity shareholders' funds	(6,543)	
8890 Minority interest	-	
8899 Capital and reserves	(6,543)	

£19 m

£(24)m

Consolidating schedules  
as at March 31, 2011

	National Grid plc IFRS company	National Grid USA IFRS consolidated (section 2)	National Grid Gas plc IFRS consolidated (section 3)	National Grid Elect. Trans. plc IFRS consolidated (section 3)	Other major subsidiaries IFRS aggregated (section 4)	Total of non-major subsidiaries IFRS aggregated	Consol- idation adjustments IFRS	National Grid plc IFRS consolidated	National Grid plc US GAAP adjustments	National Grid plc US GAAP consolidated
	\$'m	\$'m	\$'m	\$'m	\$'m	\$'m	\$'m	\$'m	\$'m	\$'m
<b>Condensed balance sheet</b>										
Goodwill	-	7,671	-	-	-	-	5	7,675	3,410	11,085
Other intangible assets	-	383	309	80	35	-	-	805	(313)	492
Property, plant & equipment	-	18,882	18,130	12,239	2,179	(3)	(74)	51,853	2,104	59,457
Investments in subsidiaries	12,678	(0)	-	-	183,280	23,899	(219,858)	-	-	-
Investments	-	560	-	-	2	392	-	953	5	958
Non-current regulatory assets	-	0	-	-	-	-	-	-	6,177	6,177
Other non-current assets	326	461	866	254	646	(2)	-	3,151	-	3,151
Intercompany receivables	16,546	3	9,065	53	52,671	25,788	(104,126)	-	-	-
Inventories	-	357	64	45	48	-	-	514	2	516
Receivables and other current assets	403	2,795	489	326	378	18	(101)	4,307	(34)	4,273
Regulatory assets	-	0	-	-	-	-	-	-	280	280
Financial and other investments	2,288	1,545	357	-	490	43	-	4,723	(4,016)	707
Cash and cash equivalents	321	77	133	-	39	47	-	617	4,062	4,680
Assets of businesses held for sale	-	486	-	-	-	-	-	486	-	486
<b>Total assets</b>	<b>33,164</b>	<b>33,199</b>	<b>29,413</b>	<b>12,997</b>	<b>239,768</b>	<b>50,182</b>	<b>(324,154)</b>	<b>74,565</b>	<b>11,676</b>	<b>86,241</b>
Borrowings (including bank overdrafts)	(1,808)	(860)	(667)	(93)	(1,313)	-	(3)	(4,744)	452	(4,292)
Current liabilities	(366)	(2,325)	(1,242)	(1,077)	(437)	(35)	66	(5,417)	(355)	(5,772)
Current tax liabilities	-	(824)	(37)	-	66	(13)	-	(808)	440	(368)
Intercompany payables	(12,767)	(1,147)	(718)	(492)	(82,423)	(7,823)	105,389	-	-	-
Non-current borrowings	(5,830)	(7,886)	(11,439)	(7,076)	(452)	2	145	(32,535)	1,008	(31,528)
Other non-current liabilities	(407)	(3,561)	(2,196)	(841)	(297)	(6)	-	(5,121)	(1,961)	(7,082)
Deferred tax liabilities	-	(1,476)	(3,010)	(1,223)	(349)	3	-	(6,052)	(3,227)	(9,279)
Pensions and other post-retirement benefits	-	(3,347)	-	(750)	(40)	-	-	(4,136)	(22)	(4,158)
Liabilities of businesses held for sale	-	(177)	-	-	-	-	-	(177)	-	(177)
<b>Total liabilities</b>	<b>(21,198)</b>	<b>(20,703)</b>	<b>(19,221)</b>	<b>(11,352)</b>	<b>(85,245)</b>	<b>(7,873)</b>	<b>105,596</b>	<b>(59,991)</b>	<b>(5,696)</b>	<b>(63,656)</b>
Shareholders' equity	(11,966)	(12,485)	(10,188)	(1,646)	(154,523)	(42,311)	218,560	(14,559)	(7,974)	(22,533)
Minority interests	-	(11)	(3)	-	-	2	(2)	(14)	(37)	(51)
<b>Total liabilities and equity</b>	<b>(33,164)</b>	<b>(33,199)</b>	<b>(29,413)</b>	<b>(12,997)</b>	<b>(239,768)</b>	<b>(50,182)</b>	<b>324,154</b>	<b>(74,565)</b>	<b>(11,676)</b>	<b>(86,241)</b>

\$30,433 m

AT GBP: USD FX RATE OF 1.607

= £18,942 million

## 27. Consolidated cash flow statement

### (a) Cash flow from operating activities – discontinued operations

	2011 £m	2010 £m	2009 £m
Operating profit	-	-	13
Changes in working capital, provisions and pensions	-	-	(21)
Cash flow relating to discontinued operations	-	-	(8)

### (b) Cash flow from investing activities – discontinued operations

	2011 £m	2010 £m	2009 £m
Disposal proceeds (i)	-	-	1,617
Tax arising on disposal	-	-	(584)
Other investing activities	-	-	(4)
Cash flow relating to discontinued operations	-	-	1,049

(i) Disposal proceeds are in respect of the sale of assets and liabilities classified as held for sale.

### (c) Reconciliation of net cash flow to movement in net debt

	2011 £m	2010 £m	2009 £m
(Decrease)/Increase in cash and cash equivalents	(346)	(28)	538
Increase/(decrease) in financial investments	1,577	(805)	(99)
Decrease/(Increase) in borrowings and related derivatives	1,763	499	(1,641)
Net interest paid on the components of net debt	1,011	999	956
Change in net debt resulting from cash flows	4,005	865	(246)
Changes in fair value of financial assets and liabilities and exchange movements	690	865	(3,625)
Net interest charge on the components of net debt	(1,228)	(996)	(1,161)
Reclassified as held for sale	9	-	-
Other non-cash movements	(68)	-	-
Movement in net debt (net of related derivative financial instruments) in the year	3,408	634	(5,032)
Net debt (net of related derivative financial instruments) at start of year	(22,139)	(22,673)	(17,641)
Net debt (net of related derivative financial instruments) at end of year	(18,731)	(22,139)	(22,673)

### (d) Analysis of changes in net debt

	Cash and cash equivalents £m	Bank overdrafts £m	Net cash and cash equivalents £m	Financial investments £m	Borrowings £m	Derivatives £m	Total <sup>(i)</sup> £m
At 31 March 2008	174	(10)	164	2,095	(20,993)	1,093	(17,641)
Cash flow	545	(7)	538	(184)	(1,318)	716	(246)
Fair value gains and losses and exchange movements	18	-	18	207	(3,222)	(628)	(3,625)
Interest charges	-	-	-	79	(1,245)	5	(1,161)
At 31 March 2009	737	(17)	720	2,197	(26,776)	1,186	(22,673)
Cash flow	(16)	(12)	(28)	(826)	2,079	(580)	865
Fair value gains and losses and exchange movements	(1)	-	(1)	2	644	220	865
Interest charges	-	-	-	24	(1,042)	22	(996)
At 31 March 2010	720	(29)	691	1,397	(25,095)	868	(22,139)
Cash flow	(333)	(13)	(346)	1,551	2,933	(133)	4,005
Fair value gains and losses and exchange movements	(3)	-	(3)	(34)	402	325	690
Interest charges	-	-	-	25	(1,337)	84	(1,228)
Reclassified as held for sale	-	-	-	-	9	-	9
Other non-cash movements	-	-	-	-	(68)	-	(68)
At 31 March 2011	384	(42)	342	2,939	(23,156)	1,144	(18,731)
Balances at 31 March 2011 comprise:							
Non-current assets	-	-	-	-	-	1,270	1,270
Current assets	384	-	384	2,939	-	488	3,791
Current liabilities	-	(42)	(42)	-	(2,910)	(190)	(3,142)
Non-current liabilities	-	-	-	-	(20,246)	(404)	(20,650)
	384	(42)	342	2,939	(23,156)	1,144	(18,731)

(i) Includes accrued interest at 31 March 2011 of £182m (2010: £232m).

Date of Request: May 23, 2012  
Due Date: June 4, 2012

Request No. DPS-108 (MWC-3)  
NMPC Req. No. 108

NIAGARA MOHAWK POWER CORPORATION

Case No. 12-E-0201 and 12-G-0202 - Niagara Mohawk Power Corporation  
d/b/a National Grid - Electric and Gas Rates

Request for Information

FROM: Michael Colby  
TO: Elizabeth D. Arangio  
SUBJECT: Load and Capacity

Request:

1. Please provide a load duration curve for the test year winter, the 2013-14 winter, the 2014-15 winter, and the 2015-16 winter. Include the forecasted Global Foundries load for all years that they are expected to be a firm sales customer. Also, include any current or projected bundled purchases to be delivered to the city gate when applicable (Canajoharie Call, etc.).
2. In your testimony you state that the company contracted for an additional 20,000 Dth/day of Dominion Transmission Inc. (DTI) pipeline capacity to the company's East Gate in November 2011, while Exhibit\_\_ (EDA-2) only shows 17,700 of additionally acquired DTI capacity. Please explain this discrepancy. Was any of this capacity procured in order to serve Global Foundries current or future load?
3. Please provide updated information on Global Foundries, including any details on how long the company anticipates that it will provide firm sales service to this customer and any expected changes to loads and/or ramp up dates changed since the initial case was filed.
4. Is the Canajoharie Call required to provide firm service to Global Foundries in the time period between now and March 31, 2016. If so, explain. If not, please provide the company's plan to service this additional load.
5. Please explain how the proposed Canajoharie Call will benefit the company's distribution system when it appears that this will provide peaking supplies to the West Gate of the system but that the majority of load growth appears to come off of the East Gate.
6. Please provide individual load duration curves for the East Gate, the West Gate, and the Iroquois gate for the test year winter, the 2013-14, the 2014-15, and the 2015-16 winters.
7. How often does the company review its holdings of long line capacity and what changes does the company plan to make over the next five years?

Response:

1. See attachment: MWC-3-Attachment 1



2. The MDQ for the Company's DTI Hub II FT Contract # 200558 is 20,000 Dth/day. Since April 2011, the Company has released 2,300 Dth/day to NYSEG as part of a long-standing service agreement between NYSEG and NMPC so that NYSEG is able to serve its load at Mechanicsville. Prior to April 2011, this capacity was released from the Company's FT Contract # 100001.

NMPC provided Staff with two presentations in November 2007 which stated the reasons for procuring this capacity. Please refer to attachments MWC-3-Attachment 2 and MWC-3-Attachment 3. Global Foundries was one of the considerations for procuring this capacity as the Company expects to see ancillary load growth in the area as a result of the facility. The capacity was not intended to be used solely for Global Foundries' production load requirements. Since 2007, the Company has seen its forecast peak day load decline by approximately 20 Mdt/day. Most reductions have been in the western side of the NMPC gas system thus not diminishing the need for East Gate capacity.

3. Global Foundries provided a new ramp-up schedule in April 2012, but it was not significantly different than the schedule provided in May 2011. This latest ramp-up schedule indicates Global Foundries should currently be averaging approximately 4,000 Dth/day, but it has yet to reach 2,000 Dth on any one day this year. Its next large ramp-up is supposed to occur in the summer of 2014 when it projects to reach 20,000 Dth/day. NMPC will require more system reinforcements to support such a load. NMPC and Staff agreed that prior to approving those reinforcements, Global Foundries will have to provide a gas supply plan. As discussed, NMPC will not be able to support Global Foundries as a firm sales customer through all the phases of its project without additional East Gate capacity. However, at present it is not possible for the Company to determine with certainty how long Global Foundries will remain as a sales customer.
4. The Canajoharie call option may be needed to help serve East Gate load between now and March 31, 2016 depending on whether load growth continues behind the Company's Croghan gate. As discussed in MWC-3-Attachment 3 (Page 6), the Army's Fort Drum expansion has been the major factor in increasing usage in the Watertown area. The DTI Hub II capacity has negated the need for the call option in the Company's current supply plan. Recently, the Company has been able to buy gas at Canajoharie in the daily market when needed to maintain Maximum Daily Delivery Obligation ("MDDOs") at the East Gate. Should there be an issue due to lack of counterparties for sales agreements, the Company will revisit the call option.

Global Foundries' requirements have been incorporated into all of the forecasts used for this filing. Global Foundries would most likely need to move to firm transportation service and procure their own East Gate capacity by 2016. If they wish to remain as a firm sales customer, they would need to provide commitments to remain a sales customer to ensure that any new capacity is utilized fully and does not affect other firm sales customers.

5. Contrary to the assumption underlying the question, the Canajoharie Call would provide supply to East Gate, not West Gate. During the winter, NMPC contracts for 51,596 Dth/day of supply into Waddington on Iroquois. This supply is then split

between Croghan and Canajoharie as needed depending on the requirements behind the Croghan gate. As stated in MWC-3-Attachment 3 (Page 6), bringing additional gas supply to Croghan (rather than diverting supply to Canajoharie), “will help maintain system integrity on the pipeline system in the Watertown area.” The Canajoharie call option will provide the 20 Mdt needed to maintain the maximum MDDO at the East gate on peak or near-peak days. The Company’s primary DTI FT contract (#100001) requires deliveries of 14 Mdt at Ellisburg and 20 Mdt at Canajoharie to maintain East Gate MDDOs on peak days. The 14 Mdt at Ellisburg is procured through a winter term deal.

6. The requirements forecasts used for this filing were not developed to provide a breakdown between East Gate, West Gate and Iroquois. The Company has reviewed the percentage breakdown for 2011-12 winter between “eastern” load (DTI East Gate plus TGP South Albany load) and “western” load (DTI West Gate plus Iroquois load). These percentages were applied to the overall sendout requirements forecast for 2011-12 to split the load between East and West. A load duration curve was developed for the winter of 2011-12 (see attachment MWC-3-Attachment 4).

As there is no current forecast for how these percentages will change going forward, the Company is not able to produce curves for 2013-14, 2014-15 and 2015-16. The Company is currently working on developing new forecasting models to provide this kind of detail in the future.

7. The Company constantly reviews its gas supply portfolio. The Company closely monitors the expected versus actual load growth occurring throughout its territory and modifies the portfolio as needed. When contracts in the portfolio come up for expiration and/or termination, the Company determines whether the capacity is still needed to meet customer requirements in a least-cost manner. If so, the capacity is renewed, and if not, the Company would either terminate the contract or let it expire. At this time and given the current load forecast, the Company has no plans to make any changes to its portfolio over the next five years.

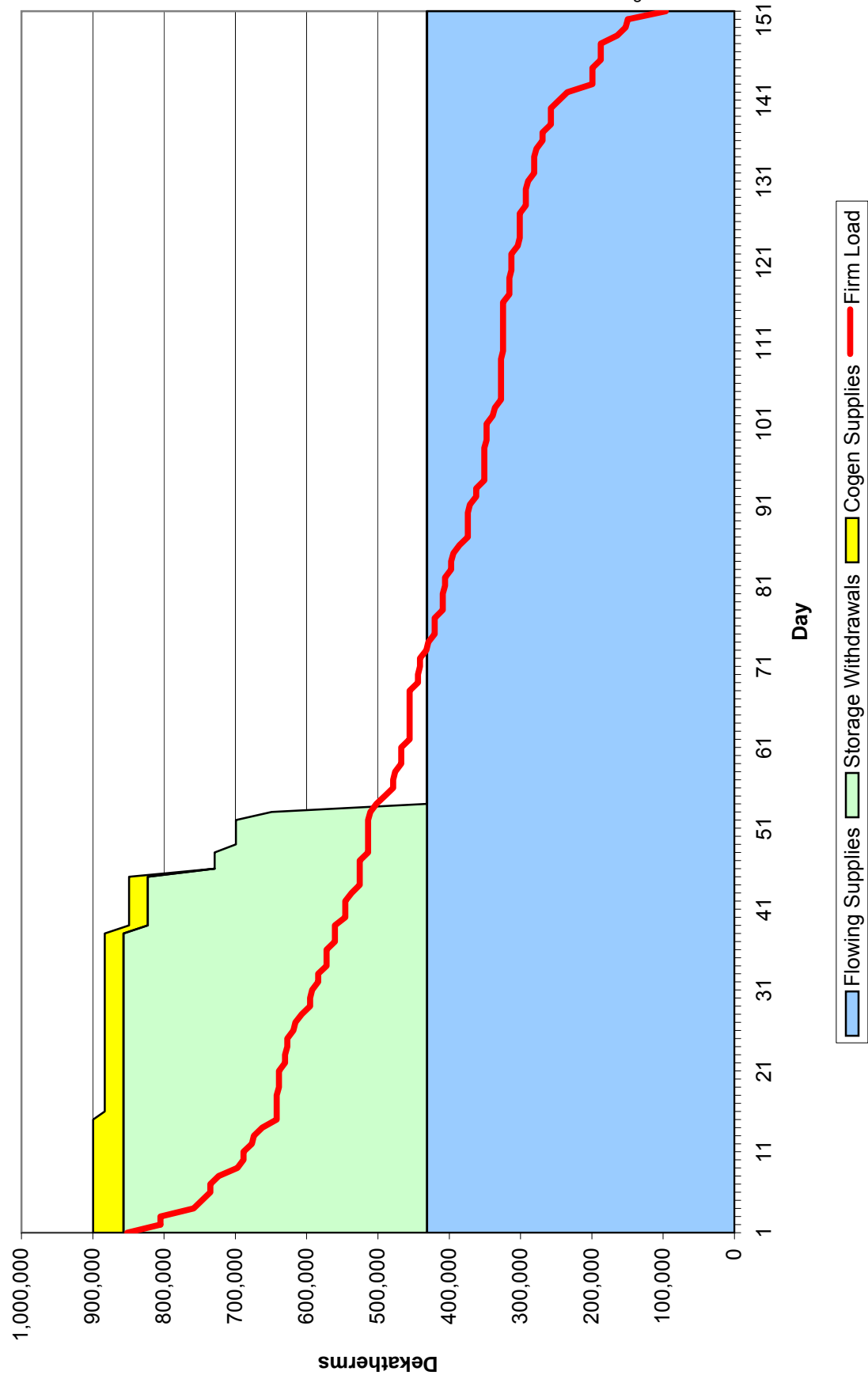
Name of Respondent:

Elizabeth Arangio

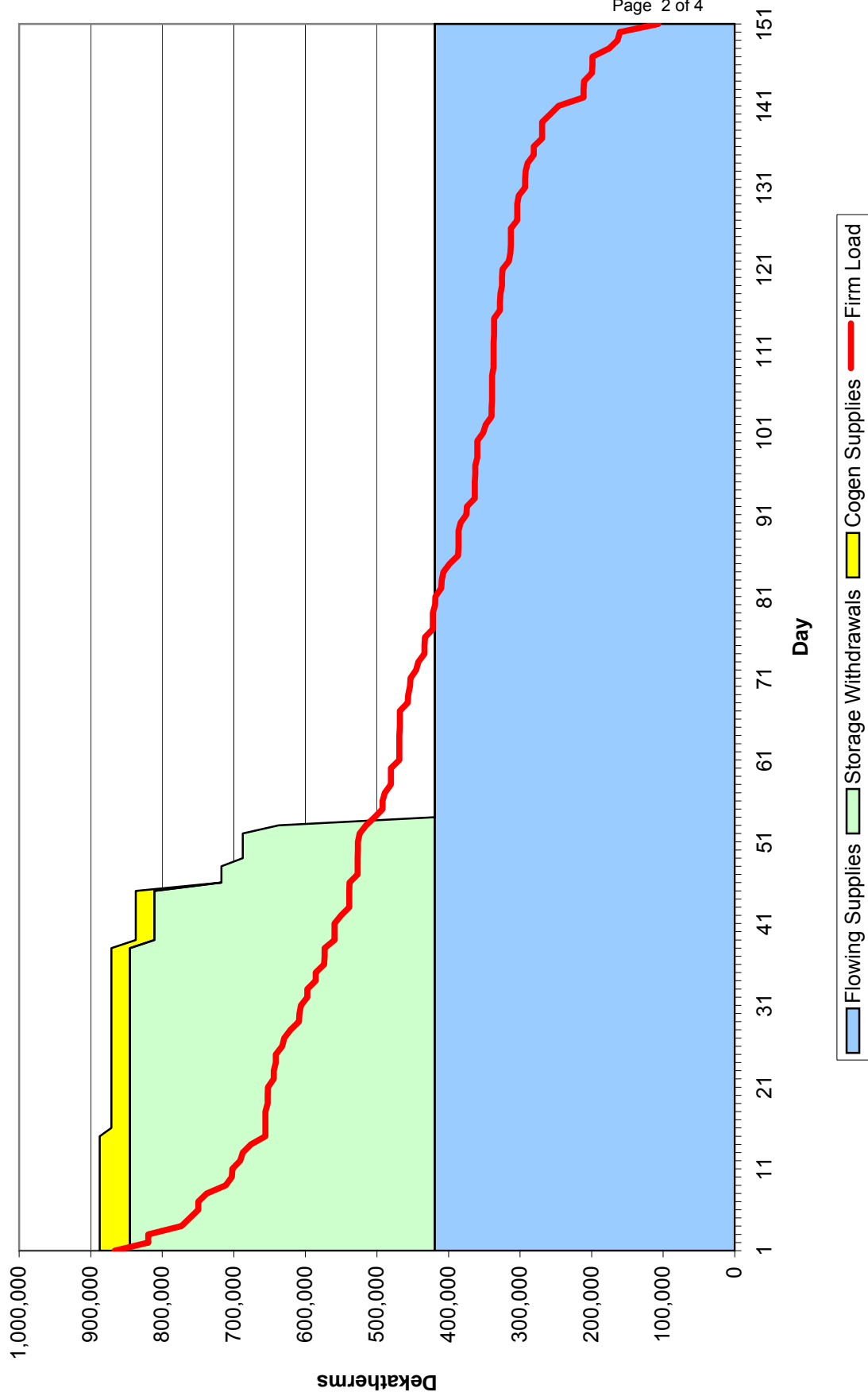
Date of Reply:

June 1, 2012

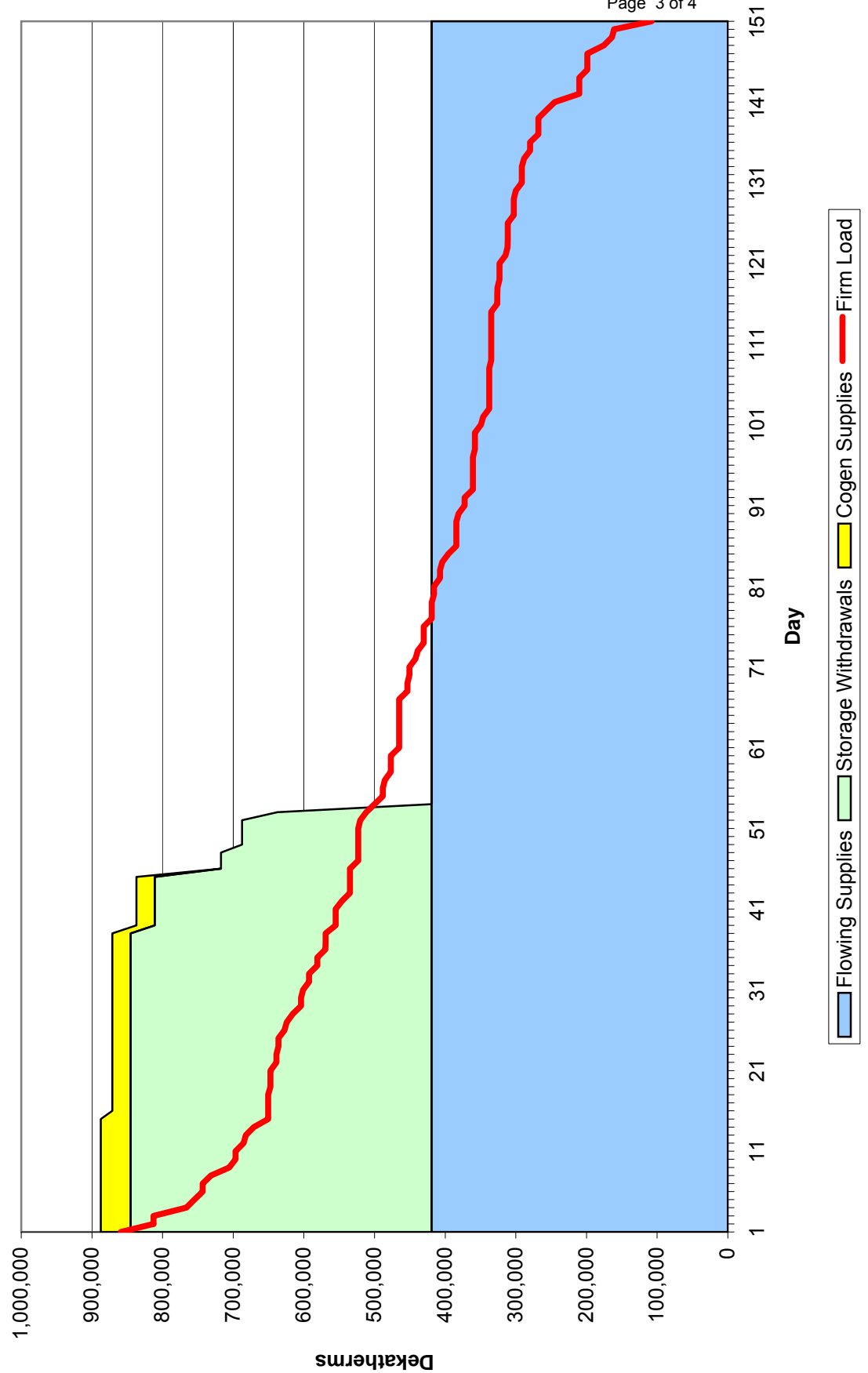
**NMPC Load Duration Curve 2011-12 (Test Year Winter)**



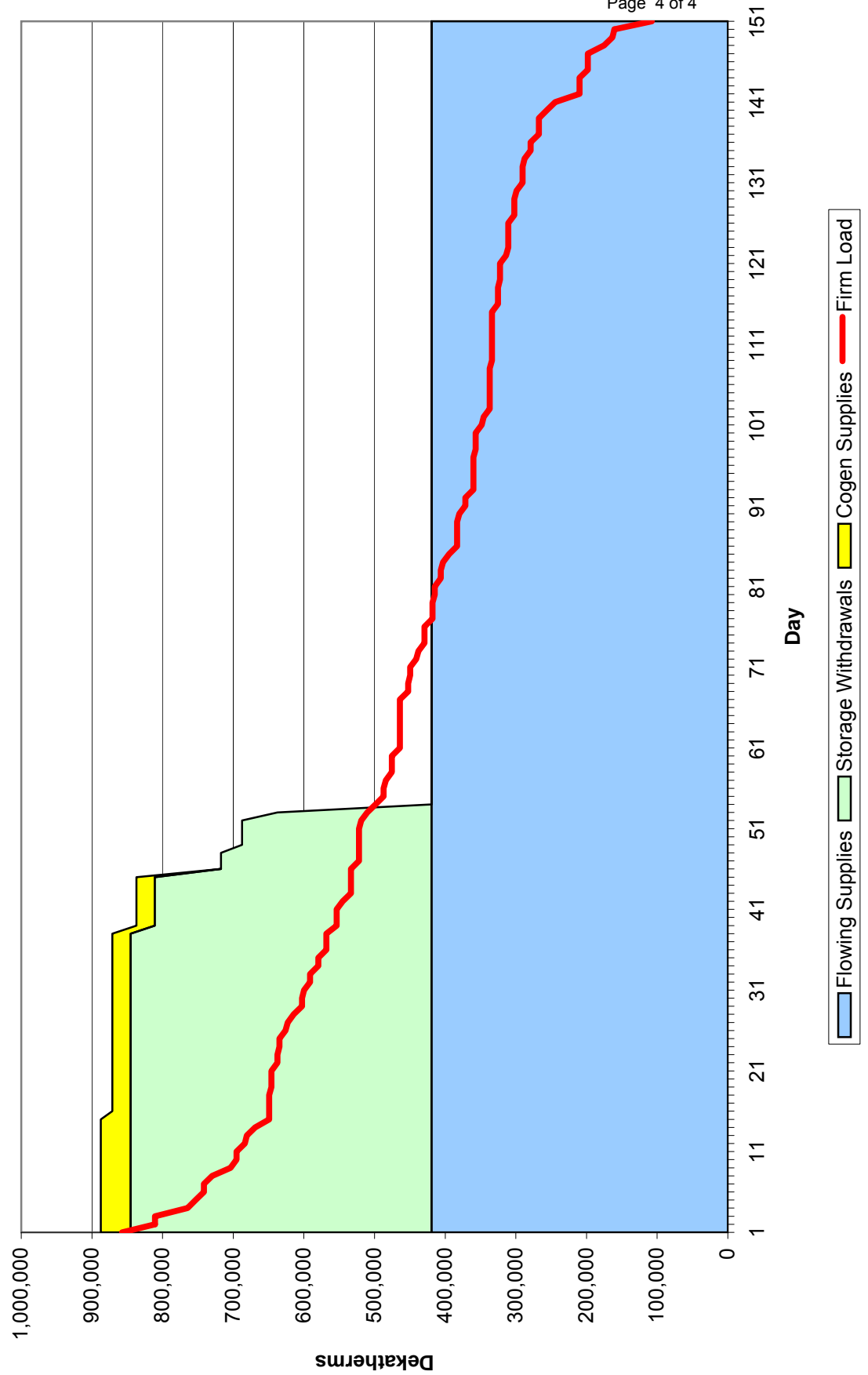
# NMPC Load Duration Curve 2013-14



# NMPC Load Duration Curve 2014-15



### NMPC Load Duration Curve 2015-16



# National Grid

## Incremental DTI Deliveries to the East Gate

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PSC Staff Presentation  
November 19, 2007

**nationalgrid**

# Agenda

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- ◆ **Purpose – Review with Staff, National Grid’s plan to increase delivery to the East Gate by 20 MDT per day**
  - ◆ Background
    - ◆ Albany and System Gas Demand
    - ◆ Albany and System Gas Supply
  - ◆ Opportunity
  - ◆ Contract and Rate Alternatives
  - ◆ Planned Next Steps



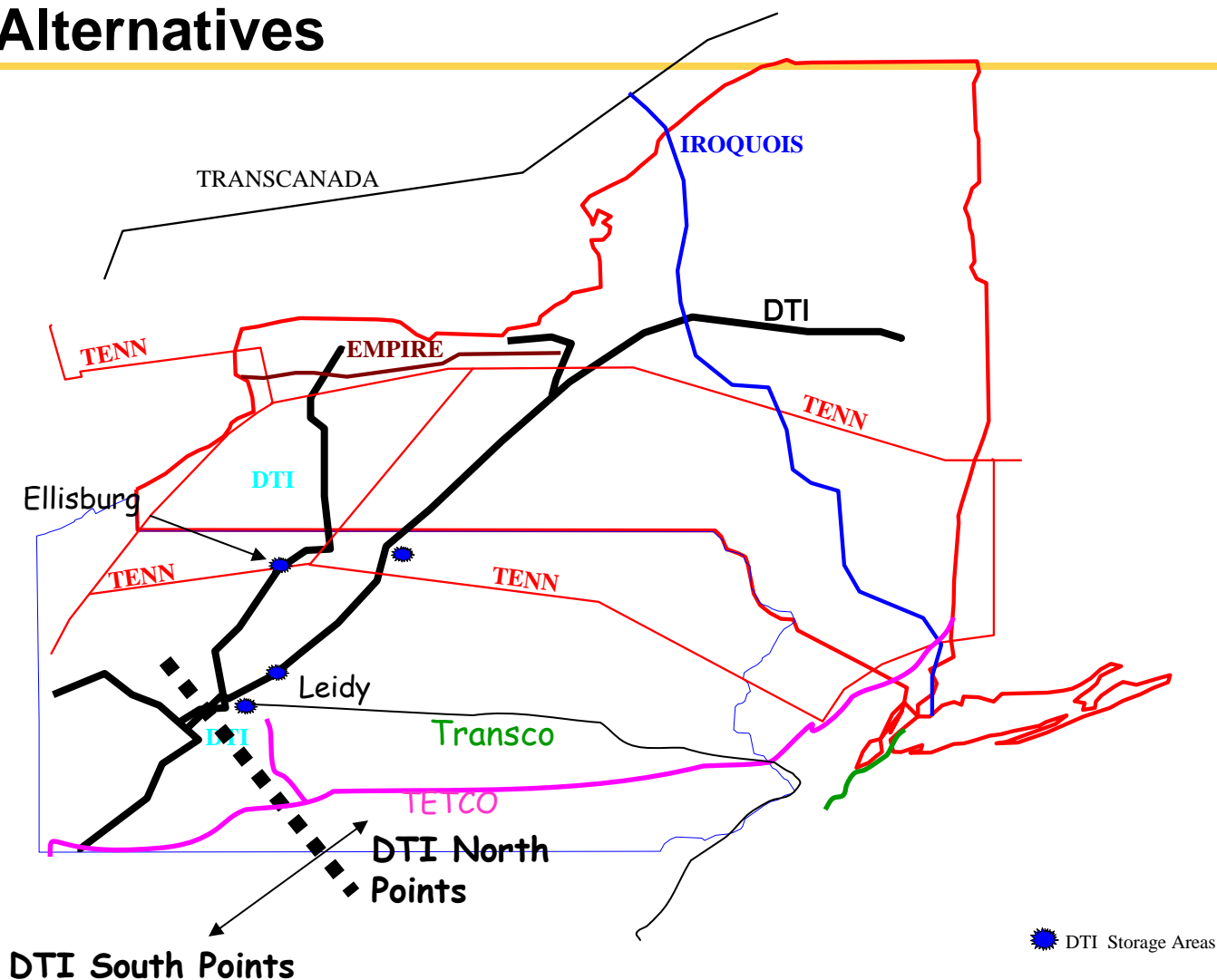
# Albany and System Gas Demand

- ♦ **Current Albany area demand close to supply capacity limits**
  - ♦ Design day forecast load (including IPP peak shaving capacity) is 98% of DTI's Maximum Daily Delivery Obligation (MDDO)
  - ♦ Forecast peak flowrate exceeds DTI's hourly OFO limit requiring peak shaving to comply
  - ♦ Secondary transportation to Albany frequently cut by DTI in the winter, often for long durations
- ♦ **Albany area demand forecast to grow**
  - ♦ Area has highest level of new customer additions
  - ♦ Anticipated additional future growth driven by computer chip manufacturing and nano-technology expansions in Albany area
  - ♦ Additional displacement of oil heating (high oil prices)
  - ♦ National Grid expects design day firm demand to grow 0.5% annually
  - ♦ Growth at Fort Drum limits the gas that can be delivered on Iroquois to Canajoharie for redelivery by DTI to Albany
- ♦ **System City Gate delivery capacity currently short by 12,000 Dt/d**
  - ♦ Requirement met by short term bundled supply or capacity releases
  - ♦ Currently met by capacity release expiring 3/31/2013

# Albany and System Gas Supply

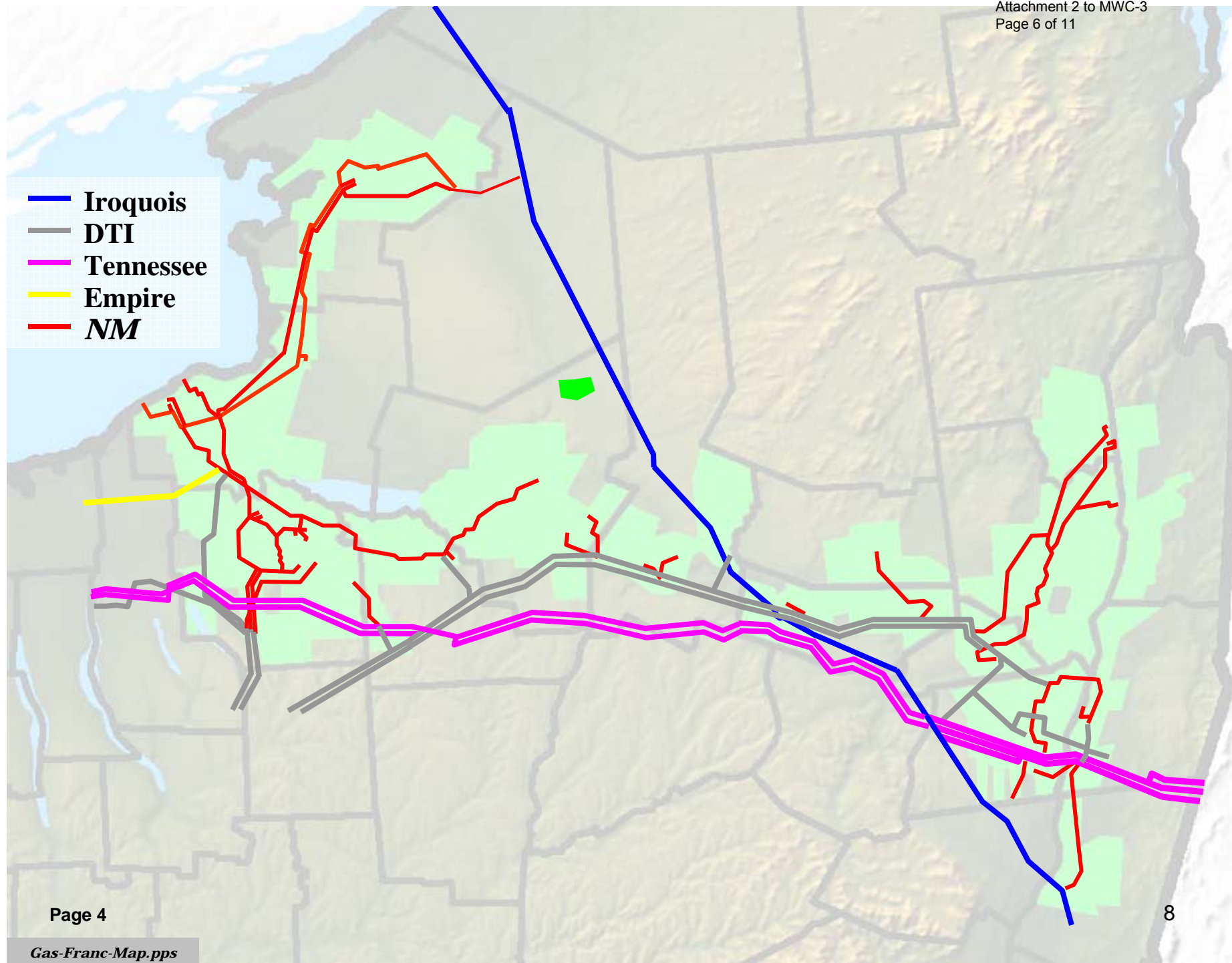
- ◆ **Albany has historically faced supply constraints**
  - ◆ At the “tail end” of the Dominion Transmission Inc. (DTI) system
  - ◆ Existing DTI MDDO at Albany requires deliveries from Iroquois to DTI at Canajoharie, NY
  - ◆ Tennessee capacity constrained east of Sta. 237 West Winfield (ConneXion project expansion relatively expensive >\$20.00/Dt capacity charge requiring capacity contracts to Gulf production area)
  - ◆ Backhauls on Tennessee rely on expensive New England supplies (Dracut, MA)
- ◆ **Niagara Mohawk has bid for additional capacity in several recent DTI open seasons**
  - ◆ Bids have been unsuccessful since additional capacity provides insufficient DTI system benefits to allow rolled-in rates
  - ◆ Historically, incremental rates have been high

# Supply Alternatives



Pipelines Serving NYS.PR4

**nationalgrid**



# DTI Compressor replacement provides unique opportunity

- ♦ **In an Open Season conducted in August of 2005 NM requested**
  - ♦ Maintain East Gate MDDO but eliminate NM delivery obligation to Canajoharie
  - ♦ Incremental 20,000 dt/day service to East Gates
- ♦ **DTI must replace Borger Station compressor to meet air quality standards**
  - ♦ Replace existing 5,800 hp unit with 6,300 hp Centaur 50 unit
  - ♦ Total Cost: \$14.1 million (based on engineering estimates)
  - ♦ No effect on Niagara Mohawk rates or contract quantities
- ♦ **Upgrade Opportunity**
  - ♦ Replace existing unit with 10,130 hp Solar Taurus 70 unit (derated to 9,000 hp)
  - ♦ Additional horsepower adds capacity sufficient to meet either of NM's August 2005 requests above, but not both
  - ♦ Total Cost: \$18.6 million
  - ♦ Incremental Cost: \$4.5 million
  - ♦ Scheduled completion: November 1, 2010
- ♦ **Rate Comparison**
  - ♦ Rates do not include surcharges

	System	Incremental
Demand (\$/Dt-mo.)	\$3.882	\$4.045
100% LF (\$/dt)	\$0.1276	\$0.133

# Contract and Rate Alternatives

## 1. Maintain East Gate MDDO without delivery of 20,000 DT/d to Canajoharie

- ♦ Include upgrade costs in existing FTNN contract
- ♦ Likely results in a negotiated rate
- ♦ Any capacity releases would be limited to the max. system recourse rate causing stranded costs
- ♦ 15 year term on entire FTNN contract to ensure cost recovery
- ♦ Negotiated rate would depend upon the billing determinants over which the costs were spread (e.g. 20,000 dt/d, 40,000 dt/d, the entire FTNN contract)
- ♦ Canajoharie receipt point moved to Leidy; Delivery Point - Schenectady

## 2. Incremental 20,000 Dt/d

- ♦ Separate 20,000 Dt/d FTNN contract
- ♦ incremental rate (approximately \$4.045/dt/month)
- ♦ 15 year term (DTI requirement to ensure cost recovery)
- ♦ Receipt point – Leidy; Delivery Point- Schenectady

# Planned Next Steps

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## Contract for Incremental 20,000 Dt/d

- ◆ Meets forecast Albany area growth
- ◆ Can be used to meet existing city gate delivery shortfall if Albany growth does not materialize
- ◆ Minimizes 15 yr commitment (20,000 Dt/d vs. 350,000 Dt/d)
- ◆ Canajoharie receipt point requirement has been satisfied with low demand charge peaking supply

## Next Steps

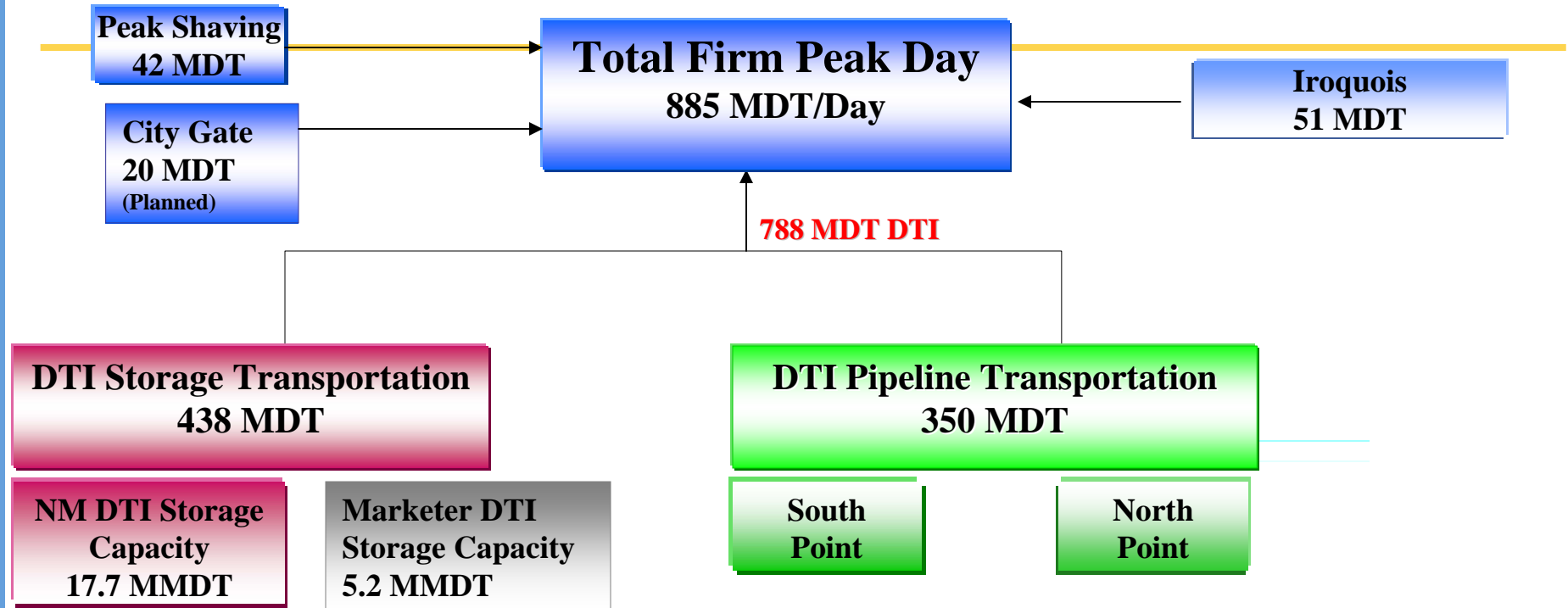
- ◆ Finalize costs
- ◆ Execute contract

# References

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# NM City Gate Storage & Pipeline Capacity



# National Grid Incremental DTI Deliveries to the East Gate

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Follow-up to November 19, 2007 PSC Staff  
Presentation

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# Incremental DTI Capacity to Albany Area

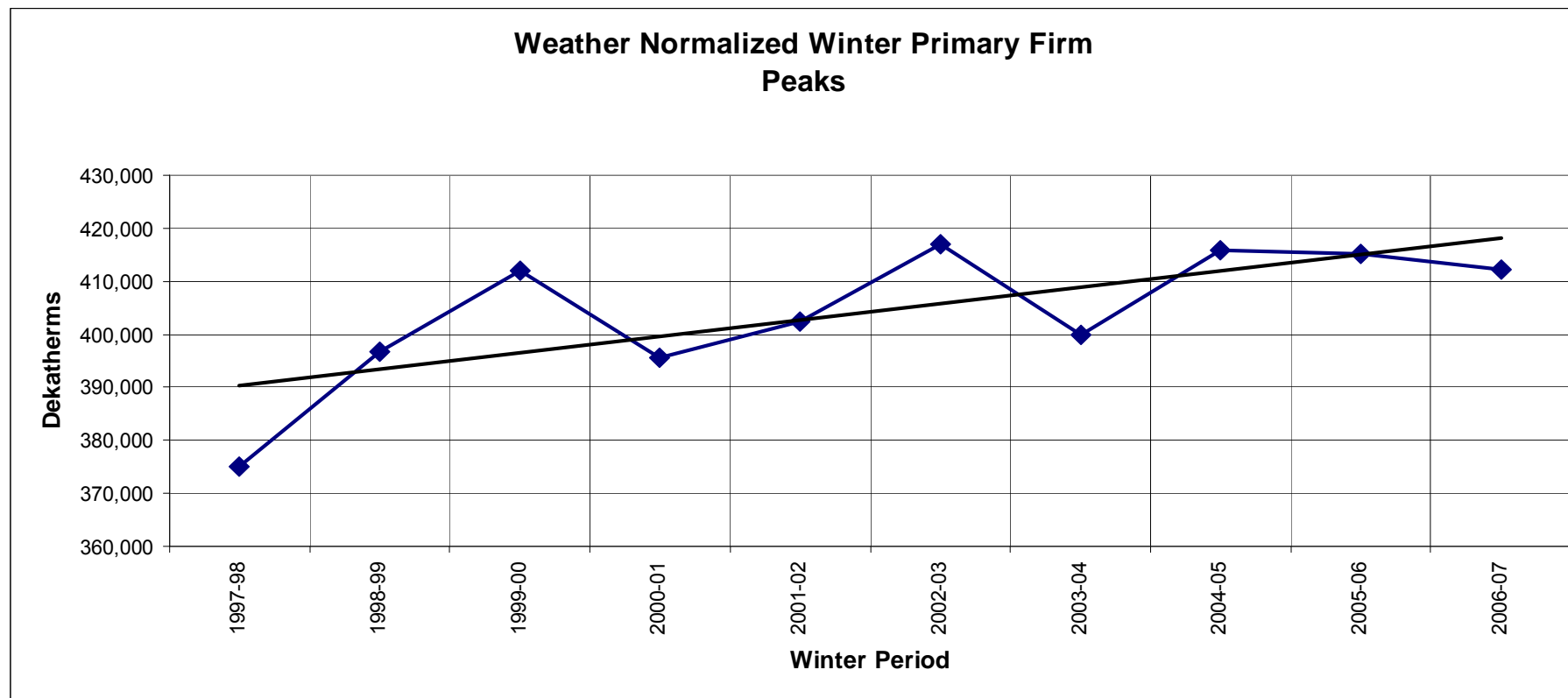
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- ◆ **Purpose – Respond to questions raised during November 19, 2007 presentation on National Grid’s plan to increase deliveries to the East Gate by 20 MDT per day**
  - ◆ Albany growth projections
  - ◆ Fort Drum growth impact
  - ◆ Limits to benefit derived from single compressor upgrade

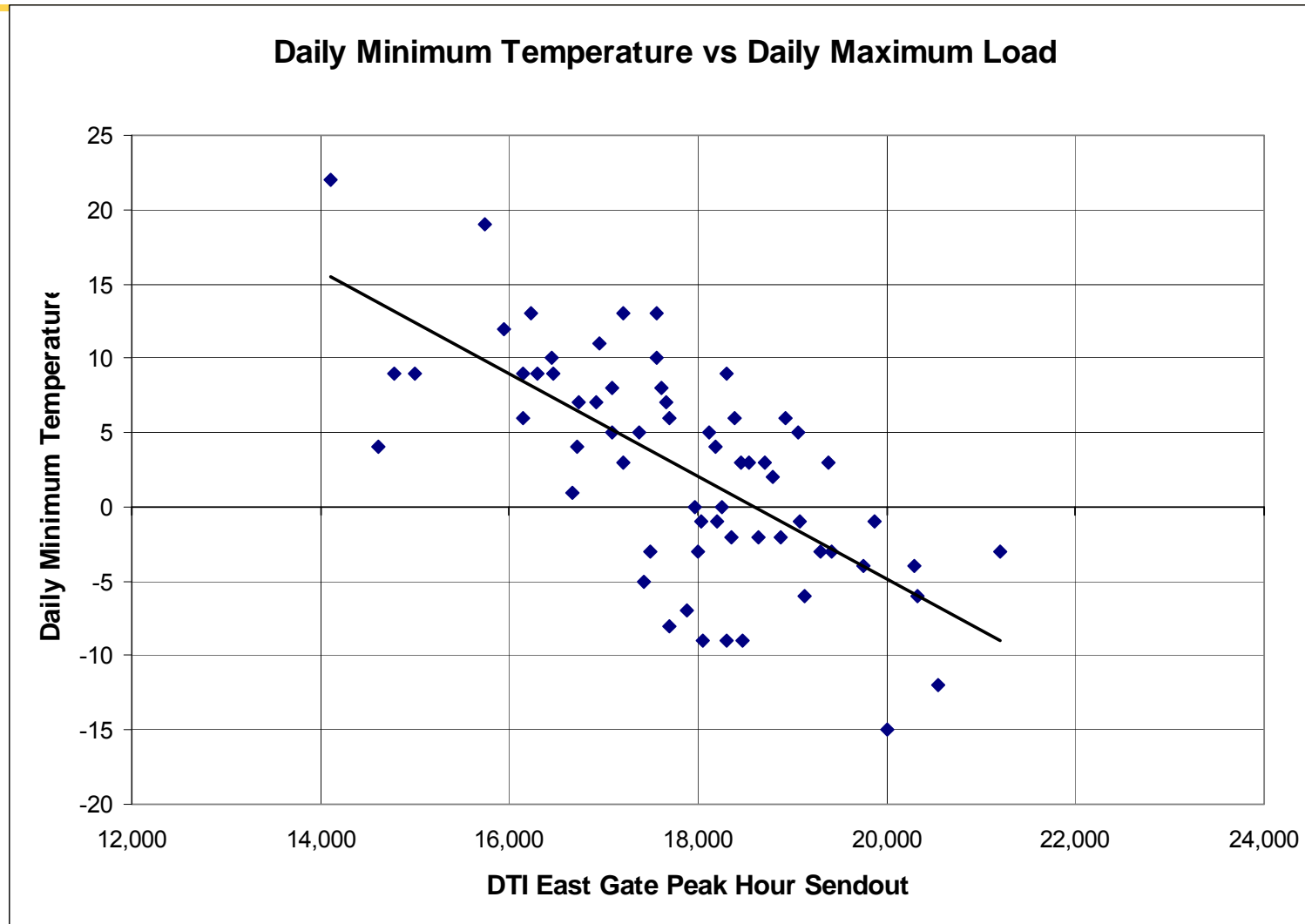
# Albany Gas Demand

- ◆ **Current Albany area demand close to supply capacity limits**
  - ◆ Design day forecast load (including IPP peak shaving capacity) is 98% of DTI's Maximum Daily Delivery Obligation (MDDO)
  - ◆ Forecast peak hour flow rate exceeds DTI's hourly OFO limit requiring peak shaving to comply
- ◆ **Albany area demand forecast to grow**
  - ◆ Albany area has household addition rate of 3-4,000 per year
    - ◆ approximately 1DT/d of design day load per household or 1% growth annually
  - ◆ Anticipated additional future firm load growth driven by computer chip manufacturing and nano-technology expansions in Albany area

# Albany Gas Demand



# Albany Gas Demand



# Fort Drum (Croghan) Gas Demand

- ♦ Currently, on non-critical winter days 20,000 DT/d of Iroquois supply has been routed past the primary delivery point at Croghan, NY to DTI at Canajoharie, NY.
  - ♦ DTI's maximum daily delivery obligation (MDDO) to NG in Albany is reduced by the difference between 20,000 and the actual deliveries at Canajoharie. (e.g. 15,000 Dt/d delivered at Canajoharie, MDDO reduced by 5,000 Dt/d)
- ♦ Load growth associated with the expansion of the Army's Fort Drum is beginning to limit the number of days and the quantity of gas that can be routed past Croghan to Canajoharie
- ♦ Gas Control has reported that "the Croghan Gate station has experienced lower gas pressures this winter and last winter than in past history. These lower pressures have raised concerns on our ability to maintain system reliability..."
- ♦ Gas Control has reported that the usage in the Watertown area was increased dramatically due to the Fort Drum expansion. Bringing additional gas supply when needed will help maintain system integrity on the pipeline system in the Watertown area.
- ♦ NG has a peaking supply contract to maintain deliveries up to 20,000 Dt/d at Canajoharie in the event more gas is delivered to Croghan, but the gas costs are high when called upon (Iroquois, Zone 2)

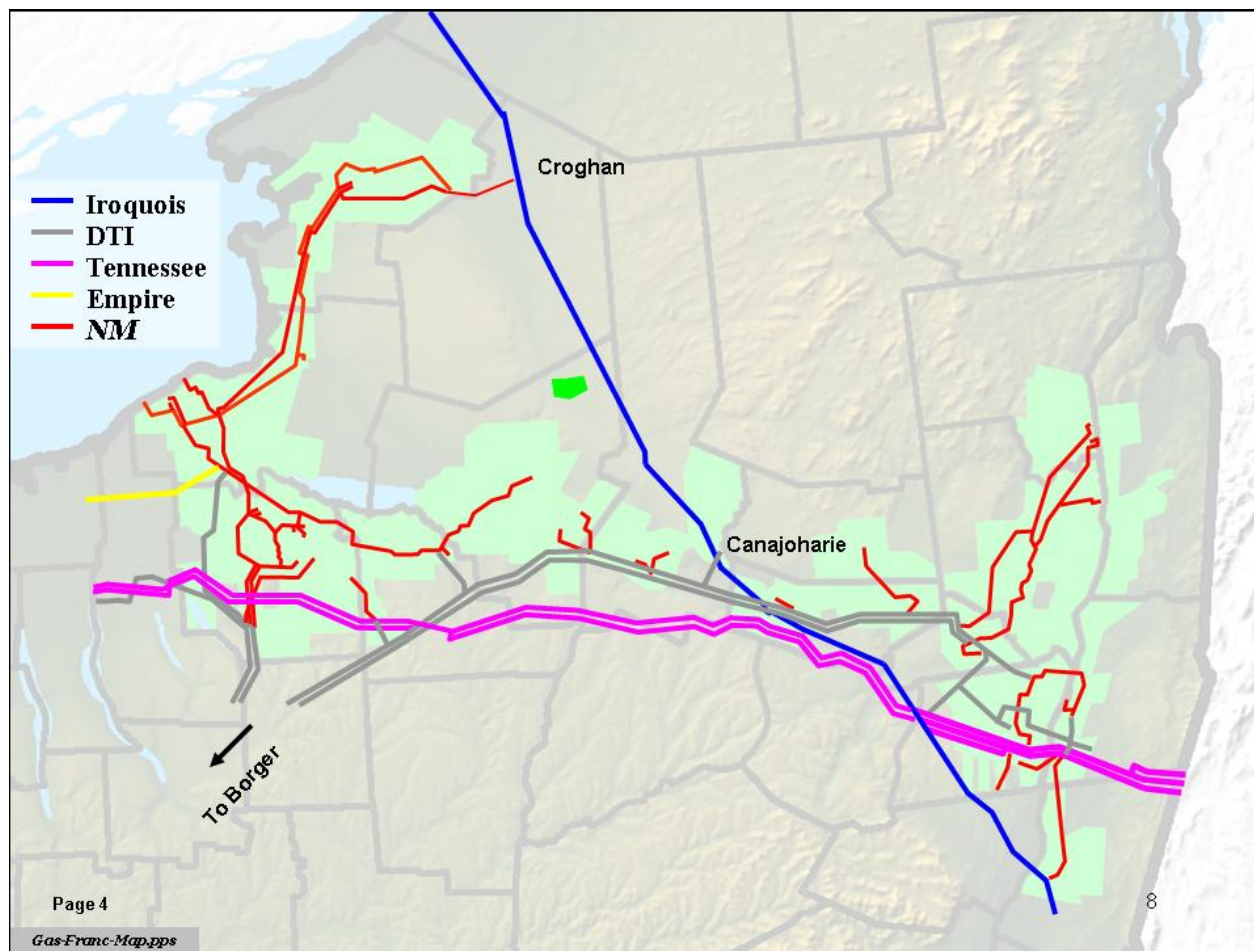
# Fort Drum Data

## Fort Drum Metered Usage



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# DTI Compressor replacement provides unique opportunity

- ♦ **In an Open Season conducted in August of 2005 NM requested**
  - ♦ Maintain East Gate MDDO but eliminate NM delivery obligation to Canajoharie
  - ♦ Incremental 20,000 dt/day service to East Gate
- ♦ **DTI must replace Borger Station compressor to meet air quality standards**
  - ♦ Replace existing 5,800 hp unit with 6,300 hp Centaur 50 unit
  - ♦ Total Cost: \$17 million (based on engineering estimates)
  - ♦ No effect on Niagara Mohawk rates or contract quantities
- ♦ **Upgrade Opportunity**
  - ♦ Replace existing unit with 9,000 hp unit instead of the planned 6,300 hp unit
  - ♦ Additional horsepower adds capacity sufficient to meet either of NM's August 2005 requests above, but not both
  - ♦ Total Cost: \$21.6 million
  - ♦ Incremental Cost: \$4.6 million
  - ♦ Scheduled completion: November 1, 2010
- ♦ **Rate Comparison**
  - ♦ Rates do not include surcharges

	System	Incremental
Demand (\$/Dt-mo.)	\$3.882	\$4.252
100% LF (\$/dt)	\$0.1276	\$0.1398

# Alternatives

## 1. Maintain East Gate MDDO without delivery of 20,000 DT/d to Canajoharie

- ◆ Current DTI contract MDDO predicated on NG North Point receipts from higher pressure Iroquois Pipeline at Canajoharie to increase pressure on DTI system
- ◆ Increased compression at Borger accomplishes required pressure increase allowing equal receipts at an alternative North Point (Leidy)
- ◆ Total receipt entitlements (and deliveries) remain the same as the current contract (see table)
- ◆ Would not increase total deliveries to Albany (MDDO remains the same)
- ◆ Would eliminate the need for the current Canajoharie peaking service demand charges and exposure to Iroquois Zone 2 gas prices when called upon

# Alternatives

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## 2. Incremental 20,000 Dt/d

- ◆ Maintain receipts at Canajoharie and the pressure increase they provide to support existing DTI MDDO
- ◆ Add new contract for incremental 20,000 Dt/d receipts (and deliveries)
- ◆ Increased compression at Borger allows delivery to Albany of incremental receipts
- ◆ Total receipt entitlements (and deliveries) increase by 20,000 Dt/d from current contract (see table)
- ◆ Albany MDDO increased by 20,000 Dt/d allowing growth
- ◆ If Albany growth zero or less than 20,000, remaining incremental capacity would replace current city gate capacity purchase or a portion of the Canajoharie peaking supply

# Receipt Point Table

Receipt Point Name	Current Entitlement	Eliminate Canajoharie Obligation	Incremental Albany Deliveries
***** South Point Total ***	<b>286,726</b>	<b>286,726</b>	<b>286,726</b>
Cornwell	49,316	49,316	49,316
Gilmore	19,727	19,727	19,727
Lebanon	51,004	51,004	51,004
OakFord	125,679	125,679	125,679
Petersburg	41,000	41,000	41,000
South Point	0	0	0
***** North Point Total ***	<b>63,396</b>	<b>63,396</b>	<b>63,396</b>
Canajoharie	20,000	0	20,000
Ellisburg	20,680	20,680	20,680
Leidy	12,716	32,716	32,716
Yawger Road	10,000	10,000	10,000
North Point	0	0	0
	<b>350,122</b>	<b>350,122</b>	<b>370,122</b>

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# Plans

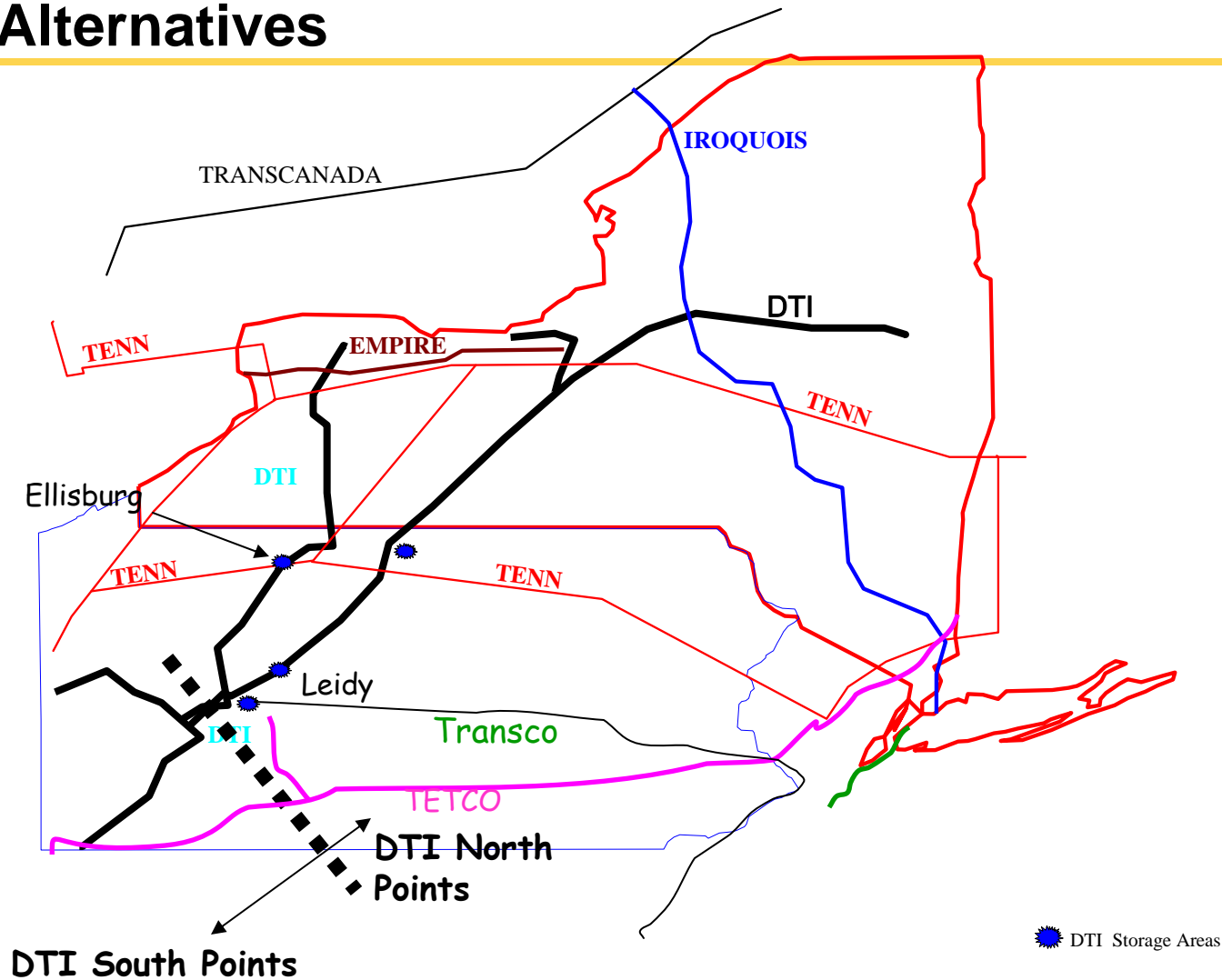
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- ◆ **Enter binding precedent agreement with DTI for incremental deliveries at Niagara Mohawk's East Gate**
  - ◆ 20,000 Dt/d
  - ◆ Year-round service
  - ◆ 15 year term

# References

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# Supply Alternatives

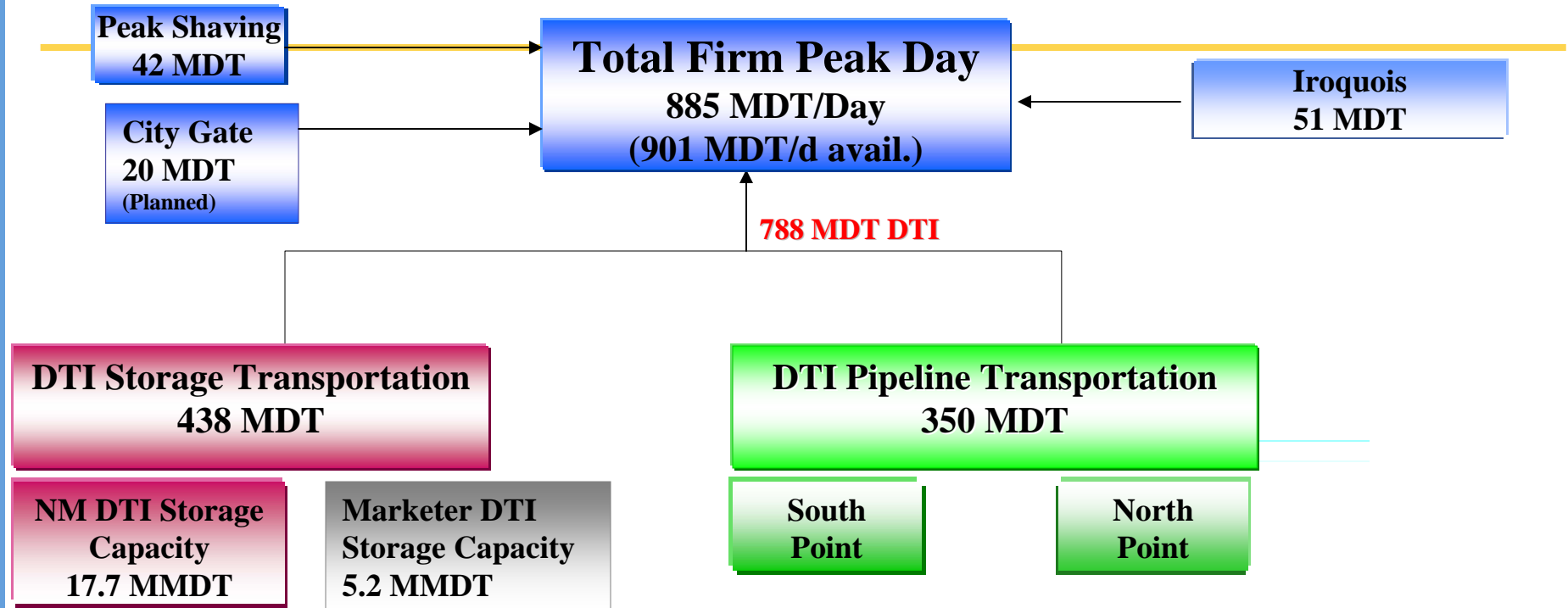


Pipelines Serving NYS.PR4

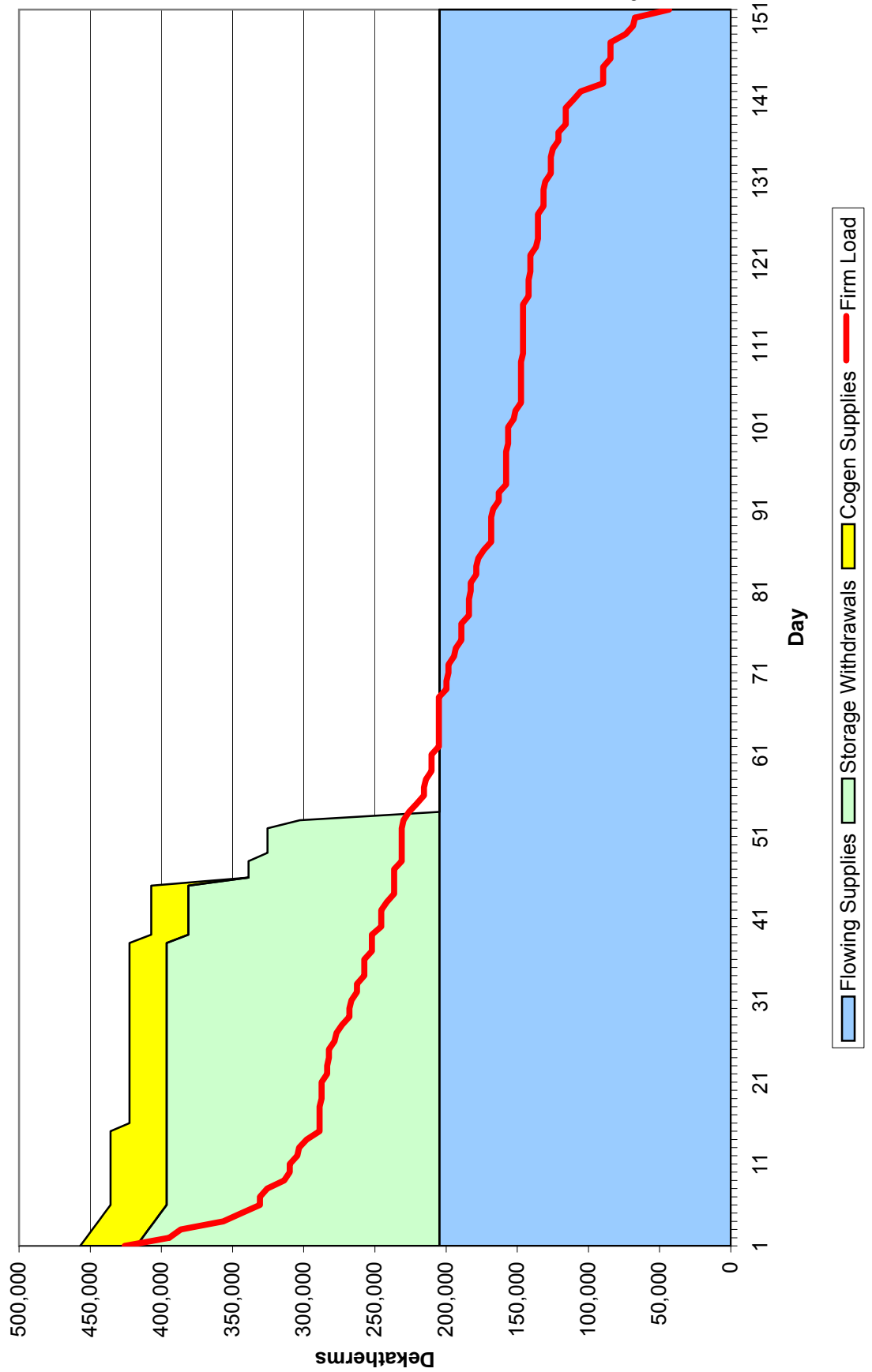
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# NM City Gate Storage & Pipeline Capacity



**NMPC East Load Duration Curve 2011-12 (Test Year Winter)**



NMPC West Load Duration Curve 2011-12 (Test Year Winter)

