

Date of Request: February 4, 2010

Request No. AAE-3

Due Date: March 15, 2010

NMPC Req. No. NM 3 DPS-3

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Allison Esposito

TO: Revenue Requirements Panel

Request:

1. Please provide, in Excel, a list of all work orders over \$10,000 entered into the system from 1/1/03 – 12/31/09 that had periods of inactivity of over 6 months. For each work order please provide the following information:

- a. Work order number
- b. A description of the work order
- c. The date the work order was created
- d. The date the work order was operationally placed in service
- e. The date the inactivity began
- f. The date the inactivity ended
- g. The total amount closed to Plant in Service
- h. The applicable depreciation rate
- i. The amount of AFUDC, if any, which accrued during inactivity and closed to plant in service

2. Based on this information, please provide an analysis showing the amount of depreciation related to inactive work orders which should have been expensed from 1/1/03 – 12/31/09. Please provide all supporting workpapers and calculations. To the extent that the Company is unable to quantify a precise amount, please provide the best estimate, along with all supporting workpapers, calculations and assumptions used.

Please note, if this Information Request is too voluminous or time consuming, please call Allison Esposito to work out something regarding the data that is acceptable to both the Company and Staff.

Response:

1. Please see Attachment 1, DPS-3 -AAE-3 ("the Attachment"). As per our discussion with Allison Esposito on 2/9/2010, the Company agreed to provide data for work orders over \$10,000 that were initiated during the five calendar years 2005 – 2009, which should be representative of prior periods. It was further agreed to that the Company would provide one report as of 12/31/09, with data for all work orders initiated during those five years. As to the specific

information being requested, the Company is providing items A – D as requested above. For purposes of estimating the periods of any potential inactivity that may have occurred after the in-service date (items E and F), the Company is providing the date the work order was last charged and the first Continuing Property Record (CPR) month, which represents when the work order was first closed to Completed Construction Not Classified (CCNC) - FERC account 106. For the purposes of item G, the Company is providing the dollars included in either CCNC - FERC account 106 or Plant In Service (PIS) - FERC account 101, which are separately identified on the attachment. Consistent with the Company's filing, the Company is providing the appropriate depreciation composite rate based on the work order type for item H. For purposes of AFUDC - item I, the Company is only able to provide the total AFUDC associated with each work order as opposed to the AFUDC accrued during any specific period of inactivity. However, any accrual of AFUDC beyond the in-service date is automatically trued-up in the fixed asset system as of the in-service date.

2. The Company's position is that the depreciation expense booked during the period in question is accurate based on the first CPR month date. The Company considers that its calculation of depreciation expense is appropriate given the company's procedure of following broad group depreciation. This procedure is often followed by Electric utilities due to the significant volume of assets processed. Service lives tend to be more predictable as a group, rather than an expectation attached to a particular unit and statistical ratios are used as a result. Depreciation studies calculate an average prospective life for the assets, and this was updated and submitted in the depreciation study recently prepared by Ron White. Included in the study is a comparison of the book reserve and a calculated reserve based on the results of the study (Exhibit REW-2, page 13). The comparison of electric and common depreciation reserve results in a reserve excess of approximately 2% of the book reserve. Therefore, the Company believes that the book depreciation reserve is accurately stated.

During the course of the construction work order lifecycle there are compelling business reasons why periods of apparent inactivity occur. In order to facilitate effective work management practices and to provide for a ready supply of schedulable work orders, the Company initiates work orders in advance of their schedule for release to field operations. This is referred to as the "Get Ahead Program." Also during the work order lifecycle, there may be work orders that are waiting on materials, work orders that are waiting for developer, delays in pursuing and procuring easements, delays in inspections or DOT and/or customers completing their work. Work may also be on hold waiting for a required outage, pending changes in regulations, pending a payment dispute, or due to coordination of work with an electricity generator.

At the end of its life cycle, a significant amount of information is required to complete the transfer from Construction Work in Progress (CWIP) to CCNC. The information required includes, among other things, the in-service date as advised

by the Project Engineer, Project Manager or other Responsible Party for the work order (either manually provided or sent automatically through the Work Management System (WMS) based on work order requirements being completed) and a preliminary estimate of the assets constructed that is used until all late/lagging charges have been received (refer comment below) and as built drawings are finalized. Typically, for smaller work orders this information is provided in the same month the work is in service or automatically through WMS system interfaces, which facilitates an accelerated closing process. However, there are typically timing lags for closing larger work orders because of the work involved in developing preliminary estimates of the data required to close the order. Additionally, it is normal business practice to incur trailing charges on work orders subsequent to the in-service date that may relate to completing minor components of the job and for invoice processing. The Company has implemented new Fixed Asset and WMS systems in recent years that have improved the closing process and is making on-going efforts to close work orders in a timely fashion. The majority of work orders are closed in a timely manner (considered within a few months of the in-service date).

While the Company considers that its calculation of depreciation expense is appropriate given the nature and scale of this activity it has nevertheless made a high level calculation of depreciation for the period between the in-service date of a work order and either the first CPR month of work orders closed to CCNC/PIS or up to the 12/31/2009 date of the report for work orders in CWIP. The Company used the in-service date as the starting point for this calculation. However, given the nature and scale of this activity and the time that is typically required to complete the activities needed to complete the transfer to CCNC (of particularly the larger projects) no calculation has been made in respect of work orders where this transfer occurred within six months of the in-service date. Additionally due to the voluminous amount of data, the Company applied a high-level approach to develop the depreciation calculation by using total dollars with no consideration to the timing of the charges. Although this approach facilitates a high-level calculation, it is flawed because trailing charges incurred subsequent to the in-service date are being including in the total dollars in the calculation as if they had been incurred prior to the in-service date. Please see column N of the Attachment for the depreciation estimate requested.

Name of Respondent:  
Lisa Figliozzi

Date of Reply:  
March 15, 2010

Date of Request: February 5, 2010  
Due Date: February 15, 2010

Request No. DPS-13(RAV-9)  
NMPC Req. No. NM 13

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO:

Request:

- A. Please provide a copy of all monthly, quarterly, semi-annual and annual reports provided to top National Grid - US management on the status of achieving the KeySpan merger savings from January 1, 2008 to present. This should include, but is not limited to, copies of all quarterly reports provided to CEO Holiday on actually achieved versus internal management targeted KeySpan related synergy and efficiency savings.
- B. Same as A. for all reports provided to National Grid – UK management.
- C. Continue providing monthly updates of the information requested in A. and B. above until further notice.

Response:

- A. Reporting of integration savings (synergy savings plus efficiency savings) following the Keyspan acquisition takes place on a quarterly basis. Reports are provided to the Group Executive via US Shared Services Finance.

All Executive Summary reports which have been produced are attached. They are as follows and include the savings resulting from targeted synergy and efficiency savings;

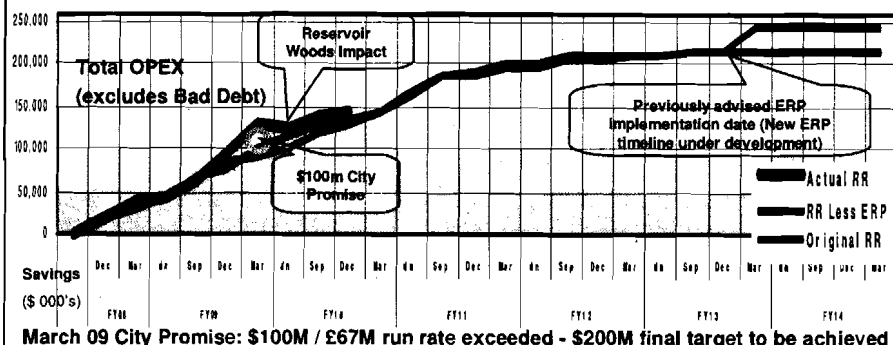
- Synergy Savings Tracking to 31<sup>st</sup> December 2009. (1 Sheet)
- Synergy Savings Tracking to 30<sup>th</sup> September 2009. (1 Sheet)
- Synergy Savings Tracking to 30<sup>th</sup> June 2009. (1 Sheet)
- Synergy Savings Tracking to 31<sup>st</sup> March 2009. (1 Sheet)
- Synergy Savings Tracking to 31<sup>st</sup> December 2008. (2 Sheets)
- Synergy Savings Tracking to 30<sup>th</sup> September 2008. (2 Sheets)
- Synergy Savings Tracking to 30<sup>th</sup> June 2008. (2 Sheets)
- Synergy Savings Tracking to 31<sup>st</sup> March 2008. (2 Sheets)
- Synergy Savings Tracking to 31<sup>st</sup> December 2007. (1 Sheet)



# Synergy Savings Tracking to 31<sup>st</sup> December 2009:

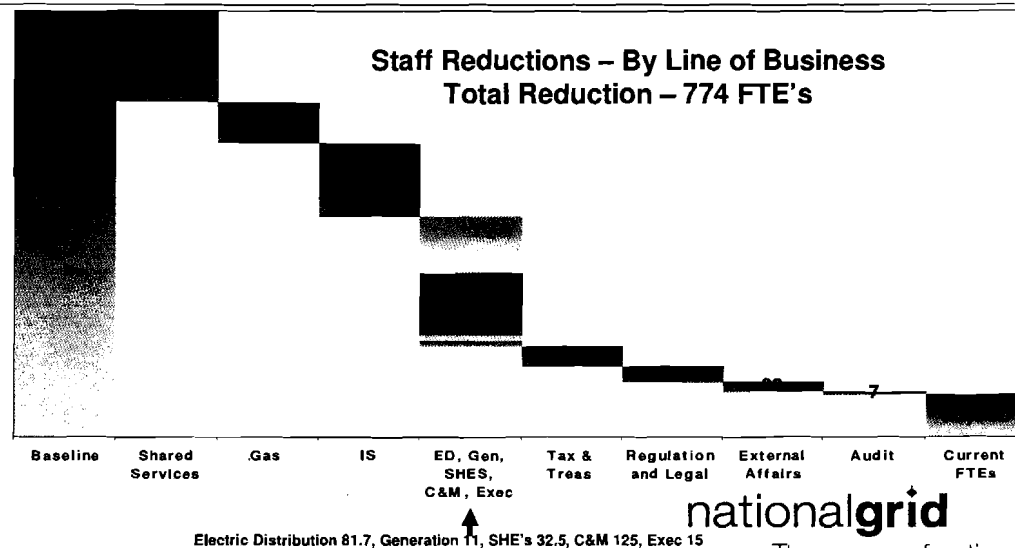
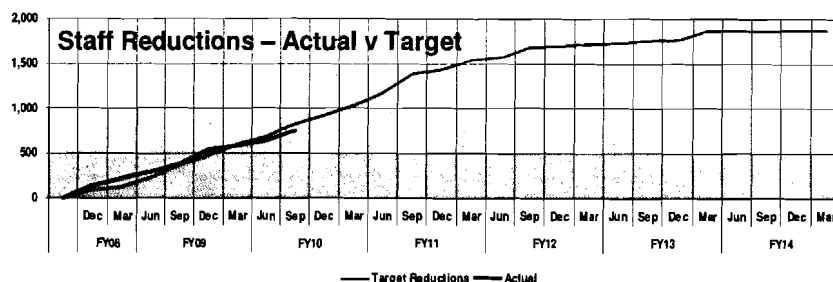
Run Rate exceeds target but is slowing and projected to be just ahead of year end target.

OPEX Reductions \$ in Millions	Q3 FY10			RR Dec 09			F'Cast RR Mar 10			Day N
	Act	Target	Var	Act	Target	Var	F'cast	Target	Var	Target
OPEX	106.0	93.5	12.4	150.3	133.4	16.9	156.7	144.1	12.6	226.6
Total Property	(2.6)	2.6	(5.3)	(4.6)	4.0	(8.6)	(4.6)	4.1	(8.7)	17.3
Total OPEX	103.3	96.2	7.2	145.7	137.4	8.3	152.1	148.2	3.9	246.9
Bad Debt & Weather Hedge	35.6	16.9	18.7	47.8	22.5	25.3	47.8	24.0	23.8	40.7
Grand Total	138.9	113.1	25.8	193.5	160.0	33.6	199.8	172.2	27.6	287.6



- December 09 run rate is ahead of the savings target by around \$8 million.
- Reservoir Woods costs, a negative synergy of \$11.5 million was recognized on 1<sup>st</sup> May 2009. Weak real estate demand is restricting offset of this cost, by reducing the property footprint.
- Transformation projects and the reorganization of lines of business are creating challenges in relating savings back to the original Mercer Initiatives.
- Many of the obvious savings initiatives have been achieved. However key integration projects such as Call Centre rationalization, reduction of the Property Footprint, Systems Integration and Gas AMR have either been delayed or cancelled leading to a slowing down of the increase in the level of savings.
- The main contributors to savings over the quarter were EDO, through the transformation project, and Customer and Markets. Workforce Management within Customer and Markets regarding call centre scheduling and better utilization of resources to meet customer requirements generated significant savings over the quarter.
- SHE's, Corporate Affairs, Generation & Group Audit have all completed their integration initiatives.

- 774 employee positions eliminated as of 31<sup>st</sup> December 2009; falling below target (FY10 Q3 target is 990). (Figures exclude contractors.)
- The cancelled Gas AMR and lack of a single customer system has caused the FTE savings gap to widen over the quarter and is projected to continue to do so by year end.

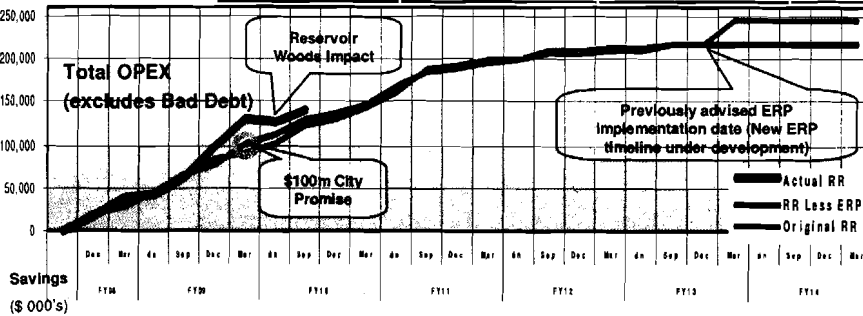


Electric Distribution 81.7, Generation 11, SHE's 32.5, C&M 125, Exec 15

# Synergy Savings Tracking to 30<sup>th</sup> September 2009:

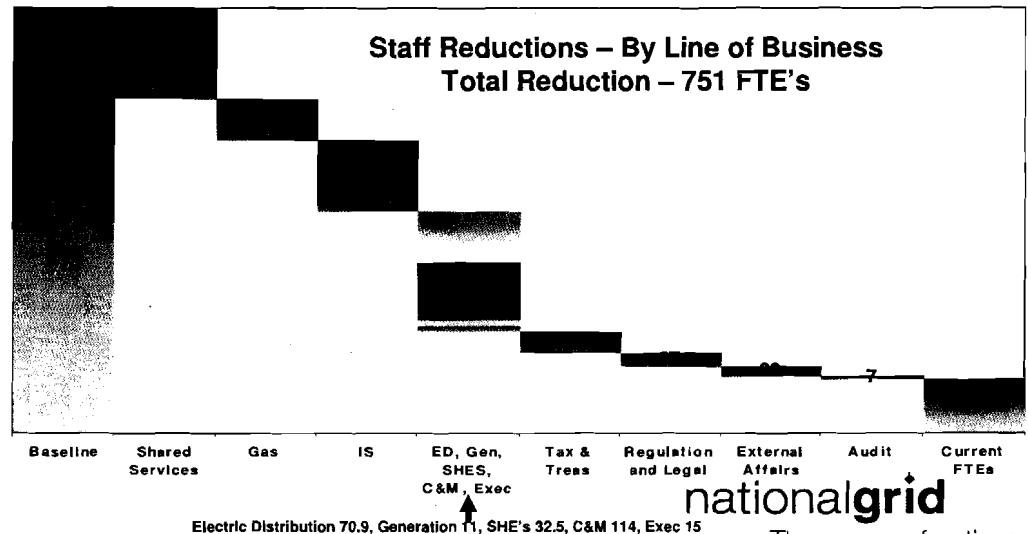
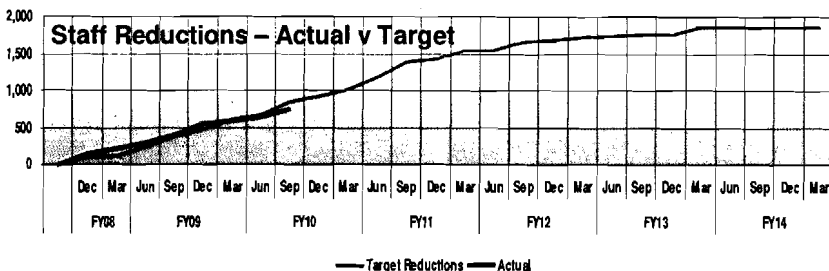
Run Rate exceeds target but is slowing and projected to be just ahead of year end target.

OPEX Reductions \$ in Millions	Q2 FY10			RR Sep 09			F'Cast RR Mar 10			Day N
	Act	Target	Var	Act	Target	Var	F'cast	Target	Var	Target
OPEX	66.6	60.2	6.4	145.4	128.9	16.5	159.1	146.7	12.4	229.6
Total Property	(1.5)	1.6	(3.2)	(4.8)	3.4	(8.2)	(4.8)	4.1	(9.0)	17.3
Total OPEX	65.0	61.8	3.2	140.5	132.3	8.3	154.2	150.8	3.4	246.9
Bad Debt & Weather Hedge	20.3	9.7	10.7	28.2	21.5	6.7	38.6	25.8	12.8	40.7
Grand Total	85.4	71.4	13.9	168.7	153.8	15.0	192.8	176.6	16.2	287.6



Original City Promise: \$100M / £67M run rate exceeded - \$200M final target to be achieved

- 751 employee positions eliminated as of 30th September 2009; falling below target (FY10 Q2 target is 830). (Figures exclude contractors.)
- The cancelled Gas AMR and lack of a single customer system has caused the FTE savings gap to widen over the quarter and is projected to continue to do so by year end.



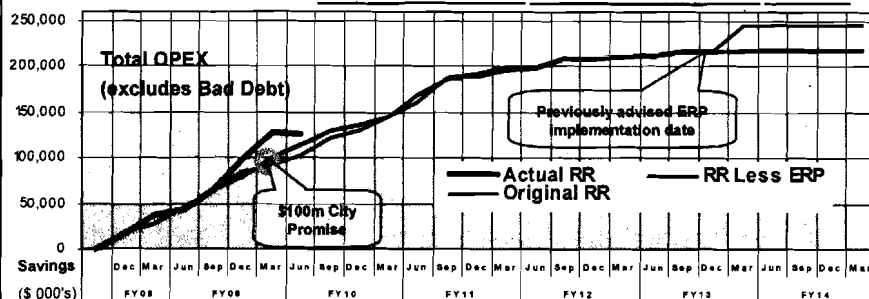
# Synergy Savings Tracking to 30<sup>th</sup> June 2009:

Run Rate target exceeded but down on prior quarter / FTE's slightly below target

OPEX Reductions  
\$ in Millions

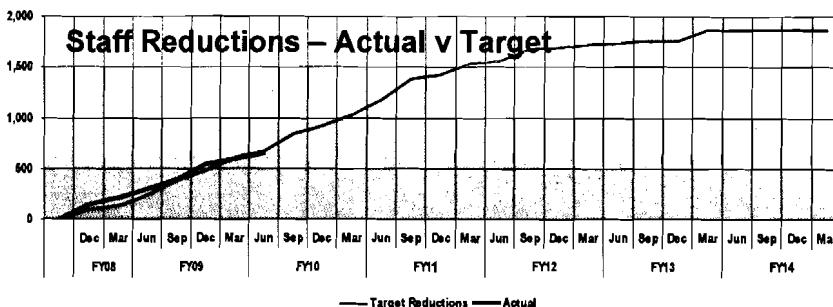
	Q1 FY10			RR Jun 09			Day N
	Act	Target	Var	Act	Target	Var	Target
OPEX	37.3	28.0	9.3	131.2	112.2	19.0	229.6
Total Property	(0.3)	0.8	(1.1)	(5.2)	3.1	(8.2)	17.3
Total OPEX	36.9	28.7	8.2	126.0	115.3	10.7	246.9
Bad Debt & Weather Hedge	6.4	4.0	2.4	27.6	16.2	11.4	40.7
Grand Total	43.4	32.8	10.6	153.6	131.5	22.2	287.6

- June 09 run rate is ahead of the savings target by around \$11 million.
- Reservoir Woods costs, a negative synergy of \$11.5 million was recognized on 1<sup>st</sup> May 2009. Weak demand for commercial property is impacting the ability to offset this cost by reducing the property footprint.
- The ERP decision is awaited, around \$30m of synergy benefits are affected by this project. In addition organizational changes and strategic decision making are creating challenges to achieve targeted savings.
- Agent Desktop is expected to enable customer and market synergies which were previously affected by ERP implementation. This should provide a fresh impetus and benefits to begin towards the end of Q3 FY10.
- SHE's, Corporate Affairs, Generation and Group Audit have completed their integration initiatives.

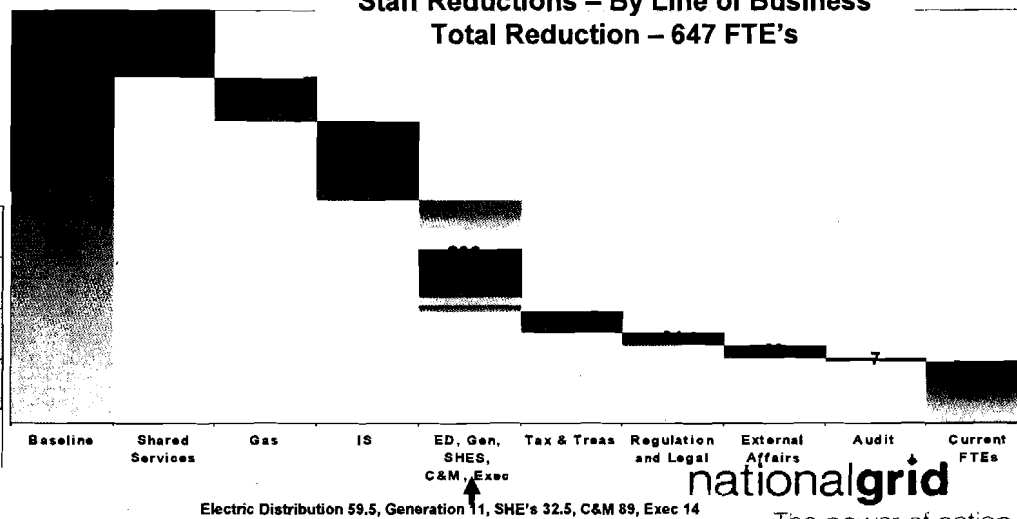


Original City Promise: \$100M / £67M run rate exceeded - \$200M final target to be achieved

- 647 employee positions eliminated as of 30<sup>th</sup> June 2009; Slightly below target. (Figures exclude contractors.)
- Shared Services, Electric Distribution and IS are driving the FTE reductions. The cancelled Gas AMR project will though lead to a widening of the shortfall in outer periods.



## Staff Reductions – By Line of Business Total Reduction – 647 FTE's



Electric Distribution 59.5, Generation 11, SHE's 32.5, C&M 89, Exec 14

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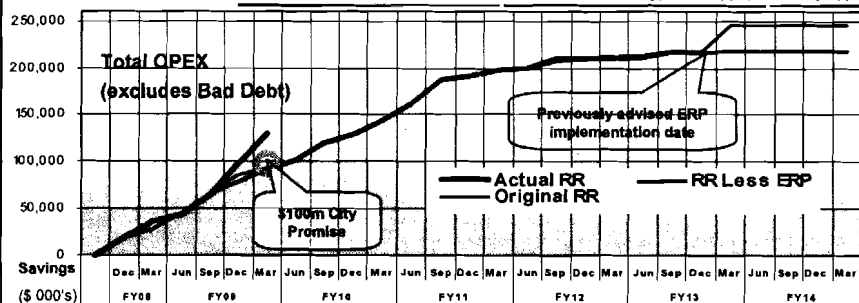
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# Synergy Savings Tracking to 31<sup>st</sup> March 2009:

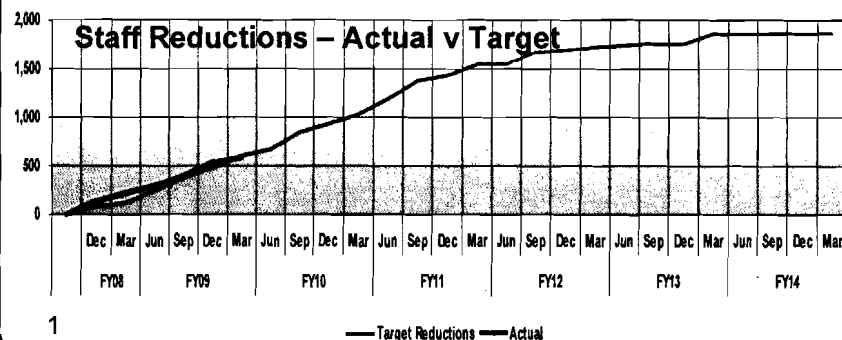
March run rate exceeded year 1 City promise / FTE's essentially on target

OPEX Reductions \$ in Millions	Actual Savings FY09			Run Rate March 09			Day N
	Act	Target	Var	Act	Target	Var	Target
OPEX	71.6	73.4	(1.8)	124.5	97.9	26.7	230.1
Total Property	4.7	2.6	2.1	6.1	3.0	3.1	16.8
Total OPEX	76.2	76.0	0.3	130.7	100.9	29.8	246.9
Bad Debts	15.4	8.0	7.4	26.2	12.3	13.9	40.7
Grand Total	91.6	84.0	7.6	156.9	113.2	43.6	287.6

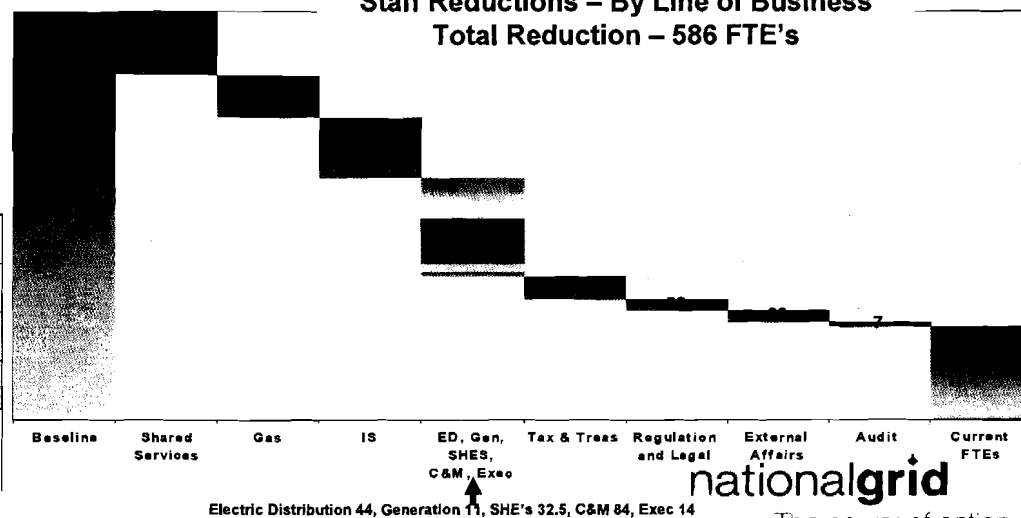
- March 09 run rate is well ahead of the \$100m City promise at \$130 million.
- Significant additional initiatives in Benefits, Property and Executive and locational labor rate differentials in Customer and Markets are driving the favorability.
- A decision regarding the consolidation of the US ERP platforms is expected in June 09. Around \$30m of synergy benefits are affected by this project.
- The cost of outside professional services have restricted synergies within Legal and Regulation. External professionals have compensated for a reduction of staff in Legal and increased work within Regulation.
- Recognition of Reservoir Woods costs (a negative synergy) will be recognized on the expected lease commencement date in June 2009.



- 586 employee positions eliminated as of 31st March 2009; Essentially on target. (Figures exclude contractors.)
- Shared Services, Electric Distribution and IS are driving the FTE reductions. The Gas AMR project and revision of initiatives in Customer and Markets have led to some re-phasing.



## Staff Reductions – By Line of Business Total Reduction – 586 FTE's

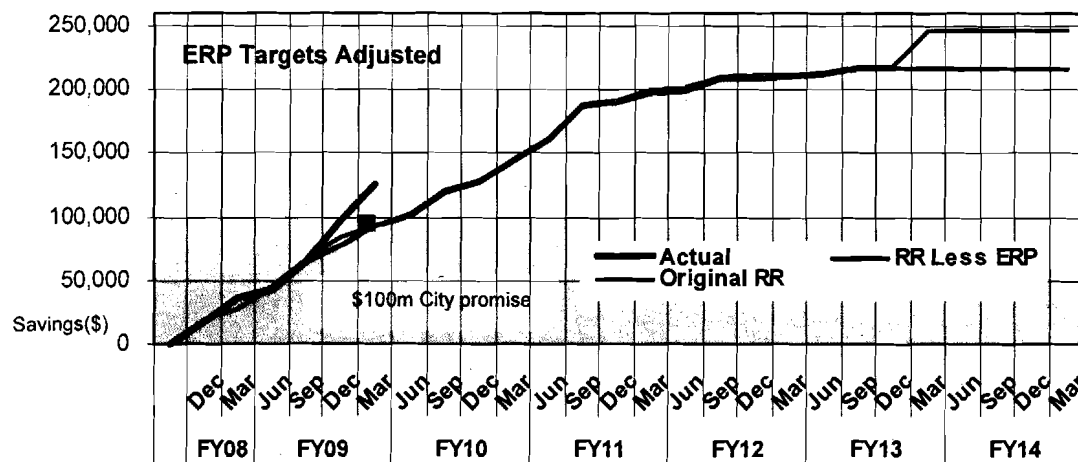


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# Synergy Savings Tracking to 31<sup>st</sup> December 2008: March run rate likely to exceed Year 1 City forecast

OPEX Reductions \$ in Millions	Fiscal Year Basis			Run Rate Basis			Run Rate Basis			Day N
	08/09 Q1, Q2 & Q3			As at Dec 08			As at Mar 09			Target
	Act	Target	Var	Act	Target	Var	F'cast	Target	Var	
Shared Services (less Property)	8.7	2.9	5.7	24.4	5.1	19.3	28.7	5.3	23.4	35.1
Gas Distribution	5.8	10.8	(5.0)	12.5	18.6	(6.1)	16.6	23.2	(6.6)	47.9
Information Services	4.0	4.7	(0.7)	6.6	8.9	(2.3)	9.3	9.2	0.1	41.0
Customers and Markets	7.3	6.6	0.7	10.1	11.0	(0.9)	15.6	12.0	3.6	37.8
Electric Distribution	1.6	4.3	(2.6)	5.7	5.5	0.3	11.6	5.7	5.9	20.1
Tax, Treas. & Decision Support	5.0	3.5	1.5	8.0	6.1	1.9	8.2	7.0	1.2	15.4
Regulation and Legal	4.5	4.3	0.2	6.0	7.6	(1.7)	6.6	8.6	(2.0)	12.0
Executive	4.9	5.5	(0.5)	6.6	7.8	(1.3)	11.1	7.8	3.3	7.8
SHES	2.7	1.1	1.6	4.0	3.9	0.1	4.5	4.0	0.5	5.0
External Affairs	3.6	3.3	0.3	4.8	4.7	0.2	4.8	4.7	0.2	4.8
Generation	1.0	0.9	0.1	1.7	1.3	0.4	1.7	1.3	0.4	1.7
Group Audit	1.1	0.7	0.4	1.4	0.9	0.5	1.4	0.9	0.5	1.2
<b>OPEX</b>	<b>50.3</b>	<b>48.7</b>	<b>1.6</b>	<b>91.7</b>	<b>81.3</b>	<b>10.4</b>	<b>120.2</b>	<b>89.7</b>	<b>30.5</b>	<b>229.6</b>
Other Property Synergies	1.8	1.6	0.2	2.4	2.7	(0.3)	2.8	2.9	(0.1)	13.4
Metrotech Savings	1.3	0.2	1.1	3.5	0.3	3.2	3.5	0.3	3.2	3.9
<b>Total Property</b>	<b>3.1</b>	<b>1.8</b>	<b>1.2</b>	<b>5.9</b>	<b>3.0</b>	<b>2.9</b>	<b>6.3</b>	<b>3.2</b>	<b>3.1</b>	<b>17.3</b>
<b>Total OPEX</b>	<b>53.3</b>	<b>50.5</b>	<b>2.8</b>	<b>97.6</b>	<b>84.4</b>	<b>13.2</b>	<b>126.5</b>	<b>92.9</b>	<b>33.6</b>	<b>246.9</b>
<b>Bad Debts</b>	<b>3.0</b>	<b>3.9</b>	<b>(0.9)</b>	<b>7.4</b>	<b>9.6</b>	<b>(2.1)</b>	<b>10.1</b>	<b>12.3</b>	<b>(2.2)</b>	<b>40.7</b>
<b>Grand Total</b>	<b>56.3</b>	<b>54.4</b>	<b>1.9</b>	<b>105.0</b>	<b>93.9</b>	<b>11.1</b>	<b>136.6</b>	<b>105.2</b>	<b>31.4</b>	<b>287.6</b>



City Promise: \$100M / £67M run rate target at the end of the first full year

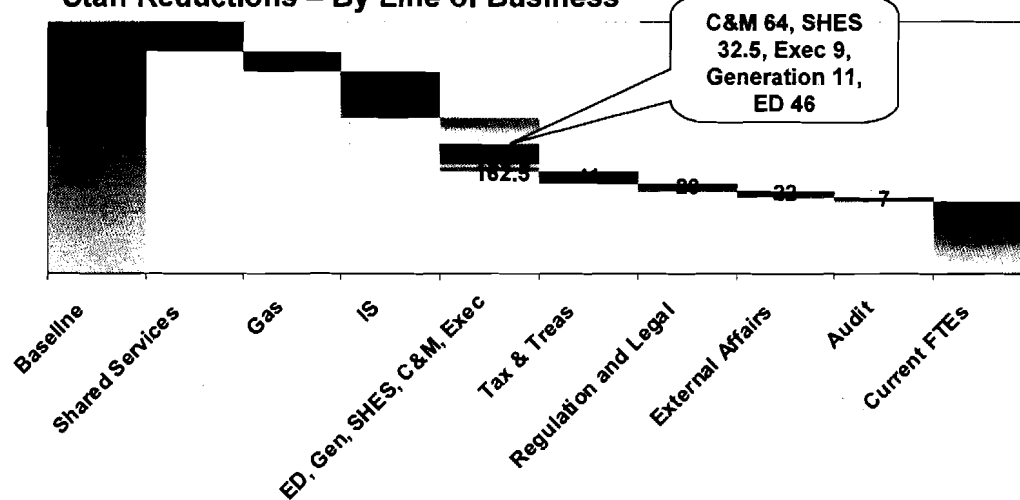
- December 08 run rate is closing in on the \$100m City promise.
- Run rate growth across the final quarter is forecast to drive the year end March 09 run rate to circa \$125m (excluding bad debt synergies).
- Recognition of Reservoir Woods costs (a negative synergy) will be delayed until the expected lease commencement date in June 2009.
- Executive to exceed synergy targets by 31<sup>st</sup> March 2009 due to additional items identified and FTE' target completed.
- Additional HR savings identified include \$6.5m pension assumption alignments, \$6.5m (\$10.2m in March 09) for the elimination of the Keyspan Long Term Incentive Plan and \$4.2m for alignment of benefits.
- The removal of AMR (Gas) project and Customer System has presented significant challenges to Gas Distribution and Customer & Markets.
- \$30m of synergy benefits relating to the consolidation of the US systems platform have been eliminated from target run rates in 13/14 (but remain in the Day N target)

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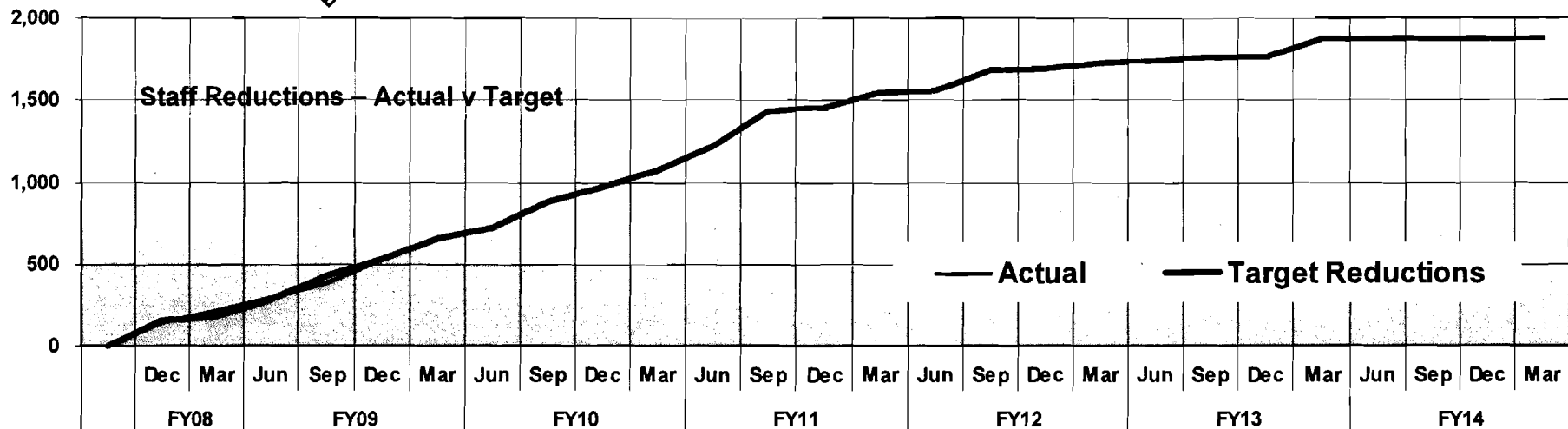
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## Synergy Savings Tracking to 31<sup>st</sup> December 2008: FTE Bridge & Tracking to 31<sup>st</sup> December slightly ahead of target

Staff Reductions – By Line of Business



- 540 employee positions eliminated as of 31st December 2008; 66 ahead of schedule
- Electric Distribution and IS were key contributors although the AMR project and revision of initiatives in customer and markets have led to some re-phasing.
- Double manning is assumed to be charged as exceptional and therefore not impacting synergies or the headcount validation

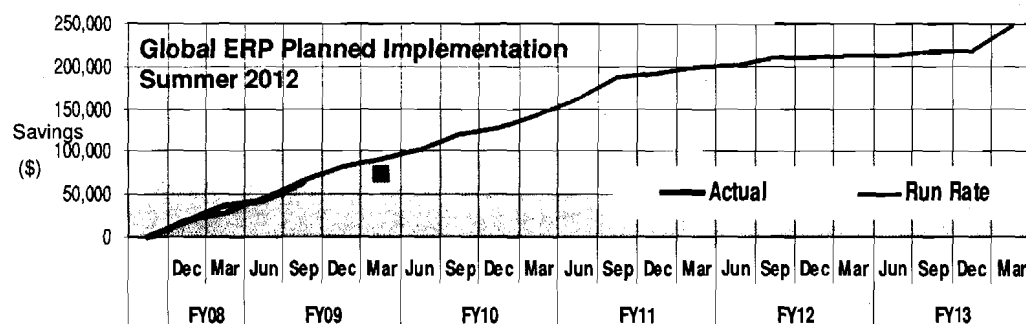


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## Appendix 4 Savings Tracking to 30<sup>th</sup> September: Savings slightly behind target and fall short of \$100M commitment as of Mar 2009

OPEX Reductions \$ in Millions	Fiscal Year Basis		Run Rate Basis		Run Rate Basis		Day N
	08/09 Q1 and Q2		As at Sept 08		As at Mar 09		Target
	Act	Var	Act	Var	F'cast	Var	
Shared Services	\$3.7	\$0.9	\$9.6	\$2.8	\$12.4	\$3.9	\$52.3
Gas Distribution	\$2.2	(\$4.0)	\$8.4	(\$6.9)	\$19.6	(\$3.6)	\$47.9
Information Services	\$2.6	\$0.0	\$5.8	\$0.0	\$11.0	\$2.4	\$41.0
Customers and Markets	\$3.8	(\$0.1)	\$9.1	(\$1.1)	\$10.5	(\$1.4)	\$37.8
Electric Distribution	\$1.1	(\$0.0)	\$2.7	\$0.0	\$6.6	\$0.9	\$20.1
Tax, Treas. & Decision Support	\$2.8	\$0.8	\$5.9	\$1.7	\$8.0	\$1.0	\$15.4
Regulation and Legal	\$3.0	\$0.6	\$6.0	\$1.2	\$6.6	(\$2.1)	\$12.0
Executive	\$2.9	(\$0.6)	\$5.8	(\$2.0)	\$5.8	(\$2.0)	\$7.8
SHES	\$1.9	\$1.7	\$3.8	\$2.7	\$4.3	\$0.3	\$5.0
External Affairs	\$2.4	\$0.2	\$4.8	\$0.3	\$4.8	\$0.2	\$4.8
Generation	\$0.6	(\$0.0)	\$1.2	(\$0.1)	\$1.2	(\$0.1)	\$1.7
Group Audit	\$0.7	\$0.2	\$1.4	\$0.5	\$1.4	\$0.5	\$1.2
<b>OPEX</b>	<b>\$27.6</b>	<b>(\$0.1)</b>	<b>\$64.7</b>	<b>(\$0.9)</b>	<b>\$92.2</b>	<b>(\$0.2)</b>	<b>\$246.9</b>
<b>Bad Debts</b>	<b>\$1.6</b>	<b>(\$1.0)</b>	<b>\$2.9</b>	<b>(\$3.8)</b>	<b>\$10.1</b>	<b>(\$2.2)</b>	<b>\$40.7</b>
<b>Grand Total</b>	<b>\$29.2</b>	<b>(\$1.1)</b>	<b>\$67.6</b>	<b>(\$4.7)</b>	<b>\$102.3</b>	<b>(\$2.4)</b>	<b>\$287.6</b>



City Promise: \$100M run rate target at the end of the first full year

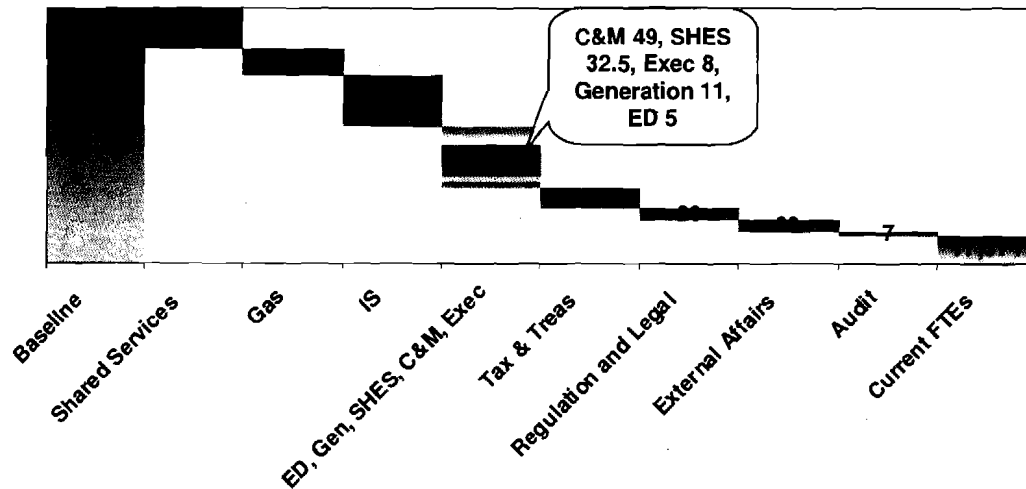
- Two key projects are driving total savings to fall behind target. The AMR (Gas) project has been significantly scaled back as it did not receive the required regulatory approvals and Contact Center initiatives (Customer & Markets) are behind schedule. Consolidation schedule has been impacted by labor and system dependencies. Outsourcing strategy being reevaluated based on vendor cost and performance issues
- Within Regulation and Legal, the planned reduction in outside legal costs are not forecast to be attained by March 09 due to increased costs for new Rate Cases
- Executive is behind target as 8 positions have been eliminated compared to the original plan of 13
- The effect of the above projects has been partially offset by the acceleration of a number of other initiatives.
  - Surrender of three floors from Metrotech, acceleration of Supply Chain initiatives and transition of Finance resulting in a favorable position for Shared Services
  - Information Services is benefiting from contract volume discounts and various infrastructure projects
  - Tax, Treasury and Decision Support are ahead of plan due to the elimination of overlapping staff and departments
  - SHES, Corporate Affairs, Group Audit and Generation have all achieved their Day N FTE target ahead of schedule
- The AMR (Gas) project has been significantly scaled back as it did not receive the necessary regulatory approvals. Plans are in place to achieve a run rate of \$16.3M by March 09 and in addition 50% of the AMR shortfall or \$3.3M has been added back as a task. Gas Distribution is in the process of filing with the NYPSC for regulatory approval for a smaller AMR program.
- Contact Center consolidation, virtualization and cost structure efficiencies will be achieved as long as dependencies noted above are successfully addressed. Overall contact center costs have been hampered by significantly increased call volumes and call complexity due to the economic environment.

**nationalgrid**

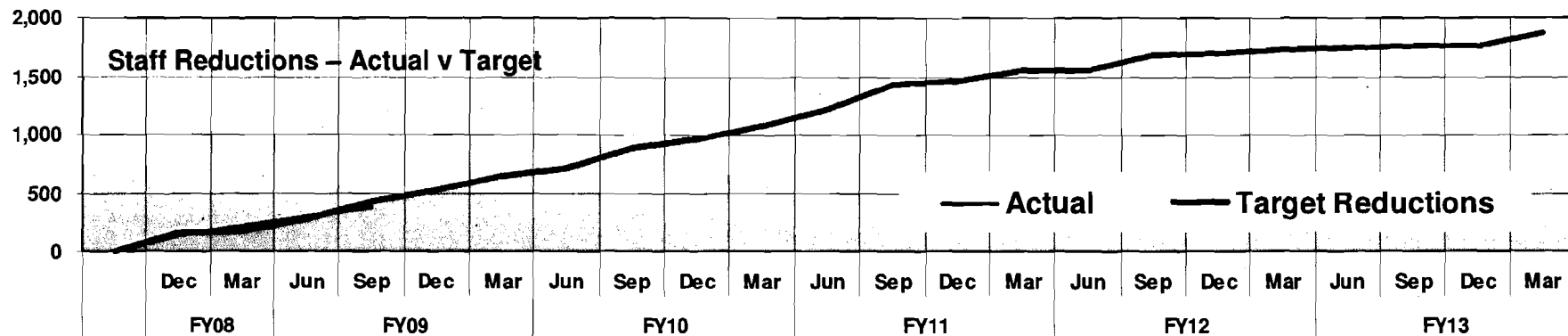
The power of action.

## Appendix 4 Savings Tracking to 30<sup>th</sup> September: FTE Bridge & Tracking to 30<sup>th</sup> September behind target

Staff Reductions – By Line of Business



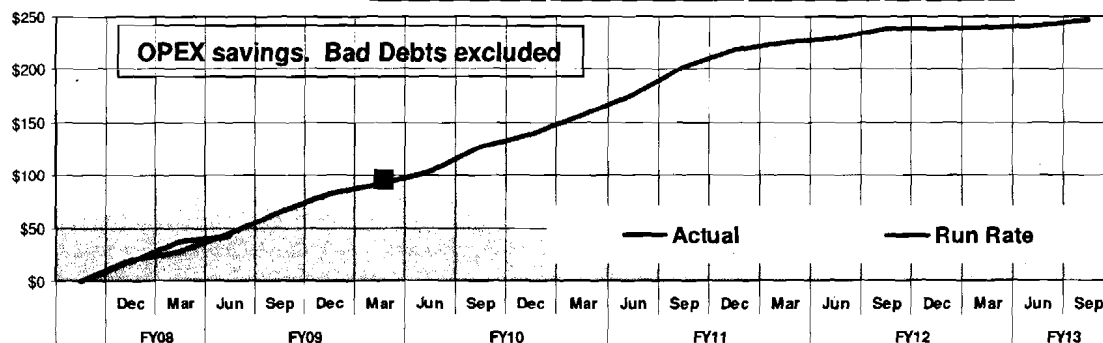
- 388 employee positions eliminated as of 30th September 2008; 37 behind schedule
- Principal issues are the AMR project, Outsourcing Contact Center and the increased volume and complexity of calls
- Double manning is assumed to be charged as exceptional and therefore not impacting synergies or the headcount validation





## Savings Tracking to 30<sup>th</sup> June: OPEX Savings slightly behind target and fall short of \$100M commitment as of Mar 2009.

OPEX Reductions \$ in Millions	Fiscal Year Basis FY 08/09 Q1		Run Rate Basis As at June 08		Target Run Rate Mar 09	Day N Target
	Act	Var	Act	Var		
Shared Services	\$1.5	\$0.5	\$6.2	\$2.3	\$8.3	\$52.1
Gas Distribution	\$0.5	\$1.8	\$4.2	\$5.2	\$8.3	\$47.9
Information Services	\$1.1	\$0.1	\$4.2	\$0.3	\$8.3	\$43.8
Customers and Markets	\$1.1	\$0.8	\$7.7	\$0.1	\$8.3	\$40.5
Electric Distribution	\$0.7	\$0.2	\$1.7	\$0.0	\$8.3	\$20.1
Tax, Treas. & Decision Support	\$0.5	\$0.5	\$2.1	\$1.8	\$8.3	\$12.9
Regulation and Legal	\$1.6	\$0.4	\$6.4	\$1.7	\$8.3	\$12.0
Executive	\$1.5	\$0.1	\$5.8	\$0.4	\$8.3	\$7.8
SHES	\$0.9	\$1.0	\$3.6	\$4.0	\$8.3	\$5.0
External Affairs	\$0.1	\$0.3	\$0.4	\$1.1	\$8.3	\$2.1
Generation	\$0.3	\$0.0	\$1.2	\$0.0	\$8.3	\$1.7
Group Audit	\$0.4	\$0.1	\$1.5	\$0.5	\$8.3	\$1.2
<b>OPEX</b>	<b>\$10.1</b>	<b>\$1.3</b>	<b>\$45.0</b>	<b>\$0.3</b>	<b>\$100.1</b>	<b>\$246.9</b>
<b>Bad Debts</b>	<b>\$0.9</b>	<b>\$0.0</b>	<b>\$2.9</b>	<b>\$0.7</b>	<b>\$12.3</b>	<b>\$40.7</b>
<b>Grand Total</b>	<b>\$10.9</b>	<b>\$1.3</b>	<b>\$48.0</b>	<b>\$1.0</b>	<b>\$112.4</b>	<b>\$287.6</b>

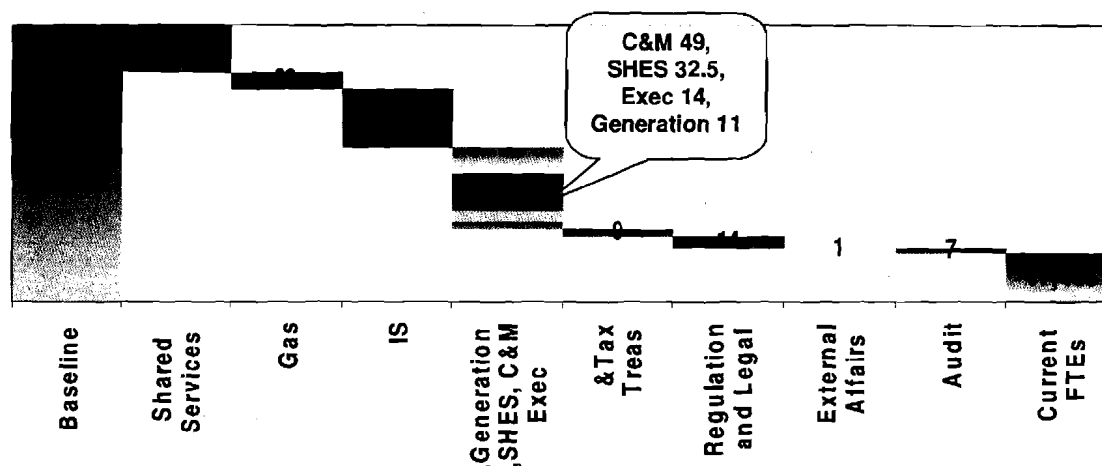


■ City Promise: \$100m run rate target at the end of the first full year

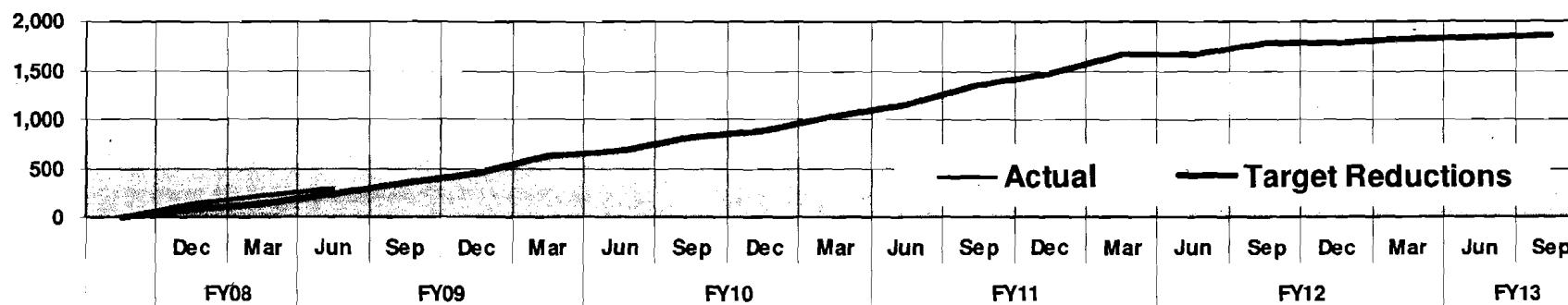
- Savings falling behind target due to delays in implementation of certain synergy saving initiatives. Plans are being developed to catch up and exceed the re-phased OPEX run rate, after adjusting for P1, of \$92.5M as of March 2009.
- Within Gas Distribution, the AMR project is behind schedule: The NYC and LI programs are currently under internal evaluation. To move forward, PSC approval would then still need to be granted for each program. The AMR project was targeted to generate a Run Rate of \$ 6.5M at March 09. Replacement initiatives are being fast tracked to bring the savings back in line with the targets.
- Reported savings exclude savings from the surrender of three floors at Metrotech scheduled in Q2 and Q3. This will add \$ 3.0M to the run rate.
- FTE savings of 297 are being reported against the 2006 baseline used for Integration.
- Drivers
  - Elimination of posts not in Day N structures
  - Elimination of senior executive overlaps
  - Elimination of duplicative positions within LoBs
  - Elimination of KSE Board of Directors
  - Elimination of Stock Listing Fees
- Headcount reconciliation from 2006 baseline to 08/09 budget has been completed and validates the savings.
- Double manning assumed to be charged as exceptional and therefore not impacting synergies.
- Bad debt savings reported are the estimated impacts of remediation strategies implemented.... But the underlying debt expense run rate (both charge offs & provision movements) is running well ahead of integration assumptions.

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# FTE Bridge & Tracking to 30<sup>th</sup> June Tracking ahead of target. Validation complete.



- 297 employee positions eliminated as of 30th June 2008; 8 ahead of schedule
- Headcount reconciliation from 2006 to 08/09 budget validates all reported synergy savings.



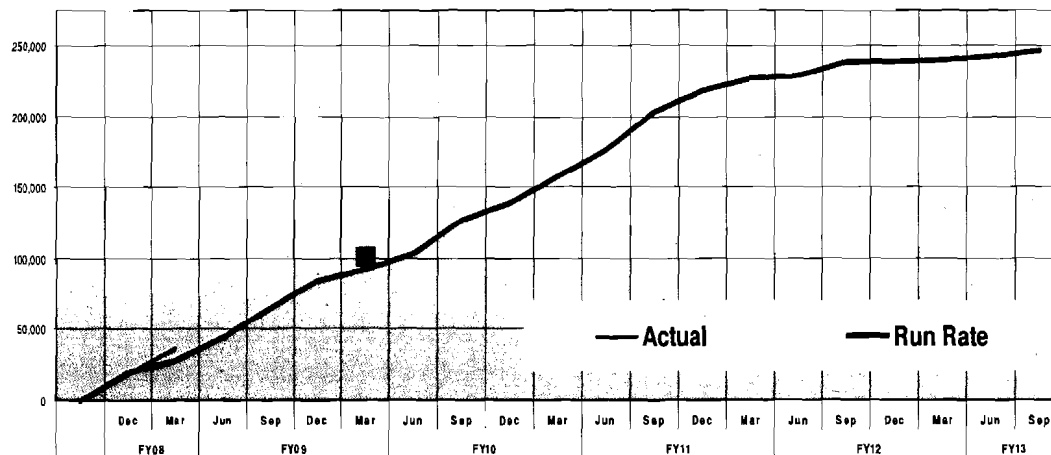
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## Savings Tracking to 31<sup>st</sup> March: Initial View

Savings ahead of target but fall slightly short of \$100M commitment as of Mar 2009.

Headcount is the key driver across all groups.

OPEX Reductions \$ in Millions	Fiscal Year Basis			Run Rate Basis			Day N Target
	FY08 Year End			Run Rate at Mar 08			
	Act	Target	Var	Act	Target	Var	
Shared Services	\$3.5	\$0.2	\$3.3	\$5.5	\$0.4	\$5.1	\$52.1
Gas Distribution	\$2.1	\$2.3	(\$0.2)	\$3.8	\$5.8	(\$2.0)	\$47.9
Information Services	\$2.4	\$1.8	\$0.6	\$4.2	\$3.9	\$0.3	\$43.8
Customers and Markets	\$2.1	\$1.3	\$0.7	\$3.6	\$2.8	\$0.8	\$40.5
Electric Distribution	\$0.3	\$0.2	\$0.0	\$0.2	\$0.7	(\$0.5)	\$20.1
Tax ,Treas. & Decision Suppor	\$0.9	\$1.7	(\$0.7)	\$2.0	\$3.5	(\$1.5)	\$12.9
Regulation and Legal	\$1.9	\$1.9	(\$0.0)	\$6.4	\$4.0	\$2.4	\$12.0
Executive	\$2.6	\$1.3	\$1.3	\$5.8	\$4.0	\$1.8	\$7.8
SHES	\$0.6	\$0.0	\$0.6	\$2.5	\$0.1	\$2.5	\$5.0
External Affairs	\$0.2	\$0.1	\$0.0	\$0.4	\$0.4	\$0.0	\$2.1
Generation	\$0.3	\$0.6	(\$0.3)	\$1.2	\$1.2	\$0.0	\$1.7
Group Audit	\$0.5	\$0.5	\$0.0	\$1.5	\$0.9	\$0.5	\$1.2
Sub Total	\$17.4	\$11.9	\$5.5	\$37.1	\$27.7	\$9.4	\$246.9
Bad Debts	\$0.4	\$0.7	(\$0.4)	\$1.2	\$2.0	(\$0.8)	\$40.7
Grand Total	\$17.8	\$12.7	\$5.1	\$38.3	\$29.7	\$8.6	\$287.6



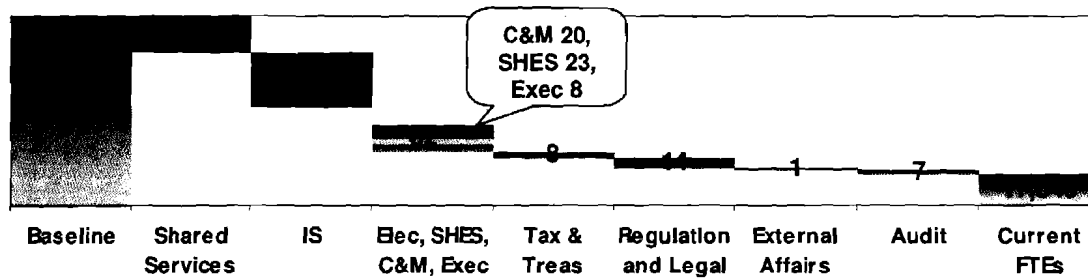
■ City Promise: \$100m run rate target at the end of the first full year

- Savings are ahead of target but the re-phased run rate, after adjusting for P1, is \$92.4M as of March 2009 falling slightly short of \$100M commitment
- FTE savings are being reported against the 2006 baseline used for Integration
- Drivers
  - Elimination of posts not in Day N structures
  - Elimination of senior executive overlaps
  - Elimination of duplicative positions within LoBs
  - Elimination of KSE Board of Directors
  - Elimination of Stock Listing Fees
- Headcount reconciliation from 2006 baseline to 08/09 budget has been completed and validates the reported savings.
- Double manning (duplicate headcount carried for a short period to facilitate the transfer of work between locations) assumed to be charged as an exceptional and therefore not impact synergies. Double manning being recorded as part of 08/09 budget uploads. Key risk – large population of internal postings means that all double manning may not be “incremental” on a company basis and therefore not treated as exceptional
- Bad debt savings reported are the estimated impacts of remediation strategies implemented.... But the underlying debt expense run rate (both charge offs & provision movements) is running well ahead of integration assumptions

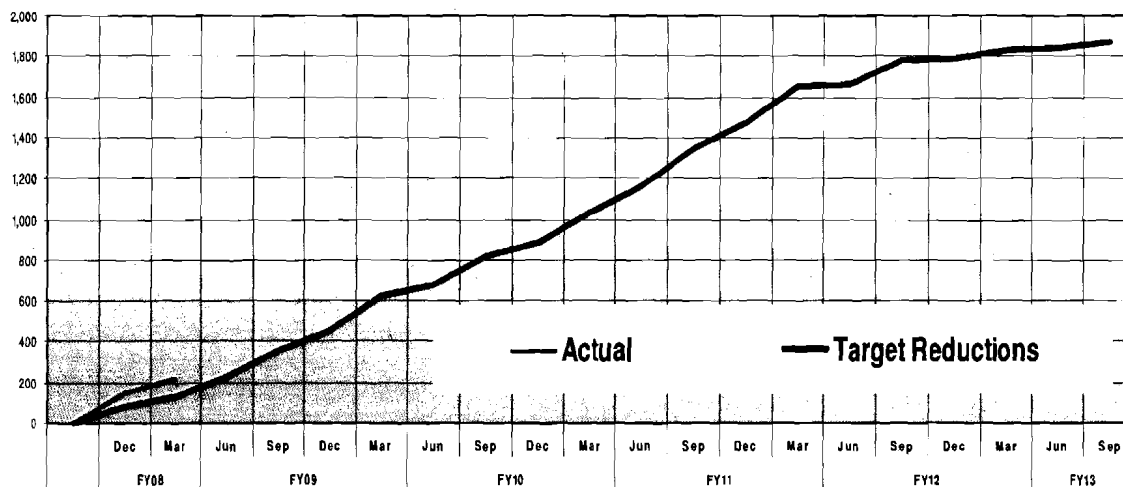
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## FTE Bridge & Tracking to 31<sup>st</sup> March

### Tracking ahead of target Validation complete



- 217 employee positions eliminated as of March 31, 2008; 31 ahead of schedule
- Headcount reconciliation from 2006 to 08/09 budget validates all reported synergy savings



# US Integration Synergies

## Summary Savings - Preliminary Tracking to December 2007

### OPEX Reductions \$ in Millions

	Qtr Dec 07			FY08 Year End			Run Rate			Day N Target
	Act	Target	Var	Act	Target	Var	Act	Target	Var	
Shared Services	\$0.3	\$0.1	\$0.2	\$0.8	\$0.2	\$0.6	\$3.5	\$0.4	\$3.2	\$52.1
Gas Distribution	0.8	0.8	0.0	2.3	2.3	0.0	3.2	3.2	0.0	47.9
Information Services	0.9	0.8	0.1	1.6	1.8	(0.2)	3.2	3.4	(0.2)	43.8
Customers and Markets	0.7	0.7	0.0	1.4	1.3	0.0	2.7	2.6	0.1	40.5
Regulation and Legal	1.3	0.9	0.5	1.9	1.9	0.0	3.2	3.5	(0.3)	12.0
Executive	0.5	0.3	0.2	1.1	1.3	(0.2)	2.5	1.2	1.3	7.8
<b>Total</b>	<b>\$4.5</b>	<b>\$3.6</b>	<b>\$0.9</b>	<b>\$9.0</b>	<b>\$8.8</b>	<b>\$0.2</b>	<b>\$18.3</b>	<b>\$14.2</b>	<b>\$4.0</b>	<b>\$204.1</b>
Electric Distribution		0.1			0.2			0.2		20.1
Tax & Treasury		0.8			1.7			3.1		12.9
SHES		0.0			0.0			0.1		5.0
External Affairs		0.1			0.1			0.2		2.1
Generation		0.3			0.6			1.1		1.7
Group Audit		0.2			0.5			0.9		1.2
<b>Total</b>		<b>1.4</b>			<b>3.1</b>			<b>5.7</b>		<b>42.9</b>
<b>Total</b>		<b>\$5.0</b>			<b>\$11.9</b>			<b>\$20.0</b>		<b>\$246.9</b>

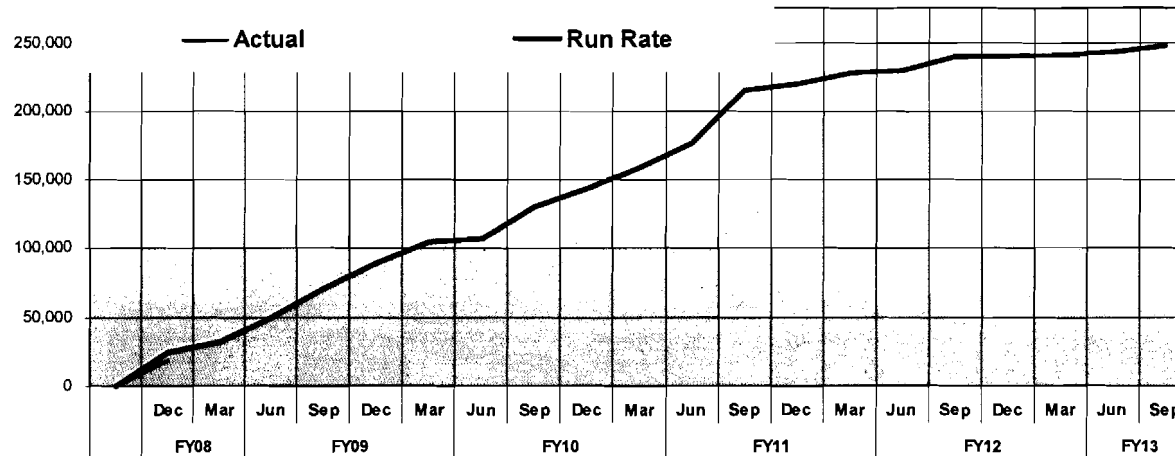
- All Businesses are committed to achieving 100% of Synergy Savings embedded into budgets

- Business Units currently reporting actual Synergy Savings to date

- Shared Services
- Gas Distribution
- Information Services
- Customers and Markets
- Regulation and Legal
- Executive

- Business Units developing a rigorous Synergy Savings tracking process

- Electric Distribution
- Tax & Treasury
- SHES
- External Affairs
- Generation
- Group Audit



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Date of Request: February 5, 2010  
Due Date: February 15, 2010

Request No. DPS-15(RAV-11 a,k,l)  
NMPC Req. No. NM 15

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO:

Request:

Attached to this IR is a January 5, 2010 Syracuse Post Standard Letter to the Editor from the Company's Susan Crossett. Regarding this letter as it relates to the Company's Information Systems (IS) department, please provide the following information:

A. Provide a breakdown of National Grid's 2007, 2008 and 2009 IS department costs by cost-component and by affiliate, both regulated and unregulated. Include all affiliates even if no IS costs were allocated to some of them. Include percentages as well as dollars.

K. Same as A. for the rate year forecast.

L. As related to this IS study, fully explain and quantify how the rate year forecast reflects "ways to improve performance and control costs for the benefit of customers," as stated in the January 5, 2010 Syracuse Post Standard Letter to the Editor, attached as RAV-11 Attachment. Include supporting workpapers and tie-ins to rate case exhibits

Response:

A. Please refer to Attachment 1.

K. The rate year forecast does not include a specific forecast for the IS department. The Company used the historic test year cost allocations as the basis for the rate year cost allocations.

L. IS performance improvements and cost control measures are captured in the overall rate year productivity adjustment and synergy savings adjustment. There are no discrete savings for the IS department.

Name of Respondent:  
James M. Molloy

Date of Reply:  
February 14, 2010

Date of Request: February 9, 2010  
Due Date: February 19, 2010

Request No. RAV-13  
NMPC Req. No. NM 18 DPS 18

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO:

Request:

A. For each month, January 2006 through December 2009, please provide a breakdown of total service company costs charged to every individual affiliate of National Grid, both regulated and unregulated; also include 2006 – 2009 annual amounts. Please provide this information broken down between those costs allocated from the National Grid – USA service company, the KeySpan service company, and in total.

B. Same as A, for the rate years' forecasted amounts.

C. Please provide monthly updates for A. above until further notice.

**Note:** Please provide the information in an excel spreadsheet, not a pdf file.

Response:

A. Please see Attachment 1 (Attachment 1 to RAV-13.xls). Also, please note that the charges to affiliates from the 3 KeySpan service companies are consolidated.

B. The forecast for the rate years does not include a specific forecast of service company allocated charges to individual companies. The Company used the historic test year cost allocations as the basis for the allocated charges in the rate years.

C. Monthly updates to be provided as requested.

Name of Respondent:  
Andrew Sloey

Date of Reply:  
February 19, 2010

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Annual Amounts Charged from National Grid & KeySpan Service Companies to Affiliates

Charged Company	2006	2007	2008	2009	
00001 National Grid USA	6,892,894	7,207,027	9,078,845	4,017,730	27,196,495
00004 Nantucket Electric Company	2,120,106	1,892,196	1,985,566	2,024,569	8,022,437
00005 Massachusetts Electric Company	156,715,567	165,330,427	202,227,835	238,723,445	762,997,275
00006 NE Hydro - Trans Electric Co	3,208,133	3,311,213	3,651,055	3,486,402	13,656,803
00007 New England Hydro Finance Co	-	109	443	(31)	521
00008 New England Hydro - Trans Corp	1,060,162	1,205,537	970,382	1,049,859	4,285,940
00010 New England Power Company	42,417,423	44,234,131	51,444,171	60,031,910	198,127,636
00020 New England Electric Trans Co	837,531	592,685	421,005	(660,671)	1,190,551
00021 National Grid Trans Services	7,302	115,682	37,651	36,895	197,530
00035 Niagara Mohawk Holdings, Inc.	859	7,572	18,209	43,407	70,047
00036 Niagara Mohawk Power Corp	192,708,260	230,215,297	271,807,390	349,469,851	1,044,200,798
00037 Opinac North America, Inc	3,298	3,911	375	-	7,584
00041 Granite State Electric Company	5,365,037	6,534,089	7,206,804	7,920,041	27,025,972
00048 Narragansett Gas Company	5,828,034	21,239,945	29,500,058	36,724,474	93,292,511
00049 Narragansett Electric Company	59,287,685	63,198,136	74,930,270	79,845,549	277,261,640
00070 Wayfinder Group Inc.	9,144	12,518	16,890	58,962	97,514
00071 Valley Appliance & Merchandise	737	6,623	6,514	1,207	15,081
00072 National Grid Billing Entity	4,523,622	4,651,381	6,216,091	4,991,884	20,382,978
00075 NEES Communications, Inc.	301	-	-	-	301
00076 NGrid Communications Billing	2,304,578	1,692,712	(67,303)	-	3,929,988
00077 Grid Communications Inc	225	-	-	-	225
00078 Atlantic Western Consulting	160	-	-	-	160
00079 National Grid Wireless Cons	(2,957)	1,593	-	-	(1,363)
00082 GridAmerica Holdings	(9,147)	43,816	2,137	64,617	101,423
00083 GridAmerica LLC	124,056	-	-	-	124,056
00085 NEES Energy, Inc.	10,732	8,258	8,272	13,477	40,739
00086 EUA Energy Investment	2,418	2,472	2,740	6,191	13,820
00092 Prudence Corporation	515	211	53	268	1,046
00093 Patience Corporation	20	208	2,490	347	3,065
00094 Newport America Corporation	242	601	268	896	2,006
00095 Metrowest Realty LLC	1,581	2,549	9,054	20,306	33,490
00402 Essex Gas Company	-	-	21,439	90,082	111,521
00457 KeySpan Energy Services Inc.	-	-	2,893	-	2,893
00460 KeySpan Corporation	-	-	156,810	1,806	158,617
01401 Boston Gas Company Billing BU	-	25,637,149	87,675,910	90,103,320	203,416,379
01402 ESSEX COUNTY GAS COMPANY	-	64,904	378,634	850,180	1,293,719
01403 Colonial Lowell Div Billing BU	-	5,516,845	18,496,186	18,986,444	42,999,475
01404 Colonial Cape Cod Billing BU	-	156,995	878,657	504,494	1,540,146
01406 EnergyNorth Nat Gas Billing BU	-	3,111,446	10,913,308	10,889,618	24,914,372
01407 KEYSpan NEW ENGLAND LLC	-	55,803	124,449	268,070	448,322
01429 KEYSpan MONEY POOLS	-	4,656,100	10,283,490	3,006,793	17,946,383
01431 KeySpan Corp Serv Billing BU	-	423	45,695	37,226	83,345
01434 KeySpan Electric Srv BillingBU	-	41,470,933	147,264,159	154,132,965	342,868,056
01435 KeySpan Generation Billing BU	-	18,395,152	65,774,605	77,420,670	161,590,427
01436 KeySpan Energy Dev Billing BU	-	1,500,419	4,668,341	5,030,199	11,198,958
01437 KS Gas East Corp KEDLI Bill BU	-	27,663,982	97,478,708	95,945,499	221,088,189
01438 Brklyn Union Gas KEDNY Bill BU	-	40,633,919	146,358,908	153,523,730	340,516,558
01441 TRANSCANADA RAVENSWOOD	-	-	35,674	-	35,674
01442 KS Ravenswood Srves Billing BU	-	10,462,341	23,236,775	706,366	34,405,482
01444 KS Energy Trading Billing BU	-	1,367,536	6,144,594	3,898,926	11,411,056
01446 KS Glenwood Energy Billing BU	-	536,084	2,545,695	2,549,096	5,630,875
01448 KS Port Jeff Energy Billing BU	-	822,521	2,687,566	2,753,923	6,264,010
01457 KEYSpan ENERGY SERVICES INC.	-	183,645	384,450	(334)	567,761
01458 KS Energy Supply Billing BU	-	1,041,099	1,717	25	1,042,841
01459 KS Services Billing BU	-	3,799,786	15,143,491	12,053,853	30,997,130
01460 KEYSpan ENERGY CORP	-	(7,615,531)	(20,658,581)	(20,071,787)	(48,345,900)
01471 Seneca Upshur Billing BU	-	187,893	1,376,326	978,489	2,542,708
82 NG RAVENSWOOD SERV (post Sale)	-	-	10,042,797	5,950,934	15,993,732
01563 KeySpan E&P JV Billing BU	-	11,005	29,121	39,283	79,409
C4 KEYSpan LNG LP REGULATED ENTITY	-	-	(3,177)	-	(3,177)
D1 TRANSGAS	-	-	-	6,685	6,685
NK NGUSA Service Company, Inc.	-	-	1,556	-	1,556
Total	\$483,418,520	\$731,171,347	\$1,290,967,461	\$1,407,528,141	\$3,913,085,469



NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Calendar Year 2006 Amounts Charged from National Grid & KeySpan Service Companies to Affiliates by Month

Charged Company	January 2006	February 2006	March 2006	April 2006	May 2006	June 2006	July 2006	August 2006	September 2006	October 2006	November 2006	December 2006	
00001 National Grid USA	\$406,324	\$381,815	\$2,417,722	\$383,781	\$546,688	\$328,368	\$204,368	\$414,103	\$435,979	\$312,907	\$344,056	\$630,783	\$6,892,894
00004 Nantuxet Electric Company	144,269	150,313	205,773	161,335	192,839	216,836	171,892	257,639	152,392	173,634	162,867	130,316	2,130,106
00005 Massachusetts Electric Company	12,432,906	12,365,011	16,779,554	10,859,274	11,435,816	14,579,261	12,056,245	12,384,040	13,842,246	13,711,945	12,565,592	13,503,678	156,715,567
00006 NE Hydro - Trans Electric Co	250,737	246,494	295,195	288,360	255,470	251,562	261,695	237,577	261,945	308,074	272,342	278,784	3,208,133
00007 New England Hydro Finance Co	-	-	102	-	-	(102)	-	-	-	-	-	-	-
00008 New England Hydro - Trans Corp	77,421	55,650	181,745	120,362	56,381	73,820	114,182	79,879	63,575	87,740	68,280	80,927	1,060,162
00010 New England Power Company	3,762,216	3,505,636	4,505,331	3,288,712	3,131,594	3,657,966	3,284,776	3,742,823	3,729,922	3,438,763	3,558,392	3,341,293	42,417,423
00020 New England Electric Trans Co	50,609	57,342	63,552	102,844	75,740	64,722	75,283	62,603	56,961	58,448	65,085	62,342	837,531
00021 National Grid Trans Services	138	117	1,601	590	591	631	751	569	484	637	584	609	7,302
00035 Niagara Mohawk Holdings, Inc.	-	-	9	-	-	-	-	-	138	296	416	-	859
00036 Niagara Mohawk Power Corp	16,611,944	13,956,090	13,773,099	12,800,442	14,372,174	15,412,270	16,031,225	14,996,347	16,066,770	20,103,242	20,291,489	18,328,468	193,708,260
00037 Opineac North America, Inc.	-	-	1,544	-	1,390	109	-	-	-	255	-	-	3,298
00041 Granite State Electric Company	453,665	427,982	549,632	447,791	413,309	461,141	399,262	441,821	453,156	460,355	422,366	433,957	5,365,037
00048 Narragansett Gas Company	-	-	-	-	-	-	-	7,773	1,247,535	1,751,462	1,250,248	1,571,017	5,838,034
00049 Narragansett Electric Company	4,660,564	4,695,614	5,665,534	4,039,097	4,471,798	5,269,556	4,932,481	5,104,422	5,437,030	5,367,167	4,706,054	4,938,269	59,287,685
00070 Worlfinder Group Inc.	311	221	1,698	1,077	644	1,094	885	700	738	707	637	(78)	9,144
00071 Valley Appliances & Merchandise	-	-	-	-	-	-	-	-	20	717	-	-	737
00072 National Grid Billing Entity	291,215	75,262	342,155	542,616	353,520	703,469	553,620	369,865	266,936	142,780	378,992	503,989	4,533,222
00075 NEES Communications, Inc.	301	-	-	-	-	-	-	-	-	-	-	-	301
00076 NGrid Communications Billing	337,420	138,085	175,722	226,695	200,564	(19,535)	200,497	224,338	216,784	221,836	214,734	167,440	2,304,578
00077 Grid Communications Inc	222	3	-	-	-	-	-	-	-	-	-	-	225
00078 Atlantic Western Consulting	158	-	2	-	-	-	-	-	-	-	-	-	160
00079 National Grid Wireless Cons	-	(3,207)	31	300	-	-	-	(80)	-	-	-	-	(2,957)
00082 GridAmerica Holdings	461	(177)	(7,501)	40,013	4,390	(14,518)	(2,858)	(4,111)	(10,677)	(11,872)	(698)	(1,600)	(9,147)
00083 GridAmerica LLC	111,191	3,948	8,917	-	-	-	-	-	-	-	-	-	124,056
00085 NEES Energy, Inc.	217	351	2,969	876	574	729	554	513	2,377	595	580	398	10,732
00086 EDA Energy Investment	26	15	1,222	429	149	476	(295)	151	195	290	178	(418)	2,418
00092 Prudence Corporation	-	-	-	-	-	-	-	-	20	495	-	-	515
00093 Patience Corporation	-	-	-	-	-	-	-	-	20	-	-	-	20
00094 Newport America Corporation	-	-	-	-	-	-	-	-	20	222	-	-	242
00095 Metrowest Realty LLC	40	44	476	151	151	151	(126)	151	218	197	192	(63)	1,581
Total	\$39,492,355	\$36,056,606	\$44,929,984	\$33,305,346	\$35,514,584	\$40,968,916	\$38,344,435	\$38,521,121	\$41,724,783	\$46,180,893	\$44,304,387	\$43,975,110	\$483,418,520

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Calendar Year 2007 Amounts Charged from National Grid & KeySpan Service Companies to Affiliates by Month

Charged Company	January 2007	February 2007	March 2007	April 2007	May 2007	June 2007	July 2007	August 2007	September 2007	October 2007	November 2007	December 2007	
00001 National Grid USA	401,048	401,692	699,572	409,886	418,881	427,064	458,700	1,260,687	427,553	762,296	469,063	1,070,585	7,207,027
00004 Nantucket Electric Company	186,506	177,075	293,682	105,626	131,332	123,695	137,321	204,723	113,100	128,639	144,696	145,801	1,892,196
00005 Massachusetts Electric Company	12,254,659	12,734,934	19,600,885	10,796,235	13,211,714	13,912,576	13,239,891	14,404,977	12,925,708	14,248,587	14,111,698	13,888,563	165,330,427
00006 NE Hydro - Trans Electric Co	311,949	245,638	342,911	264,203	258,341	386,425	269,199	260,746	228,395	251,745	295,911	195,749	3,311,213
00007 New England Hydro Finance Co	-	-	-	-	-	-	109	-	-	-	-	-	109
00008 New England Hydro - Trans Corp	85,370	84,528	161,363	149,349	72,919	94,238	71,714	105,320	65,472	149,723	92,397	73,144	1,205,537
00010 New England Power Company	3,219,663	3,454,978	4,815,187	3,024,044	3,403,562	3,404,226	3,579,362	4,019,837	4,113,053	3,579,510	4,088,951	3,531,759	44,234,131
00020 New England Electric Trans Co	68,340	57,788	65,689	59,297	46,970	52,858	33,487	39,695	39,210	41,847	52,395	35,109	592,685
00021 National Grid Trans Services	545	462	336	401	357	427	1,188	123,625	(20,269)	2,202	3,547	2,861	115,682
00035 Niagara Mohawk Holdings, Inc.	-	-	-	-	-	-	-	-	-	-	-	-	7,572
00036 Niagara Mohawk Power Corp	19,218,946	18,380,328	21,978,954	13,746,287	18,689,214	16,479,492	19,806,665	21,422,162	19,370,108	21,130,748	19,342,718	20,649,673	230,215,297
00037 Opinac North America, Inc	-	5	667	-	1,860	-	1,380	-	-	-	-	-	3,911
00041 Granite State Electric Company	457,432	403,645	753,213	439,172	471,606	889,492	440,833	563,014	405,191	592,446	607,051	510,995	6,534,089
00048 Narragansett Gas Company	1,562,086	1,445,889	2,012,064	1,371,306	1,396,912	1,794,893	1,628,565	2,109,684	1,561,678	2,699,704	1,877,346	1,779,817	21,239,945
00049 Narragansett Electric Company	4,980,156	4,820,678	7,487,973	4,092,107	4,964,642	5,123,707	4,962,673	5,352,535	5,104,066	5,146,994	5,766,327	5,396,279	63,198,136
00070 Wayfinder Group Inc.	1,505	714	2,072	858	696	690	(83)	641	(124)	411	1,437	3,702	12,518
00071 Valley Appliance & Merchandise	50	-	504	304	380	1,101	368	464	782	413	375	1,880	6,623
00072 National Grid Billing Entity	228,523	386,954	265,160	348,446	312,855	399,138	299,493	340,843	391,597	351,317	587,289	739,766	4,651,381
00076 NGrid Communications Billing	203,053	188,159	207,428	226,407	269,026	212,448	198,190	117,181	2,940	68,021	(139)	-	1,692,712
00079 National Grid Wireless Cons	1,593	-	-	-	-	-	-	-	-	-	-	-	1,593
00082 GridAmerica Holdings	2,002	1,825	29,911	2,064	3,013	4,940	14,858	-	-	(14,797)	-	-	43,816
00085 NEES Energy, Inc.	778	1,604	493	614	706	570	316	564	551	866	650	545	8,258
00086 EUA Energy Investment	176	354	(248)	434	173	174	264	223	216	222	267	217	2,472
00092 Prudence Corporation	50	-	161	-	-	-	-	-	-	-	-	-	211
00093 Patience Corporation	50	-	158	-	-	-	-	-	-	-	-	-	208
00094 Newport America Corporation	50	-	106	-	444	-	-	-	-	-	-	-	601
00095 Metrowest Realty LLC	189	182	(1)	344	359	415	(500)	240	199	270	670	182	2,549
01401 Boston Gas Company Billing BU	-	-	-	-	-	-	-	-	8,245,067	4,791,378	6,310,964	6,289,740	25,637,149
01402 ESSEX COUNTY GAS COMPANY	-	-	-	-	-	-	-	-	26,963	(3,546)	27,784	13,703	64,904
01403 Colonial Lowell Div Billing BU	-	-	-	-	-	-	-	-	1,804,875	1,052,422	1,354,556	1,304,993	5,516,845
01404 Colonial Cape Cod Billing BU	-	-	-	-	-	-	-	-	59,784	25,967	47,802	23,442	156,995
01406 EnergyNorth Nat Gas Billing BU	-	-	-	-	-	-	-	-	1,030,861	583,544	787,156	709,884	3,111,446
01407 KEYSpan NEW ENGLAND LLC	-	-	-	-	-	-	-	-	37,795	9,912	7,617	-	55,803
01429 KEYSpan MONEY POOLS	-	-	-	-	-	-	-	-	1,799,915	1,254,063	887,210	714,913	4,656,100
01431 KeySpan Corp Serv Billing BU	-	-	-	-	-	-	-	-	-	-	-	423	423
01434 KeySpan Electric Srv BillingBU	-	-	-	-	-	-	-	-	12,247,825	8,315,566	9,848,739	11,058,802	41,470,933
01435 KeySpan Generation Billing BU	-	-	-	-	-	-	-	-	6,022,513	3,742,309	3,777,494	4,852,836	18,395,152
01436 KeySpan Energy Dev Billing BU	-	-	-	-	-	-	-	-	653,624	78,249	325,791	442,755	1,500,419
01437 KS Gas East Corp KEDLI Bill BU	-	-	-	-	-	-	-	-	7,893,159	6,042,699	6,419,056	7,309,069	27,663,982
01438 Brklyn Union Gas KEDNY Bill BU	-	-	-	-	-	-	-	-	11,749,295	8,267,717	9,857,450	10,759,457	40,633,919
01442 KS Ravenswood Svcs Billing BU	-	-	-	-	-	-	-	-	3,275,009	1,956,005	2,564,130	2,667,198	10,462,341
01444 KS Energy Trading Billing BU	-	-	-	-	-	-	-	-	463,496	172,093	322,823	409,124	1,367,536
01446 KS Glenwood Energy Billing BU	-	-	-	-	-	-	-	-	250,202	16,643	121,280	147,960	536,084
01448 KS Port Jeff Energy Billing BU	-	-	-	-	-	-	-	-	203,510	324,887	142,016	152,109	822,521
01457 KEYSpan ENERGY SERVICES INC.	-	-	-	-	-	-	-	-	59,657	34,447	36,007	53,534	183,645
01458 KS Energy Supply Billing BU	-	-	-	-	-	-	-	-	429,328	74,006	214,943	322,823	1,041,099
01459 KS Services Billing BU	-	-	-	-	-	-	-	-	1,135,720	905,464	917,965	840,637	3,799,786
01460 KEYSpan ENERGY CORP	-	-	-	-	-	-	-	-	(2,149,166)	(1,880,149)	(1,824,986)	(1,761,230)	(7,615,531)
01471 Seneca Upshur Billing BU	-	-	-	-	-	-	-	-	75,661	15,447	50,857	45,928	187,893
01563 KeySpan E&P JV Billing BU	-	-	-	-	-	-	-	-	5,354	(205)	3,253	2,603	11,005
Total	43,184,719	42,787,433	58,718,240	35,037,385	43,655,962	43,308,567	45,143,993	50,327,161	100,049,872	84,910,648	89,644,851	94,402,516	731,171,347

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Calendar Year 2008 Amounts Charged from National Grid & KeySpan Service Companies to Affiliates by Month

Charged Company	January 2008	February 2008	March 2008	April 2008	May 2008	June 2008	July 2008	August 2008	September 2008	October 2008	November 2008	December 2008	
00001 National Grid USA	837,787	921,405	3,370,873	195,173	864,561	493,869	404,171	358,981	538,560	312,292	232,478	548,696	9,078,845
00004 Nantucket Electric Company	173,905	257,601	149,212	172,253	162,280	165,317	135,738	117,946	234,307	166,127	135,232	115,648	1,985,566
00005 Massachusetts Electric Company	14,375,919	14,478,124	19,322,255	14,813,575	16,620,765	16,594,638	15,779,627	15,524,399	20,700,498	17,544,496	15,875,592	20,597,948	202,227,835
00006 NE Hydro - Trans Electric Co	280,132	255,402	214,018	263,932	366,287	314,670	380,074	262,510	249,560	517,773	271,725	274,970	3,651,055
00007 New England Hydro Finance Co	-	-	102	-	-	-	-	341	-	-	-	-	443
00008 New England Hydro - Trans Corp	153,305	47,477	161,039	61,043	66,626	81,622	56,664	58,058	118,210	59,225	63,022	44,092	970,382
00010 New England Power Company	4,160,567	3,729,709	5,087,696	3,684,194	4,376,188	4,120,936	3,757,447	3,875,895	5,318,971	4,424,986	4,673,718	4,213,864	51,444,171
00020 New England Electric Trans Co	46,977	29,093	34,579	32,394	42,937	27,893	32,558	35,697	28,056	28,198	51,313	33,310	421,005
00021 National Grid Trans Services	3,337	4,650	2,674	3,057	3,321	2,394	3,064	2,896	3,058	3,095	3,165	2,940	37,651
00035 Niagara Mohawk Holdings, Inc.	-	2,498	4,755	125	967	1,766	2,934	1,611	2,663	890	-	-	18,209
00036 Niagara Mohawk Power Corp	19,298,844	20,416,420	23,744,764	17,947,324	20,310,800	25,256,499	20,945,820	22,965,592	29,319,342	23,959,179	23,357,483	24,345,323	271,807,390
00037 OpInac North America, Inc	-	-	-	375	-	-	-	-	-	-	-	-	375
00041 Granite State Electric Company	738,290	602,491	630,547	516,997	525,457	526,990	530,420	572,158	671,540	612,641	563,644	715,629	7,206,804
00048 Narragansett Gas Company	2,295,379	1,820,069	2,187,313	2,021,855	2,016,867	2,698,284	2,062,017	2,077,009	3,028,557	3,027,709	2,904,268	3,360,731	29,500,058
00049 Narragansett Electric Company	5,971,371	5,456,510	7,190,775	5,509,424	6,362,983	6,993,441	5,968,918	5,905,298	8,043,788	6,618,133	5,536,359	5,973,271	74,930,270
00070 Wayfinder Group Inc.	2,679	(4,272)	2,322	404	573	3,903	1,556	817	2,245	618	2,989	3,056	16,890
00071 Valley Appliance & Merchandise	1,011	578	1,027	208	530	314	527	293	574	499	638	314	6,514
00072 National Grid Billing Entity	265,202	177,158	307,796	486,571	227,414	55,086	692,195	134,230	(43,370)	121,660	3,674,988	117,161	6,216,091
00076 NGrid Communications Billing	-	(67,303)	-	-	-	-	-	-	-	-	-	-	(67,303)
00082 GridAmerica Holdings	-	(43)	450	-	1,637	92	-	-	-	-	-	-	2,137
00085 NEES Energy, Inc.	1,075	110	2,016	564	633	474	566	561	560	575	571	568	8,272
00086 EUA Energy Investment	223	286	214	224	223	211	226	225	224	226	229	228	2,740
00092 Prudence Corporation	-	-	53	-	-	-	-	-	-	-	-	-	53
00093 Patience Corporation	-	270	53	-	-	-	-	-	-	-	2,168	-	2,490
00094 Newport America Corporation	-	216	53	-	-	-	-	-	-	-	-	-	268
00095 Metrowest Realty LLC	261	2,186	198	268	432	1,051	664	1,206	631	759	711	687	9,054
00402 Essex Gas Company	32	64	(22)	942	2,442	2,624	2,702	1,427	2,298	2,571	2,472	3,886	21,439
00457 KeySpan Energy Services Inc.	-	-	-	-	-	-	-	-	2,893	-	-	-	2,893
00460 KeySpan Corporation	-	-	-	249	-	-	-	7,017	27,284	121,483	777	-	156,810
01401 Boston Gas Company Billing BU	4,920,072	6,550,560	13,648,759	4,027,116	7,755,661	7,235,980	5,562,372	5,743,712	7,533,486	9,311,410	7,775,945	7,610,836	87,675,910
01402 ESSEX COUNTY GAS COMPANY	(2,114)	23,499	321,025	(14,210)	(2,356)	16,271	13,172	(9,352)	(1,112)	76,142	(12,481)	(29,850)	378,634
01403 Colonial Lowell Div Billing BU	1,025,469	1,453,842	3,248,545	827,611	1,675,465	1,515,951	1,135,563	1,344,442	1,590,457	1,657,889	1,343,759	1,677,193	18,496,186
01404 Colonial Cape Cod Billing BU	533	17,176	306,961	11,677	33,263	28,287	69,396	40,027	96,451	158,130	59,899	56,857	878,657
01406 Energy/North Nat Gas Billing BU	567,419	843,276	1,866,701	508,180	995,726	956,899	713,534	745,294	951,589	973,635	796,604	994,452	10,913,308
01407 KEYSpan NEW ENGLAND LLC	15,439	8,386	9,110	13,917	5,931	5,771	6,490	2,594	6,344	32,428	6,298	11,744	124,449
01429 KEYSpan MONEY POOLS	870,271	1,318,607	1,400,738	1,076,749	833,459	659,172	793,456	798,352	819,007	737,632	907,436	68,613	10,283,490
01431 KeySpan Corp Serv Billing BU	5,000	(5,702)	-	6,813	28,720	-	206	1,079	-	6,912	-	2,667	45,695
01434 KeySpan Electric Srv BillingBU	7,446,245	11,201,859	19,391,839	9,520,356	14,622,552	12,685,238	9,606,052	10,973,857	13,813,994	12,648,478	11,753,816	13,599,872	147,264,159
01435 KeySpan Generation Billing BU	3,456,792	4,869,680	7,697,016	4,718,706	7,966,550	6,976,346	4,912,387	4,985,035	6,582,629	4,451,372	4,313,088	4,845,004	65,774,605
01436 KeySpan Energy Dev Billing BU	194,453	313,394	614,336	281,815	428,755	350,092	453,354	367,763	441,385	406,172	321,320	495,501	4,668,341
01437 KS Gas East Corp KEDLI Bill BU	5,684,891	7,280,050	13,606,633	5,915,661	8,964,904	9,216,605	9,929,128	7,697,810	8,104,934	8,511,774	7,748,794	8,817,524	97,478,708
01438 Brklyn Union Gas KEDLI Bill BU	8,205,867	10,985,356	23,313,656	7,111,847	13,841,736	12,929,991	9,334,785	10,942,985	11,529,634	13,097,056	11,898,969	13,167,025	146,358,908
01441 TRANSCANADA RAVENSWOOD	-	-	-	35,674	-	-	-	-	-	-	-	-	35,674
01442 KS Ravenswood Svcs Billing BU	1,709,358	2,805,293	5,443,459	1,677,847	3,577,019	2,983,547	2,189,277	2,339,783	121,041	125,234	187,599	77,317	23,236,775
01444 KS Energy Trading Billing BU	196,893	305,768	1,407,777	470,325	627,372	363,837	257,013	401,541	742,934	529,194	417,470	424,470	6,144,594
01446 KS Glenwood Energy Billing BU	134,588	110,807	185,965	134,450	265,122	348,130	170,745	241,219	269,404	254,964	255,544	174,756	2,545,695
01448 KS Port Jeff Energy Billing BU	110,098	146,108	255,123	376,571	246,936	179,623	269,207	239,606	183,893	261,275	205,914	213,213	2,687,566
01457 KEYSpan ENERGY SERVICES INC.	17,026	33,324	82,720	36,466	51,817	35,550	23,532	39,380	15,572	13,423	13,605	22,035	384,450
01458 KS Energy Supply Billing BU	97,601	240,895	(335,730)	(1,049)	-	-	-	-	-	-	-	-	1,717
01459 KS Services Billing BU	595,449	940,737	1,791,951	1,132,523	1,182,231	1,357,602	1,038,894	1,329,376	1,927,826	1,222,247	1,130,351	1,494,304	15,143,491
01460 KEYSpan ENERGY CORP	(1,598,356)	(1,823,420)	(1,827,667)	(1,827,667)	(1,788,485)	(1,735,306)	(1,876,333)	(1,302,045)	(1,542,953)	(1,812,375)	(1,828,767)	(1,664,483)	(20,658,581)
01471 Seneca Upshur Billing BU	40,924	81,917	171,979	52,090	157,849	139,222	99,070	150,518	138,655	98,819	90,136	155,148	1,376,326
82 NG RAVENSWOOD SERV (post Sale)	-	-	-	-	-	-	-	-	2,949,558	2,343,852	2,093,315	2,656,072	10,042,797
01563 KeySpan E&P JV Billing BU	3,278	7,913	16,252	(8,897)	3,378	557	1,110	960	1,499	656	1,357	1,059	29,121
C4 KEYSpan LNG LP REGULATED ENTITY	(3,177)	-	-	-	-	-	-	-	-	-	-	-	(3,177)
NK NGUSA Service Company, Inc.	-	-	-	-	-	-	-	-	-	-	-	1,556	1,556
Total	82,300,317	95,840,024	155,001,185	81,795,724	113,427,527	112,991,437	91,460,296	98,916,101	124,546,678	112,629,452	106,833,511	115,225,208	1,290,967,461

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Calendar Year 2009 Amounts Charged from NGRID USA Service Co. to Affiliates by Month

Charged Company	January 2009	February 2009	March 2009	April 2009	May 2009	June 2009	July 2009	August 2009	September 2009	October 2009	November 2009	December 2009	
00001 National Grid USA	635,699	245,814	536,252	215,416	242,457	265,401	189,058	201,959	720,322	145,127	283,831	336,193	4,017,730
00004 Nantucket Electric Company	134,739	149,514	285,553	127,269	138,916	207,424	126,434	143,260	180,213	178,477	168,732	184,037	2,024,569
00005 Massachusetts Electric Company	21,154,620	32,979,716	29,822,206	15,112,861	17,277,532	20,859,456	14,543,630	16,148,570	18,682,889	17,528,908	16,881,826	17,731,232	238,723,445
00006 NE Hydro - Trans Electric Co	249,605	267,916	319,935	273,185	291,797	283,933	273,809	245,324	271,746	310,045	375,328	324,409	3,486,402
00007 New England Hydro Finance Co	-	-	-	-	-	1	(1)	-	-	355	(512)	126	(31)
00008 New England Hydro - Trans Corp	54,040	68,634	82,192	82,296	81,345	127,483	65,630	90,943	99,740	128,082	76,321	93,152	1,049,859
00010 New England Power Company	4,279,713	4,816,696	7,916,029	4,370,829	3,654,234	5,385,562	4,024,357	4,270,045	6,015,053	5,406,124	4,626,325	5,266,943	60,031,910
00020 New England Electric Trans Co	32,814	26,685	41,336	15,276	17,093	24,351	38,885	151,134	197,827	90,973	160,465	(1,457,510)	(660,671)
00021 National Grid Trans Services	(1,194)	3,084	2,767	6,386	3,214	3,257	3,038	3,473	3,226	3,086	3,228	3,332	36,895
00035 Niagara Mohawk Holdings, Inc.	-	-	-	120	-	4	(4)	-	-	-	19,029	24,258	43,407
00036 Niagara Mohawk Power Corp	24,872,163	39,431,018	44,974,165	19,406,146	22,647,312	34,216,906	22,793,492	24,688,997	34,316,128	26,130,971	26,155,391	29,837,162	349,469,851
00037 Opinec North America, Inc	-	-	-	-	-	8	(8)	-	-	-	-	-	-
00041 Granite State Electric Company	882,874	808,694	964,539	531,859	594,717	640,177	486,954	530,347	638,570	595,837	591,585	653,888	7,920,041
00048 Narragansett Gas Company	1,313,540	2,443,061	4,618,536	2,224,737	2,731,805	3,310,212	2,721,608	3,451,685	3,387,787	3,815,309	2,929,998	3,776,196	36,724,474
00049 Narragansett Electric Company	5,675,841	8,430,154	9,888,835	5,073,870	5,818,926	7,817,519	5,220,369	5,727,760	6,871,496	6,528,804	5,968,968	6,823,007	79,845,549
00070 Wayfinder Group Inc.	27,163	1,594	5,581	10,119	2,368	2,922	1,774	2,523	2,435	(751)	1,676	1,558	58,962
00071 Valley Appliances & Merchandise	(2,151)	1,012	445	1,590	300	(36)	100	101	99	(273)	12	9	1,207
00072 National Grid Billing Entity	63,097	219,983	1,945,740	507,533	131,245	398,733	211,438	137,672	507,810	582,625	131,878	154,131	4,991,884
00082 GridAmerica Holdings	597	100	61,844	895	200	246	200	267	200	(131)	100	100	64,617
00083 GridAmerica LLC	-	-	-	-	-	-	140	-	-	-	(140)	-	-
00085 NEES Energy, Inc.	1,118	671	957	1,754	748	753	1,033	3,455	766	732	746	744	13,477
00086 EUA Energy Investment	871	330	325	1,218	425	424	427	436	435	433	424	424	6,191
00092 Prudence Corporation	139	-	-	12	16	17	12	14	14	14	14	14	268
00093 Patience Corporation	139	-	-	-	-	1	140	67	-	-	-	-	347
00094 Newport America Corporation	595	-	-	-	-	2	-	299	-	-	-	-	896
00095 Metrowest Realty LLC	2,256	921	837	1,154	504	523	626	505	2,020	3,700	2,693	4,568	20,306
00402 Essex Gas Company	9,577	1,404	6,227	4,727	8,033	4,364	3,789	4,225	5,879	5,308	5,153	31,394	90,082
00460 KeySpan Corporation	-	-	-	-	-	-	1,806	-	-	-	-	-	1,806
01401 Boston Gas Company Billing BU	5,526,725	8,299,018	11,688,021	5,728,094	7,274,338	8,188,715	5,066,775	9,020,038	8,129,125	6,066,682	6,115,545	9,000,245	90,103,320
01402 ESSEX COUNTY GAS COMPANY	(111,493)	(13,670)	(25,294)	(8,271)	21,223	27,630	16,711	15,357	15,539	274,164	222,334	415,951	850,180
01403 Colonial Lowell Div Billing BU	1,113,056	1,561,988	2,423,650	1,248,714	1,478,503	1,818,410	1,077,727	1,861,416	1,839,938	1,310,924	1,399,838	1,852,278	18,986,444
01404 Colonial Cape Cod Billing BU	(205,468)	45,725	6,152	5,746	18,776	70,822	73,859	95,192	29,509	112,341	107,336	144,304	504,494
01406 EnergyNorth Nat Gas Billing BU	492,346	912,946	1,266,111	655,721	829,724	1,065,712	667,801	1,141,854	967,817	666,661	871,600	1,351,325	10,889,618
01407 KEYSPAN NEW ENGLAND LLC	16,888	54,216	35,582	16,258	8,717	14,295	18,590	17,397	5,918	7,343	29,300	43,566	268,070
01429 KEYSPAN MONEY POOLS	326,452	303,562	73,426	225,092	154,574	148,455	269,377	225,446	205,623	187,875	400,695	486,215	3,006,793
01431 KeySpan Corp Serv Billing BU	13,811	17,182	(234,312)	77,202	29,486	18,755	10,286	20,599	9,097	8,994	11,255	54,871	37,216
01434 KeySpan Electric Srv BillingBU	10,276,942	13,182,174	19,103,491	11,584,492	12,266,054	14,640,959	10,029,750	12,590,513	13,751,189	11,730,625	11,183,610	13,793,165	154,132,965
01435 KeySpan Generation Billing BU	3,309,639	5,488,044	9,164,484	7,118,871	7,537,030	8,548,874	6,048,605	5,858,827	6,677,980	6,281,588	5,485,491	5,901,237	77,420,670
01436 KeySpan Energy Dev Billing BU	264,749	529,927	1,163,117	307,495	331,508	390,688	236,739	406,869	541,429	249,796	233,235	374,645	5,030,199
01437 KS Gas East Corp KEDLI Bill BU	6,389,064	8,465,942	12,554,297	6,603,947	7,443,472	9,041,912	5,971,219	8,044,873	8,734,491	7,404,371	6,943,384	8,348,524	95,945,499
01438 Brklyn Union Gas KEDNY Bill BU	10,092,820	13,941,708	21,397,198	10,600,055	11,308,135	13,898,622	10,135,839	12,662,856	15,551,391	11,150,208	10,519,222	12,265,675	153,523,730
01442 KS Ravenswood Srvc Billing BU	96,970	271,458	337,805	-	-	-	133	-	-	-	-	-	706,366
01444 KS Energy Trading Billing BU	266,110	329,195	490,133	404,104	378,316	393,474	321,851	426,327	278,606	225,814	198,384	286,614	3,898,926
01446 KS Glenwood Energy Billing BU	118,383	149,676	257,353	314,930	279,331	183,615	246,087	173,132	204,043	258,796	165,245	198,507	2,549,096
01448 KS Port Jeff Energy Billing BU	121,840	153,663	303,853	324,296	226,076	285,196	301,532	197,738	287,721	175,584	161,948	214,478	2,753,923
01457 KEYSPAN ENERGY SERVICES INC.	-	-	(334)	-	-	-	-	-	-	-	-	-	(334)
01458 KS Energy Supply Billing BU	-	22	-	-	-	-	4	-	-	-	-	-	25
01459 KS Services Billing BU	961,669	940,666	2,086,999	817,670	865,339	889,729	635,127	880,120	1,122,932	803,893	839,505	1,210,204	12,053,853
01460 KEYSPAN ENERGY CORP	(1,501,502)	(1,866,830)	71,665	(2,485,854)	(1,783,228)	(1,833,060)	(1,603,141)	(1,719,169)	(1,831,452)	(1,825,614)	(1,892,765)	(1,800,836)	(20,071,787)
01471 Seneca Upshur Billing BU	80,559	92,941	260,477	44,951	54,015	82,569	43,360	60,199	50,718	49,532	74,235	84,937	978,489
82 NG RAVENSWOOD SERV (post Sale)	1,584,246	2,030,069	3,442,668	10,312	3,867	(14,313)	(8,123)	(13,690)	(1,084,102)	-	-	-	5,950,934
01563 KeySpan E&P JV Billing BU	1,075	4,513	6,667	1,563	2,249	5,667	2,293	2,790	3,759	2,753	2,345	3,609	39,283
DI TRANSGAS	-	-	6,685	-	-	-	-	-	-	-	-	-	6,685
NK NGUSA Service Company, Inc.	(1,556)	1,556	(1,556)	1,556	-	-	-	-	-	-	-	-	-
Total	\$98,621,174	\$144,792,693	\$187,352,007	\$91,566,198	\$102,370,693	\$131,416,371	\$90,171,138	\$107,771,743	\$127,420,001	\$106,595,237	\$101,431,934	\$118,018,952	\$1,407,528,141

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Annual Amounts Charged from NGRID USA Service Co. to Affiliates

Charged Company	2006	2007	2008	2009	
00001 National Grid USA	\$6,892,894	\$7,199,114	\$8,994,548	\$3,861,314	\$26,947,870
00004 Nantucket Electric Company	2,120,106	1,886,808	1,839,537	1,671,033	7,517,485
00005 Massachusetts Electric Company	156,715,567	165,020,634	195,096,973	221,847,141	738,680,315
00006 NE Hydro - Trans Electric Co	3,208,133	3,307,713	3,596,249	3,364,572	13,476,667
00007 New England Hydro Finance Co	-	109	443	(31)	521
00008 New England Hydro - Trans Corp	1,060,162	1,202,494	923,284	955,674	4,141,613
00010 New England Power Company	42,417,423	44,200,296	50,368,270	57,618,030	194,604,019
00020 New England Electric Trans Co	837,531	592,229	415,442	(667,931)	1,177,271
00021 National Grid Trans Services	7,302	115,682	37,651	36,895	197,530
00035 Niagara Mohawk Holdings, Inc.	859	7,572	18,209	43,407	70,047
00036 Niagara Mohawk Power Corp	192,708,260	229,480,143	255,504,904	306,215,399	983,908,705
00037 Opimac North America, Inc	3,298	3,911	375	-	7,584
00041 Granite State Electric Company	5,365,037	6,523,354	6,903,182	7,085,600	25,877,172
00048 Narragansett Gas Company	5,828,034	21,157,400	24,453,798	28,248,718	79,687,950
00049 Narragansett Electric Company	59,287,685	63,057,791	72,222,417	72,923,948	267,491,841
00070 Wayfinder Group Inc.	9,144	12,518	16,890	58,962	97,514
00071 Valley Appliance & Merchandise	737	6,623	6,514	1,207	15,081
00072 National Grid Billing Entity	4,523,622	4,651,381	6,216,091	4,991,884	20,382,978
00075 NEES Communications, Inc.	301	-	-	-	301
00076 NGRID Communications Billing	2,304,578	1,692,712	(67,303)	-	3,929,988
00077 Grid Communications Inc	225	-	-	-	225
00078 Atlantic Western Consulting	160	-	-	-	160
00079 National Grid Wireless Cons	(2,957)	1,593	-	-	(1,363)
00082 GridAmerica Holdings	(9,147)	43,816	2,137	64,617	101,423
00083 GridAmerica LLC	124,056	-	-	-	124,056
00085 NEES Energy, Inc.	10,732	8,258	8,272	13,477	40,739
00086 EUA Energy Investment	2,418	2,472	2,740	6,191	13,820
00092 Prudence Corporation	515	211	53	268	1,046
00093 Patience Corporation	20	208	2,490	347	3,065
00094 Newport America Corporation	242	601	268	896	2,006
00095 Metrowest Realty LLC	1,581	2,549	9,054	20,306	33,490
00402 Essex Gas Company	-	-	21,439	90,082	111,521
00457 KeySpan Energy Services Inc.	-	-	2,893	-	2,893
00460 KeySpan Corporation	-	-	156,810	1,806	158,617
01401 Boston Gas Company Billing BU	-	14,264	3,993,110	15,473,256	19,480,629
01403 Colonial Lowell Div Billing BU	-	2,821	723,647	2,620,983	3,347,450
01404 Colonial Cape Cod Billing BU	-	2,305	63,487	113,471	179,263
01406 EnergyNorth Nat Gas Billing BU	-	1,515	488,424	1,667,747	2,157,686
01431 KeySpan Corp Serv Billing BU	-	423	45,695	37,226	83,345
01434 KeySpan Electric Srv BillingBU	-	14,206	5,739,371	14,405,163	20,158,739
01435 KeySpan Generation Billing BU	-	3,659	1,802,621	5,190,952	6,997,232
01436 KeySpan Energy Dev Billing BU	-	47	23,191	46,644	69,882
01437 KS Gas East Corp KEDLI Bill BU	-	9,459	2,627,915	9,642,723	12,280,098
01438 Brklyn Union Gas KEDNY Bill BU	-	21,296	5,231,141	20,909,732	26,162,169
01442 KS Ravenswood Srves Billing BU	-	2,658	998,370	706,366	1,707,394
01444 KS Energy Trading Billing BU	-	17	3,518	5,539	9,074
01446 KS Glenwood Energy Billing BU	-	90	48,412	107,582	156,084
01448 KS Port Jeff Energy Billing BU	-	86	38,962	98,266	137,314
01458 KS Energy Supply Billing BU	-	11	1,717	25	1,753
01459 KS Services Billing BU	-	753	1,354,028	298,710	1,653,491
01471 Seneca Upshur Billing BU	-	272	127,417	285,942	413,632
01563 KeySpan E&P JV Billing BU	-	39	14,270	28,823	43,132
Total Charged from NGRID USA Service Co.	\$483,418,520	\$550,252,109	\$650,078,922	\$780,092,965	\$2,463,842,516

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Annual Amounts Charged from KeySpan Service Companies to Affiliates

Charged Company	SEP - DEC 2007	2008	2009	
01 BOSTON GAS COMPANY	25,622,885	83,682,801	74,630,065	183,935,750
02 ESSEX COUNTY GAS COMPANY	64,904	378,634	850,180	1,293,719
03 Colonial Lowell Division	5,514,024	17,772,540	16,365,461	39,652,025
04 Colonial Cape Cod Div	154,690	815,170	391,023	1,360,882
06 EnergyNorth Company	3,109,930	10,424,884	9,221,871	22,756,685
07 KEYSpan NEW ENGLAND LLC	55,803	124,449	268,070	448,322
29 KEYSpan MONEY POOLS	4,656,100	10,283,490	3,006,793	17,946,383
34 KEYSpan ELECTRIC SERVICES, LLC	41,456,727	141,524,788	139,727,803	322,709,317
35 KEYSpan GENERATION SERVICES, LLC	18,391,493	63,971,984	72,229,717	154,593,194
36 KEYSpan ENERGY DEVELOPMENT	1,500,371	4,645,150	4,983,555	11,129,076
37 KEYSpan ENERGY DELIVERY LI	27,654,523	94,850,792	86,302,775	208,808,091
38 KEYSpan ENERGY DELIVERY NY	40,612,623	141,127,768	132,613,998	314,354,389
41 TRANSCANADA RAVENSWOOD	-	35,674	-	35,674
42 TRANSCANADA RAV SERVICES	10,459,683	22,238,406	-	32,698,089
44 KEYSpan ENERGY TRADING SERVICES, LLC	1,367,519	6,141,076	3,893,387	11,401,983
46 KEYSpan GLENWOOD ENERGY CENTER LLC	535,994	2,497,283	2,441,514	5,474,791
47 KEYSpan SPAGNOLI ROAD ENERGY CENTER LLC	-	-	-	-
48 KEYSpan PORT JEFFERSON ENERGY CENTER LLC	822,436	2,648,604	2,655,657	6,126,696
57 KEYSpan ENERGY SERVICES INC.	183,645	384,450	(334)	567,761
58 KEYSpan ENERGY SUPPLY INC.	1,041,088	-	-	1,041,088
59 KEYSpan SERVICES INC	3,799,032	13,789,463	11,755,144	29,343,639
60 KEYSpan ENERGY CORP	(7,615,531)	(20,658,581)	(20,071,787)	(48,345,900)
71 SENECA UPSHUR PETROLEUM	187,621	1,248,909	692,546	2,129,076
82 NG RAVENSWOOD SERV (post Sale)	-	10,042,797	5,950,934	15,993,732
C4 KEYSpan LNG LP REGULATED ENTITY	-	(3,177)	-	(3,177)
D1 TRANSGAS	-	-	6,685	6,685
F1 KEYSpan E&P JOINT VENTURE 50%	10,966	14,851	10,460	36,277
KT KEYSpan TECHNOLOGIES	-	-	-	-
NA National Grid USA (Parent)	7,913	84,297	156,416	248,626
NB Nantucket Electric Company	5,389	146,028	353,535	504,952
NC Massachusetts Electric Company	309,794	7,130,862	16,876,303	24,316,960
ND New England Power Company	33,835	1,075,902	2,413,879	3,523,616
NE Niagara Mohawk Power-Elect Dist	735,154	12,819,059	26,664,409	40,218,623
NF Granite State Electric Company	10,736	303,623	834,441	1,148,800
NG Narragansett Gas Company	82,545	5,046,260	8,475,756	13,604,561
NH Narragansett Electric Company	140,346	2,707,853	6,921,601	9,769,800
NK NGUSA Service Company, Inc.	-	1,556	-	1,556
NL NE Hydro-Trans Elec Co, Inc.	3,500	54,806	121,830	180,136
NN NE Hydro-Trans Corporation	3,044	47,098	94,185	144,327
NO NE Electric Trans Corporation	456	5,564	7,260	13,280
NP Niagara Mohawk Power-Gas	-	2,929,055	14,255,528	17,184,584
NQ Niagara Mohawk Power-Trans	-	554,372	2,334,514	2,888,886
Grand Total	180,919,238	640,888,539	627,435,176	1,449,242,953

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Calendar Year 2006 Amounts Charged from NGRID USA Service Co. to Affiliates by Month

Charged Company	January 2006	February 2006	March 2006	April 2006	May 2006	June 2006	July 2006	August 2006	September 2006	October 2006	November 2006	December 2006	
00001 National Grid USA	\$406,324	\$381,815	\$2,417,722	\$383,781	\$546,688	\$328,368	\$264,368	\$414,103	\$435,979	\$332,907	\$344,056	\$636,783	\$6,892,894
00004 Nantucket Electric Company	144,269	150,313	205,773	161,335	192,839	216,836	171,892	257,639	152,392	173,634	162,867	130,316	2,120,106
00005 Massachusetts Electric Company	12,432,906	12,365,011	16,779,554	10,859,274	11,435,816	14,579,261	12,056,245	12,584,040	13,842,246	13,711,945	12,565,592	13,503,678	156,715,567
00006 NE Hydro - Trans Electric Co	250,737	246,494	295,195	288,260	255,470	251,562	261,695	237,577	261,945	308,074	272,342	278,784	3,208,133
00007 New England Hydro Finance Co	-	-	-	102	-	(102)	-	-	-	-	-	-	-
00008 New England Hydro - Trans Corp	77,421	55,650	181,745	120,362	56,581	73,820	114,182	79,879	63,575	87,740	68,280	80,927	1,060,162
00010 New England Power Company	3,762,216	3,505,636	4,505,331	3,288,712	3,131,594	3,637,966	3,284,776	3,742,823	3,229,922	3,428,763	3,558,392	3,341,293	42,417,423
00020 New England Electric Trans Co	50,609	57,342	65,552	102,844	75,740	64,722	75,283	62,603	56,961	98,448	65,085	62,342	837,531
00021 National Grid Trans Services	138	117	1,601	590	591	631	751	569	484	637	584	609	7,302
00035 Niagara Mohawk Holdings, Inc.	-	-	9	-	-	-	-	-	138	296	416	-	859
00036 Niagara Mohawk Power Corp	16,611,944	13,956,090	13,735,099	12,800,442	14,372,174	15,412,970	16,031,225	14,996,347	16,066,770	20,103,242	20,293,489	18,328,468	192,708,260
00037 Opinac North America, Inc	-	-	1,544	-	1,390	109	-	-	-	255	-	-	3,298
00041 Granite State Electric Company	453,665	427,982	549,632	447,791	413,909	461,141	399,262	441,821	453,156	460,355	422,366	433,957	5,365,037
00048 Narragansett Gas Company	-	-	-	-	-	-	-	7,773	1,247,535	1,751,462	1,250,248	1,571,017	5,828,034
00049 Narragansett Electric Company	4,660,564	4,695,614	5,665,534	4,039,097	4,471,798	5,269,656	4,932,481	5,104,422	5,437,030	5,367,167	4,706,054	4,938,269	59,287,685
00070 Wayfinder Group Inc.	311	221	1,698	1,677	644	1,004	885	700	738	707	637	(78)	9,144
00071 Valley Appliance & Merchandise	-	-	-	-	-	-	-	-	20	717	-	-	737
00072 National Grid Billing Entity	291,215	75,262	342,155	542,616	353,520	703,669	553,620	369,865	266,936	142,780	378,992	502,989	4,523,622
00075 NEES Communications, Inc.	301	-	-	-	-	-	-	-	-	-	-	-	301
00076 NGrid Communications Billing	337,420	138,085	175,722	226,695	200,564	(19,535)	200,497	224,338	216,784	221,836	214,734	167,440	2,304,578
00077 Grid Communications Inc	222	-	3	-	-	-	-	-	-	-	-	-	225
00078 Atlantic Western Consulting	158	-	2	-	-	-	-	-	-	-	-	-	160
00079 National Grid Wireless Cons	-	(3,207)	31	300	-	-	-	(80)	-	-	-	-	(2,957)
00082 GridAmerica Holdings	461	(177)	(7,501)	40,013	4,390	(14,518)	(2,858)	(4,111)	(10,677)	(11,872)	(698)	(1,600)	(9,147)
00083 GridAmerica LLC	111,191	3,948	8,917	-	-	-	-	-	-	-	-	-	124,056
00085 NEES Energy, Inc.	217	351	2,969	876	574	729	554	513	2,377	595	580	398	10,732
00086 EUA Energy Investment	26	15	1,222	429	149	476	(295)	151	195	290	178	(418)	2,418
00092 Prudence Corporation	-	-	-	-	-	-	-	-	20	495	-	-	515
00093 Patience Corporation	-	-	-	-	-	-	-	-	20	-	-	-	20
00094 Newport America Corporation	-	-	-	-	-	-	-	-	20	222	-	-	242
00095 Metrowest Realty LLC	40	44	476	151	151	151	(126)	151	218	197	192	(63)	1,581
Total Charged from NGRID USA Service Co.	\$39,592,355	\$36,056,606	\$44,929,984	\$33,305,346	\$35,514,584	\$40,968,916	\$38,344,435	\$38,521,121	\$41,724,783	\$46,180,893	\$44,304,387	\$43,975,110	\$483,418,520

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Calendar Year 2007 Amounts Charged from NGRID USA Service Co. to Affiliates by Month

Charged Company	January 2007	February 2007	March 2007	April 2007	May 2007	June 2007	July 2007	August 2007	September 2007	October 2007	November 2007	December 2007	
00001 National Grid USA	\$401,048	\$401,692	\$699,572	\$409,886	\$418,881	\$427,064	\$458,700	\$1,260,687	\$427,553	\$762,296	\$465,398	\$1,066,337	\$7,199,114
00004 Nantucket Electric Company	186,506	177,075	293,682	105,626	131,332	123,695	137,321	204,723	113,100	128,639	142,167	142,941	1,886,808
00005 Massachusetts Electric Company	12,254,659	12,734,934	19,600,885	10,796,235	13,211,714	13,912,576	13,239,891	14,404,977	12,925,708	14,348,587	13,964,108	13,726,360	165,028,634
00006 NE Hydro - Trans Electric Co	311,949	245,638	342,911	264,203	258,341	386,425	269,199	260,746	228,395	251,745	294,290	193,870	3,307,713
00007 New England Hydro Finance Co	-	-	-	-	-	-	109	-	-	-	-	-	109
00008 New England Hydro - Trans Corp	85,370	84,528	161,363	149,349	72,919	94,238	71,714	105,320	65,472	149,723	90,987	71,511	1,202,494
00010 New England Power Company	3,219,663	3,454,978	4,815,187	3,024,044	3,403,562	3,404,226	3,579,362	4,019,837	4,113,053	3,579,510	4,073,375	3,513,500	44,200,296
00020 New England Electric Trans Co	68,340	57,788	63,689	59,297	46,970	52,858	33,487	39,695	39,210	41,847	52,184	34,864	592,229
00021 National Grid Trans Services	543	462	336	401	357	427	1,188	123,625	(20,269)	2,202	3,547	2,861	115,682
00035 Niagara Mohawk Holdings, Inc.	-	-	-	-	-	-	-	-	-	-	-	7,572	7,572
00036 Niagara Mohawk Power Corp	19,218,946	18,380,328	21,978,954	13,746,287	18,689,214	16,479,492	19,806,665	21,422,162	19,370,108	21,130,748	19,002,112	20,255,124	229,480,143
00037 Oplacac North America, Inc	-	5	667	-	1,860	-	1,380	-	-	-	-	-	3,911
00041 Granite State Electric Company	457,432	403,645	753,213	439,172	471,606	889,492	440,833	563,014	405,191	592,446	601,928	505,382	6,523,354
00048 Narragansett Gas Company	1,562,086	1,445,889	2,012,064	1,371,306	1,396,912	1,794,893	1,628,565	2,109,684	1,561,678	2,699,704	1,848,739	1,725,880	21,157,400
00049 Narragansett Electric Company	4,980,156	4,820,678	7,487,973	4,092,107	4,964,642	5,123,707	4,962,673	5,352,535	5,104,066	5,146,994	5,703,931	5,318,329	63,057,791
00070 Wayfinder Group Inc.	1,505	714	2,072	858	696	690	(83)	641	(124)	411	1,437	3,702	12,518
00071 Valley Appliance & Merchandise	50	-	504	304	380	1,101	368	464	782	413	375	1,880	6,623
00072 National Grid Billing Entity	228,523	386,954	265,160	348,446	312,855	399,138	299,493	340,843	391,597	351,317	587,289	739,766	4,651,381
00076 NGrid Communications Billing	203,053	188,159	207,428	226,407	269,026	212,448	198,190	117,181	2,940	68,021	(139)	-	1,692,712
00079 National Grid Wireless Coas	1,593	-	-	-	-	-	-	-	-	-	-	-	1,593
00082 GridAmerica Holdings	2,602	1,825	29,911	2,064	3,013	4,940	14,858	-	-	(14,797)	-	-	43,816
00085 NEES Energy, Inc.	778	1,604	493	614	706	570	316	564	551	866	650	545	8,258
00086 EUA Energy Investment	176	354	(248)	434	173	174	264	223	216	222	267	217	2,472
00092 Prudence Corporation	50	-	161	-	-	-	-	-	-	-	-	-	211
00093 Patience Corporation	50	-	158	-	-	-	-	-	-	-	-	-	208
00094 Newport America Corporation	50	-	106	-	444	-	-	-	-	-	-	-	601
00095 Metrowest Realty LLC	189	182	(1)	344	359	415	(500)	240	199	270	670	182	2,549
01401 Boston Gas Company Billing BU	-	-	-	-	-	-	-	-	-	-	296	13,968	14,264
01403 Colonial Lowell Div Billing BU	-	-	-	-	-	-	-	-	-	-	59	2,762	2,821
01404 Colonial Cape Cod Billing BU	-	-	-	-	-	-	-	-	-	-	-	2,305	2,305
01406 EnergyNorth Nat Gas Billing BU	-	-	-	-	-	-	-	-	-	-	32	1,484	1,515
01431 KeySpan Corp Serv Billing BU	-	-	-	-	-	-	-	-	-	-	-	423	423
01434 KeySpan Electric Srv BillingBU	-	-	-	-	-	-	-	-	-	-	346	13,860	14,206
01435 KeySpan Generation BillingBU	-	-	-	-	-	-	-	-	-	-	152	3,507	3,659
01436 KeySpan Energy Dev Billing BU	-	-	-	-	-	-	-	-	-	-	0	47	47
01437 KS Gas East Corp KEDLI Bill BU	-	-	-	-	-	-	-	-	-	-	198	9,261	9,459
01438 Brklyn Union Gas KEDNY Bill BU	-	-	-	-	-	-	-	-	-	-	444	20,852	21,296
01442 KS Ravenswood Svcs Billing BU	-	-	-	-	-	-	-	-	-	-	115	2,543	2,658
01444 KS Energy Trading Billing BU	-	-	-	-	-	-	-	-	-	-	0	17	17
01446 KS Glenwood Energy Billing BU	-	-	-	-	-	-	-	-	-	-	4	86	90
01448 KS Port Jeff Energy Billing BU	-	-	-	-	-	-	-	-	-	-	4	82	86
01458 KS Energy Supply Billing BU	-	-	-	-	-	-	-	-	-	-	0	11	11
01459 KS Services Billing BU	-	-	-	-	-	-	-	-	-	-	18	736	753
01471 Seneca Upshur Billing BU	-	-	-	-	-	-	-	-	-	-	2	270	272
01563 KeySpan E&P JV Billing BU	-	-	-	-	-	-	-	-	-	-	-	39	39
Total Charged from NGRID USA Service Co.	\$43,184,719	\$42,787,433	\$58,718,240	\$35,037,385	\$43,655,962	\$43,308,567	\$45,143,993	\$50,327,161	\$44,729,427	\$49,141,164	\$46,834,984	\$47,383,074	\$550,252,109



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

For the Post Merger period August 27 (September 1) - December 31, Calendar Year 2007 Amounts Charged from KeySpan Service Companies to Affiliates by Month

	Charged Company	SEPTEMBER-07	OCTOBER-07	NOVEMBER-07	DECEMBER-07	
01	BOSTON GAS COMPANY	8,245,067	4,791,378	6,310,668	6,275,772	25,622,885
02	ESSEX COUNTY GAS COMPANY	26,963	(3,546)	27,784	13,703	64,904
03	Colonial Lowell Division	1,804,875	1,052,422	1,354,497	1,302,231	5,514,024
04	Colonial Cape Cod Div	59,784	25,967	47,802	21,137	154,690
05	COLONIAL ADMINISTRATION	-	-	-	-	-
06	EnergyNorth Company	1,030,861	583,544	787,125	708,401	3,109,930
07	KEYSPAN NEW ENGLAND LLC	37,795	479	9,912	7,617	55,803
29	KEYSPAN MONEY POOLS	1,799,915	1,254,063	887,210	714,913	4,656,100
34	KEYSPAN ELECTRIC SERVICES, LLC	12,247,825	8,315,566	9,848,393	11,044,942	41,456,727
35	KEYSPAN GENERATION SERVICES, LLC	6,022,513	3,742,309	3,777,342	4,849,329	18,391,493
36	KEYSPAN ENERGY DEVELOPMENT	653,624	78,249	325,791	442,708	1,500,371
37	KEYSPAN ENERGY DELIVERY LI	7,893,159	6,042,699	6,418,857	7,299,808	27,654,523
38	KEYSPAN ENERGY DELIVERY NY	11,749,295	8,267,717	9,857,006	10,738,605	40,612,623
41	TRANSCANADA RAVENSWOOD	-	-	-	-	-
42	TRANSCANADA RAV SERVICES	3,275,009	1,956,005	2,564,015	2,664,654	10,459,683
44	KEYSPAN ENERGY TRADING SERVICES, LLC	463,496	172,093	322,822	409,107	1,367,519
46	KEYSPAN GLENWOOD ENERGY CENTER LLC	250,202	16,643	121,276	147,874	535,994
47	KEYSPAN SPAGNOLI ROAD ENERGY CENTER LLC	-	-	-	-	-
48	KEYSPAN PORT JEFFERSON ENERGY CENTER LLC	203,510	324,887	142,012	152,027	822,436
57	KEYSPAN ENERGY SERVICES INC.	59,657	34,447	36,007	53,534	183,645
58	KEYSPAN ENERGY SUPPLY INC.	429,328	74,006	214,942	322,812	1,041,088
59	KEYSPAN SERVICES INC	1,135,720	905,464	917,947	839,901	3,799,032
60	KEYSPAN ENERGY CORP	(2,149,166)	(1,880,149)	(1,824,986)	(1,761,230)	(7,615,531)
71	SENECA UPSHUR PETROLEUM	75,661	15,447	50,856	45,658	187,621
82	NG RAVENSWOOD SERV (post Sale)	-	-	-	-	-
C4	KEYSPAN LNG LP REGULATED ENTITY	-	-	-	-	-
D1	TRANSGAS	-	-	-	-	-
F1	KEYSPAN E&P JOINT VENTURE 50%	5,354	(205)	3,253	2,565	10,966
KT	KEYSPAN TECHNOLOGIES	-	-	-	-	-
NA	National Grid USA (Parent)	-	-	3,665	4,248	7,913
NB	Nantucket Electric Company	-	-	2,529	2,860	5,389
NC	Massachusetts Electric Company	-	-	147,590	162,203	309,794
ND	New England Power Company	-	-	15,577	18,259	33,835
NE	Niagara Mohawk Power-Elect Dist	-	-	340,605	394,549	735,154
NF	Granite State Electric Company	-	-	5,123	5,613	10,736
NG	Narragansett Gas Company	-	-	28,608	53,937	82,545
NH	Narragansett Electric Company	-	-	62,396	77,949	140,346
NK	NGUSA Service Company, Inc.	-	-	-	-	-
NL	NE Hydro-Trans Elec Co, Inc.	-	-	1,621	1,879	3,500
NN	NE Hydro-Trans Corporation	-	-	1,410	1,634	3,044
NO	NE Electric Trans Corporation	-	-	211	245	456
NP	Niagara Mohawk Power-Gas	-	-	-	-	-
NQ	Niagara Mohawk Power-Trans	-	-	-	-	-
Grand Total		55,320,444	35,769,484	42,809,867	47,019,442	180,919,238

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID COMPANY 36  
Calendar Year 2008 Amounts Charged from NGRID USA Service Co. to Affiliates by Month

Charged Company	January 2008	February 2008	March 2008	April 2008	May 2008	June 2008	July 2008	August 2008	September 2008	October 2008	November 2008	December 2008
00001 National Grid USA	\$835,577	\$916,001	\$3,355,996	\$189,186	\$858,442	\$486,773	\$401,799	\$141,871	\$531,312	\$310,072	\$225,507	\$541,752
00004 National Electric Company	172,365	252,749	139,829	165,539	155,195	156,616	130,954	102,250	188,302	153,916	119,125	102,008
00005 Massachusetts Electric Company	14,285,765	14,201,040	18,933,925	14,405,706	16,189,022	16,037,113	15,437,754	14,562,270	19,841,025	16,896,130	15,030,430	19,376,772
00006 NE Hydro - Trans Electric Co	279,137	253,189	207,438	259,597	361,856	309,532	378,357	230,120	244,239	316,165	266,677	269,942
00007 New England Hydro Finance Co			102					341				443
00008 New England Hydro - Trans Corp	152,440	45,552	155,317	57,327	62,828	77,217	55,192	47,438	52,328,889	57,847	38,695	39,782
00010 New England Power Company	4,151,005	3,705,246	4,994,511	3,623,385	4,305,520	3,972,638	3,721,803	3,664,320	4,270,129	4,334,967	4,570,129	4,091,857
00020 New England Electric Trans Co	46,847	28,804	31,720	31,981	42,515	27,404	32,395	32,517	28,044	28,044	30,833	32,831
00021 National Grid Trans Services	3,337	4,650	2,674	3,057	3,321	2,394	3,064	2,896	3,058	3,095	3,165	2,940
00035 Niagara Mohawk Holdings, Inc.		2,498	4,755	125	967	1,766	2,934	1,611	2,663	890		18,209
00036 Niagara Mohawk Power Corp	19,090,843	19,815,504	22,444,420	16,954,262	19,185,703	23,771,039	20,116,069	20,498,741	27,578,248	22,167,431	21,388,695	22,492,949
00037 Optane North America, Inc				375								375
00041 Granite State Electric Company	735,166	592,943	612,941	502,367	510,511	505,292	516,772	531,615	625,149	580,699	516,444	673,283
00048 Narragansett Gas Company	2,184,565	1,748,874	1,956,351	1,826,433	1,690,333	2,233,762	1,810,796	1,560,404	2,703,154	2,037,544	1,922,266	2,779,316
00049 Narragansett Electric Company	5,933,306	5,340,951	6,984,215	5,346,300	6,034,340	6,179,237	5,838,196	5,516,438	7,762,220	6,368,470	5,220,447	5,698,397
00070 Weylender Group Inc.	2,679	(4,272)	2,322	404	573	3,903	1,536	817	2,245	618	2,989	3,056
00071 Valley Appliances & Merchandise	1,011	578	1,027	208	530	314	327	293	574	499	638	314
00072 National Grid Billing Entity	265,202	177,158	307,796	486,571	227,414	55,086	692,195	134,230	(43,370)	121,660	3,674,988	117,161
00076 NGRID Communications Billing		(67,303)										(67,303)
00082 GRIDAmerica Holdings		(43)	430		1,637	92						2,137
00085 NEES Energy, Inc.	1,075	110	2,016	564	633	474	566	581	560	575	571	568
00086 EUA Energy Investment	223	286	214	224	223	211	226	225	224	226	229	228
00092 Prudence Corporation			53									53
00093 Palanca Corporation		270	53								2,168	
00094 Newport America Corporation		216	53									268
00095 Midwestern Realty LLC	261	2,186	198	268	432	1,051	664	1,206	631	759	711	687
00402 Elcom Gas Company	32	64	(22)	942	2,442	2,624	2,702	1,427	2,298	2,571	2,472	3,886
00457 KeySpan Energy Services Inc.									2,893			2,893
00460 KeySpan Corporation				249				7,017	27,284	121,483	777	156,810
01401 Bortin Gas Company Billing BU	105,785	521,398	1,213,636	(1,003,792)	696,609	170,129	312,069	210,449	496,039	344,168	444,505	482,414
01403 Colonial Lowell Div Billing BU	21,338	103,489	241,335	(200,703)	129,531	30,291	56,427	35,983	87,580	59,270	80,485	78,002
01404 Colonial Cape Cod Billing BU			505	920	2,657	3,428	2,874	2,995	27,155	9,317	2,619	11,016
01406 EnergyNorth Nat Gas Billing BU	11,865	56,918	132,372	(106,943)	84,957	21,987	36,322	28,564	63,492	47,530	58,379	52,381
01431 KeySpan Corp Serv Billing BU	5,000	(5,702)		6,813	28,720		206	1,079		6,912		2,667
01434 KeySpan Electric Serv Billing BU	116,077	597,673	1,489,117	(701,769)	964,818	133,397	404,299	167,055	987,414	598,817	553,544	428,928
01435 KeySpan Generation Billing BU	47,947	250,101	584,845	(514,717)	426,080	64,963	159,167	71,364	236,887	126,104	196,467	153,405
01436 KeySpan Energy Der Billing BU	777	4,283	9,983	(9,064)	5,836	667	2,001	838	2,656	1,282	2,234	1,696
01437 KS Gas East Corp KEDLI BU BU	70,201	348,389	824,450	(670,179)	505,343	108,945	225,837	125,993	318,204	207,454	284,951	278,327
01438 Bridyn Union Gas KEDNY BU BU	157,499	795,584	1,857,867	(1,539,254)	990,154	209,379	427,710	243,003	618,157	391,884	546,495	532,562
01442 KS Ravenwood Svcs Billing BU	36,295	197,191	458,679	(414,883)	212,387	32,798	79,895	36,256	119,668	63,799	98,766	77,317
01444 KS Energy Trading Billing BU	135	179	257	80	78	198	258	327	757	450	394	404
01446 KS Glenwood Energy Billing BU	1,327	7,720	18,231	(16,804)	12,004	1,653	4,260	6,001	6,001	3,130	5,193	3,518
01448 KS Port Laff Energy Billing BU	1,263	7,336	17,325	(15,966)	9,175	1,264	3,256	1,310	4,590	2,410	3,970	3,963
01458 KS Energy Supply Billing BU	131	557	2,077	(1,049)								1,717
01459 KS Services Billing BU	6,943	103,300	319,679	19,279	43,747	56,293	87,602	44,179	587,863	42,060	18,678	24,403
01471 Seneca Upstar Billing BU	4,365	23,420	54,784	(49,486)	31,415	3,711	10,528	4,769	14,757	7,177	12,261	9,376
01563 KeySpan E&P JV Billing BU	711	4,169	9,856	(9,103)	3,167	512	1,028	370	1,245	579	1,117	820
Total Charged from NGRID USA Service Co.	\$48,728,478	\$50,034,655	\$67,275,382	\$38,628,460	\$53,781,325	\$54,663,954	\$50,958,660	\$48,235,295	\$68,419,366	\$55,616,025	\$55,349,032	\$58,269,278
												\$650,789,922

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Calendar Year 2008 Amounts Charged from KeySpan Service Companies to Affiliates by Month

Charged Company	JANUARY-08	FEBRUARY-08	MARCH-08	APRIL-08	MAY-08	JUNE-08	JULY-08	AUGUST-08	SEPTEMBER-08	OCTOBER-08	NOVEMBER-08	DECEMBER-08
01 BOSTON GAS COMPANY	4,814,286	6,029,161	12,435,123	5,030,307	7,059,055	7,066,851	5,230,303	5,533,533	7,037,243	8,967,443	7,331,440	7,128,422
02 ESSEX COUNTY GAS COMPANY	(2,114)	321,499	321,025	(14,210)	(2,356)	16,271	13,172	(9,352)	(1,112)	76,142	(12,481)	83,682,801
03 Colonial Lowell Division	1,004,111	1,350,531	3,007,210	1,028,314	1,455,934	1,485,660	1,079,136	1,308,460	1,502,619	1,598,619	1,263,274	378,634
04 Colonial Cape Cod Div	533	17,176	306,456	10,757	30,605	24,858	66,522	37,031	69,296	148,813	57,280	17,772,540
05 COLONIAL ADMINISTRATION	555,554	786,358	1,734,329	615,123	910,769	934,911	677,212	716,329	888,097	926,055	738,225	815,170
06 EnergyNorth Company	15,439	8,386	9,110	13,917	5,931	5,771	6,490	2,594	6,344	32,228	6,298	10,424,884
07 KEYSPAN NEW ENGLAND LLC	870,271	1,318,607	1,400,738	1,076,749	833,459	659,172	793,456	798,332	819,007	737,032	907,436	124,449
29 KEYSPAN MONEY POOLS	7,330,168	10,604,187	17,902,722	10,222,125	13,657,734	12,551,841	9,201,753	10,806,803	12,826,580	12,049,661	11,200,272	10,283,490
34 KEYSPAN ELECTRIC SERVICES, LLC	3,408,846	4,619,580	7,112,171	5,233,423	7,540,461	6,911,382	4,733,220	4,913,671	6,345,742	4,325,568	4,116,621	68,013
35 KEYSPAN GENERATION SERVICES, LLC	193,676	309,111	604,353	290,478	422,919	349,425	451,353	366,926	438,729	404,890	319,085	13,170,944
36 KEYSPAN ENERGY DEVELOPMENT	5,614,690	6,931,661	12,782,183	6,585,840	8,459,561	9,107,660	5,703,291	7,571,817	7,786,730	8,304,320	7,463,842	63,971,984
37 KEYSPAN ENERGY DELIVERY LI	8,048,367	10,189,772	21,451,789	8,651,101	12,851,582	12,720,613	8,907,071	10,697,882	10,911,477	12,705,172	11,352,474	4,691,599
38 KEYSPAN ENERGY DELIVERY NY	1,673,063	2,608,102	4,984,780	2,092,730	3,364,432	2,950,748	2,109,382	2,303,527	1,373	61,435	88,834	493,805
41 TRANSCANADA RAVENSWOOD	196,758	305,589	1,407,520	470,245	627,294	363,639	256,754	401,214	742,176	528,744	417,076	8,539,198
42 KEYSPAN ENERGY TRADING SERVICES, LLC	133,261	103,087	1,67,734	151,254	253,118	346,477	166,485	239,506	263,403	251,814	230,352	12,634,463
44 KEYSPAN GLENWOOD ENERGY CENTER LLC	-	-	-	-	-	-	-	-	-	-	-	-
46 KEYSPAN SPAGNOLI ROAD ENERGY CENTER LLC	-	-	-	-	-	-	-	-	-	-	-	-
47 KEYSPAN PORT JEFFERSON ENERGY CENTER LLC	-	-	-	-	-	-	-	-	-	-	-	-
48 KEYSPAN ENERGY SERVICES INC.	108,835	138,772	237,798	392,537	237,761	178,359	265,951	238,286	179,303	258,866	201,944	210,183
57 KEYSPAN ENERGY SUPPLY INC.	17,026	33,324	82,720	36,466	51,817	35,550	23,532	39,380	15,572	13,423	13,605	22,035
58 KEYSPAN SERVICES INC	97,470	240,338	(337,808)	-	-	-	-	-	-	-	-	2,649,404
59 KEYSPAN ENERGY CORP	588,504	837,437	1,472,272	1,113,244	1,138,483	1,301,309	951,292	1,285,196	1,339,963	1,180,187	1,111,673	384,450
60 KEYSPAN ENERGY CORP	(1,598,356)	(1,823,420)	(1,858,392)	(1,827,667)	(1,788,485)	(1,735,066)	(1,876,333)	(1,302,045)	(1,812,755)	(1,828,767)	(1,828,767)	1,469,502
71 SENECA UPSHUR PETROLEUM	36,560	58,496	117,196	101,577	126,433	135,510	88,141	145,808	123,898	91,942	77,875	(1,664,483)
82 NG RAVENSWOOD SERV (post Sale)	-	-	-	-	-	-	-	-	2,949,558	2,343,852	2,093,315	12,488,509
84 KEYSPAN LNG LP REGULATED ENTITY	(3,177)	-	-	-	-	-	-	-	-	-	-	145,772
D1 TRANS GAS	-	-	-	-	-	-	-	-	-	-	-	10,042,797
F1 KEYSPAN E&P JOINT VENTURE 50%	2,568	3,743	6,397	206	211	245	82	590	253	77	240	2,656,072
KT KEYSPAN TECHNOLOGIES	-	-	-	-	-	-	-	-	-	-	-	(3,177)
NA National Grid USA (Parent)	2,250	5,004	14,877	5,987	6,119	7,096	2,372	17,110	7,348	2,220	6,971	14,851
NB Nantuxet Electric Company	1,540	4,852	9,383	6,714	7,085	8,702	4,785	13,696	45,805	12,211	16,107	239
NC Massachusetts Electric Company	90,155	277,084	488,330	407,868	431,743	557,525	341,873	961,829	859,472	648,566	845,141	6,943
ND New England Power Company	9,562	24,463	91,186	60,808	70,607	148,599	35,644	211,575	106,082	90,018	103,589	13,150
NE Niagara Mohawk Power-Elec Dist	208,000	599,916	1,300,344	993,063	1,125,097	1,029,045	640,040	1,693,865	1,192,745	1,161,152	1,536,308	1,221,476
NF Granite State Electric Company	3,124	9,549	17,605	14,630	21,698	13,648	46,391	40,543	46,391	31,941	47,200	122,007
NG Narragansett Gas Company	110,814	71,196	230,962	195,422	326,534	464,521	251,221	516,605	325,403	990,164	982,003	1,339,485
NH Narragansett Electric Company	38,065	115,559	206,561	163,124	328,643	214,204	130,721	388,861	281,567	249,663	315,911	42,146
NK NGUSA Service Company, Inc.	-	-	-	-	-	-	-	-	-	-	-	581,415
NL NE Hydro-Trans Elec Co, Inc.	995	2,213	6,580	4,336	4,431	5,138	1,717	12,390	5,321	1,607	5,048	2,707,853
NN NE Hydro-Trans Corporation	865	1,925	5,722	3,716	3,798	4,404	1,472	10,620	4,561	1,378	4,327	1,556
NO NE Electric Trans Corporation	130	289	858	413	422	489	164	1,180	507	153	481	5,086
NP Niagara Mohawk Power-Gas	-	-	-	-	-	381,293	163,983	532,935	464,806	606,508	352,199	47,098
NQ Niagara Mohawk Power-Trans	-	-	-	-	-	75,122	25,729	180,050	83,543	24,088	80,282	479
Grand Total	33,571,839	45,805,369	87,725,833	43,167,274	59,446,202	58,377,483	40,501,636	50,680,805	56,127,312	57,013,127	51,465,479	56,855,880
												640,888,339

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Calendar Year 2009 Amounts Charged from NGRID USA Service Co. to Affiliates by Month

Charged Company	January 2009	February 2009	March 2009	April 2009	May 2009	June 2009	July 2009	August 2009	September 2009	October 2009	November 2009	December 2009
00001 National Grid USA	\$628,768	\$241,989	\$513,307	\$207,774	\$229,817	\$252,320	\$179,444	\$180,304	\$700,945	\$134,153	\$271,340	\$312,153
00004 Nantuxet Electric Company	125,396	139,001	198,756	107,585	115,369	176,490	108,572	114,811	143,222	153,161	143,004	145,668
00005 Massachusetts Electric Company	20,447,054	32,308,740	27,887,508	14,100,708	15,880,038	19,171,850	13,549,995	14,612,026	16,625,128	16,202,387	15,498,854	15,562,854
00006 NE Hydro - Trans Electric Co	244,585	265,146	302,690	267,307	281,950	273,485	263,867	263,122	256,258	301,200	365,497	305,467
00007 New England Hydro Finance Co						1	(1)		355	(512)	126	(31)
00008 New England Hydro - Trans Corp	49,738	66,260	67,950	77,887	73,952	119,619	59,647	83,261	88,098	121,419	68,927	78,917
00010 New England Power Company	4,139,054	4,691,385	7,942,434	4,236,401	3,402,927	5,168,720	3,875,435	4,081,275	5,753,280	5,232,259	4,441,698	4,952,961
00020 New England Electric Trans Co	32,336	26,421	39,754	14,982	16,598	23,820	38,480	150,614	197,045	90,521	159,966	(1,458,467)
00021 National Grid Trans Services	(1,194)	3,084	2,767	6,386	3,214	3,257	3,038	3,473	3,226	3,086	3,228	3,332
00035 Niagara Mohawk Holdings, Inc.						4	(4)				19,029	24,258
00036 Niagara Mohawk Power Corp	23,395,846	37,952,716	40,177,479	17,223,600	19,325,394	29,856,499	20,139,325	19,844,079	28,804,889	22,788,684	22,347,968	24,358,920
00037 Opineac North America, Inc.						8	(8)					
00041 Granite State Electric Company	844,229	743,547	817,358	482,040	531,072	562,414	448,764	464,295	552,447	540,873	535,245	563,316
00048 Narragansett Gas Company	1,639,163	2,297,159	3,648,655	1,773,484	1,950,962	2,455,994	2,090,562	2,306,159	2,253,002	3,077,384	2,128,516	2,627,677
00049 Narragansett Electric Company	5,466,219	8,213,961	9,274,444	4,665,068	5,242,781	7,101,348	4,779,748	5,087,121	5,875,427	5,955,877	5,371,482	5,890,472
00070 Wayfinder Group Inc.	27,163	1,594	5,581	10,119	2,368	2,922	1,774	2,523	2,435	(751)	1,676	1,558
00071 Valley Appliance & Merchandise	(2,151)	1,012	445	1,590	300	(36)	100	101	99	(273)	12	9
00072 National Grid Billing Entity	63,097	219,983	1,945,740	507,533	131,245	398,733	211,438	137,672	507,810	582,625	131,878	154,131
00082 GridAmerica Holdings	597	100	61,844	895	200	246	200	267	200	(131)	100	100
00083 GridAmerica LLC							140				(140)	
00085 NEES Energy, Inc.	1,118	671	957	1,754	748	753	1,033	3,455	766	732	746	744
00086 EIA Energy Investment	871	330	325	1,218	425	424	427	436	435	453	424	424
00092 Prudence Corporation	139	-	-	12	16	17	12	14	14	14	14	14
00093 Patience Corporation	-	-	-	-	-	1	140	67	-	-	-	-
00094 Newport America Corporation	595	921	837	1,154	504	523	299	505	2,020	3,700	2,693	896
00098 Metrowest Realty LLC	2,256	1,404	6,227	4,727	8,033	4,364	3,789	4,225	5,879	5,308	5,153	20,306
00099 Essex Gas Company	9,577						1,806					90,082
00460 KeySpan Corporation	415,440	1,984,513	1,642,153	799,263	803,673	1,687,365	766,218	1,405,091	1,782,474	1,249,532	1,389,297	1,548,237
01401 Boston Gas Company Billing BU	79,685	350,522	304,785	131,318	158,073	298,858	154,541	200,472	280,931	188,361	227,176	266,261
01403 Colonial Lowell Div Billing BU	13,255	13,371	18,863	11,433	5,076	17,209	4,996	6,204	4,378	5,500	6,671	6,515
01404 Colonial Cape Cod Billing BU	54,356	289,911	218,363	81,245	91,586	227,582	85,379	114,515	150,751	105,239	121,653	127,167
01406 EnergyNorth Nat Gas Billing BU	13,811	17,182	(234,312)	77,202	29,486	18,755	10,286	20,599	9,097	8,994	11,255	54,871
01431 KeySpan Corp Serv Billing BU	421,335	1,984,972	1,854,614	898,341	601,317	1,712,751	758,408	1,212,187	1,674,150	846,575	1,247,008	1,193,505
01434 KeySpan Electric Serv Billing BU	192,157	566,091	965,397	245,759	248,350	694,675	259,499	348,254	527,341	383,737	313,999	405,744
01435 KeySpan Generation Billing BU	1,809	(11,623)	11,506	2,901	2,797	9,447	3,438	3,920	5,901	4,113	3,326	9,110
01436 KeySpan Energy Dev Billing BU	274,002	1,637,775	1,158,520	535,593	427,319	1,212,813	325,621	719,514	1,061,550	649,716	749,466	890,836
01437 KS Gas East Corp KEDLI Bill BU	519,121	3,223,690	3,816,238	1,230,770	850,424	2,303,157	861,234	1,428,307	2,288,160	1,360,693	1,404,301	1,623,636
01438 Bklyn Union Gas KEDNY Bill BU							133					
01442 KS Ravenwood Svcs Billing BU	566	271,458	337,805	926	672	728	908	758	1,904	489	989	944
01444 KS Energy Trading Billing BU	4,911	12,407	25,367	4,277	4,239	13,735	5,300	7,626	9,368	7,259	5,582	7,513
01446 KS Glenwood Energy Billing BU	3,755	7,722	19,441	4,538	4,599	14,254	5,467	8,033	9,675	7,519	5,781	7,781
01448 KS Port Jeff Energy Billing BU		22	-	-	-	-	4	-	-	-	-	25
01458 KS Energy Supply Billing BU	25,140	(150,675)	37,223	25,635	26,683	30,552	28,248	32,370	166,107	14,177	42,528	20,691
01559 KS Services Billing BU	10,080	11,857	62,812	13,062	14,523	44,611	18,092	19,827	32,276	19,951	17,869	28,592
01571 Saeneca Upshur Billing BU	816	4,381	5,876	976	1,383	4,681	1,561	1,840	2,266	1,934	1,408	1,782
01583 KeySpan E&P JV Billing BU												
Total Charged from NGRID USA Service Co.	\$59,241,823	\$97,384,515	\$102,841,278	\$47,785,480	\$50,467,813	\$73,864,946	\$49,069,633	\$52,850,617	\$69,779,309	\$60,045,561	\$87,045,742	\$59,746,048
												\$780,092,565

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Calendar Year 2009 Amounts Charged from Keyspan Service Companies to Affiliates by Month

Charged Company	JANUARY-09	FEBRUARY-09	MARCH-09	APRIL-09	MAY-09	JUNE-09	JULY-09	AUGUST-09	SEPTEMBER-09	OCTOBER-09	NOVEMBER-09	DECEMBER-09
01 BOSTON GAS COMPANY	5,111,285	6,314,505	10,045,868	4,928,831	6,470,664	6,501,350	4,300,557	7,614,947	6,346,650	4,817,151	4,726,248	7,452,008
02 ESSEX COUNTY GAS COMPANY	(111,493)	(15,670)	(25,294)	(8,271)	21,223	27,630	16,711	15,337	15,539	274,104	222,314	415,951
03 Colonial Lowell Division	1,033,371	1,211,466	2,118,865	1,117,397	1,320,430	1,519,552	943,187	1,660,945	1,559,007	1,122,562	1,172,662	1,386,017
04 Colonial Cape Cod Div	(218,724)	33,354	(12,712)	(5,687)	13,700	53,613	68,863	88,987	25,131	106,841	100,666	137,989
06 EnergyNorth Company	437,989	623,015	1,047,747	574,477	738,138	838,130	583,423	1,027,339	817,066	561,423	749,947	1,224,158
07 KEYSpan NEW ENGLAND LLC	16,888	54,216	35,582	16,258	8,717	14,295	18,590	17,397	5,918	7,343	29,300	43,566
29 KEYSpan MONEY POOLS	326,452	303,562	73,426	225,092	154,574	148,455	269,377	225,446	205,623	187,875	400,695	486,215
34 KEYSpan ELECTRIC SERVICES, LLC	9,855,607	11,197,202	17,248,737	10,686,152	11,664,737	12,928,208	9,271,343	11,378,326	10,884,050	12,077,040	9,936,602	12,599,659
35 KEYSpan GENERATION SERVICES, LLC	3,117,482	4,921,953	8,199,087	6,871,111	7,288,680	7,854,199	5,749,156	5,510,574	6,150,638	5,897,851	5,171,492	5,495,493
36 KEYSpan ENERGY DEVELOPMENT	262,941	541,550	1,151,612	304,594	328,711	381,241	233,301	402,949	555,529	245,683	229,910	365,535
37 KEYSpan ENERGY DELIVERY LI	6,115,062	6,828,167	11,395,777	6,068,354	7,016,153	7,829,099	5,645,598	7,325,360	7,672,943	6,754,655	6,193,918	7,457,688
38 KEYSpan ENERGY DELIVERY NY	9,573,700	10,718,018	17,580,960	9,369,285	10,457,712	11,595,465	9,274,604	11,234,549	13,263,300	9,780,515	9,114,921	10,642,039
41 TRANSCANADA RAVENSWOOD	-	-	-	-	-	-	-	-	-	-	-	-
42 TRANSCANADA RAVENSWOOD	-	-	-	-	-	-	-	-	-	-	-	-
44 KEYSpan ENERGY TRADING SERVICES, LLC	265,544	334,080	488,594	403,178	377,644	392,746	220,943	425,569	276,702	225,324	197,395	285,669
45 LIPA	-	-	-	-	-	-	-	-	-	-	-	-
46 KEYSpan GLENWOOD ENERGY CENTER LLC	113,472	137,269	231,985	310,654	275,092	169,881	240,787	165,506	194,675	251,537	159,663	190,993
47 KEYSpan PORT JEFFERSON ENERGY CENTER LLC	-	-	-	-	-	-	-	-	-	-	-	-
48 KEYSpan ENERGY SERVICES INC.	118,084	145,940	284,411	319,857	221,677	270,942	296,065	189,705	278,046	168,065	156,167	206,697
57 KEYSpan ENERGY SUPPLY INC.	-	-	(334)	-	-	-	-	-	-	-	-	(334)
58 KEYSpan SERVICES INC	-	-	2,049,746	-	-	-	-	-	-	-	-	-
59 KEYSpan ENERGY CORP	936,529	1,091,341	2,049,746	792,036	838,656	859,177	606,879	847,750	956,825	789,715	796,976	1,189,513
60 KEYSpan ENERGY CORP	(1,501,502)	(1,866,830)	71,665	(2,485,854)	(1,783,228)	(1,833,060)	(1,603,141)	(1,719,169)	(1,831,452)	(1,825,614)	(1,892,765)	(1,800,836)
71 SENECA UPSHUR PETROLEUM	70,475	81,083	197,665	31,889	39,491	37,958	25,268	40,372	41,959	29,581	32,849	63,955
82 NC RAVENSWOOD SERV (post Sale)	1,584,246	2,030,069	3,442,668	10,312	3,867	(14,313)	(8,123)	(13,690)	(1,084,102)	-	-	5,950,934
C4 KEYSpan LNG LP REGULATED ENTITY	-	-	-	-	-	-	-	-	-	-	-	-
D1 TRANSGAS	-	-	6,685	-	-	-	-	-	-	-	-	6,685
F1 KEYSpan E&P JOINT VENTURE 50%	239	132	791	588	966	986	731	950	1,493	819	938	1,827
KT KEYSpan TECHNOLOGIES	-	-	-	-	-	-	-	-	-	-	-	-
NA National Grid USA (Parent)	6,931	3,825	22,945	7,643	12,640	13,081	9,614	12,656	19,578	10,973	12,491	24,040
NB Nantux Electric Company	9,344	10,514	86,797	19,685	23,417	30,935	17,862	28,449	36,900	25,317	25,728	38,369
NC Nantux Electric Company	707,565	670,976	1,934,697	1,012,154	1,397,495	1,687,607	993,635	1,536,544	2,057,761	1,326,531	1,392,971	2,168,377
ND New England Power Company	140,659	125,111	273,595	134,427	231,307	216,842	148,521	188,770	281,773	173,865	184,627	113,983
NE Niagara Mohawk Power-Elec Dist	913,963	897,825	3,072,151	1,510,220	2,266,189	2,662,253	1,644,130	2,507,639	3,404,590	2,063,962	2,221,344	3,493,943
NF Granite State Electric Company	38,645	65,147	147,181	49,819	63,645	77,763	38,190	66,051	86,123	54,964	56,341	90,572
NG Narragansett Gas Company	(325,623)	145,902	969,881	451,253	780,443	854,218	631,046	1,145,526	1,134,785	737,994	801,481	1,148,519
NH Narragansett Electric Company	209,622	216,193	614,391	408,802	576,145	716,171	440,622	640,639	996,068	572,927	597,486	6,921,601
NK NGUSA Service Company, Inc.	(1,556)	1,556	(1,556)	1,556	-	-	-	-	-	-	-	-
NL NE Hydro-Trans Elec Co, Inc.	5,019	2,770	16,615	5,879	9,848	10,450	7,942	10,201	15,488	8,845	9,831	121,830
NN NE Hydro-Trans Corporation	4,302	2,374	14,242	4,409	7,394	7,865	5,983	7,682	11,642	6,663	7,394	14,235
NO NE Electric Trans Corporation	478	264	1,582	294	495	531	406	520	783	452	499	957
NP Niagara Mohawk Power-Gas	479,095	516,906	1,464,136	537,503	845,607	1,486,219	860,681	2,132,597	1,795,773	1,105,410	1,397,277	1,634,322
NQ Niagara Mohawk Power-Trans	83,260	63,568	260,400	128,823	210,122	211,935	149,356	204,682	310,876	172,914	188,602	349,978
Grand Total	39,379,351	47,408,378	84,510,728	43,810,719	51,902,479	57,551,425	41,101,505	54,921,126	57,640,692	46,549,277	44,386,192	58,272,904
												627,435,176

Date of Request: February 17, 2010  
Due Date: March 1, 2010

Request No. RAV-13 SUPP  
NMPC Req. No. NM 18 DPS 18

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid  
Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO:

Request:

A. For each month, January 2006 through December 2009, please provide a breakdown of total service company costs charged to every individual affiliate of National Grid, both regulated and unregulated; also include 2006 – 2009 annual amounts. Please provide this information broken down between those costs allocated from the National Grid – USA service company, the KeySpan service company, and in total.

B. Same as A, for the rate years' forecasted amounts.

C. Please provide monthly updates for A. above until further notice.

Note: Please provide the information in an excel spreadsheet, not a pdf file.

SUPPLEMENT: Please provide the NMPC amounts split apart between E & G.

Response:

SUPP: As requested, please see RAV-13 SUPP Attachment 1, which supplements the information provided in the response to RAV-13.

Name of Respondent:  
Andrew Sloey

Date of Reply:  
March 1, 2010

**NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)**  
**Annual Amounts Charged from KeySpan Service Companies to Niagara Mohawk by Segment**

Company	Company Description	SEP - DEC 2007	2008	2009	TOTAL
NE	Niagara Mohawk Power-Elect Dist	735,154.38	12,819,059.35	26,664,409.15	40,218,622.88
NP	Niagara Mohawk Power-Gas	0.00	2,929,055.24	14,255,528.49	17,184,583.73
NQ	Niagara Mohawk Power-Trans	0.00	554,372.32	2,334,514.11	2,888,886.43
Grand Total		735,154.38	16,302,486.91	43,254,451.75	60,292,093.04

**NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)**  
**Calendar Year 2009 Amounts Charged from KeySpan Service Companies to NMPC by Segment**

Company	Company Description	JANUARY-09	FEBRUARY-09	MARCH-09	APRIL-09	MAY-09	JUNE-09	JULY-09	AUGUST-09	SEPTEMBER-09	OCTOBER-09	NOVEMBER-09	DECEMBER-09	TOTAL
NE	Niagara Mohawk Power-Elect Dist	913,962.87	897,825.16	3,072,150.65	1,516,220.03	2,266,188.83	2,662,253.46	1,644,130.10	2,507,639.29	3,404,589.83	2,063,962.03	2,221,544.38	3,493,942.52	26,664,409.15
NP	Niagara Mohawk Power-Gas	479,095.24	516,907.66	1,464,135.86	537,503.42	845,607.15	1,486,219.31	860,680.77	2,132,596.90	1,795,773.28	1,105,409.87	1,397,276.99	1,634,322.04	14,255,528.49
NQ	Niagara Mohawk Power-Trans	83,259.57	63,568.27	260,400.16	128,822.56	210,121.55	211,934.89	149,355.56	204,681.50	310,875.63	172,914.39	188,602.01	349,977.62	2,334,514.11
<b>Grand Total</b>		<b>1,476,317.68</b>	<b>1,478,301.09</b>	<b>4,796,686.67</b>	<b>2,182,546.41</b>	<b>3,321,917.53</b>	<b>4,360,407.66</b>	<b>2,654,166.43</b>	<b>4,844,917.69</b>	<b>5,511,238.74</b>	<b>3,342,286.29</b>	<b>3,807,433.38</b>	<b>5,478,242.18</b>	<b>43,254,451.75</b>



**NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)**  
**Calendar Year 2008 Amounts Charged from KeySpan Service Companies to NMPC by Segment**

Company	Company Description	JANUARY-08	FEBRUARY-08	MARCH-08	APRIL-08	MAY-08	JUNE-08	JULY-08	AUGUST-08	SEPTEMBER-08	OCTOBER-08	NOVEMBER-08	DECEMBER-08	TOTAL
NE	Niagara Mohawk Power-Elect Dist	208,000.43	599,915.91	1,300,344.15	993,062.55	1,125,096.96	1,029,045.43	640,039.60	1,693,864.92	1,192,745.23	1,161,151.89	1,536,307.53	1,339,484.75	12,819,059.35
NP	Niagara Mohawk Power-Gas	0.00	0.00	0.00	0.00	0.00	381,293.04	163,983.39	532,935.18	464,805.83	606,508.13	352,198.66	427,331.01	2,979,055.24
NQ	Niagara Mohawk Power-Trans	0.00	0.00	0.00	0.00	0.00	75,122.10	25,728.50	180,050.07	83,543.23	24,087.64	80,281.96	85,558.82	554,372.32
<b>Grand Total</b>		<b>208,000.43</b>	<b>599,915.91</b>	<b>1,300,344.15</b>	<b>993,062.55</b>	<b>1,125,096.96</b>	<b>1,485,460.57</b>	<b>829,751.49</b>	<b>2,406,850.17</b>	<b>1,741,094.29</b>	<b>1,791,747.66</b>	<b>1,968,788.15</b>	<b>1,852,374.58</b>	<b>16,302,466.91</b>

**NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)**  
**For the Post Merger period August 27 (September 1) - December 31, Calendar Year 2007 Amounts Charged from KeySpan Service Companies to NMPC by Segment**

Company	Company Description	SEPTEMBER-07	OCTOBER-07	NOVEMBER-07	DECEMBER-07	TOTAL
NE	Niagara Mohawk Power-Elect Dist	0.00	0.00	340,605.43	394,548.95	735,154.38
NP	Niagara Mohawk Power-Gas	0.00	0.00	0.00	0.00	0.00
NQ	Niagara Mohawk Power-Trans	0.00	0.00	0.00	0.00	0.00
<b>Grand Total</b>		0.00	0.00	340,605.43	394,548.95	735,154.38

**NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)**  
**Annual Amounts Charged from NGRID USA Service Co. to Niagara Mohawk by Segment**

Company	Company Description	2006	2007	2008	2009	TOTAL
NE	Niagara Mohawk Power-Elect Dist	138,176,844.88	160,723,647.11	179,762,174.05	217,476,846.21	696,139,512.25
NP	Niagara Mohawk Power-Gas	25,372,367.13	30,098,236.79	30,547,968.38	37,515,937.84	123,534,510.13
NQ	Niagara Mohawk Power-Trans	29,159,048.01	38,658,258.91	45,194,761.10	51,222,614.76	164,234,682.78
Grand Total		192,708,260.02	229,480,142.81	255,504,903.52	306,215,398.81	983,908,705.16

**NIAGARA MOHAWK POWER CORPORATION db/a NATIONAL GRID (COMPANY 36)**  
**Calendar Year 2009 Amounts Charged from NGRID USA Service Co. to NMPC by Segment**

Company	Company Description	JANUARY-09	FEBRUARY-09	MARCH-09	APRIL-09	MAY-09	JUNE-09	JULY-09	AUGUST-09	SEPTEMBER-09	OCTOBER-09	NOVEMBER-09	DECEMBER-09	TOTAL
NE	Niagara Mohawk Power-Elec Dig	16,970,772.21	30,505,675.91	29,846,723.66	12,107,052.88	14,073,600.34	21,293,207.47	13,429,160.00	14,223,122.48	19,583,665.61	14,828,321.83	15,389,242.80	15,026,291.52	217,476,846.21
NP	Niagara Mohawk Power-Gas	2,757,316.28	3,691,549.73	4,084,608.38	1,836,444.35	2,635,266.43	4,372,448.27	2,599,818.88	2,623,407.41	3,398,910.71	3,139,419.21	2,532,472.66	3,644,275.55	37,515,937.84
NQ	Niagara Mohawk Power-Trans	3,667,756.60	3,753,490.82	6,246,146.49	3,080,102.34	2,616,527.53	4,190,842.88	4,110,337.32	2,997,548.98	5,622,313.04	4,820,943.29	4,426,252.53	5,688,352.94	51,222,614.76
	<b>Grand Total</b>	<b>23,395,845.59</b>	<b>37,952,716.46</b>	<b>40,177,478.53</b>	<b>17,223,599.57</b>	<b>19,325,394.30</b>	<b>29,856,498.62</b>	<b>20,139,325.20</b>	<b>19,844,078.87</b>	<b>28,604,889.36</b>	<b>22,788,684.33</b>	<b>22,347,967.99</b>	<b>24,358,919.99</b>	<b>306,215,398.81</b>

NIAGARA MOHAWK POWER CORPORATION db/a NATIONAL GRID (COMPANY 36)  
 Calendar Year 2008 Amounts Charged from NGRID USA Service Co. to NMPC by Segment

Company	Company Description	JANUARY-08	FEBRUARY-08	MARCH-08	APRIL-08	MAY-08	JUNE-08	JULY-08	AUGUST-08	SEPTEMBER-08	OCTOBER-08	NOVEMBER-08	DECEMBER-08	TOTAL
NE	Niagara Mohawk Power-Elect Dist	13,357,325.56	14,783,790.81	14,290,502.14	12,539,713.60	13,807,879.64	17,688,049.80	13,315,427.91	15,094,424.35	19,366,733.53	15,522,769.49	13,855,015.42	16,140,541.80	179,762,174.05
NP	Niagara Mohawk Power-Gas	2,290,358.14	1,982,261.83	2,318,426.12	1,975,685.99	2,272,766.27	2,906,001.16	2,673,389.57	2,400,211.88	5,636,566.81	2,664,462.94	2,485,786.57	2,941,811.10	30,547,968.38
NO	Niagara Mohawk Power-Trans	3,442,919.39	3,050,451.04	5,835,491.97	2,438,862.11	3,105,057.57	3,176,987.70	4,127,251.36	3,004,105.19	4,574,947.59	5,980,198.49	5,047,892.88	3,410,595.81	45,194,761.10
Grand Total		19,090,843.09	19,816,503.68	22,444,420.22	16,954,261.70	19,185,703.48	23,771,038.66	20,116,068.84	20,498,741.42	27,578,247.93	22,167,430.92	21,388,694.87	22,492,948.71	255,504,903.52

NIAGARA MOHAWK POWER CORPORATION db/a NATIONAL GRID (COMPANY 36)  
 Calendar Year 2007 Amounts Charged from NGRID USA Service Co. to NMPC by Segment

Company	Company Description	JANUARY-07	FEBRUARY-07	MARCH-07	APRIL-07	MAY-07	JUNE-07	JULY-07	AUGUST-07	SEPTEMBER-07	OCTOBER-07	NOVEMBER-07	DECEMBER-07	TOTAL
NE	Niagara Mohawk Power-Elect Dist	14,392,226.69	13,215,806.40	14,525,497.15	10,102,734.58	13,823,378.01	11,610,078.30	13,828,424.56	14,941,218.21	13,778,337.79	14,918,850.88	13,152,478.13	12,414,616.42	160,723,647.11
NP	Niagara Mohawk Power-Gas	2,153,485.46	2,364,731.96	2,914,472.29	1,882,462.96	2,622,924.88	2,342,750.33	2,696,340.65	2,882,571.74	2,741,183.75	2,869,804.40	2,156,199.97	2,531,308.40	30,098,256.79
NQ	Niagara Mohawk Power-Trans	2,673,234.26	2,779,789.71	4,538,984.89	1,761,089.59	2,242,911.50	2,528,663.54	3,341,899.33	3,598,372.45	2,850,586.78	3,342,093.03	3,693,434.22	5,309,199.61	38,658,258.91
Grand Total		19,218,946.41	18,360,328.07	21,978,954.33	13,746,287.13	18,689,214.39	16,479,492.17	19,806,664.54	21,422,162.40	19,370,108.32	21,130,748.31	19,002,112.32	20,265,124.43	279,480,142.81

**NIAGARA MOHAWK POWER CORPORATION db/a NATIONAL GRID (COMPANY 36)**  
**Calendar Year 2006 Amounts Charged from NGRID USA Service Co. to NMPC by Segment**

Company	Company Description	JANUARY-06	FEBRUARY-06	MARCH-06	APRIL-06	MAY-06	JUNE-06	JULY-06	AUGUST-06	SEPTEMBER-06	OCTOBER-06	NOVEMBER-06	DECEMBER-06	TOTAL
NE	Niagara Mohawk Power-Elect Dist	11,965,898.43	10,117,407.39	9,507,118.04	9,406,758.03	10,245,253.93	11,135,273.20	11,561,302.57	11,049,101.99	11,211,191.10	14,038,395.55	15,035,949.23	12,903,195.33	138,176,844.88
NP	Niagara Mohawk Power-Gas	2,010,317.50	1,634,618.43	1,526,119.51	1,689,762.22	1,936,221.41	2,139,844.72	2,319,124.07	2,031,525.61	2,297,362.09	2,718,270.40	2,550,660.16	2,518,541.01	25,372,567.13
NQ	Niagara Mohawk Power-Trans	2,635,727.94	2,204,064.57	2,701,861.09	1,703,921.34	2,190,699.04	2,137,852.50	2,150,798.71	1,915,719.00	2,558,216.53	3,346,576.36	2,706,879.12	2,906,731.81	29,159,048.01
<b>Grand Total</b>		<b>16,611,943.87</b>	<b>13,956,090.39</b>	<b>13,735,098.63</b>	<b>12,800,441.59</b>	<b>14,372,174.38</b>	<b>15,412,970.42</b>	<b>16,031,225.35</b>	<b>14,996,346.60</b>	<b>16,066,769.71</b>	<b>20,103,242.31</b>	<b>20,293,488.51</b>	<b>18,328,468.25</b>	<b>192,708,260.02</b>

Date of Request: February 10, 2010  
Due Date: February 22, 2010

Request No. CVB-1  
NMPC Req. No. NM 19 DPS-19

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Christian Bonvin

TO: Infrastructure and Operations Panel

Request:

1. Please provide an excel file containing the following information for each distribution and sub-transmission blanket project on a total company basis (i.e. does not need to reflect line items for East, Central, West):
  - A. Approved budgets from FY05/06 through FY09/10
  - B. Actual expenditures for FY05/06 through FY08/09
  - C. Forecasted expenditure for FY09/10 (using actual expenditures incurred to date)
  - D. Forecasted expenditures for FY10/11 through FY14/15
2. Please explain instances, if any, where a blanket account has been modified over the fiscal years to reflect a different work level ( $\leq \$100,000$ ), subsume or remove other blanket accounts, or otherwise changed such that year to year comparison would be inappropriate.

Response:

1. Figures are provided in Attachment 1 (CVB-1\_Attach 1\_Blanket Capital Project Analysis.xls).
  - A. See Columns labeled C, E, G, I, and K for the appropriate categories.
  - B. See Columns labeled D, F, H, and J for the appropriate categories.
  - C. See Column labeled L for the appropriate categories.
  - D. See Columns labeled M, N, O, P, and Q for the appropriate categories.



2. Over the time period included in the Information Request CVB-1, blanket projects have evolved differently for Distribution vs. Sub-Transmission. Therefore this portion of the response will address them separately.

#### **DISTRIBUTION BLANKET PROJECTS:**

Instances where a blanket project has been modified over the fiscal years such that year to year comparison would be inappropriate:

- a. All blankets in FY2005/06 and FY2006/07 included more work orders over \$100k than in more recent years. FY07/08 and beyond have separated these larger work orders into specific project numbers to improve monitoring, resource planning and overall project approval. These larger work orders occurred more frequently in New Business, Public Requirements, Load Relief and Asset Replacement categories.
- b. General Equipment – In FY08/09 a significant accounting adjustment relating to prior and current year was made to reinstate the previous Niagara Mohawk general equipment capitalization limit of \$200 (Column J – Row 4).
- c. Public Requirements – FY07/08 actuals (Column H – Row 9) included an accounting adjustment of over \$7M for benefits overhead adjustment.

#### **SUB-TRANSMISSION BLANKET PROJECTS**

Divisional Sub-Transmission blanket projects (project numbers CNE071 to CNW077) were set up in June 2007. They were first used in fiscal year 2007/08 for a portion of the year and budgeted for the first time in fiscal year 2008/09. The intent of these projects is to better controls for the budgeting, approval, and tracking of work in these various categories. Prior to establishing these projects, certain specific projects were utilized to collect costs within current blanket-type categories but without the \$100k work order limit. In the enclosed budget-to-actual excel spreadsheet, we have mapped these types of projects to represent the budgets and actuals for the sub-transmission blanket classifications. This “map” is provided in Attachment 2, (CVB-1\_Attach 2\_TxD Blanket Map.xls)

Name of Respondent:

Glen DiConza

Date of Reply:

February 18, 2010

BLANKET CAPITAL PROJECT ANALYSIS  
 NIAGARA MOHAWK (\$000)  
 DISTRIBUTION

COLUMN											
A	B	C	D	E	F	G	H	I	J	K	L
Blanket # / Blanket Description			FY05/06 Actual Spend		FY06/07 Actual Spend		FY07/08 Actual Spend		FY08/09 Actual Spend		
002	Substation Blanket	-	882	-	767	750	955	780	1,190	1,099	1,979
004	Meter Blanket (installs & purchases)	2,024	2,389	2,700	4,943	5,600	6,691	6,068	5,661	7,006	3,360
006/070	Genl Equip Blanket	1,475	2,155	1,300	810	1,000	1,460	614	8,275	647	3,177
009	Land/Rights Blanket	-	1,478	1,210	1,776	1,750	1,154	1,820	1,718	1,945	1,919
010	New Bus-Resid Blankt	31,202	41,227	34,200	41,439	45,500	35,055	35,756	29,649	25,492	27,724
011	New Bus-Comm Blanket	3,205	10,973	8,500	9,426	10,900	11,466	10,968	11,516	9,245	12,168
012	Outdoor Lighting	6,873	7,082	6,700	7,029	7,900	7,361	6,596	8,113	7,258	6,400
013	Public Requir Blankt	6,841	9,590	7,000	8,290	9,690	15,417	8,756	3,212	7,340	4,282
014	Damages&Failure Blankt	5,091	8,161	6,300	11,232	10,700	13,044	13,098	14,175	18,241	15,213
015	Reliability Blanket	1,783	6,737	4,500	5,079	6,200	4,220	4,869	7,270	7,432	8,428
016	Load Relier Blanket	2,363	6,715	4,500	1,355	2,000	1,001	1,360	1,334	2,895	1,375
017	Asset Replace Blankt	6,237	6,915	5,700	7,555	8,000	4,885	3,838	6,642	6,961	9,370
020	Transf/Capac Blanket	21,942	25,182	20,000	24,488	23,400	25,428	22,738	23,174	23,920	24,276
021	Dist - Telecom	428	510	550	64	150	(151)	156	1	24	(4)
022	3rd Party Attch Blnkt	156	457	500	292	450	128	468	156	252	294
<b>TOTAL</b>			130,453		124,545		128,114		122,086		

BLANKET CAPITAL PROJECT ANALYSIS  
 NIAGARA MOHAWK (\$000)  
 SUB-TRANSMISSION

Blanket # / Blanket Description			FY05/06 Actual Spend		FY06/07 Actual Spend		FY07/08 Actual Spend		FY08/09 Actual Spend		
071	New Business (All)	-	502	-	88	100	458	750	20	241	430
072	Public Requirements	492	556	450	920	(230)	(592)	750	85	145	56
073	Damage/Failure	1,023	1,533	1,725	1,332	1,950	1,709	1,600	2,812	1,304	2,750
074	Substation Blanket	-	54	25	180	555	427	750	829	757	972
075	Asset Replacement	180	694	450	576	450	1,995	2,909	1,321	716	1,400
076	Reliability	-	-	-	-	-	72	750	439	615	575
077	Load Relief	-	35	-	127	-	298	750	272	99	50
<b>TOTAL</b>			3,374		3,223		4,367		5,778		

ROW #

M	N	O	P	Q
---	---	---	---	---

ROW #	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
	1,382	1,440	1,493	1,545	1,605																										
	7,132	7,765	8,329	8,844	9,492																										
	1,987	4,070	4,211	4,359	4,511																										
	1,920	2,075	2,245	2,428	2,626																										
	27,773	29,802	31,423	32,917	34,642																										
	12,620	13,190	13,830	14,415	15,054																										
	8,172	8,629	8,982	9,323	9,733																										
	4,346	4,519	4,661	5,082	5,333																										
	14,463	15,284	16,860	16,405	17,045																										
	6,631	7,181	7,754	8,284	8,900																										
	1,104	1,144	1,193	1,233	1,288																										
	5,750	5,750	5,150	4,690	4,000																										
	26,830	29,933	32,536	34,539	37,242																										
	30	30	30	30	30																										
	265	280	290	300	310																										

	531	563	574	595	615																										
	264	293	309	316	331																										
	3,087	3,181	3,268	3,354	3,442																										
	532	585	617	631	661																										
	930	966	995	1,031	1,060																										
	614	628	642	656	669																										
	106	110	114	118	122																										

Niagara Mohawk Power Corp.  
TxD Blanket Map

CVB-1  
Attachment 2

BUSINESS UNIT	PROJECT	BLANKET # ASSIGNED	BLANKET TYPE	PROJECT DESCRIPTION	LONG DESC
00036	C00399	072	Public Requirements	DOT/Mandated Central Region Sub-Tra	Relocation of subtransmission facilities due to mandate by governmental authorities such as NYSDOT, Counties and Municipalities.
00036	C00415	072	Public Requirements	DOT/Mandated Mohawk Valley Region S	Relocation of subtransmission facilities due to mandate by governmental authorities such as NYSDOT, Counties and Municipalities.
00036	C00421	072	Public Requirements	DOT/Mandated Northern Region Sub-Tr	Relocation of subtransmission facilities due to mandate by governmental authorities such as NYSDOT, Counties and Municipalities.
00036	C00434	072	Public Requirements	DOT/Mandated Capital Region Sub-Tra	Relocation of subtransmission facilities due to mandate by governmental authorities such as NYSDOT, Counties and Municipalities.
00036	C00465	072	Public Requirements	DOT/Mandated Northeast (23-69kV) Re	Relocation of subtransmission facilities due to mandate by governmental authorities such as NYSDOT, Counties and Municipalities.
00036	C00474	073	Damage/Failure	12kV and 23kV Cable Failure Repairs	Repair 12kV (Niagara Falls) and 23kV (Buffalo) subtransmission cable failures as they occur to maintain system integrity.
00036	C00486	072	Public Requirements	DOT/Mandated Frontier Region Sub-Tr	Relocation of subtransmission facilities due to mandate by governmental authorities such as NYSDOT, Counties and Municipalities.
00036	C00501	072	Public Requirements	DOT/Mandated Western Region Sub-Tra	Relocation of subtransmission facilities due to mandate by governmental authorities such as NYSDOT, Counties and Municipalities.
00036	C00512	074	Substation Blanket (Damage Capital Region SubTransmission (23-	Replacement of failed SubTransmission Station Equipment (23-69kV) in the Capital Region	
00036	C00517	074	Substation Blanket (Damage Frontier Region SubTransmission (12	Replacement of failed SubTransmission Station Equipment (12-69kV) in the Frontier Region	
00036	C00518	074	Substation Blanket (Damage Western Region SubTransmission (23-	Replacement of failed SubTransmission Station Equipment (23-69kV) in the Western Region	
00036	C03820	077	Load Relief	West Div Misc SubT Conv Projects	West Div Misc SubT Conv Projects
00036	C03823	077	Load Relief	Central Div Misc SubT Conv Projects	Central Div Misc SubT Conv Projects
00036	C03824	073	Damage/Failure	Central Div SubT Cable Failures	Central Div SubT Cable Failures
00036	C03827	077	Load Relief	East Div Misc SubT Conv Projects	East Div Misc SubT Conv Projects

BUSINESS UNIT	PROJECT	BLANKET # ASSIGNED	BLANKET TYPE	PROJECT DESCRIPTION	LONG DESC
00036	C03828	073	Damage/Failure	East Div Sub-T Cable Failures	East Div Sub-T Cable Failures
00036					Replace failed Sub-T Station Equipment (12-69kV) in the Central Division
00036	C03921	074	Substation Blanket (Damage Rpl Failed Sub-T Sta Equip-Cent Div		
00036	C03940	077	Load Relief	East Div Sub-T Stations Conv	East Div Sub-T Stations Conv
00036	C03941	077	Load Relief	Cent Div Sub-T Stations Conv	Cent Div Sub-T Stations Conv
00036	C03942	077	Load Relief	West Div Sub-T Stations Conv	West Div Sub-T Stations Conv
00036	C04243	071	New Business	23 kV New Service Projects	
00036	C04246	075	Asset Replacement	12-23 kV Cable Retirements	
00036					Replacement of failed Sub Transmission Station Equipment (23kV-69 kV) in Westrn Region
00036	C04313	074	Substation Blanket (Damage West NY-Sub-T-Subs Blanket		
00036	C04314	074	Substation Blanket (Damage Central NY-Sub-T-Subs Blanket		
00036	C04315	074	Substation Blanket (Damage East NY-Sub-T-Subs Blanket		
00036	C04685	075	Asset Replacement	Sub-Transmission B-Maint Capital	Sub-Transmission 23-69 kV B-Maintenance
00036	C04688	075	Asset Replacement	Sub-Transmission B Maintenance	B maintenance that is able to be capitalized.
00036	C05884	071	New Business	Sub-T Customer Work	Customer related work on the 34.5 kV system
00036	C06004	075	Asset Replacement	Sub-Transmission A-Maint Capital	Sub-T A Maintenance Work - Capital \$
00036					Replacement of failed Sub-Transmission Station Equipment (12-69 kV) in all Divisions
00036	C06837	074	Substation Blanket (Damage Replacement of failed Sub-Transmission St&kV)		
00036					Relocations associated with highway rearrangements that affect Sub-T facilities in the Central Division for FY07.
00036	C06874	072	Public Requirements	Cent Div Sub-T DOT Relocates FY07	
00036	C07100	073	Damage/Failure	Cent Div Sub-T Emergency Work	Covers the capitalizable Sub-T line work identified as emergency.
00036					Covers all identified Sub-T PM work that is capitalizable for the Central Division
00036	C07104	075	Asset Replacement	Cent Div Sub-T Capitalizable PM Wrk	
00036					This covers the costs associated with capitalizable PM work for the Sub-T facilities in the Central Division
00036	C04689	075	Asset Replacement	Central Div Sub-T PM Capital Work	
00036	C07237	071	New Business	Customer Requirements/Taps	Customer Requirements/Taps
00036	C07238	075	Asset Replacement	Capitalizable B-Maintenance	Capitalizable B-Maintenance
00036					Covers to any costs associated with Sub-Transmission line retirements for the Central Division
00036	C07541	075	Asset Replacement	Cent Div Sub-T Line Retirements	
00036					Replacement of failed Sub Transmission Station Equipment (23-69kV) in the Capital Region
00036	C07548	074	Substation Blanket (Damage Replacement of failed Sub Transmission Sta		
00036					Replacement of failed Sub Transmission Station Equipment (23-69kV) in the Northeast Region
00036	C07549	074	Substation Blanket (Damage Replacement of failed Sub Transmission Sta		
00036					Company 36 Substation Damage/Failure Reserve for Transmission Managed By Distribution
00036	C18555	074	Substation Blanket (Damage TxD Substation Dmg/Fail Reserve C36		
00036	C21631	075	Asset Replacement	NY SubT Asset Replacement	This funding is for asset replacement of sub poles or equipment
00036	CNC071	071	New Business	CNY Sub Trans-Line New Business	Central NY Sub Trans-Line New Business

BUSINESS UNIT	PROJECT	BLANKET # ASSIGNED	BLANKET TYPE	PROJECT DESCRIPTION	LONG DESC
00036	CNC072	072	Public Requirements	CNY Sub Trans-Line Public Require	Central NY Sub Trans-Line Public Require
00036	CNC073	073	Damage/Failure	CNY Sub Trans-Line Damage Failure	Central NY Sub Trans-Line Damage Failure
00036	CNC074	074	Substation Blanket (Damage)	CNY Sub Trans-Substation Blanket	Central NY Sub Trans-Substation Blanket
00036	CNC075	075	Asset Replacement	CNY Sub Trans-Line Asset Replace	Central NY Sub Trans-Line Asset Replace
00036	CNC076	076	Reliability	CNY Sub Trans-Line Reliability	Central NY Sub Trans-Line Reliability
00036	CNC077	076	Reliability	CNY Sub Trans-Line Load Relief	Central NY Sub Trans-Line Load Relief
00036	CNE071	071	New Business	ENY Sub Trans-Line New Business	East NY Sub Trans-Line New Business
00036	CNE072	072	Public Requirements	ENY Sub Trans-Line Public Require	East NY Sub Trans-Line Public Require
00036	CNE073	073	Damage/Failure	ENY Sub Trans-Line Damage Failure	East NY Sub Trans-Line Damage Failure
00036	CNE074	074	Substation Blanket (Damage)	ENY Sub Trans-Substation Blanket	East NY Sub Trans-Substation Blanket
00036	CNE075	075	Asset Replacement	ENY Sub Trans-Line Asset Replace	East NY Sub Trans-Line Asset Replace
00036	CNE076	076	Reliability	ENY Sub Trans-Line Reliability	East NY Sub Trans-Line Reliability
00036	CNE077	072	Public Requirements	ENY Sub Trans-Line Load Relief	East NY Sub Trans-Line Load Relief
00036	CNW071	071	New Business	WNY Sub Trans-Line New Business	West NY Sub Trans-Line New Business
00036	CNW072	072	Public Requirements	WNY Sub Trans-Line Public Require	West NY Sub Trans-Line Public Require
00036	CNW073	073	Damage/Failure	WNY Sub Trans-Line Damage Failure	West NY Sub Trans-Line Damage Failure
00036	CNW074	074	Substation Blanket (Damage)	WNY Sub Trans-Substation Blanket	West NY Sub Trans-Substation Blanket
00036	CNW075	075	Asset Replacement	WNY Sub Trans-Line Asset Replace	West NY Sub Trans-Line Asset Replace
00036	CNW076	076	Reliability	WNY Sub Trans-Line Reliability	West NY Sub Trans-Line Reliability
00036	CNW077	077	Load Relief	WNY Sub Trans-Line Load Relief	West NY Sub Trans-Line Load Relief

Date of Request: February 11, 2010  
Due Date: February 22, 2010

Request No. DPS-22(DSM-1)

NMPC Req. No. \_\_\_\_\_

**NIAGARA MOHAWK POWER CORPORATION**

Case No.10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid

Electric Rates

**Request for Information**

**FROM:** David Morrell

**TO:** Infrastructure and Operations Panel

**Request:**

A. Please provide a complete breakdown (cost and volume, e.g. acres ROW edge miles, etc.) for all transmission vegetation management activities planned for the rate years. Items may include routine ROW floor treatment acres, widening edge miles, trimming, danger trees, mowing and other.

B. Please provide what voltage classes are covered in item #1 answer.

**Response:**

A. See Attachment 1 (DSM-1\_Attach 1\_ Transmission Veg Management Rate Year Estimates).

The Integrated Vegetation Management acres presented in Attachment 1 are an average of actual acres treated between the years 2006 through 2009, as shown below.

<b>New York Integrated Vegetation Management Acres (2006 – 2009)</b>		
<b>YEAR</b>	<b>ACRES</b>	
2006	9,041	As reported to the PSC in the 2006 transmission right of way management program report
2007	7,633	As reported to the PSC in the 2007 transmission right of way management program report
2008	7,368	As reported to the PSC in the 2008 transmission right of way management program report
2009	10,066	Acres treated in 2009 Pending Final Verification
<b>4 year average acres</b>	<b>8,527</b>	

B. The voltage classes covered in Attachment 1 are 23kV through 345kV for transmission lines, and 12kV through 345kV for substations. Please note that there can be numerous operating voltages on a single right-of-way.

**Name of Respondent:**

**Date of Reply:**

Dawn Travalini

February 22, 2010



## Transmission Veg Management Rate Year Estimates

Vegetation Management Activities		Voltage (kV)	CY2011 (based on 4 year avg. acres)	CY2011 (projected cost)	CY2012 (based on 4 year avg. acres)	CY2012 (projected cost)	CY2013 (based on 4 year avg. acres)	CY2013 (projected cost)
TRIM-STC-MOW (trim, prune/cut, stump treat & chip/mechanical brush mowing)		23 - 46	333	\$477,611.00	333	\$491,939.00	333	\$506,697.00
		69 - 345	295	\$423,108.00	295	\$435,802.00	295	\$448,876.00
TOTALS			628	\$900,719.00 **	628	\$927,741.00	628	\$955,573.00
INTEGRATED VEGETATION MANAGEMENT		Voltage (kV)	CY2011 (based on 4 year avg. acres)	CY2011 (projected cost)	CY2012 (based on 4 year avg. acres)	CY2012 (projected cost)	CY2013 (based on 4 year avg. acres)	CY2013 (projected cost)
		23 - 46	2,132	\$680,108.00	2,132	\$701,428.00	2,132	\$720,616.00
TOTALS		69 - 345	6,395	\$2,040,005.00	6,395	\$2,103,955.00	6,395	\$2,161,510.00
			8,527	\$2,720,113.00	8,527	\$2,805,383.00	8,527	\$2,882,126.00
DANGER TREE		Voltage (kV)	CY2011 (estimated miles)	CY2011 (projected cost)	CY2012 (estimated miles)	CY2012 (projected cost)	CY2013 (estimated miles)	CY2013 (projected cost)
		23 - 46	108	\$1,085,750.00	111	\$1,118,322.50	115	\$1,151,872.39
TOTALS		69 - 345	126	\$1,439,250.00	130	\$1,482,427.50	134	\$1,526,900.61
			234	\$2,525,000.00	241	\$2,600,750.00	249	\$2,678,773.00
OFF-CYCLE		Voltage (kV)	CY2011	CY2011 (projected cost)	CY2012	CY2012 (projected cost)	CY2013	CY2013 (projected cost)
		23 - 345	unplanned hazard tree removals	\$440,840.00	unplanned hazard tree removals	\$454,065.00	unplanned hazard tree removals	\$467,687.00
SUB-T WIDENING		Voltage (kV)	CY2011 (projected miles)	CY2011 (projected cost)	CY2012 (projected miles)	CY2012 (projected cost)	CY2013 (projected miles)	CY2013 (projected cost)
		23 - 69	140	\$3,488,239.00	140	\$3,592,886.00	140	\$3,700,673.00
SUBSTATIONS		Voltage (kV)	CY2011 (acres)	CY2011 (projected cost)	CY2012 (acres)	CY2012 (projected cost)	CY2013 (acres)	CY2013 (projected cost)
		12 - 345	877	\$342,400.00	877	\$352,672.00	877	\$363,252.00
GRASS MOWING		Voltage (kV)	CY2011 (acres)	CY2011 (projected cost)	CY2012 (acres)	CY2012 (projected cost)	CY2013 (acres)	CY2013 (projected cost)
		23 - 345	1302	\$130,000.00	1302	\$133,900.00	1302	\$137,917.00
115 KV WIDENING		Voltage (kV)	CY2011 (projected miles)	CY2011 (cost)	CY2012 (projected miles)	CY2012 (cost)	CY2013 (projected miles)	CY2013 (cost)
		115	50 - 110	\$1,500,000.00	50 - 110	\$1,500,000.00	50 - 110	\$1,500,000.00

Date of Request: February 11, 2010

Request No. DPS-23(DSM-2)

Due Date: February 22, 2010

NMPC Req. No. \_\_\_\_\_

**NIAGARA MOHAWK POWER CORPORATION**

Case No.10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

**Request for Information**

**FROM:** David Morrell

**TO:** Infrastructure and Operations Panel

**Request:** Page 223 of Book 26 discusses a revenue requirement of \$935,000 for the Company's ROW floor trim program. Relative to this program, please provide the following:

- A. Supply the inventories that support the work requiring this expenditure.
- B. How the work will be administered, i.e. lump sum bid or T&M?
- C. The reason(s) these sites need to be treated outside the normal cycles.
- D. The type of work that will be done on these sites, e.g. mow, hand cut, trim etc.

**Response:**

A. National Grid performs detailed site-by-site inventories for each transmission line right-of-way prior to scheduled maintenance. These inventories are performed after the previous growing season ends and prior to the treatment of the right-of-way. For this reason, no inventories are available for planned work in 2011, 2012 and 2013. The acres provided in Attachment 1 (DSM-1 Attach 1 Transmission Veg Management Rate Year Estimates) in DPS-22(DSM-1) for floor trim sites are an average of actual acres treated from the years 2006 through 2009, as shown below.

New York Floor Trim Site Acres (2006 - 2009)		
YEAR	ACRES	
2006	607	As reported to the PSC in the 2006 transmission right of way management program report
2007	702	As reported to the PSC in the 2007 transmission right of way management program report
2008	528	As reported to the PSC in the 2008 transmission right of way management program report
2009	677	Acres treated in 2009 pending final verification
<b>4 year average acres</b>	<b>628</b>	

B. The work will be administered on a Time & Material basis. However, beginning in 2010, the Company will initiate a pilot lump sum program for some floor trim sites and

also several lines scheduled for danger tree work. The Company will assess the results of the lump sum pilot program and determine whether to expand the use of lump sum work in the future.

C. These floor trim sites will not be treated outside normal cycles. The indicated annual amounts are the funds necessary to maintain the average number of acres treated per year in on-cycle work.

D. The majority of work performed in the floor trim program will be tree pruning and tree removal.

Name of Respondent:

Dawn Travalini

Date of Reply:

February 22, 2010

Date of Request: February 11, 2010  
Due Date: February 22, 2010

Request No. DPS-24(DSM-3)

NMPC Req. No. \_\_\_\_\_

**NIAGARA MOHAWK POWER CORPORATION**

Case No.10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: David Morrell

TO: Infrastructure and Operations Panel

Request: Page 222 of Book #26 states the Company projects an annual cost of \$1.5 million for 115 kV widening. Relative to this expenditure please provide the following:

- A. Total ROW edge miles to be completed in this work scope.
- B. Verification that property rights exist to complete this activity.
- C. Number of 115 kV outages over the last five years from off-ROW trees (non storm).
- D. Number of years for which this work is planned.
- E. How this work will be administered, i.e. lump sum or time and material?
- F. Lines 7 & 8 on page 222 state that all trees will be removed to a new cleared width. State what that new width will be in terms of feet from centerline.
- G. Will this new cleared width area be included as part of on-going routine vegetation management acres or be allowed to grow back?
- H. By stating "all trees" (line 7 page 222) does the Company mean all trees tall enough to strike to conductor or does it mean any tree species regardless of height at the time of work?
- I. Provide inventory data (e.g. number of trees or ROW edge miles) supporting the need for this work product.

Response:

- A. Between 50 and 110 miles of right-of-way (ROW) will be widened per year
- B. Only ROW segments and individual properties within segments where we currently have adequate property rights will be widened under this program. Property rights are currently documented within our GIS system (Corridor Manager) by the Real Estate Assets Management Department, which is referenced prior to commencing work.
- C. There were eighty-five (85) 115 kV sustained outages during the years 2005 through 2009. Please see Attachment I (DSM-3\_Attach 1\_New York 115 kV Sustained Vegetation-Caused Outages). This document presents sustained vegetation-caused outages on 115 kV lines for the years 2005 through 2009. Both storm and non-storm outages are presented in the document since all outages with impacts to customers are evaluated in selecting the ROWs to be widened. Of the 85 sustained outages, 54 outages occurred during PSC defined major storms.

D. This work will be on-going and may run as long as 10 years depending on the number of candidate lines that will realize improved reliability from the program.

E. The work will be administered on a time and material basis utilizing rates that are competitively bid. Cost control is achieved through oversight by Transmission Foresters who visit the sites on a regular basis to monitor productivity and verify the work has been completed per specification.

F. Where rights allow, 115 kV ROW's will be widened to the edge of the existing ROW up to a maximum of 50 feet from centerline.

G. Where rights allow, the new width will be maintained to remove tall growing species on cycle within the ROW floor maintenance program (Integrated Vegetation Management). Where rights do not allow, it will be necessary to maintain this new width on cycle in the danger tree program, removing the trees when they attain sufficient height to be danger trees.

H. "All trees" refers to any tree listed as an "Undesirable Tall Growing Species" in the National Grid Transmission Right-of-Way Management Program (Part 84 Plan), or any "Medium Tree", as listed, that because of its proximity could enter the wire security zone (minimum clearance distance) of the transmission conductor.

I. There are 2,550 miles of 115 kV ROW in New York. In 2004, it was found that the New York 115 kV transmission system was exposed to approximately 628,000 danger trees. Our research reveals that the utility forest will increase to approximately 1.9 million trees between the years 2004 and 2019. Since most of tree-caused service interruptions are caused by trees outside the ROW, this area is targeted for reduction of danger trees. Because the utility forest is increasing in area, the current danger tree program, which targets identifiable hazard trees, will not keep pace with the increase in the number of danger trees. Our data since 1996 indicates that 68% of trees that fail and cause an outage event could not have been identified as hazard trees. Therefore, it is necessary to focus on danger trees to effect an improvement in reliability.

Name of Respondent:  
Dawn Travalini

Date of Reply:  
February 22, 2010

**Niagara Mohawk Power Corp**  
**New York 115 kV Sustained Vegetation-Caused Outages (2005 - 2009)**

New York 115 kV Sustained Vegetation-Caused Outages (2005 - 2009)												
Interruption & Disturbance System Event	Incident Report No.	Circuit Identification	Circuit Name	Outage Date/Time	Restore Date/Time	Storm?	Loss of Supply - Customers Interrupted	Lost Customer Minutes	Weather	Calendar Year	Sub-Region	Division
202355		T1100	Dunkirk - Falconer #162	1/8/05 15:35	1/8/05 15:36	N				2005	WSW	Western
208985		T1280	Gardenville - Homer Hill #152	4/2/05 19:49	4/2/05 19:50	Y				2005	WF	Western
209166		T1080	Dunkirk - Falconer #160	4/3/05 0:00	4/4/05 12:50	Y	11,524	57,620		2005	WSW	Western
209125		T1950	Gardenville - Homer Hill #151	4/3/05 9:42	4/3/05 23:30	Y	1	77		2005	WF	Western
215508		T5810	Ticonderoga - Republic #2	6/9/05 18:42	6/10/05 10:01	N	4,452	4,091,388		2005	ENE	Eastern
217871		T1550	Lockport - Mortimer #114	7/8/05 15:33	7/8/05 15:34	N				2005	WG	Western
219982		T1280	Gardenville - Homer Hill #152	7/26/05 17:38	7/27/05 17:47	Y	3,100	83,700		2005	WF	Western
219980		T1080	Dunkirk - Falconer #160	7/28/05 18:21	7/28/05 15:00	Y	11,527	314,029		2005	WSW	Western
225694		T1340	Homer Hill - Bennett Road #157	9/29/05 8:56	9/30/05 14:03	N	6,836	79,248		2005	WSW	Western
225717		T3280	McIntyre - Colton #8	9/29/05 12:22	9/30/05 18:27	N				2005	CN	Central
228107		T5270	Inghams - Stoner #9	10/19/05 19:39	10/20/05 19:26	N	10,328	888,208		2005	ENE	Eastern
231048		T1100	Dunkirk - Falconer #162	11/9/05 17:10	11/10/05 15:27	N	1,374	8,244		2005	WSW	Western
232948		T3210	Lake Colby - Lake Placid #3	11/29/05 8:34	11/29/05 15:26	Y	1,615	218,300		2005	CN	Central
232951		T3170	Colton - Malone #3	11/29/05 11:38	11/29/05 19:57	Y	555	33,855		2005	CN	Central
239946		T1170	Falconer - Homer Hill #154	2/17/06 7:26	2/18/06 14:28	Y	1	6	Rain - Heavy; Wind - Severe (55-73 mph); 49F	2006	WSW	Western
239781		T5690	Rotterdam - New Scotland #19	2/17/06 10:20	2/18/06 18:41	Y			Wind - Severe (55-73 mph)	2006	EC	Eastern
240240		T5810	Ticonderoga - Republic #2	2/17/06 11:25	2/17/06 21:54	Y	4,268	2,658,964		2006	ENE	Eastern
239840		T5750	Spier - Rotterdam #1	2/17/06 12:02	2/18/06 7:31	Y	18,900	21,320,000	Rain - Heavy; Wind - Severe (55-73 mph);	2006	ENE	Eastern
239842		T5760	Spier - Rotterdam #2	2/17/06 12:06	2/18/06 7:07	Y	19,855	22,655,000		2006	ENE	Eastern
239829		T5390	Meco - Rotterdam #10	2/17/06 15:08	2/19/06 9:22	Y			Wind - Severe (55-73 mph); 30F	2006	EC	Eastern
245301		T5880	Warrensburg - Scofield Road #10	5/24/06 15:34	5/25/06 21:03	N	3,496	279,680	Fair; Calm to light wind (0-12 mph); 65F	2006	ENE	Eastern
255890		T3140	Colton - Browns Falls #1	9/24/06 10:44	9/24/06 18:18	N	2,611	28,721	Rain - Heavy; Wind - Mild (13 - 31 mph); 65F	2006	CN	Central
256679		T1660	Niagara - Gardenville #180	10/13/06 4:50	10/13/06 18:00	Y	2,713	8,139	Freezing rain or sleet; Calm to light wind (0 - 12 mph); 32F	2006	WF	Western
		T1500	Lockport - Batavia #108	10/13/06 5:01	10/15/06 12:15	Y	3,900	7,800		2006	WG	Western
		T1550	Lockport - Mortimer #114	10/13/06 6:02	10/16/06 1:48	Y	1	642		2006	WG	Western
256689		T6020	Walck Road - Huntley #133	10/13/06 9:35	10/14/06 18:25	Y			Snow - Wet; Wind - Mild (13 - 31 mph); 33F	2006	WF	Western
		T1660	Niagara - Gardenville #180	10/13/06 19:51	10/14/06 1:50	Y				2006	WF	Western
256800		T3210	Lake Colby - Lake Placid #3	10/20/06 19:59	10/21/06 1:26	N	1,713	164,679	Freezing rain or sleet; Calm to light wind (0 - 12 mph); 33F	2006	CN	Central
256942		T1820	Packard - Huntley #130	10/28/06 23:17	10/29/06 18:20	Y	5,064	15,192	Rain - Light to moderate; Wind - Mild (13 - 31 mph); 36F	2006	WF	Western
257407		T1160	Falconer - Homer Hill #153	12/1/06 14:55	12/4/06 20:46	Y	1	860	Rain - Light to Moderate; Major Storm; 48F	2006	WSW	Western
257408		T1170	Falconer - Homer Hill #154	12/1/06 14:55	12/6/06 15:25	Y	1	860	Rain - Light to Moderate; Major Storm; 48F	2006	WSW	Western

# New York 115 kV Sustained Vegetation-Caused Outages (2005 - 2009)

Interruption & Disturbance System Event	Incident Report No.	Circuit Identification	Circuit Name	Outage Date/Time	Restore Date/Time	Storm?	Loss of Supply - Customers Interrupted	Lost Customer Minutes	Weather	Calendar Year	Sub-Region	Division
257443		T6060	Mohican - North Troy #3	12/2/06 6:52	12/2/06 17:28	Y	2,576	110,768	Fair, wind - Mild (13 - 31 mph); 40F	2006	ENE	Eastern
257885		T5440	Mohican - Butler #18	1/15/07 9:08	1/16/07 21:49	Y	5,377	205,339	Freezing Rain or Sleet; Calm to light wind (0 - 12 mph); 28F	2007	ENE	Eastern
258829		T5820	Ticonderoga - Hague Road #4	4/15/07 19:21	4/18/07 12:59	N			Snow - West, Major Storm	2007	ENE	Eastern
259283		T1610	Mortimer (Sta.82) - Quaker (Sta.121) #23	5/15/07 21:44	5/16/07 7:30	N			Rain - light / moderate, Thunderstorms, 60F	2007	WG	Western
259589		T1610	Mortimer (Sta.82) - Quaker (Sta.121) #23	6/3/07 1:12	6/3/07 10:03	N			Fair, Mild	2007	WG	Western
259808		T1090	Dunkirk - Falconer #161	6/13/07 13:52	6/14/07 12:34	N	2,848	50,707	Fair	2007	WSW	Western
259869		T4220	Porter - Schuyler #13	6/19/07 16:27	6/20/07 2:15	N			Rain - heavy	2007	CMV	Central
259877		T1160	Falconer - Homer Hill #153	6/19/07 18:19	6/21/07 8:25	N	1	40	Rain - heavy	2007	WSW	Western
260041		T5350	Maplewood - Menands #19	6/27/07 17:39	6/28/07 23:19	N			Extreme hot or cold, temp 90	2007	EC	Eastern
260358		T5880	Warrensburg - Scofield Road #10	7/10/07 19:10	7/11/07 4:30	Y	1,618	967,564	Major storm	2007	ENE	Eastern
260358		T5770	Spier - West #9	7/10/07 19:10	7/12/07 1:31	Y			Major storm	2007	ENE	Eastern
261354		T1580	Mortimer - Golah #110	9/11/07 22:07	9/12/07 8:12	N			Rain-heavy	2007	WG	Western
262616		T3340	Taylorville - Moshier #7	12/29/07 8:03	12/29/07 8:08	N	258	1,290	Wind - Strong	2007	CN	Central
262720		T3340	Taylorville - Moshier #7	1/9/08 9:59	1/9/08 23:59	N	256	222,464	Rain Wind Severe	2008	CN	Central
262800		T1550	Lockport - Mortimer #114	1/13/08 13:25	1/13/08 13:26	N			Fair	2008	WG	Western
262801		T1550	Lockport - Mortimer #114	1/13/08 13:43	1/14/08 17:37	N	1	3	Fair	2008	WG	Western
262990		T1280	Gardenville - Homer Hill #152	1/30/08 4:34	1/30/08 23:41	Y	4,116	185,220	Severe Winds, Rain/Sleet/Ice	2008	WF	Western
263001		T1900	Valley (Sta. 44) - Ischua Switch #158	1/30/08 6:17	1/30/08 10:07	Y	3,046	700,580	Severe Winds, Rain/Sleet/Ice	2008	WSW	Western
263163		T1300	Gardenville - Seneca #82	2/6/08 16:53	2/13/08 8:40	N	2,080	199,880	Freezing Rain/Wind	2008	WF	Western
263187		T1390	Huntley - Gardenville #39	2/6/08 20:08	2/7/08 17:02	Y			Freezing Rain/Wind	2008	WF	Western
263504		T2140	Curtis Street - Teal #13	3/8/08 21:23	3/8/08 21:29	N	12,020	72,120	Snow-wet	2008	CC	Central
266706		T1170	Falconer - Homer Hill #154	6/6/08 8:30	6/6/08 16:16	N	2	534	Fair	2008	WSW	Western
267156		T2120	Coffeen - Black River - Lighthouse Hill #5	6/10/08 11:40	6/11/08 18:32	Y	5,611	28,055	TStorms	2008	CN	Central
267179		T3140	Colton - Browns Falls #1	6/10/08 12:26	6/11/08 18:42	Y	2,649	4,807,935	TStorms	2008	CN	Central
267182		T3150	Colton - Browns Falls #2	6/10/08 12:50	6/11/08 20:16	Y			TStorms	2008	CN	Central
267503		T3160	Colton - Townline #9	6/10/08 12:50	6/11/08 23:39	Y	5	3,230	TStorms	2008	CN	Central
267184		T3170	Colton - Malone #3	6/10/08 13:02	6/11/08 19:25	Y	2,762	196,102	TStorms	2008	CN	Central
267216		T6060	Mohican - North Troy #3	6/10/08 20:21	6/11/08 18:18	Y	2,458	125,358	TStorms	2008	ENE	Eastern
276966		T1820	Packard - Huntley #130	9/14/08 21:19	9/15/08 2:33	Y	5,065	50,650	Rain, High Winds	2008	WF	Western
277026		T1900	Valley (Sta. 44) - Ischua Switch #158	9/14/08 22:58	9/15/08 8:16	Y	1,372	760,088	Rain, High Winds	2008	WSW	Western
276990		T2560	Sleight Road - Auburn (State St.) #3	9/15/08 1:53	9/15/08 19:01	Y	1	963	Rain, High Winds	2008	WG	Western
276989		T2120	Coffeen - Black River - Lighthouse Hill #5	9/15/08 3:06	9/15/08 23:43	Y	6,618	19,854	Rain, High Winds	2008	CN	Central
276991		T3340	Taylorville - Moshier #7	9/15/08 3:33	9/15/08 21:43	Y	256	277,248	Rain, High Winds	2008	CN	Central
277347		T6070	Spier - Mohican #7	9/18/08 10:09	9/18/08 15:45	N			Fair	2008	ENE	Eastern
282780		T5940	Feura Bush - North Catskill #2	12/12/08 2:13	12/12/08 21:29	Y			Ice/Snow	2008	EC	Eastern
282781		T5760	Spier - Rotterdam #2	12/12/08 2:38	12/13/08 0:10	Y	14,957	29,914	Ice/Snow	2008	ENE	Eastern
282785		T5690	Rotterdam - New Scotland #19	12/12/08 3:34	12/13/08 12:41	Y			Ice/Snow	2008	EC	Eastern
282786		T5080	Lafarge Bldg Matis - Pleasant Valley #8	12/12/08 3:46	12/13/08 19:55	Y	750	779,250	Ice/Snow	2008	EC	Eastern
284867		T1390	Huntley - Gardenville #39	12/28/08 8:22	12/28/08 17:37	Y	37	111	Fair, Severe Wind	2008	WF	Western
284872		T1340	Homer Hill - Bennett Road #157	12/28/08 9:50	12/30/08 13:38	Y	424	72,928	Fair, Severe Wind	2008	WSW	Western
284878		T1450	Huntley - Lockport #37	12/28/08 10:23	12/30/08 22:08	Y			Fair, Severe Wind	2008	WF	Western

# New York 115 kV Sustained Vegetation-Caused Outages (2005 - 2009)

Interruption & Disturbance System Event	Incident Report No.	Circuit Identification	Circuit Name	Outage Date/Time	Restore Date/Time	Storm?	Loss of Supply - Customers Interrupted	Lost Customer Minutes	Weather	Calendar Year	Sub-Region	Division
287677		T1280	Gardenville - Homer Hill #152	2/12/09 11:16	2/13/09 18:49	Y	4,166	41,660	Wet Snow, Strong Winds	2009	WF	Western
296317	21124-0	T1530	Lockport - Mortimer #111	6/9/09 10:37	6/9/09 17:29	N	6,721	20,163	Fair, Mild Wind	2009	WG	Western
301688	21154-0	T2560	Sleight Road - Auburn (State St.) #3	7/26/09 15:03	7/26/09 17:15	N			Heavy Rain, Thunderstorms	2009	WG	Western
303052	21163-1	T1080	Dunkirk - Falconer #160	8/9/09 23:27	8/10/09 11:45	Y	10,959	397,173	Rain-heavy/Thunderstorms	2009	WSW	Western
303139	21164-0	T1270	Gardenville - Dunkirk #142	8/10/09 12:06	8/10/09 18:43	Y			Fair/Mild wind	2009	WF	Western
303598	21173-1	T1950	Gardenville - Homer Hill #151	8/22/09 3:26	8/22/09 13:47	N	2	126	Fair/Calm to light wind	2009	WF	Western
304212	21182-0	T2560	Sleight Road - Auburn (State St.) #3	10/7/09 15:49	10/8/09 1:29	N	1	60	Rain-light/Strong wind	2009	WG	Western
304452	21183-0	T1170	Falconer - Homer Hill #154	10/29/09 10:28	10/30/09 15:27	N	1	32	Fair/Calm to light wind	2009	WSW	Western
304907	21197-1	T1260	Gardenville - Dunkirk #141	12/9/09 6:29	12/9/09 6:30	Y			Dry Snow, Strong Wind	2009	WF	Western
304908	21197-1	T1280	Gardenville - Homer Hill #152	12/9/09 6:44	12/9/09 11:11	Y	4,187	25,122	Dry Snow, Strong Wind	2009	WF	Western
304909	21197-1	T1600	Mortimer - Pannell Road #25	12/9/09 8:11	12/9/09 14:12	Y			Dry Snow, Strong Wind	2009	WG	Western
304906	21197-1	T1260	Gardenville - Dunkirk #141	12/9/09 8:13	12/9/09 8:14	Y			Dry Snow, Strong Wind	2009	WF	Western
304913	21197-1	T1260	Gardenville - Dunkirk #141	12/9/09 9:44	12/9/09 18:22	Y	26,968	678,187	Dry Snow, Strong Wind	2009	WF	Western



Date of Request: February 11, 2010  
Due Date: February 22, 2010

Request No. DPS-24(DSM-3) [SUPP]

NMPC Req. No. \_\_\_\_

**NIAGARA MOHAWK POWER CORPORATION**

Case No.10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates  
Request for Information

FROM: David Morrell

TO: Infrastructure and Operations Panel

Request: Page 222 of Book #26 states the Company projects an annual cost of \$1.5 million for 115 kV widening. Relative to this expenditure please provide the following:

- A. Total ROW edge miles to be completed in this work scope.
- B. Verification that property rights exist to complete this activity.
- C. Number of 115 kV outages over the last five years from off-ROW trees (non storm).
- D. Number of years for which this work is planned.
- E. How this work will be administered, i.e. lump sum or time and material?
- F. Lines 7 & 8 on page 222 state that all trees will be removed to a new cleared width. State what that new width will be in terms of feet from centerline.
- G. Will this new cleared width area be included as part of on-going routine vegetation management acres or be allowed to grow back?
- H. By stating "all trees" (line 7 page 222) does the Company mean all trees tall enough to strike to conductor or does it mean any tree species regardless of height at the time of work?
- I. Provide inventory data (e.g. number of trees or ROW edge miles) supporting the need for this work product.

Response:

- A. Between 50 and 110 miles of right-of-way (ROW) will be widened per year
- B. Only ROW segments and individual properties within segments where we currently have adequate property rights will be widened under this program. Property rights are currently documented within our GIS system (Corridor Manager) by the Real Estate Assets Management Department, which is referenced prior to commencing work.
- C. There were eighty-five (85) 115 kV sustained outages during the years 2005 through 2009. Please see Attachment 1 (DSM-3\_Attach 1\_New York 115 kV Sustained Vegetation-Caused Outages). This document presents sustained vegetation-caused outages on 115 kV lines for the years 2005 through 2009. Both storm and non-storm outages are presented in the document since all outages with impacts to customers are evaluated in selecting the ROWs to be widened. Of the 85 sustained outages, 54 outages occurred during PSC defined major storms.

D. This work will be on-going and may run as long as 10 years depending on the number of candidate lines that will realize improved reliability from the program.

E. The work will be administered on a time and material basis utilizing rates that are competitively bid. Cost control is achieved through oversight by Transmission Foresters who visit the sites on a regular basis to monitor productivity and verify the work has been completed per specification.

F. Where rights allow, 115 kV ROW's will be widened to a maximum of 50 feet from the outside conductor.

G. Where rights allow, the new width will be maintained to remove tall growing species on cycle within the ROW floor maintenance program (Integrated Vegetation Management). Where rights do not allow, it will be necessary to maintain this new width on cycle in the danger tree program, removing the trees when they attain sufficient height to be danger trees.

H. "All trees" refers to any tree listed as an "Undesirable Tall Growing Species" in the National Grid Transmission Right-of-Way Management Program (Part 84 Plan), or any "Medium Tree", as listed, that because of its proximity could enter the wire security zone (minimum clearance distance) of the transmission conductor.

I. There are 2,550 miles of 115 kV ROW in New York. In 2004, it was found that the New York 115 kV transmission system was exposed to approximately 628,000 danger trees. Our research reveals that the utility forest will increase to approximately 1.9 million trees between the years 2004 and 2019. Since most of tree-caused service interruptions are caused by trees outside the ROW, this area is targeted for reduction of danger trees. Because the utility forest is increasing in area, the current danger tree program, which targets identifiable hazard trees, will not keep pace with the increase in the number of danger trees. Our data since 1996 indicates that 68% of trees that fail and cause an outage event could not have been identified as hazard trees. Therefore, it is necessary to focus on danger trees to effect an improvement in reliability.

Name of Respondent:  
Dawn Travalini

Date of Reply:  
February 23, 2010

Niagara Mohawk Power Corp  
New York 115 kV Sustained Vegetation-Caused Outages (2005 - 2009)

New York 115 kV Sustained Vegetation-Caused Outages (2005 - 2009)												
Interruption & Disturbance System Event	Incident Report No.	Circuit Identification	Circuit Name	Outage Date/Time	Restore Date/Time	Storm?	Loss of Supply - Customers Interrupted	Lost Customer Minutes	Weather	Calendar Year	Sub-Region	Division
202355		T1100	Dunkirk - Falconer #162	1/8/05 15:35	1/8/05 15:36	N				2005	WSW	Western
208985		T1280	Gardenville - Homer Hill #152	4/2/05 19:49	4/2/05 19:50	Y				2005	WF	Western
209166		T1080	Dunkirk - Falconer #160	4/3/05 0:00	4/4/05 12:50	Y	11,524	57,620		2005	WSW	Western
209125		T1950	Gardenville - Homer Hill #151	4/3/05 9:42	4/3/05 23:30	Y	1	77		2005	WF	Western
215508		T5810	Ticonderoga - Republic #2	6/9/05 18:42	6/10/05 10:01	N	4,452	4,091,388		2005	ENE	Eastern
217871		T1550	Lockport - Mortimer #114	7/8/05 15:33	7/8/05 15:34	N				2005	WG	Western
219982		T1280	Gardenville - Homer Hill #152	7/26/05 17:38	7/27/05 17:47	Y	3,100	83,700		2005	WF	Western
219980		T1080	Dunkirk - Falconer #160	7/26/05 18:21	7/28/05 15:00	Y	11,527	314,029		2005	WSW	Western
225694		T1340	Homer Hill - Bennett Road #157	9/29/05 8:56	9/30/05 14:03	N	6,836	79,248		2005	WSW	Western
225717		T3280	McIntyre - Colton #8	9/29/05 12:22	9/30/05 18:27	N				2005	CN	Central
228107		T5270	Inghams - Stoner #9	10/19/05 19:39	10/20/05 19:26	N	10,328	888,208		2005	ENE	Eastern
231048		T1100	Dunkirk - Falconer #162	11/9/05 17:10	11/10/05 15:27	N	1,374	8,244		2005	WSW	Western
232948		T3210	Lake Colby - Lake Placid #3	11/29/05 8:34	11/29/05 15:26	Y	1,615	218,300		2005	CN	Central
232951		T3170	Colton - Malone #3	11/29/05 11:38	11/29/05 19:57	Y	555	33,855		2005	CN	Central
239946		T1170	Falconer - Homer Hill #154	2/17/06 7:26	2/18/06 14:28	Y	1	6	Rain - Heavy; Wind - Severe (55-73 mph); 49F	2006	WSW	Western
239781		T5690	Rotterdam - New Scotland #19	2/17/06 10:20	2/18/06 18:41	Y			Wind - Severe (55-73 mph)	2006	EC	Eastern
240240		T5810	Ticonderoga - Republic #2	2/17/06 11:25	2/17/06 21:54	Y	4,268	2,658,964		2006	ENE	Eastern
239840		T5750	Spier - Rotterdam #1	2/17/06 12:02	2/18/06 7:31	Y	18,900	21,320,000	Rain - Heavy; Wind - Severe (55-73 mph);	2006	ENE	Eastern
239842		T5760	Spier - Rotterdam #2	2/17/06 12:06	2/18/06 7:07	Y	19,855	22,655,000		2006	ENE	Eastern
239829		T5390	Meco - Rotterdam #10	2/17/06 15:08	2/19/06 9:22	Y			Wind - Severe (55-73 mph); 30F	2006	EC	Eastern
245301		T5880	Warrensburg - Scofield Road #10	5/24/06 15:34	5/25/06 21:03	N	3,496	279,680	Fair; Calm to light wind (0-12 mph); 65F	2006	ENE	Eastern
255890		T3140	Colton - Browns Falls #1	9/24/06 10:44	9/24/06 18:18	N	2,611	28,721	Rain - Heavy; Wind - Mild (13 - 31 mph); 65F	2006	CN	Central
256679		T1660	Niagara - Gardenville #180	10/13/06 4:50	10/13/06 18:00	Y	2,713	8,139	Freezing rain or sleet; Calm to light wind (0 - 12 mph); 32F	2006	WF	Western
		T1500	Lockport - Batavia #108	10/13/06 5:01	10/15/06 12:15	Y	3,900	7,800		2006	WG	Western
		T1550	Lockport - Mortimer #114	10/13/06 6:02	10/16/06 1:48	Y	1	642		2006	WG	Western
256689		T6020	Walck Road - Huntley #133	10/13/06 9:35	10/14/06 18:25	Y			Snow - Wet; Wind - Mild (13 - 31 mph); 33F	2006	WF	Western
		T1660	Niagara - Gardenville #180	10/13/06 19:51	10/14/06 1:50	Y				2006	WF	Western
256800		T3210	Lake Colby - Lake Placid #3	10/20/06 19:59	10/21/06 1:26	N	1,713	164,679	Freezing rain or sleet; Calm to light wind (0 - 12 mph); 33F	2006	CN	Central
256842		T1820	Packard - Huntley #130	10/28/06 23:17	10/29/06 18:20	Y	5,064	15,192	Rain - Light to moderate; Wind - Mild (13 - 31 mph); 36F	2006	WF	Western
257407		T1160	Falconer - Homer Hill #153	12/11/06 14:55	12/14/06 20:46	Y	1	860	Rain - Light to Moderate; Major Storm; 48F	2006	WSW	Western
257408		T1170	Falconer - Homer Hill #154	12/11/06 14:55	12/6/06 15:25	Y	1	860	Rain - Light to Moderate; Major Storm; 48F	2006	WSW	Western

# New York 115 kV Sustained Vegetation-Caused Outages (2005 - 2009)

Interruption & Disturbance System Event	Incident Report No.	Circuit Identification	Circuit Name	Outage Date/Time	Restore Date/Time	Storm?	Loss of Supply - Customers Interrupted	Lost Customer Minutes	Weather	Calendar Year	Sub-Region	Division
257443		T6060	Mohican - North Troy #3	12/2/06 6:52	12/2/06 17:28	Y	2,576	110,768	Fair, wind - Mild (13 - 31 mph); 40F	2006	ENE	Eastern
257885		T5440	Mohican - Butler #18	1/15/07 9:08	1/16/07 21:49	Y	5,377	205,339	Freezing Rain or Sleet; Calm to light wind (0 - 12 mph); 28F	2007	ENE	Eastern
258829		T5820	Ticonderoga - Hague Road #4	4/15/07 19:21	4/18/07 12:59	N			Snow - West, Major Storm	2007	ENE	Eastern
259283		T1610	Mortimer (Sta.82) - Quaker (Sta.121) #23	5/15/07 21:44	5/16/07 7:30	N			Rain - light / moderate, Thunderstorms, 60F	2007	WG	Western
259589		T1610	Mortimer (Sta.82) - Quaker (Sta.121) #23	6/3/07 1:12	6/3/07 10:03	N			Fair, Mild	2007	WG	Western
259808		T1090	Dunkirk - Falconer #161	6/13/07 13:52	6/14/07 12:34	N	2,848	50,707	Fair	2007	WSW	Western
259869		T4220	Porter - Schuyler #13	6/19/07 18:27	6/20/07 2:15	N			Rain - heavy	2007	CMV	Central
259877		T1160	Falconer - Homer Hill #153	6/19/07 18:19	6/21/07 8:25	N	1	40	Rain - heavy	2007	WSW	Western
260041		T5350	Maplewood - Menands #19	6/27/07 17:39	6/28/07 23:19	N			Extreme hot or cold, temp 90	2007	EC	Eastern
260358		T5880	Warrensburg - Scofield Road #10	7/10/07 19:10	7/11/07 4:30	Y	1,618	967,564	Major Storm	2007	ENE	Eastern
260358		T5770	Spier - West #9	7/10/07 19:10	7/12/07 1:31	Y			Major storm	2007	ENE	Eastern
261354		T1580	Mortimer - Golan #110	9/11/07 22:07	9/12/07 8:12	N			Rain-heavy	2007	WG	Western
262616		T3340	Taylorville - Moshier #7	12/29/07 8:03	12/29/07 8:08	N	258	1,290	Wind -Strong	2007	CN	Central
262720		T3340	Taylorville - Moshier #7	1/9/08 9:59	1/9/08 23:59	N	256	222,484	Rain Wind Severe	2008	CN	Central
262800		T1550	Lockport - Mortimer #114	1/13/08 13:25	1/13/08 13:26	N			Fair	2008	WG	Western
262801		T1550	Lockport - Mortimer #114	1/13/08 13:43	1/14/08 17:37	N	1	3	Fair	2008	WG	Western
262990		T1280	Gardenville - Homer Hill #152	1/30/08 4:34	1/30/08 23:41	Y	4,116	185,220	Severe Winds, Rain/Sleet/Ice	2008	WF	Western
263001		T1900	Valley (Sta. 44) - Ischua Switch #158	1/30/08 6:17	1/30/08 10:07	Y	3,046	700,580	Severe Winds, Rain/Sleet/Ice	2008	WSW	Western
263163		T1300	Gardenville - Seneca #82	2/6/08 16:53	2/13/08 8:40	N	2,080	199,680	Freezing Rain/Wind	2008	WF	Western
263187		T1390	Huntley - Gardenville #39	2/6/08 20:08	2/7/08 17:02	Y			Freezing Rain/Wind	2008	WF	Western
263504		T2140	Curtis Street - Teal #13	3/8/08 21:23	3/8/08 21:29	N	12,020	72,120	Snow-wet	2008	CC	Central
266706		T1170	Falconer - Homer Hill #154	6/6/08 8:30	6/6/08 16:16	N	2	534	Fair	2008	WSW	Western
267156		T2120	Coffeen - Black River - Lighthouse Hill #5	6/10/08 11:40	6/11/08 18:32	Y	5,611	28,055	TStorms	2008	CN	Central
267179		T3140	Colton - Browns Falls #1	6/10/08 12:26	6/11/08 18:42	Y	2,649	4,807,935	TStorms	2008	CN	Central
267182		T3150	Colton - Browns Falls #2	6/10/08 12:50	6/11/08 20:16	Y			TStorms	2008	CN	Central
267503		T3160	Colton - Townline #9	6/10/08 12:53	6/10/08 23:39	Y	5	3,230	TStorms	2008	CN	Central
267184		T3170	Colton - Malone #3	6/10/08 13:02	6/11/08 19:25	Y	2,762	196,102	TStorms	2008	CN	Central
267216		T6060	Mohican - North Troy #3	6/10/08 20:21	6/11/08 18:18	Y	2,458	125,358	TStorms	2008	ENE	Eastern
276966		T1820	Packard - Huntley #130	9/14/08 21:19	9/15/08 2:33	Y	5,085	50,850	Rain, High Winds	2008	WF	Western
277026		T1900	Valley (Sta. 44) - Ischua Switch #158	9/14/08 22:58	9/15/08 8:16	Y	1,372	760,088	Rain, High Winds	2008	WSW	Western
276990		T2560	Sleight Road - Auburn (State St.) #3	9/15/08 1:53	9/15/08 19:01	Y	1	963	Rain, High Winds	2008	WG	Western
276989		T2120	Coffeen - Black River - Lighthouse Hill #5	9/15/08 3:06	9/15/08 23:43	Y	6,618	19,854	Rain, High Winds	2008	CN	Central
276991		T3340	Taylorville - Moshier #7	9/15/08 3:33	9/15/08 21:43	Y	256	277,248	Rain, High Winds	2008	CN	Central
277347		T6070	Spier - Mohican #7	9/18/08 10:09	9/18/08 15:45	N			Fair	2008	ENE	Eastern
282780		T5940	Feura Bush - North Catskill #2	12/12/08 2:13	12/12/08 21:29	Y			Ice/Snow	2008	EC	Eastern
282781		T5760	Spier - Rotterdam #2	12/12/08 2:38	12/13/08 0:10	Y	14,957	29,914	Ice/Snow	2008	ENE	Eastern
282785		T5690	Rotterdam - New Scotland #19	12/12/08 3:34	12/13/08 12:41	Y			Ice/Snow	2008	EC	Eastern
282786		T5080	Lafarge Bldg Malls - Pleasant Valley #8	12/12/08 3:46	12/13/08 19:55	Y	750	779,250	Ice/Snow	2008	EC	Eastern
284867		T1390	Huntley - Gardenville #39	12/28/08 8:22	12/28/08 17:37	Y	37	111	Fair, Severe Wind	2008	WF	Western
284872		T1340	Homer Hill - Bennett Road #157	12/28/08 9:50	12/30/08 13:38	Y	424	72,928	Fair, Severe Wind	2008	WSW	Western
284878		T1450	Huntley - Lockport #37	12/28/08 10:23	12/30/08 22:08	Y			Fair, Severe Wind	2008	WF	Western

# New York 115 kV Sustained Vegetation-Caused Outages (2005 - 2009)

Interruption & Disturbance System Event	Incident Report No.	Circuit Identification	Circuit Name	Outage Date/Time	Restore Date/Time	Storm?	Loss of Supply - Customers Interrupted	Lost Customer Minutes	Weather	Calendar Year	Sub-Region	Division
287877		T1280	Gardenville - Homer Hill #152	2/12/09 11:16	2/13/09 18:49	Y	4,166	41,660	Wet Snow, Strong Winds	2009	WF	Western
296317	21124-0	T1530	Lockport - Mortimer #111	6/9/09 10:37	6/9/09 17:29	N	6,721	20,163	Fair, Mild Wind	2009	WG	Western
301688	21154-0	T2560	Sleight Road - Auburn (State St.) #3	7/26/09 15:03	7/26/09 17:15	N			Heavy Rain, Thunderstorms	2009	WG	Western
303052	21163-1	T1080	Dunkirk - Falconer #160	8/9/09 23:27	8/10/09 11:45	Y	10,959	397,173	Rain-heavy/Thunderstorms	2009	WSW	Western
303139	21164-0	T1270	Gardenville - Dunkirk #142	8/10/09 12:06	8/10/09 18:43	Y			Fair/Mild wind	2009	WF	Western
303598	21173-1	T1950	Gardenville - Homer Hill #151	8/22/09 3:26	8/22/09 13:47	N	2	126	Fair/Calm to light wind	2009	WF	Western
304212	21182-0	T2560	Sleight Road - Auburn (State St.) #3	10/7/09 15:49	10/8/09 1:29	N	1	60	Rain-light/Strong wind	2009	WG	Western
304452	21183-0	T1170	Falconer - Homer Hill #154	10/29/09 10:28	10/30/09 15:27	N	1	32	Fair/Calm to light wind	2009	WSW	Western
304907	21197-1	T1260	Gardenville - Dunkirk #141	12/9/09 6:29	12/9/09 6:30	Y			Dry Snow, Strong Wind	2009	WF	Western
304908	21197-1	T1280	Gardenville - Homer Hill #152	12/9/09 6:44	12/9/09 11:11	Y	4,187	25,122	Dry Snow, Strong Wind	2009	WF	Western
304909	21197-1	T1600	Mortimer - Pannell Road #25	12/9/09 8:11	12/9/09 14:12	Y			Dry Snow, Strong Wind	2009	WG	Western
304908	21197-1	T1280	Gardenville - Dunkirk #141	12/9/09 8:13	12/9/09 8:14	Y			Dry Snow, Strong Wind	2009	WF	Western
304913	21197-1	T1260	Gardenville - Dunkirk #141	12/9/09 9:44	12/9/09 18:22	Y	26,968	678,187	Dry Snow, Strong Wind	2009	WF	Western

Date of Request: February 11, 2010  
Due Date: February 22, 2010

Request No. DPS-25(RAV-14)

NMPC Req. No. \_\_\_\_\_  
Case No.10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates  
Request for Information

FROM: Robert Visalli

TO:

Request:

For former NMPC employee # 100028397, please provide the following information:

- A. The date of his retirement and salary at time of retirement.
- B. Indicate if he was a VERO employee. If so, provide the costs of his being VERO'ed by type of cost.
- C. From the date of retirement up to the present time, please provide in an Excel spreadsheet the following information by calendar year:
  1. Number of hours he worked for the Company as a contracted employee;
  2. Amounts paid to him for his contractor services;
  3. Amounts paid to him for air travel expenses to and from Syracuse, along with the number of roundtrip flights;
  4. Amounts paid to him for room and board;
  5. All other amounts paid to him;
  6. Total costs paid to him.
- D. Indicate whether the above costs were charged to capital or expense, along with the reason for such accounting.
- E. Indicate the date he first performed contractor services for the Company.
- F. Indicate if he is still a contracted employee; if not, indicate the last date that he performed contractor services for the Company.

Response:

- A. The former employee's date of retirement was June 1, 2002. His salary at the time of retirement was \$76,100.
- B. Yes, this individual retired under a VERO. The cost to VERO this employee was \$309,138 for pension and \$2,450 for medical.
- C. Please see Attachment 1 (RAV-14\_Attachment\_1\_Employee 100028397 Contract Expenses).
- D. The costs indicated in request C are charged to capital because he was contracted to assist in the closeout of capital work orders. As a result, all costs incurred were charged to capital.
- E. The date this individual first performed contractor services for National Grid was February 24, 2003.
- F. Yes, this individual is still a contracted employee.

Name of Respondent:

Pat Michels

Date of Reply:

2/22/2010





Date of Request: February 12, 2010  
Due Date: February 22, 2010

Request No. RAV-19  
NMPC Req. No. NM 33 DPS 30

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Maureen Heaphy

Request:

On page 20 of your pre-filed testimony, you state that “the financial goals reflected in National Grid’s variable pay Plan are not tied to the financial performance of Niagara Mohawk; they are tied to the financial performance of National Grid. As a consequence, it is not the case, as it **apparently** was in the National Fuel decision, that Niagara Mohawk must achieve savings that are not reflected in the revenue requirement in order for National Grid to achieve its enterprise-wide financial goals.” [emphasis added] Regarding this claim, please provide documented proof that National Fuel’s 1990 Incentive Plan was tied solely to the performance of NFG’s regulated operations in NYS.

Response:

Ms. Heaphy has not testified that National Fuel’s 1990 Incentive Plan “was tied solely to the performance of NFG’s regulated operations in NYS.” In its July 19, 1991 Order in *National Fuel* Case 90-G-0734, the Commission determined that “it is only reasonable to expect” that if the goals underlying National Fuel’s variable compensation plan were met, there would be “cost savings, which have not been reflected in the revenue requirement.” Ms. Heaphy assumes that when the Commission referred to “cost savings” and “the revenue requirement” it was referring to cost savings that would be properly attributable to National Fuel’s regulated operations in New York State and the revenue requirement arising from those jurisdictional operations. It is Ms. Heaphy’s testimony that it is not the case that Niagara Mohawk must achieve savings that are not reflected in Niagara Mohawk’s revenue requirement in order for National Grid to achieve its enterprise-wide financial goals. Thus, it would not be appropriate for the Commission to conclude, as it did in *National Fuel*, that if National Grid were to attain the financial goals set forth in its

variable compensation plan, it would be reasonable to expect that Niagara Mohawk had achieved savings that are not reflected in its regulated revenue requirement.

Name of Respondent:

Kenneth Maloney & Maureen Heaphy

Date of Reply:

February 18, 2010

Date of Request: February 12, 2010  
Due Date: February 22, 2010

Request No. RAV-20  
NMPC Req. No. NM 34 DPS 31

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Maureen Heaphy

Request:

A. On page 29 of your pre-filed testimony, you discuss implementation of cost containment measures in the Company's disability benefit program.

Please indicate when each of these measures took effect. Please provide all supporting internal memos, correspondence, or other documentation that shows the implementation dates.

Explain how the rate years' forecasts reflect these cost containment measures.

B. On page 30 of your pre-filed testimony, you discuss bringing all non-union employees under a common benefit program across National Grid, which helped stabilize and reduce administrative costs through economies of scale. These changes were effective January 1, 2009.

Please quantify the reduced administrative costs that occurred through the economies of scale. Include the cost benefit analysis which led the Company to make these changes.

Since this change to reduce costs took place part way through the historic test year, show how the Company's rate years' forecasts reflect annualization of these cost reduction measures. If an annualizing adjustment was not made, fully explain why not.

C. On pages 30-31 of your pre-filed testimony, you discuss a number of changes in the Company's medical, dental, and life insurance programs to reduce costs that were made during 2009.

Please indicate when each of these measures took effect; include supporting internal memos or other correspondence that shows the implementation dates.

Please quantify the reduced costs associated with each change. Include the cost benefit analysis that led the Company to make these changes.

Explain how the rate years' forecasts reflect full annualization of these cost reduction measures. If an annualizing adjustment was not made, fully explain why not.

Response:

A) The cost containment measures in the Company's disability benefit programs were first implemented in June 2002 with the introduction of Matrix as the third party administrator for both short and long-term disability benefits for National Grid New England employees. The relationship with Matrix was expanded in years 2003 and 2004 to incorporate Niagara Mohawk Power Corporation employees; non-union employees were added as of January 2003 and union employees were added as of February 2004. The documentation that shows the implementation dates is attached as Attachment 1 DPS-31 (RAV-20) and Attachment 2 DPS-31 (RAV-20). The benefits resulting from the implementation of these cost containment measures are reflected in the ongoing expense levels that carry forward to the rate years.

B) and C) In 2008, the Company completed a review of the benefit plans and programs that were in place for non-union employees at both legacy National Grid and legacy KeySpan. As a result of this review, the Company was able to align the health and welfare benefit offerings and develop a common benefits platform that was implemented for all non-union employees across the United States as of January 1, 2009. The benefit changes and any associated impact on costs were reviewed by benefit plan at a total company level, separated by legacy National Grid and legacy KeySpan. All potential cost reductions/savings were reviewed in the aggregate and administrative costs were not separately identified.

The changes in the Company's non-union medical, dental and life insurance programs addressed in the pre-filed testimony were part of the alignment mentioned above and became effective as of January 1, 2009. The implementation date for these changes was communicated to employees in October 2008 during the Open Enrollment Process. A copy of the 2009 Benefits Enrollment Guide that was distributed to all non-union employees in October 2008 is attached as Attachment 3 DPS-31 (RAV-20).

The anticipated cost reductions associated with the benefit changes in medical, dental and life insurance programs for legacy National Grid, which took effect on January 1, 2009 are as follows:

<b>Benefit Plan</b>	<b>Anticipated Reduction in Costs</b>
Medical (including Rx) and Dental Plans	\$ 3.9M
Life Insurance Plan	\$ 0.5M

The cost benefit analyses for the changes in the healthcare plans are attached as Attachment 4 DPS-31 (RAV-20) and Attachment 5 DPS-31 (RAV-20).

Since the benefit changes were effective on January 1, 2009, the test year reflected 9/12<sup>th</sup>s of the reduced costs associated with these changes.

For the life insurance benefit expense, the rate year forecast reflects full annualization of the cost reduction associated with the reduced coverage level. An annualizing adjustment of \$41,801 was made to reflect the reduced costs for the remaining 3/12<sup>th</sup>'s using the reduced coverage level and the cost per \$1,000 of coverage.

For the healthcare benefits expense, since the medical, inclusive of prescription drugs, and dental plans are self insured, the projected cost reductions were based on varying assumptions (i.e. claims experience, medical trend, plan enrollment/migration from existing plans); and the actual cost reductions for the period January 1, 2009 through September 30, 2009 attributable to the benefit changes were not quantifiable. As such, the historical test year expense level was not adjusted.

If the Company was to provide an estimate of an annualizing adjustment for the remaining 3/12's of healthcare benefits expense for the historic test year, it would be approximately \$312,147 based on the same methodology used above for the life insurance benefit expense. This adjustment is calculated with the caveat that the level of savings was calculated using varying assumptions for claims experience, plan participation and coverage levels.

Name of Respondent:

Lori Santoro

Date of Reply:

February 22, 2010

Date of Request: February 12, 2010  
Due Date: February 22, 2010

Request No. RAV-20 Supplemental  
NMPC Req. No. NM 34 DPS 31

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Maureen Heaphy

Original Request:

C. On pages 30-31 of your pre-filed testimony, you discuss a number of changes in the Company's medical, dental, and life insurance programs to reduce costs that were made during 2009.

Please indicate when each of these measures took effect; include supporting internal memos or other correspondence that shows the implementation dates.

Please quantify the reduced costs associated with each change. Include the cost benefit analysis that led the Company to make these changes.

Explain how the rate years' forecasts reflect full annualization of these cost reduction measures. If an annualizing adjustment was not made, fully explain why not.

Supplemental Request:

In Part C of this IR, I specifically asked if a normalizing adjustment had been made to fully reflect annualization of the cost reduction measures. I also specifically asked if an annualizing adjustment was not made, fully explain why not. In response, the Company states "if the Company was to provide an estimate of an annualizing adjustment it would be approximately \$312K.....".

Nowhere in the response does the Company explain why it did not make the normalizing adjustment or if it agrees/disagrees that a normalizing adjustment should be made. Would you please clarify this response?

Supplemental Response:

C. For life insurance benefit expense, an annualizing adjustment of \$41,801 was made to reflect the reduced costs for the 3/12<sup>th</sup>'s of the historic test year since the benefit change became effective on January 1, 2009. This adjustment was calculated based on the level of savings associated with reducing the coverage amount from two times base salary to one times base salary.

For healthcare benefits expense, inclusive of prescription drugs and dental plans, no annualizing adjustment was made to the historic test year. Although the benefit changes also became effective on January 1, 2009, as the Company stated in its original response to RAV-20, because these plans are self-insured and the costs are based on varying assumptions (i.e. claims experience, medical trends, plan enrollment/migration from existing plans), the Company felt that these savings were not quantifiable at the time of the filing. Thus, no annualizing adjustment was made. The Company does agree however that if the level of savings were known and measurable, an adjustment to the historic test year expense level would be warranted.

In the initial response to RAV-20, the Company provided an estimate (\$312K of which approximately \$227K is O&M) of an annualizing adjustment based on the same methodology used to calculate the savings for group life insurance (See Attachment 1); however, the Company does not believe that this adjustment is likely to be representative of actual savings because of the impacts of likely variations in claims experience, plan participation and coverage levels.

To support this position, the Company performed an analysis and reviewed the healthcare benefits expense for calendar year 2009, which should reflect a full year of savings, and compared it to the expense level for the twelve month period ended September 30, 2009 (See Attachment 2). The expense level for calendar year 2009 was nearly the same as the level of healthcare expense for the 12 months ended September 30, 2009. This further demonstrates that there are no additional savings to be normalized from the historic test year.

However, while performing this analysis, the Revenue Requirement Panel discovered that the capitalization rate used in the historic test year was incorrect. The rate used in the historic test year was 33.02% and should have been 35.64%. This results in lower healthcare expenses of \$667,000 for the historic test year and \$688,000, \$701,000, and \$714,000 for each respective rate year. The capitalization rate change will also reduce expense levels for some other benefits as well. For all affected benefits, the Company estimates a reduction of \$1.014 million in the historic test year, and \$1.047 million, \$1.066 million, and \$1.086 million in each respective rate year. All benefits affected will be adjusted at the time the Company submits Corrections and Updates in this proceeding.

Name of Respondent:  
Maureen Heaphy  
James Molloy

Date of Reply:  
March 16, 2010

[illegible]



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

**Operating Expenses by Component**

**Health Care - Expense Type B03**

(S000's)

	Column	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)
	Line	Calendar Year Ended December 31, 2009 (per books)			Adjustments to Normalize Historic Test Year			Calendar Year Ended December 31, 2009 (as Adjusted)		
		Total	Electric	Gas	Total	Electric	Gas	Total	Electric	Gas
<b>Provider Company:</b>										
Niagara Mohawk Power Corp.	1	\$ (18,699.3)	\$ (15,508.9)	\$ (3,190.4)	\$ 37,835.2	\$ 31,391.7	\$ 6,443.5	\$ 19,135.8	\$ 15,882.7	\$ 3,253.1
National Grid USA Service Co.	2	5,466.3	4,790.6	675.7	147.7	(131.0)	278.7	5,614.0	4,659.6	954.4
All Other Companies	3	41,064.6	33,847.6	7,217.0	(39,203.2)	(32,302.6)	(6,900.6)	1,861.5	1,545.0	316.4
Total	4	\$ 27,831.6	\$ 23,129.3	\$ 4,702.3	\$ (1,220.3)	\$ (1,041.9)	\$ (178.4)	\$ 26,611.3	\$ 22,087.4	\$ 4,523.9
<b>Operation:</b>										
Production Expenses		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Power Production Expenses		-	-	-	-	-	-	-	-	-
Natural Gas Storage, Terminating and Processing Exp.		-	-	-	-	-	-	-	-	-
Transmission Expenses	5	14.9	14.9	-	(14.9)	(14.9)	-	-	-	-
Regional Market Expenses		-	-	-	-	-	-	-	-	-
Distribution Expenses	6	54.3	28.7	25.7	(54.3)	(28.7)	(25.7)	-	-	-
Customer Accounts Expenses	7	75.6	46.2	29.3	-	-	-	75.6	46.2	29.3
Customer Service and Informational Expenses		-	-	-	-	-	-	-	-	-
Sales Expenses	8	33.5	3.5	30.0	-	-	-	33.5	3.5	30.0
Administrative & General Expenses	9	27,588.8	23,022.5	4,566.3	(1,086.6)	(984.8)	(101.7)	26,502.3	22,037.7	4,464.6
Sub Total	10	\$ 27,767.1	\$ 23,115.8	\$ 4,651.3	\$ (1,155.8)	\$ (1,028.4)	\$ (127.4)	\$ 26,611.3	\$ 22,087.4	\$ 4,523.9
<b>Maintenance:</b>										
Transmission Expenses	11	\$ 1.3	\$ 1.3	\$ -	\$ (1.3)	\$ (1.3)	\$ -	\$ -	\$ -	\$ -
Distribution Expenses	12	54.3	3.3	51.0	(54.3)	(3.3)	(51.0)	-	-	-
Administrative & General Expenses	13	9.0	9.0	-	(9.0)	(9.0)	-	-	-	-
Sub Total	14	\$ 64.5	\$ 13.5	\$ 51.0	\$ (64.5)	\$ (13.5)	\$ (51.0)	\$ -	\$ -	\$ -
TOTAL	15	\$ 27,831.6	\$ 23,129.3	\$ 4,702.3	\$ (1,220.3)	\$ (1,041.9)	\$ (178.4)	\$ 26,611.3	\$ 22,087.4	\$ 4,523.9
Historic Test Year Healthcare Exp as filed with Cap % adj from 33.02% to 35.64%								26,611.6	22,087.5	4,524.1
Increased Costs for Cal 09 Healthcare Expense								(0.3)	(0.1)	(0.2)

						Niagara Mohawk Power Corporation
						d/b/a National Grid
						Case 10-E-0050
						Attachment 2 to RAV-20 Supplemental
						Sheet 2 of 2
<b>NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)</b>						
<b>Operating Expenses by Component</b>						
<b>Health Care - Expense Type B03</b>						
<b>(\$000's)</b>						
			Provider Company	Total	Electric	Gas
		Explanation of Adjustments:				
Lines	Sheet 1	Adjustments: (to normalize Historic Year)				
1		To adjust capitalization % - 37.75%	Niagara Mohawk Power Corp.	\$ (1,345.2)	\$ (1,116.48)	\$ (228.68)
2		To adjust the electric/gas allocation to 83%/17% respectively	Niagara Mohawk Power Corp.	-	(11.5)	11.5
3		To adjust accrual that should have been derived from Co. 36	Niagara Mohawk Power Corp.	39,203.2	32,538.6	6,664.5
4		Consumer Advocates Normalized	Niagara Mohawk Power Corp.	(22.9)	(19.0)	(3.9)
		To adj amount allocated from Company 99 - 25.24%	National Grid USA Service Co.	147.7	122.6	25.1
5		To adjust the electric/gas allocation to 83%/17% respectively	National Grid USA Service Co.	-	(253.6)	253.6
6		To adjust the electric/gas allocation to 83%/17% respectively	All Other Companies	-	236.0	(236.0)
7		To adjust accrual that should have been derived from Co. 36	All Other Companies	(39,203.2)	(32,538.6)	(6,664.5)
8		TOTAL		\$ (1,220.3)	\$ (1,041.9)	\$ (178.4)

Date of Request: February 17, 2010  
Due Date: March 1, 2010

Request No. RAV-22  
NMPC Req. No. NM 39 DPS 36

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: David Lister

Request:

On page 13 of your pre-filed direct testimony, you discuss the projected in-service date of the Back Office Project (BOP). Therein, you state that the Company is not proposing recovery of any costs associated with the BOP in 2011. You further state that the Company is still **“providing customers with the synergy savings credit associated with the Back Office Project beginning in the rate year ending December 31, 2011”** (emphasis added).

A. Regarding this statement, please explain the type of synergy savings credits associated with the BOP that customers are receiving in the RYE 12/31/11.

B. Please explain why customers are entitled to these synergy savings credits in the RYE 12/31/11; include references to specific clauses in joint proposals, settlement agreements, etc, if applicable.

C. How much in synergy savings credits are customers receiving in the RYE 12/31/11? Include supporting workpapers and calculations as to how the amounts were derived, and show where and how such credits are reflected in the Company's pre-filed exhibits.

On page 14 of your pre-filed direct testimony, you state that the BOP is a **“replacement of the current Finance, Human Resources and Supply Chain systems in the US”** (emphasis added).

D. Regarding this statement, please provide a breakdown of all historic test year (HTY) costs associated with the current Finance, Human Resources, and Supply Chain systems in the US, in total, including both NMPC's electric and gas allocations.

E. Fully explain how and show where these HTY costs were eliminated from the RYE 12/31/12 forecast since the BOP system will replace these current systems.

Response:

A. Since the Company based the synergy savings estimate in 2011 on the full synergies being realized by the Rate Year, any synergies and the savings associated with a new ERP system are included in the synergy savings estimate. These savings are in the rate year.

B. There is no requirement that entitles customers to these synergy savings before they are realized. However, the Company has provided the benefit to customers.

C. Customers are receiving \$3,128,364 in synergy savings credits in the RYE 12/31/11. Please refer to Attachment A for the supporting calculation and references to the Company's pre-filed exhibits.

D. Please refer to Attachment B.

E. The current Finance, Human Resources, and Supply Chain system in the US, also known as PeopleSoft ERP, appears on the books of NMPC as rent expense allocated from the Service Company. Please refer to the Rent Expense exhibit, Exhibit \_\_\_\_ (RRP-2), Schedule 8, Sheets 10 and 11, Line 9. Line 9 shows the historical test year costs for the PeopleSoft ERP system. PeopleSoft ERP was fully amortized as of September 2009; therefore, looking across Line 9 into Rate Years 2011, 2012, and 2013, the schedule shows no dollars have been included in the Rate Years for this project. Forecasted rent expense for the new BOP is shown on this same schedule at Line 18 in the Rate Years 2012 and 2013.

Name of Respondent:  
James M. Molloy

Date of Reply:  
February 23, 2010

**NIAGARA MOHAWK POWER CORPORATION**

**d/b/a National Grid**

**Case 10-E-0050**

**Attachment A to RAV-22**

**Sheet 1 of 1**

**RAV-22 Part C: Synergy Savings related to the US ERP Back Office Project**

Line		Rate Year 2011
1	US ERP BOP projected savings	\$ 15,009,800 a
2	Prorated @ \$200m/\$246.917m	81.00% b & c
3	Line 1 * Line 2	\$ 12,157,770
4	NiMo Electric allocation	24.93% d
5	Line 3 * Line 4	\$ 3,030,932
6	Inflation	3.21% e
7	Line 5 * (1+ Line 6)	\$ 3,128,364

a\ Per Exhibit \_\_ (RRP-10) Workpaper to Exhibit \_\_ (RRP-2), Schedule 42, Workpaper 1, Sheet 6

b\ \$200m = Per Exhibit \_\_ (RRP-2), Schedule 42, Sheet 5

c\ \$246.917m = Exhibit \_\_ (RRP-10) Workpaper to Exhibit \_\_ (RRP-2), Schedule 42, Workpaper 1, Sheet 10

d\ Per Exhibit \_\_ (RRP-2), Schedule 42, Sheet 4

e\ Per Exhibit \_\_ (RRP-7), Summary, Sheet 1

RAV-22 Part D: Historic Test Year costs associated with the US PeopleSoft ERP system

NIAGARA MOHAWK POWER CORPORATION  
d/b/a National Grid  
Case 10-E-0050  
Attachment B to RAV-22  
Sheet 1 of 1

Work Order	9000027746
Work Order Descr	(All)

Sum of GL Act \$		Business Unit	Bus Unit Descr	Electric	Gas	Other	Grand Total
Expense Type	500	Rental/Lease Non-Real Estate	00004	Nantucket Electric Company	7,846.55		7,846.55
Expense Type Descr			00005	Massachusetts Electric Company	1,202,685.31		1,202,685.31
			00006	NE Hydro - Trans Electric Co	12,859.44		12,859.44
			00008	New England Hydro - Trans Corp	36,383.84		36,383.84
			00010	New England Power Company	168,551.18		168,551.18
			00020	New England Electric Trans Co	1,635.59		1,635.59
			00021	National Grid Trans Services	327.06		327.06
			00036	Niagara Mohawk Power Corp	1,991,217.62	407,822.16	2,399,039.78
			00041	Granite State Electric Company	37,544.91		37,544.91
			00048	Narragansett Gas Company	246,257.46		246,257.46
			00049	Narragansett Electric Company	419,313.38		419,313.38
			00070	Wayfinder Group Inc.	61.11		61.11
			00071	Valley Appliance & Merchandise	413.72		413.72
Grand Total					3,878,364.88	654,079.62	4,532,919.33

Expense Type	500	Rental/Lease Non-Real Estate	Business Unit	Bus Unit Descr	Electric	Gas	Other	Grand Total	Business Unit
Expense Type Descr									Allocation
			00004	Nantucket Electric Company	100.00%	0.00%	0.00%	100.00%	0.17%
			00005	Massachusetts Electric Company	100.00%	0.00%	0.00%	100.00%	26.53%
			00006	NE Hydro - Trans Electric Co	100.00%	0.00%	0.00%	100.00%	0.28%
			00008	New England Hydro - Trans Corp	100.00%	0.00%	0.00%	100.00%	0.80%
			00010	New England Power Company	100.00%	0.00%	0.00%	100.00%	3.72%
			00020	New England Electric Trans Co	100.00%	0.00%	0.00%	100.00%	0.04%
			00021	National Grid Trans Services	100.00%	0.00%	0.00%	100.00%	0.01%
			00036	Niagara Mohawk Power Corp	83.00%	17.00%	0.00%	100.00%	52.92%
			00041	Granite State Electric Company	100.00%	0.00%	0.00%	100.00%	0.83%
			00048	Narragansett Gas Company	0.00%	100.00%	0.00%	100.00%	5.43%
			00049	Narragansett Electric Company	100.00%	0.00%	0.00%	100.00%	9.25%
			00070	Wayfinder Group Inc.	0.00%	0.00%	100.00%	100.00%	0.00%
			00071	Valley Appliance & Merchandise	0.00%	0.00%	100.00%	100.00%	0.01%
Grand Total					85.56%	14.43%	0.01%	100.00%	100.00%

a) agrees to Exhibit (RRP-2), Schedule 8, Sheet 10, Line 9 "Test Year IS Rent Expense"

Date of Request: February 17, 2010  
Due Date: March 1, 2010

Request No. RAV-27  
NMPC Req. No. NM 44 DPS 41

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Infrastructure and Operations Panel

Request:

Regarding the Panel's pre-filed direct testimony on major storms at pages 23- 238, please provide the following information:

A. Fully explain why the Panel chose the 4.5 year period from April 2005 – August 2009 as the basis for determining the rate year forecast of "Incremental Deferred" storm costs. Why didn't the Company use 3 years? Why didn't the Company use 5 years? Why didn't the Company use entire approximate 7.75 years from the time the MJP first went into effect through the end of the historic test year?

B. What was the average "Incremental Deferred" storm cost for the period from February 1, 2002 – September 30, 2009? Include supporting calculations with all individual qualifying "Incremental Deferred" storms and related costs listed.

C. What is the Company's rationale for establishing the storm fund at 88% of the average "Incremental Deferred" storm costs? Why not establish the storm fund at 75% of the average "Incremental Deferred" storm costs? Why not establish the storm fund at 100% of the average "Incremental Deferred" storm costs?

D. Fully explain why the Company included two major storms with costs in excess of \$45 million (\$78.4 million for the October 2006 Buffalo storm and \$47.4 million for the December 2008 ice storm) in the 4.5 year average used to make the rate year forecast. Why wasn't a normalization adjustment made to reflect the fact that it is not likely that two major storms of this cost magnitude will occur every 4.5 years?

E. Provide a list of all major storms over the past 20 years that had costs in excess of \$20 million.

F. On page 236, for the types of major storm costs that are eligible for recovery through the Company's proposed storm fund, the Panel proposes using "the existing criteria established for deferral of storm costs."

Which criteria is the Panel referring to, the criteria set forth in the 2001 MJP or the criteria set forth in the 2007 Stipulation?

Specifically list each criteria the Company proposes using.

G. As set forth in Clause 1.2.4.5 of the MJP, the storm deferral account included a \$2.0 million deductible for each major storm which “resolved any and all issues related to the Incremental Costs having the effect of reducing Niagara Mohawk’s ongoing operating costs.” Does the Company’s proposed storm fund have a similar deductible? If so, how much is the deductible for each major storm and how was the amount determined? If not, fully explain why the Company does not agree that a similar deductible should not be put into effect in this case, assuming for purposes of this question only that the Commission were to agree to the Company’s proposal to have a major storm fund.

H. Please provide a comprehensive list of every type of cost that the Company proposes to be included in the major storm fund account. Explain why each such cost is considered incremental to the base O&M allowances. Also indicate if there are any threshold levels that have to be met before the costs qualify for inclusion in the storm fund account (e.g., refer to the payroll tax threshold in storm Stipulation Clause 3.6.4 and to baseline internal employee count threshold in Stipulation Attachment 3). If there are such thresholds, identify the threshold levels and explain how each was derived / will be calculated. If there are no threshold levels, fully explain why not.

I. What is the maximum amount of time a cost can be incurred after a major storm but still be considered to be “major storm related?” For example, can a tree, said to be weakened / damaged by a major storm, be cut down one year after the storm and still be included in the storm fund account? Explain in full how you arrived at the maximum duration.

J. How much has the Company included in each of the three rate years for major storm expenses? Include exhibit / workpaper references.

Response:

- A. The Panel chose a review from 1/1/2005 through 12/31/09, a five year period in preparation for this submittal. Exhibit IOP -11 Sheet 1 of 1, as well as page 234 of the testimony refer to a 4.5 year average which is the time frame between the first event of 2005 and the final event prior to year end of 2009. A storm occurred in December of 2009 which was not included in this review due to qualifying status of a deferral event being undetermined at that time. The five-year period was utilized as a reasonable period over which to consider storm data, particularly given the three-year period proposed in this case. Calculation of a storm fund based on a different period was not specifically considered.
- B. The average annual “Incremental Deferred” storm cost for the period from February 1, 2002 through September 30, 2009 was \$22.4 million. Attachment 1 (RAV-27\_Attach 1\_Incremental Deferred) provides the support as requested.
- C. The 88% proportion referred to in the request appears to be based on the 4.5 year period referenced in the testimony, which is also described in the response to part A, above. Available data at the time of the filing of the rate case for the five-year period for the period January 1, 2005 – December 31, 2009 results in annual average deferrable incremental storm costs of approximately \$30 million, which is the requested storm fund amount.



- D. The events happened to take place in the five-year review period. Severe events such as the October 2006 snow storm and December 2008 ice storm do occur from time to time in upstate New York within close proximity, and the proposed storm is intended to provide for such extraordinary events. As stated in testimony these types of events can adversely affect cash flow and impact payments which are required to be made to mutual assistance organizations, third party contractors, and suppliers. Reconciliation of these accounts is required to ensure the success of future assistance requests.
- E. Attachment 2 provides a list of all known major storms over the past 20 years that had costs in excess of \$20 million.
- F. The Panel is referring to the criteria set forth in the 2007 Stipulation. The Company proposes \$6 million to be included in base rates for National Grid storm restoration annually. Each major storm event includes a \$2 million deductible. After the \$6 million major storm annual base allowance is reached in a calendar year, the Company would be allowed recovery through the storm fund of incremental major storm costs incurred in excess of the \$2 million per event deductible. For storm fund recovery purposes, a major storm occurs when a period of severe weather results in outages in a region exceeding 10% of the region's customers and/or at least 1% of its customers experience interrupted service for at least 24 hours.
- G. Yes, the storm fund proposal continues the same \$2.0 million deductible for each major storm event.
- H. The costs the Company proposes to be included in the major storm fund account are the same as utilized currently under the Storm Restoration Deferrals set forth in the 2007 Stipulation. These costs include:
- Incremental costs that represent payments to any affiliated company or companies separately from the portion of incremental costs that represents internal costs and costs paid to unaffiliated third-parties. The labor and/or expenses would not be required without the event.
  - The portion of Niagara Mohawk cost of contractors that qualify as incremental costs shall be determined by application of the methodology set forth in the 2007 Stipulation.
  - Material and supplies – required to support the storm effort in materials, not required without the event.
  - Internal and external overtime costs – required due to event.
  - Transportation costs (excluding Niagara Mohawk including pooled vehicles) – required due to the event.
  - Payroll taxes on storm-related overtime for Company employees over an annual threshold of \$241,800 as deferrable incremental costs.
  - Lodging – required due to the event.
  - Employee expenses (meals, mileage, unusual, etc.) – required due to the event.

All thresholds to be utilized are taken from the 2007 Stipulation.

- I. The maximum time a cost could be incurred after a major storm and be considered "major storm related" would generally be 3-4 months from the end of the event restoration. Some costs may be incurred even later in the case of extraordinary circumstances. However, all costs would still be subject to audit, and Commission approval. For example, the December 2008 ice storm required follow up patrols and maintenance from January through March due to the extent of the severe damage incurred during the event. Experience in major events provides insight into complete restoration requirements, which may require surveys, tree trimming, and construction /maintenance of facilities. Depending on the geography and severity of damage, it is reasonable to expect 3-4 months to complete this work in some cases. There will also be events requiring additional efforts which should be communicated with Staff as they occur. It should also be noted there is a difference between when costs are incurred and invoicing, which could differ greatly. For example, invoices for mutual assistance, reconciling and verifying invoices, etc., may be received long after actual incurrence of the costs reflected in the invoices.
- J. The Company has included \$30.5 million for rate year 2011, \$31.26 million for rate year 2012, and \$32 million for rate year 2013 in major storm expenses. Please see attachment 3 for reference.

Name of Respondent:  
Allen Chieco

Date of Reply:  
March 1, 2010

Niagara Mohawk  
Storm Deferrals - February 2002 to September 2009 - Cost Summary  
RAV-27 B\_Attach 1

Event	Total	Base Pay	Benefits	Bonus	Contractor	Emp Exp	Inventory	Other	Overtime	Sales & Use Tax	Transportation	Payroll Tax	Regional Disqual.	Storm Deduct
February 1, 2002 (55645)	932,000		514,857		4,383,021	474,195	300,854	-3,253,603	5,764,706	170,556	77,414			-7,500,000
March 9, 2002 (83110)	2,865,482		200,161		1,257,001	167,892	40,519	756,328	2,245,604	98,648	99,329			-2,000,000
April 4, 2003 (55823)	9,507,265		278,744		7,471,321	696,237	453,754	882,103	7,512,815	179,425	32,866			-8,000,000
Storm # 82950	576,960		140,024		643,056	100,412	6,075	111,057	1,571,541		4,795			-2,000,000
October 15, 2003 (82965)	1,231,941		184,359		750,453	137,265	8,816	54,790	2,069,124		27,134			-2,000,000
November 13, 2003 (82978)	4,794,922		303,741		2,348,249	285,400	14,000	426,593	3,408,989		7,950			-2,000,000
February 17, 2006	2,835,937	211,301	0	0	4,697,117	269,290	403,418	725,285	5,574,853	212,131	-275,480	6,040	-988,018	-8,000,000
October 12, 2006	78,435,181	1,192,183	0	0	54,352,783	515,542	3,350,333	3,448,355	13,558,504	3,162,529	223,741	631,210	0	-2,000,000
October 28, 2006	219,340	1,249,177	82,105	1,680	2,936,696	57,606	20,584	55,585	20,215	35,961	683	0	-2,240,952	-2,000,000
December 1, 2006	2,117,778	1,051,977	94,040	0	1,876,941	59,283	45,000	1,085,626	0	4,286	-99,375	0		-2,000,000
January 30, 2008	2,478,492	23,334	0	26,687	3,497,221	155,930	13,450	20,020	748,002	0	0	0		-2,006,152
March 10, 2008	5,790,753	83,960	0	93,815	5,448,023	77,046	214,495	263,393	1,579,017	0	31,004			-2,000,000
June 10, 2008	6,181,131	66,733	0	68,405	5,624,407	101,340	207,857	202,788	1,893,025		16,576			-2,000,000
September 15, 2008	5,816,459	208,746	0	106,030	4,527,084	136,660	110,052	283,951	2,373,039	0	75,158	-4,261		-2,000,000
October 28, 2008	661,939	20,704	0	25,777	1,883,813	32,294	46,715	58,851	563,554		7,847	22,384		-2,000,000
December 11, 2008	47,032,207	144,785	0	126,643	33,468,551	556,896	1,926,170	1,820,408	10,551,432		16,373	420,949		-2,000,000
December 28, 2008	52,584	10,888	0	79,101	1,066,945	42,974	56,560	6,378	755,270	0	1,708	32,760		-2,000,000
Total Storm Deferrals	\$171,530,371													
# of Years = 7.66	\$22,392,999	Average Annual "Incremental Deferred" Storm Cost												

The cost detail for storms prior to February 2006 was obtained from the Attachment 11 filings. Attachment 11 grouped all charges from affiliates in a single line item that was classified in "Other" for the RAV-27 B response. This amount would have include base pay, bonus, overtime, etc...

**Niagara Mohawk**  
**Storms > \$20,000,000 from 1990 to present**  
**RAV-27 E\_Attach 2**

<b>Event Date</b>	<b>Year</b>	<b>Deferral</b>
January 1998	1998	67,724,598
October 12, 2006	2006	78,435,181
December 11, 2008	2008	47,389,800
<b>Total Storm Deferrals &gt; \$20M</b>		<b>193,549,579</b>

***Note: The 1998 storm is net of FEMA recoveries that were in excess of \$25 million.***  
***Note: Costs shown are original costs and are not adjusted for inflation.***

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

**Case: 10-E-0050**

**Attachment 3 to NM 44 DPS-41 RAV-27 - Major Storms**

**Response to PART J.**

**Sheet 1 of 1**

**Major Storm Costs in Rate Years**

**Includes Incremental and Non-incremental Costs**

Expense Type	Historic Test Year	Historic Test Year Adjustment	Adjusted Historic Test Year	Inflation Method	Rate Year 2011	Rate Year 2012	Rate Year 2013	Exhibit RRP-2, RRP-10 Schedule
Contractors	43,986,824	(44,585,419)	(598,595)	General	(617,837)	(628,959)	(640,909)	2
Employee Expenses	889,757		889,757	General	918,359	934,889	952,652	4
Hardware	1,373		1,373	General	1,417	1,442	1,470	5
Other	(43,218,533)	44,585,419	1,366,886	General	1,410,825	1,436,220	1,463,508	7
Service Co Operating Costs	18,876		18,876	General	19,482	19,833	20,210	17
Supervision & Admin	693		693	General	715	728	742	16
Sales Tax	139,162		139,162	General	143,636	146,221	148,999	18
Materials Outside Vendor	639,313		639,313	General	659,864	671,742	684,505	28
Materials From Inventory	1,519,938		1,519,938	General	1,568,797	1,597,036	1,627,379	29
Materials Stores Handling	247,625		247,625	General	255,585	260,186	265,130	30
Other Benefits	256,637		256,637	General	264,887	269,655	274,778	19-26
Transportation	1,958,573		1,958,573	General	2,021,533	2,057,920	2,097,021	32
Sub-total	6,440,237	-	6,440,237		6,647,263	6,766,914	6,895,485	
Base Labor	7,660,803		7,660,803	Labor	8,095,783	8,306,274	8,522,237	31
Overtime	14,007,756		14,007,756	Labor	14,803,117	15,187,998	15,582,886	31
Variable Pay	920,954		920,954	Labor	973,246	998,551	1,024,513	31
Payroll Tax	70,950		70,950	Labor	74,978	76,928	78,928	27
Sub-total	22,589,514		22,589,514		23,872,146	24,492,822	25,129,635	
Total	29,029,751		29,029,751		30,519,409	31,259,736	32,025,121	

**Inflation Rates**

General - (Exhibit RRP-7)

Historic test year through 2011	3.2%	29,900,643.20	31,312,913.95	31,373,952.77
2012	1.8%	6,647,263.06	24,492,822.05	25,129,635.42
2013	1.9%	23,872,146.25	6,766,913.79	6,895,485.16
		30,519,409.30	31,259,735.84	32,025,120.58

Labor - (Exhibit RRP-10, Workpaper 4 to RRP-2, sheet 10-12, 22-28)

2010	3.0%
2011-2013	2.60%

**Note**

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

**Case: 10-E-0050**

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**Response to PART J.**

Rate year major storm labor costs were calculated by escalating historic year costs with a composite rate (87% represented, 13% management) from wage and salary increases used in developing total labor costs presented in exhibit RRP-2, schedule 31. The 87% represented, 13% management split is the ratio of how historic year major storm base labor was charged.

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

Case: 10-E-0050

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Response to PART J.

Sheet 1 of 1

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**Includes Incremental and Non-incremental Costs**

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Sub-total	22,589,514		22,589,514		23,872,146	24,492,822	25,129,635	
Total	29,029,751		29,029,751		30,519,409	31,259,736	32,025,121	

**Inflation Rates**

General - (Exhibit RRP-7)

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Labor - (Exhibit RRP-10, Workpaper 4 to RRP-2, sheet 10-12, 22-28)

2010	3.0%
2011-2013	2.60%

**Note**

Rate year major storm labor costs were calculated by escalating historic year costs with a composite rate (87% represented, 13% management) from wage and salary increases used in developing total labor costs presented in exhibit RRP-2, schedule 31. The 87% represented, 13% management split is the ratio of how historic year major storm base labor was charged.

Date of Request: March 22, 2010  
Due Date: April 1, 2010

Request No. AJR-1 SUPP  
NMPC Req. No. NM 45 DPS 42

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Aric Rider

TO: Infrastructure and Operations Panel

Request:

In the plant model the Company has the following:

	6 mo Forecast Per FY10	FY11	Per FY11 - FY15 Capex/COR Plan			
			FY12	FY13	FY14	FY15
<b>Distribution</b>						
Capex Forecast (Workpaper 3)	129.0	244.0	255.0	265.0	275.0	286.0
COR Forecast	10.5	21.7	22.2	22.3	24.2	25.7
<b>Sub-Transmission (TxD)</b>						
Capex Forecast (Workpaper 4)	26.9	48.0	53.0	58.0	65.0	72.0
COR Forecast	2.8	5.1	5.6	6.1	6.8	7.6
<b>Transmission</b>						
Capex Forecast (Workpaper 5)	73.0	132.0	228.0	290.0	295.0	295.0
COR Forecast	4.6	10.0	17.3	22.0	22.4	22.4
<b>Shared Services</b>						

How do you get from the COR %s listed in the file NY DIST COR MAT.xls - in response AJR-1 Attachment 5 - to the %s listed above. Where are the transmission and shared services %s developed?

Response:

Distribution:

The COR percentages in the detail file (NY DIST COR MAT.xls, attached to the March 22, 2010 e-mail from Aric Rider to Glen DiConza) were developed using historical data and applied to a preliminary version of the 'project by project' budget based on the COR % listed by category. This provided a baseline as to the Cost of Removal percentage the Company could expect for FY11. The calculation produced a result of 8.9% for FY11. Then evaluating the investment outlined in the future years we determined that the COR % was realistic based on the historic COR %. The percentage was kept within a reasonable range for the forecasted projects for those years. See Attachment 1 (AJR-1 SUPP\_Attach 1\_COR FY11.xls) for a preliminary budget version for FY11 which shows the FY11 percentage using the COR % from AJR-1\_Attach 5\_NY DIST COR MAT.xls.

Transmission:

The Transmission COR percentages for FY11- FY15 were based on a three year historical average. The Company looked at the last three years (FY06/07-FY08/09) of COR based on prior years actual. We reviewed those percentages against future budgets and project mix to determine whether the percentages were reasonable. Following this determination, we reviewed whether the percentages assumed for future years were reasonable relative to the three year average percentages and future trends as well. The percentages were kept within a reasonable range for the projects in those years.

Shared Services:

Shared Services uses a historic average annual spend as the Cost of Removal estimate. This figure would be adjusted for any known large variances from past spend rates.

Name of Respondent:

Glen DiConza  
Antoinette Stores

Date of Reply:

4/1/2010  
4/1/2010

Draft budget # - not final

271,000,000

23,886,155 COR Column Total

24,000,000 USED

8.9%

AJR-1 SUPP

Attachment 1

Proj #	BU	Project Description						BUDGET CLASS2		FY11 Removal
CNC022	36	Cent NY-Dist-3rd Party Attch Blankt	NY	NY	DIST	LINE & OTHER	3rd Party Attachments			14,250.00
CNE022	36	East NY-Dist-3rd Party Attch Blankt	NY	NY	DIST	LINE & OTHER	3rd Party Attachments			14,250.00
CNW022	36	West NY-Dist-3rd Party Attch Blankt	NY	NY	DIST	LINE & OTHER	3rd Party Attachments			11,250.00
C00194	36	NR-Distr-8043.08-CuNaph(soleowned)	NY	NY	DIST	LINE & OTHER	Asset Replacement			9,600.00
C06723	36	Buffalo Station 29 Rebuild - Fdrs	NY	NY	DIST	LINE & OTHER	Asset Replacement			156,000.00
C10164	36	Schuylerville 12- Reconductor Rt 29	NY	NY	DIST	LINE & OTHER	Asset Replacement			32,000.00
C10960	36	IE - NE Cutout Replacement	NY	NY	DIST	LINE & OTHER	Asset Replacement			16,000.00
C11099	36	IE-NE Cable Replacements Placeholde	NY	NY	DIST	LINE & OTHER	Asset Replacement			459,840.00
C12967	36	IE - NC Cutout Replacement	NY	NY	DIST	LINE & OTHER	Asset Replacement			16,000.00
C12968	36	IE - NW Cutout Replacement	NY	NY	DIST	LINE & OTHER	Asset Replacement			16,000.00
C13282	36	IE-NW Cable Replacements Placeholde	NY	NY	DIST	LINE & OTHER	Asset Replacement			619,680.00
C13822	36	IE-NC Cable Replacements Placeholde	NY	NY	DIST	LINE & OTHER	Asset Replacement			430,720.00
C26902	36	Lape - Snyders Lake Tie	NY	NY	DIST	LINE & OTHER	Asset Replacement			16,000.00
C26977	36	Doghouse Replacement - Central Div	NY	NY	DIST	LINE & OTHER	Asset Replacement			20,000.00
C27864	36	Replace Open Wire Secondary-NY Eas	NY	NY	DIST	LINE & OTHER	Asset Replacement			17,600.00
C27884	36	Replace open wire secondary-NY Cent	NY	NY	DIST	LINE & OTHER	Asset Replacement			17,600.00
C27886	36	Replace open wire secondary-NY West	NY	NY	DIST	LINE & OTHER	Asset Replacement			17,600.00
C27947	36	Buffalo Station 23 Rebuild - Fdrs	NY	NY	DIST	LINE & OTHER	Asset Replacement			104,000.00
C27948	36	Buffalo Station 43 Rebuild - Fdrs	NY	NY	DIST	LINE & OTHER	Asset Replacement			104,000.00
C27949	36	Buffalo Station 52 Rebuild - Fdrs	NY	NY	DIST	LINE & OTHER	Asset Replacement			160,000.00
C28042	36	East NWP Relay Replacements	NY	NY	DIST	LINE & OTHER	Asset Replacement			36,000.00
C28590	36	Gilbert Mills 51 Rebuild due to QRS	NY	NY	DIST	LINE & OTHER	Asset Replacement			88,000.00
C28688	36	Brunswick 52 New feeder getaway	NY	NY	DIST	LINE & OTHER	Asset Replacement			62,400.00
C28790	36	Alps - new dist sub - D Line work	NY	NY	DIST	LINE & OTHER	Asset Replacement			168,000.00

<b>C29113</b>	36	Brook Road 36954 Getaway cable repl	NY	NY	DIST	LINE & OTHER	Asset Replacement	64,000.00
<b>C29214</b>	36	LV Neutral Cable Replacement	NY	NY	DIST	LINE & OTHER	Asset Replacement	20,960.00
<b>C31598</b>	36	North Troy - Install Feeder Getaway	NY	NY	DIST	LINE & OTHER	Asset Replacement	57,600.00
<b>C31633</b>	36	208 Line Refurbishment	NY	NY	DIST	LINE & OTHER	Asset Replacement	1,600.00
<b>C31860</b>	36	IE - NE Replace open wire primary	NY	NY	DIST	LINE & OTHER	Asset Replacement	76,800.00
<b>C31861</b>	36	IE - NC Replace open wire primary	NY	NY	DIST	LINE & OTHER	Asset Replacement	63,200.00
<b>C31862</b>	36	IE - NW Replace open wire primary	NY	NY	DIST	LINE & OTHER	Asset Replacement	70,400.00
<b>C32091</b>	36	IE-NC Duct Replac Placeholder	NY	NY	DIST	LINE & OTHER	Asset Replacement	16,000.00
<b>C32093</b>	36	IE-NE_Duct Replace Placeholder	NY	NY	DIST	LINE & OTHER	Asset Replacement	16,000.00
<b>C32095</b>	36	IE-NW_Duct replace Placeholder	NY	NY	DIST	LINE & OTHER	Asset Replacement	16,000.00
<b>C32101</b>	36	IE- NC- MH Program Placeholder	NY	NY	DIST	LINE & OTHER	Asset Replacement	16,000.00
<b>C32102</b>	36	IE-NW-MH Program Placeholder	NY	NY	DIST	LINE & OTHER	Asset Replacement	16,000.00
<b>C32103</b>	36	IE-NE-MH-Program-Placeholder	NY	NY	DIST	LINE & OTHER	Asset Replacement	16,000.00
<b>C32292</b>	36	Lowville-Boonville #22 Dist Underbu	NY	NY	DIST	LINE & OTHER	Asset Replacement	14,400.00
<b>C32693</b>	36	V-72 Howard St Replace Vault Roof	NY	NY	DIST	LINE & OTHER	Asset Replacement	24,000.00
<b>C33173</b>	36	Albany Network Equipment	NY	NY	DIST	LINE & OTHER	Asset Replacement	240,000.00
<b>C33476</b>	36	Buffalo Station 27 Rebuild - Line	NY	NY	DIST	LINE & OTHER	Asset Replacement	16,000.00
<b>C33477</b>	36	Buffalo Station 37 Rebuild - Line	NY	NY	DIST	LINE & OTHER	Asset Replacement	16,000.00
<b>C33478</b>	36	Buffalo Station 59 Rebuild - Line	NY	NY	DIST	LINE & OTHER	Asset Replacement	16,000.00
<b>C33908</b>	36	V2325 Albany NY Roof Replacement	NY	NY	DIST	LINE & OTHER	Asset Replacement	24,000.00
<b>C33909</b>	36	V2326 Albany NY Roof Replacement	NY	NY	DIST	LINE & OTHER	Asset Replacement	24,000.00
<b>C33910</b>	36	V2327 Albany NY Roof Replacement	NY	NY	DIST	LINE & OTHER	Asset Replacement	24,000.00
<b>C33911</b>	36	V-6 Albany NY Roof Replacement	NY	NY	DIST	LINE & OTHER	Asset Replacement	24,000.00
<b>C33912</b>	36	V5825 Schenectady NY Roof Repl	NY	NY	DIST	LINE & OTHER	Asset Replacement	24,000.00
<b>C33913</b>	36	V573 Troy NY Roof Replacement	NY	NY	DIST	LINE & OTHER	Asset Replacement	24,000.00
<b>C33914</b>	36	V-500 Troy NY Roof Replacement	NY	NY	DIST	LINE & OTHER	Asset Replacement	24,000.00
<b>C33915</b>	36	V-198 Albany NY Roof Replacement	NY	NY	DIST	LINE & OTHER	Asset Replacement	24,000.00
<b>CNC017</b>	36	Cent NY-Dist-Asset Replace Blanket	NY	NY	DIST	LINE & OTHER	Asset Replacement	363,360.00
<b>CNE017</b>	36	East NY-Dist-Asset Replace Blanket	NY	NY	DIST	LINE & OTHER	Asset Replacement	165,120.00
<b>CNW017</b>	36	West NY-Dist-Asset Replace Blanket	NY	NY	DIST	LINE & OTHER	Asset Replacement	412,960.00
<b>C06722</b>	36	Buffalo Indoor Sub. #29 Refurb.	NY	NY	DIST	SUB	Asset Replacement	29,000.00
<b>C08435</b>	36	White Lake Station Upgrades	NY	NY	DIST	SUB	Asset Replacement	16,000.00

<b>C18850</b>	36	Circuit Switcher Strategy Co:36 DxT	NY	NY	DIST	SUB	Asset Replacement	18,000.00
<b>C24240</b>	36	Battery Strategy FY09 CO36 DxT	NY	NY	DIST	SUB	Asset Replacement	2,500.00
<b>C25639</b>	36	Buffalo Indoor Sub. #23 Refurb.	NY	NY	DIST	SUB	Asset Replacement	13,000.00
<b>C25659</b>	36	Buffalo Indoor Sub. #52 Refurb.	NY	NY	DIST	SUB	Asset Replacement	21,200.00
<b>C25660</b>	36	Buffalo Indoor Sub. #43 Refurb.	NY	NY	DIST	SUB	Asset Replacement	19,000.00
<b>C25801</b>	36	IE - NY ARP Transformers	NY	NY	DIST	SUB	Asset Replacement	30,000.00
<b>C26054</b>	36	NY ARP MetalClad Equipment	NY	NY	DIST	SUB	Asset Replacement	5,000.00
<b>C26760</b>	36	NY Small Capital Items	NY	NY	DIST	SUB	Asset Replacement	2,000.00
<b>C28788</b>	36	Alps - new dist sub - add feeder	NY	NY	DIST	SUB	Asset Replacement	2,000.00
<b>C29205</b>	36	Network Transformer Replacement	NY	NY	DIST	SUB	Asset Replacement	6,000.00
<b>C29206</b>	36	Network Protector Replacement	NY	NY	DIST	SUB	Asset Replacement	6,000.00
<b>C32004</b>	36	Mobile Readiness-NY Central	NY	NY	DIST	SUB	Asset Replacement	4,000.00
<b>C32005</b>	36	Mobile Readiness-NY West	NY	NY	DIST	SUB	Asset Replacement	12,000.00
<b>C32014</b>	36	Batts/Charg- NY West	NY	NY	DIST	SUB	Asset Replacement	7,000.00
<b>C32252</b>	36	NE ARP Breakers & Reclosers	NY	NY	DIST	SUB	Asset Replacement	14,200.00
<b>C32253</b>	36	NC ARP Breakers & Reclosers	NY	NY	DIST	SUB	Asset Replacement	19,400.00
<b>C32261</b>	36	NW ARP Breakers & Reclosers	NY	NY	DIST	SUB	Asset Replacement	12,600.00
<b>C32296</b>	36	Altamont Sub Metalclad Replacement	NY	NY	DIST	SUB	Asset Replacement	17,000.00
<b>C32298</b>	36	Market Hill Sub Metalclad Replacemt	NY	NY	DIST	SUB	Asset Replacement	3,000.00
<b>C32340</b>	36	Ellicott Regulator Replacement	NY	NY	DIST	SUB	Asset Replacement	9,000.00
<b>C33473</b>	36	Buffalo Station 27 Rebuild - Sta	NY	NY	DIST	SUB	Asset Replacement	6,000.00
<b>C33474</b>	36	Buffalo Station 37 Rebuild - Sub	NY	NY	DIST	SUB	Asset Replacement	6,000.00
<b>C33475</b>	36	Buffalo Station 59 Rebuild - Sub	NY	NY	DIST	SUB	Asset Replacement	6,000.00
<b>C26159</b>	36	FH - NE D-Line Work Found by Insp.	NY	NY	DIST	LINE & OTHER	Asset Replacement - I&M (NY)	635,900.00
<b>C26160</b>	36	FH - NC D-Line Work Found by Insp.	NY	NY	DIST	LINE & OTHER	Asset Replacement - I&M (NY)	635,900.00
<b>C26161</b>	36	FH - NW D-Line Work Found by Insp.	NY	NY	DIST	LINE & OTHER	Asset Replacement - I&M (NY)	635,900.00
<b>C26162</b>	36	FH - NE UG Work Found by Insp.	NY	NY	DIST	LINE & OTHER	Asset Replacement - I&M (NY)	83,300.00
<b>C26163</b>	36	NC - UG Work Found by Insp.	NY	NY	DIST	LINE & OTHER	Asset Replacement - I&M (NY)	83,300.00
<b>C26164</b>	36	NW - UG Work Found by Insp.	NY	NY	DIST	LINE & OTHER	Asset Replacement - I&M (NY)	83,400.00
<b>CNC014</b>	36	Cent NY-Dist-Damage/Failure Blanket	NY	NY	DIST	LINE & OTHER	Damage/Failure	676,600.00
<b>CNE014</b>	36	East NY-Dist-Damage/Failure Blanket	NY	NY	DIST	LINE & OTHER	Damage/Failure	925,820.00
<b>CNW014</b>	36	West NY-Dist-Damage/Failure Blanket	NY	NY	DIST	LINE & OTHER	Damage/Failure	854,590.00

<b>RESERVE I</b>	36	Reserve for Damage/Failure Unidentifie	NY	NY	DIST	LINE & OTHER	Damage/Failure	436,900.00
<b>C18595</b>	36	DxT Substation Dmg/Fail Reserve C36	NY	NY	DIST	SUB	Damage/Failure	2,000.00
<b>CNC002</b>	36	Cent NY-Dist-Subs Blanket	NY	NY	DIST	SUB	Damage/Failure	7,340.00
<b>CNE002</b>	36	East NY-Dist-Subs Blanket	NY	NY	DIST	SUB	Damage/Failure	12,560.00
<b>CNW002</b>	36	West NY-Dist-Subs Blanket	NY	NY	DIST	SUB	Damage/Failure	7,340.00
<b>RESERVE I</b>	36	Reserve for Damage/Failure Unidentifie	NY	NY	DIST	SUB	Damage/Failure	20,000.00
<b>CNC070</b>	36	Cent NY-General-Genl Equip Blanket	NY	NY	DIST	LINE & OTHER	General Equipment - Dist	-
<b>CNE070</b>	36	East NY-Genl Equip Budgetary Reserv	NY	NY	DIST	LINE & OTHER	General Equipment - Dist	-
<b>CNW070</b>	36	West NY-General-Genl Equip Blanket	NY	NY	DIST	LINE & OTHER	General Equipment - Dist	-
<b>RESERVE I</b>	36	Reserve for General Equipment Specifi	NY	NY	DIST	LINE & OTHER	General Equipment - Dist	-
<b>CNC009</b>	36	Cent NY-Dist-Land/Rights Blanket	NY	NY	DIST	LINE & OTHER	Land and Land Rights - Dist	13,250.00
<b>CNW009</b>	36	West NY-Dist-Land/Rights Blanket	NY	NY	DIST	LINE & OTHER	Land and Land Rights - Dist	5,950.00
<b>C00376</b>	36	St. Johnsville 51-Wagner/Wiltse Rds	NY	NY	DIST	LINE & OTHER	Load Relief	21,000.00
<b>C06765</b>	36	East Golah -F5151E, F5151W & F5151	NY	NY	DIST	LINE & OTHER	Load Relief	82,530.00
<b>C10967</b>	36	IE - NW Dist Transformer Upgrades	NY	NY	DIST	LINE & OTHER	Load Relief	80,535.00
<b>C12719</b>	36	Rosa Road 55 - Overloaded Ratio bks	NY	NY	DIST	LINE & OTHER	Load Relief	5,250.00
<b>C14846</b>	36	IE - NC Dist Transformer Upgrades	NY	NY	DIST	LINE & OTHER	Load Relief	80,535.00
<b>C15828</b>	36	IE - NE Dist Transformer Upgrades	NY	NY	DIST	LINE & OTHER	Load Relief	80,535.00
<b>C18991</b>	36	Port Henry 51 - Convert Westport	NY	NY	DIST	LINE & OTHER	Load Relief	36,750.00
<b>C26379</b>	36	Attica12-Rebuild,Xfer F1263 to 0158	NY	NY	DIST	LINE & OTHER	Load Relief	84,000.00
<b>C28022</b>	36	Sycaway-add new feeders	NY	NY	DIST	LINE & OTHER	Load Relief	28,350.00
<b>C28023</b>	36	Reynolds Rd - add new feeders	NY	NY	DIST	LINE & OTHER	Load Relief	66,150.00
<b>C28545</b>	36	LeMoyne Ave Rebild	NY	NY	DIST	LINE & OTHER	Load Relief	42,000.00
<b>C28607</b>	36	Lehigh 66952 Tie With Colosse 32151	NY	NY	DIST	LINE & OTHER	Load Relief	79,800.00
<b>C28608</b>	36	McGraw 69 Low Voltage improvement	NY	NY	DIST	LINE & OTHER	Load Relief	47,250.00
<b>C28618</b>	36	Valley 59476 Rebuild Rasbach Rd	NY	NY	DIST	LINE & OTHER	Load Relief	4,200.00
<b>C28622</b>	36	Poland Convert Old State Rd	NY	NY	DIST	LINE & OTHER	Load Relief	36,855.00
<b>C28765</b>	36	Johnson 35251 - getaway replacement	NY	NY	DIST	LINE & OTHER	Load Relief	9,450.00
<b>C28772</b>	36	Inman Rd - add new feeders	NY	NY	DIST	LINE & OTHER	Load Relief	105,000.00
<b>C28780</b>	36	Seminole 33904 - add feeder tie	NY	NY	DIST	LINE & OTHER	Load Relief	10,500.00
<b>C28781</b>	36	Riverside 28854 - replace getaway	NY	NY	DIST	LINE & OTHER	Load Relief	16,275.00
<b>C28816</b>	36	Chittenango Relief	NY	NY	DIST	LINE & OTHER	Load Relief	31,500.00

<b>C28820</b>	36	Park Load Relief	NY	NY	DIST	LINE & OTHER	Load Relief	13,020.00
<b>C28825</b>	36	Krumkill Voorheesville Tie	NY	NY	DIST	LINE & OTHER	Load Relief	52,500.00
<b>C28832</b>	36	Bartell 56 Orangeport	NY	NY	DIST	LINE & OTHER	Load Relief	26,250.00
<b>C28837</b>	36	Canajoharie D-Line Work	NY	NY	DIST	LINE & OTHER	Load Relief	94,500.00
<b>C28843</b>	36	Church St 04358 exten.	NY	NY	DIST	LINE & OTHER	Load Relief	14,805.00
<b>C28844</b>	36	Brook Rd 36957 Exten. Adams Road	NY	NY	DIST	LINE & OTHER	Load Relief	49,665.00
<b>C28847</b>	36	Fairdale Load Relief	NY	NY	DIST	LINE & OTHER	Load Relief	31,500.00
<b>C28848</b>	36	Mexico Load Relief	NY	NY	DIST	LINE & OTHER	Load Relief	21,000.00
<b>C28849</b>	36	Phoenix Load Relief	NY	NY	DIST	LINE & OTHER	Load Relief	21,000.00
<b>C28852</b>	36	Starr 53 Step Down	NY	NY	DIST	LINE & OTHER	Load Relief	52,500.00
<b>C28854</b>	36	Cortland 02 Relief	NY	NY	DIST	LINE & OTHER	Load Relief	10,500.00
<b>C28869</b>	36	E Syracuse 69 Conductor	NY	NY	DIST	LINE & OTHER	Load Relief	6,300.00
<b>C28870</b>	36	Station 21 - Split F2173	NY	NY	DIST	LINE & OTHER	Load Relief	26,250.00
<b>C28929</b>	36	Frankhauser New Station - Line Work	NY	NY	DIST	LINE & OTHER	Load Relief	63,000.00
<b>C29030</b>	36	Batavia 01 - UG Cable Recond.	NY	NY	DIST	LINE & OTHER	Load Relief	105,000.00
<b>C29181</b>	36	Station 79 - F7961 Relief	NY	NY	DIST	LINE & OTHER	Load Relief	15,382.50
<b>C29182</b>	36	Station 79 - F7962 Relief	NY	NY	DIST	LINE & OTHER	Load Relief	19,950.00
<b>C30506</b>	36	N Syracuse Sub Getaways	NY	NY	DIST	LINE & OTHER	Load Relief	3,150.00
<b>C32171</b>	36	Amsterdam 32654 - extension	NY	NY	DIST	LINE & OTHER	Load Relief	42,000.00
<b>C32345</b>	36	Butts Rd. 7252 Extension	NY	NY	DIST	LINE & OTHER	Load Relief	70,875.00
<b>C32350</b>	36	Albion 8064 Getaway Reconductoring	NY	NY	DIST	LINE & OTHER	Load Relief	19,687.50
<b>C32390</b>	36	NW-Batavia Sub Dist. Line Cap Banks	NY	NY	DIST	LINE & OTHER	Load Relief	13,860.00
<b>C32413</b>	36	Tonawanda 4.16 057 Recon UG Getaw	NY	NY	DIST	LINE & OTHER	Load Relief	35,122.50
<b>C32452</b>	36	NW 15564 Fdr, Recond ug getaway	NY	NY	DIST	LINE & OTHER	Load Relief	11,812.50
<b>C32453</b>	36	NW Fdr 4671 Recond UG cable	NY	NY	DIST	LINE & OTHER	Load Relief	19,687.50
<b>C32470</b>	36	NW F3964 Extend ug, Xfer load	NY	NY	DIST	LINE & OTHER	Load Relief	18,900.00
<b>C32494</b>	36	Gilbert Mill Relief	NY	NY	DIST	LINE & OTHER	Load Relief	53,392.50
<b>C32510</b>	36	Brockport Feeder Capacitors	NY	NY	DIST	LINE & OTHER	Load Relief	26,460.00
<b>C32595</b>	36	Rathbun Labrador conversion	NY	NY	DIST	LINE & OTHER	Load Relief	15,750.00
<b>C32598</b>	36	Ogden Brook - Install new feeders	NY	NY	DIST	LINE & OTHER	Load Relief	10,500.00
<b>CNC016</b>	36	Cent NY-Dist-Load Relief Blanket	NY	NY	DIST	LINE & OTHER	Load Relief	43,575.00
<b>CNE016</b>	36	East NY-Dist-Load Relief Blanket	NY	NY	DIST	LINE & OTHER	Load Relief	21,735.00



<b>CNW016</b>	36	West NY-Dist-Load Relief Blanket	NY	NY	DIST	LINE & OTHER	Load Relief	50,610.00
<b>C06533</b>	36	East Golah 51 - Second Bank	NY	NY	DIST	SUB	Load Relief	13,790.00
<b>C08153</b>	36	PS&I Activity - New York	NY	NY	DIST	SUB	Load Relief	1,000.00
<b>C15669</b>	36	Cuba 05 - Replace Transformer Bank	NY	NY	DIST	SUB	Load Relief	250.00
<b>C15678</b>	36	Chautauqua 57 - Replace Xfmr	NY	NY	DIST	SUB	Load Relief	8,550.00
<b>C15765</b>	36	Sheppard Rd. 29 - Second Bank	NY	NY	DIST	SUB	Load Relief	7,500.00
<b>C26418</b>	36	Sycaway - Add M/C and 13.2kV Bus	NY	NY	DIST	SUB	Load Relief	20,860.00
<b>C26481</b>	36	S. Newfane 71 - Replace Bank	NY	NY	DIST	SUB	Load Relief	250.00
<b>C26577</b>	36	Buffalo Sta. 63 bank replacement	NY	NY	DIST	SUB	Load Relief	4,600.00
<b>C26819</b>	36	Sycaway add 2nd Xfmr & 115 kV equip	NY	NY	DIST	SUB	Load Relief	19,290.00
<b>C27062</b>	36	East Golah 51 - Secondary Breakers	NY	NY	DIST	SUB	Load Relief	7,000.00
<b>C27322</b>	36	Raquette Lake 2.5 MVA	NY	NY	DIST	SUB	Load Relief	1,000.00
<b>C27323</b>	36	NR- Morristown 2.5 MVA	NY	NY	DIST	SUB	Load Relief	1,420.00
<b>C27449</b>	36	Swann Rd TB2 Replacement	NY	NY	DIST	SUB	Load Relief	22,000.00
<b>C28770</b>	36	Inman Rd -Add M/C & 13.2kV Bus work	NY	NY	DIST	SUB	Load Relief	10,000.00
<b>C28831</b>	36	N Syracuse Capacity Inc	NY	NY	DIST	SUB	Load Relief	6,700.00
<b>C28931</b>	36	Frankhauser-115-13.2KV- Bus & Bkrs	NY	NY	DIST	SUB	Load Relief	3,000.00
<b>C29049</b>	36	Younsgtown 88 - Station Rebuild	NY	NY	DIST	SUB	Load Relief	7,500.00
<b>C29186</b>	36	Station 214 - Install TB2	NY	NY	DIST	SUB	Load Relief	2,000.00
<b>C29187</b>	36	Station 214 - New F21466	NY	NY	DIST	SUB	Load Relief	1,000.00
<b>C31550</b>	36	DxT Study Budgetary Reserve - NIMO	NY	NY	DIST	SUB	Load Relief	1,000.00
<b>C32339</b>	36	Farmersville Transformer Replacemen	NY	NY	DIST	SUB	Load Relief	5,250.00
<b>C32342</b>	36	Sinclairville Transformer Replace	NY	NY	DIST	SUB	Load Relief	5,250.00
<b>C32346</b>	36	W. Albion Transformer Addition	NY	NY	DIST	SUB	Load Relief	5,000.00
<b>C32354</b>	36	NW Baker St Station Cap Bank	NY	NY	DIST	SUB	Load Relief	1,500.00
<b>C32367</b>	36	Bennett Rd. Sub Capacitor Install	NY	NY	DIST	SUB	Load Relief	8,760.00
<b>C32594</b>	36	Labrador 115-13.2kV	NY	NY	DIST	SUB	Load Relief	7,500.00
<b>C32597</b>	36	Ogden Brook- install 13.2 kV s/gear	NY	NY	DIST	SUB	Load Relief	2,500.00
<b>C00056</b>	36	Storm Damage - Dist - Western Div	NY	NY	DIST	LINE & OTHER	Major Storms - Dist	48,300.00
<b>C00328</b>	36	Storm Damage Distribution East Div.	NY	NY	DIST	LINE & OTHER	Major Storms - Dist	48,300.00
<b>C12965</b>	36	Storm Damage-Dist-Cent Div	NY	NY	DIST	LINE & OTHER	Major Storms - Dist	48,300.00
<b>CN3604</b>	36	NiMo Meter Purchases	NY	NY	DIST	LINE & OTHER	Meters - Dist	-

<b>CNC004</b>	36	Cent NY-Dist-Meter Blanket	NY	NY	DIST	LINE & OTHER	Meters - Dist	201,000.00
<b>CNE004</b>	36	East NY-Dist-Meter Blanket	NY	NY	DIST	LINE & OTHER	Meters - Dist	228,900.00
<b>CNW004</b>	36	West NY-Dist-Meter Blanket	NY	NY	DIST	LINE & OTHER	Meters - Dist	215,100.00
<b>C24233</b>	36	Primary service for Taconic Farms	NY	NY	DIST	LINE & OTHER	New Business - Commercial	30,000.00
<b>C29682</b>	36	GML Tower	NY	NY	DIST	LINE & OTHER	New Business - Commercial	27,300.00
<b>C30685</b>	36	Wal-Mart Sheridan Dr. - New Service	NY	NY	DIST	LINE & OTHER	New Business - Commercial	20,760.00
<b>CNC011</b>	36	Cent NY-Dist-New Bus-Comm Blanket	NY	NY	DIST	LINE & OTHER	New Business - Commercial	244,140.00
<b>CNE011</b>	36	East NY-Dist-New Bus-Comm Blanket	NY	NY	DIST	LINE & OTHER	New Business - Commercial	237,900.00
<b>CNW011</b>	36	West NY-Dist-New Bus-Comm Blanket	NY	NY	DIST	LINE & OTHER	New Business - Commercial	269,160.00
<b>RESERVE I</b>	36	Reserve for New Business Commercial	NY	NY	DIST	LINE & OTHER	New Business - Commercial	59,940.00
<b>C31298</b>	36	Fairland URD	NY	NY	DIST	LINE & OTHER	New Business - Residential	15,200.00
<b>C31602</b>	36	Bolton 52 - Convert Valley Woods Rd	NY	NY	DIST	LINE & OTHER	New Business - Residential	25,000.00
<b>C31612</b>	36	Helderberg Meadows URD, Phase 1	NY	NY	DIST	LINE & OTHER	New Business - Residential	36,000.00
<b>C32301</b>	36	Bell's Pond Mobile Home URD	NY	NY	DIST	LINE & OTHER	New Business - Residential	10,000.00
<b>C32891</b>	36	Jenna's Forest URD	NY	NY	DIST	LINE & OTHER	New Business - Residential	12,000.00
<b>CNC010</b>	36	Cent NY-Dist-New Bus-Resid Blanket	NY	NY	DIST	LINE & OTHER	New Business - Residential	1,028,600.00
<b>CNE010</b>	36	East NY-Dist-New Bus-Resid Blanket	NY	NY	DIST	LINE & OTHER	New Business - Residential	977,200.00
<b>CNW010</b>	36	West NY-Dist-New Bus-Resid Blanket	NY	NY	DIST	LINE & OTHER	New Business - Residential	771,500.00
<b>RESERVE I</b>	36	Reserve for New Business Residential	NY	NY	DIST	LINE & OTHER	New Business - Residential	240,800.00
<b>C26839</b>	36	Mercury Vapor Replacement	NY	NY	DIST	LINE & OTHER	Outdoor Lighting - Capital	575,000.00
<b>CNC012</b>	36	Cent NY-Dist-St Light Blanket	NY	NY	DIST	LINE & OTHER	Outdoor Lighting - Capital	335,225.00
<b>CNE012</b>	36	East NY-Dist-St Light Blanket	NY	NY	DIST	LINE & OTHER	Outdoor Lighting - Capital	215,510.00
<b>CNW012</b>	36	West NY-Dist-St Light Blanket	NY	NY	DIST	LINE & OTHER	Outdoor Lighting - Capital	389,045.00
<b>C15724</b>	36	NYS DOT Ridge Rd Bridge	NY	NY	DIST	LINE & OTHER	Public Requirements	13,600.00
<b>C21511</b>	36	DOT Queensbury Exit 18	NY	NY	DIST	LINE & OTHER	Public Requirements	256,000.00
<b>C22173</b>	36	NYS DOT Route 5	NY	NY	DIST	LINE & OTHER	Public Requirements	120,000.00
<b>C22454</b>	36	Green Ave Road Widening	NY	NY	DIST	LINE & OTHER	Public Requirements	12,000.00
<b>C26639</b>	36	Seneca Niagara Casino Relocation NF	NY	NY	DIST	LINE & OTHER	Public Requirements	8,000.00
<b>C29742</b>	36	DOTR I-81 bridge reconstruction Syr	NY	NY	DIST	LINE & OTHER	Public Requirements	2,720.00
<b>C29825</b>	36	DOT Albany Co., Johnston Rd.	NY	NY	DIST	LINE & OTHER	Public Requirements	16,000.00
<b>C30825</b>	36	372 Battenkill Bridge - DOT	NY	NY	DIST	LINE & OTHER	Public Requirements	20,000.00
<b>C31258</b>	36	DOT Glenville, Glenridge Rd.	NY	NY	DIST	LINE & OTHER	Public Requirements	54,400.00

<b>C31318</b>	36	DOT Albany, Fuller Rd.	NY	NY	DIST	LINE & OTHER	Public Requirements	16,000.00
<b>C31543</b>	36	DOT Amsterdam, Bridge St.	NY	NY	DIST	LINE & OTHER	Public Requirements	51,200.00
<b>C31554</b>	36	DOT PIN3045.55 Rt104 Osw-Scriba	NY	NY	DIST	LINE & OTHER	Public Requirements	32,000.00
<b>C31811</b>	36	DOT Erie Canal Lock E-13	NY	NY	DIST	LINE & OTHER	Public Requirements	86,400.00
<b>C31868</b>	36	DOTR PIN7804.42 Rt68	NY	NY	DIST	LINE & OTHER	Public Requirements	24,000.00
<b>C32234</b>	36	DOTR Latham, Rte.'s 2/7 Br/I-87	NY	NY	DIST	LINE & OTHER	Public Requirements	35,200.00
<b>C32286</b>	36	DOT Saratoga, Rte. 9P Bridge	NY	NY	DIST	LINE & OTHER	Public Requirements	32,000.00
<b>C32359</b>	36	NYSDOTR Rte. 28, Woodgate to McKe	NY	NY	DIST	LINE & OTHER	Public Requirements	24,000.00
<b>C32432</b>	36	DOT Schoharie, Rte.'s 30, 30A & 443	NY	NY	DIST	LINE & OTHER	Public Requirements	25,600.00
<b>C32850</b>	36	DOT 4098.04- Rt 98 & 238 Attica	NY	NY	DIST	LINE & OTHER	Public Requirements	27,840.00
<b>C33253</b>	36	DOT-Relocate facilities Maple Rd	NY	NY	DIST	LINE & OTHER	Public Requirements	1,920.00
<b>C33351</b>	36	DOT CR106/Pine Grove Rd	NY	NY	DIST	LINE & OTHER	Public Requirements	7,040.00
<b>CNC013</b>	36	Cent NY-Dist-Public Require Blanket	NY	NY	DIST	LINE & OTHER	Public Requirements	167,520.00
<b>CNE013</b>	36	East NY-Dist-Public Require Blanket	NY	NY	DIST	LINE & OTHER	Public Requirements	301,600.00
<b>CNW013</b>	36	West NY-Dist-Public Require Blanket	NY	NY	DIST	LINE & OTHER	Public Requirements	226,240.00
<b>RESERVE I</b>	36	Reserve for Public Requirements Under	NY	NY	DIST	LINE & OTHER	Public Requirements	254,080.00
<b>C06679</b>	36	Boyntonville 51 Regulators	NY	NY	DIST	LINE & OTHER	Reliability - Dist	4,500.00
<b>C06698</b>	36	Clinton 53 - Convert Ft Plain	NY	NY	DIST	LINE & OTHER	Reliability - Dist	20,700.00
<b>C06850</b>	36	Whitaker 51 River Crossing	NY	NY	DIST	LINE & OTHER	Reliability - Dist	6,750.00
<b>C07438</b>	36	Chestertown 52 - Duell Hill Rd.	NY	NY	DIST	LINE & OTHER	Reliability - Dist	13,500.00
<b>C07477</b>	36	Northville 52 - Convert N. Shore Rd	NY	NY	DIST	LINE & OTHER	Reliability - Dist	9,000.00
<b>C07482</b>	36	Battenkill 34257 - Rebuild/convert	NY	NY	DIST	LINE & OTHER	Reliability - Dist	11,250.00
<b>C07798</b>	36	EJ West 03841 - Convert to 13.2kV	NY	NY	DIST	LINE & OTHER	Reliability - Dist	9,000.00
<b>C08606</b>	36	Delmar 440, Jun, Vooh 52 Conversion	NY	NY	DIST	LINE & OTHER	Reliability - Dist	90,000.00
<b>C13266</b>	36	IE - NE Recloser Installations	NY	NY	DIST	LINE & OTHER	Reliability - Dist	148,500.00
<b>C13267</b>	36	IE - NC Recloser Installations	NY	NY	DIST	LINE & OTHER	Reliability - Dist	148,500.00
<b>C13268</b>	36	IE - NW Recloser Installations	NY	NY	DIST	LINE & OTHER	Reliability - Dist	153,000.00
<b>C15727</b>	36	NR-Gilpin Bay 95661-Fish Creek Pond	NY	NY	DIST	LINE & OTHER	Reliability - Dist	11,250.00
<b>C15732</b>	36	NR-Gilpin Bay 95661-Hoel Pond	NY	NY	DIST	LINE & OTHER	Reliability - Dist	10,890.00
<b>C16117</b>	36	IE - NE ERR and Fuse	NY	NY	DIST	LINE & OTHER	Reliability - Dist	36,000.00
<b>C16118</b>	36	IE - NC ERR and Fuse	NY	NY	DIST	LINE & OTHER	Reliability - Dist	36,000.00
<b>C16119</b>	36	IE - NW ERR and Fuse	NY	NY	DIST	LINE & OTHER	Reliability - Dist	36,000.00

<b>C17962</b>	36	Schroon 51 - Rebuild Route 74	NY	NY	DIST	LINE & OTHER	Reliability - Dist	13,500.00
<b>C19272</b>	36	Caroga - G'ville 53 Feeder Tie	NY	NY	DIST	LINE & OTHER	Reliability - Dist	15,750.00
<b>C20691</b>	36	Selkirk - Bethlehem Tie	NY	NY	DIST	LINE & OTHER	Reliability - Dist	3,600.00
<b>C22959</b>	36	NR-W.Adams87554-Church St	NY	NY	DIST	LINE & OTHER	Reliability - Dist	9,000.00
<b>C26876</b>	36	Corinth 52 - Eastern Ave. Rebuild	NY	NY	DIST	LINE & OTHER	Reliability - Dist	81,000.00
<b>C26877</b>	36	Guy Park Retirement Dist. Line	NY	NY	DIST	LINE & OTHER	Reliability - Dist	4,500.00
<b>C26973</b>	36	NR-State St 95463-Judson St Rebuild	NY	NY	DIST	LINE & OTHER	Reliability - Dist	14,400.00
<b>C28176</b>	36	Scofield 53 - Hadley/Harrisburg Rds	NY	NY	DIST	LINE & OTHER	Reliability - Dist	22,050.00
<b>C28606</b>	36	F5769/5763 Rebuild r/o Floradale	NY	NY	DIST	LINE & OTHER	Reliability - Dist	22,500.00
<b>C28610</b>	36	Peterboro Reconstructor Main St.	NY	NY	DIST	LINE & OTHER	Reliability - Dist	18,000.00
<b>C28616</b>	36	Walesville Reconstructor Utica St	NY	NY	DIST	LINE & OTHER	Reliability - Dist	9,000.00
<b>C28617</b>	36	Lehigh 66954 Teelin Rd Relocate	NY	NY	DIST	LINE & OTHER	Reliability - Dist	9,000.00
<b>C28619</b>	36	Cavanaugh 61652 River Road	NY	NY	DIST	LINE & OTHER	Reliability - Dist	10,980.00
<b>C28620</b>	36	Oneida 50153 Route 5	NY	NY	DIST	LINE & OTHER	Reliability - Dist	22,680.00
<b>C28623</b>	36	Poland 62257 Steuben Rd	NY	NY	DIST	LINE & OTHER	Reliability - Dist	6,300.00
<b>C28625</b>	36	F20871 rebuild ties F4768/F2569	NY	NY	DIST	LINE & OTHER	Reliability - Dist	14,580.00
<b>C28652</b>	36	Delameter F9352 new ties w/18251,53	NY	NY	DIST	LINE & OTHER	Reliability - Dist	27,000.00
<b>C28689</b>	36	F9753 Rebuild/Conv tie w/F21754	NY	NY	DIST	LINE & OTHER	Reliability - Dist	17,100.00
<b>C28692</b>	36	F8566 Rebuild Various Sections	NY	NY	DIST	LINE & OTHER	Reliability - Dist	9,000.00
<b>C28716</b>	36	Knapp Rd 22651 Feeder Tie	NY	NY	DIST	LINE & OTHER	Reliability - Dist	50,580.00
<b>C28717</b>	36	N.Leroy 0455 - Mumford 5052 Fdr Tie	NY	NY	DIST	LINE & OTHER	Reliability - Dist	36,000.00
<b>C28718</b>	36	E.Batavia 2855 - N.Leroy 0456 Tie	NY	NY	DIST	LINE & OTHER	Reliability - Dist	68,580.00
<b>C28719</b>	36	Batavia 0155 - Knapp Rd 22651 Tie	NY	NY	DIST	LINE & OTHER	Reliability - Dist	47,880.00
<b>C28720</b>	36	N.Eden 8251 Tie w/ F8861 & F8862	NY	NY	DIST	LINE & OTHER	Reliability - Dist	3,600.00
<b>C28721</b>	36	Delameter 9354 - 9353 Feeder Tie	NY	NY	DIST	LINE & OTHER	Reliability - Dist	16,740.00
<b>C28723</b>	36	Delameter 9352 - Eden Ctr 8862 Tie	NY	NY	DIST	LINE & OTHER	Reliability - Dist	20,880.00
<b>C28726</b>	36	Sweet Home F22457 tie with F2165	NY	NY	DIST	LINE & OTHER	Reliability - Dist	5,400.00
<b>C28791</b>	36	Krumkill 51 Russell Rd convert	NY	NY	DIST	LINE & OTHER	Reliability - Dist	6,075.00
<b>C28814</b>	36	Arbor Hill URD - Riverside 28858	NY	NY	DIST	LINE & OTHER	Reliability - Dist	13,500.00
<b>C28823</b>	36	Pinebush 37154 Prescott Woods	NY	NY	DIST	LINE & OTHER	Reliability - Dist	27,000.00
<b>C28826</b>	36	Stonehenge URD	NY	NY	DIST	LINE & OTHER	Reliability - Dist	16,200.00
<b>C29101</b>	36	NR-N Gouverneur 98352-Rt58 Transfer	NY	NY	DIST	LINE & OTHER	Reliability - Dist	27,000.00

<b>C29424</b>	36	Battenkill 56 - Weibel 51 Tie	NY	NY	DIST	LINE & OTHER	Reliability - Dist	6,300.00
<b>C29425</b>	36	Brook Road 55/57 - Daniels Rd	NY	NY	DIST	LINE & OTHER	Reliability - Dist	16,200.00
<b>C29426</b>	36	Center St 54 - Rebuild Route 5S	NY	NY	DIST	LINE & OTHER	Reliability - Dist	63,000.00
<b>C29429</b>	36	Chestertown 52 - Schroon River Rd	NY	NY	DIST	LINE & OTHER	Reliability - Dist	45,000.00
<b>C29430</b>	36	Corinth 52 - Hudson River Crossing	NY	NY	DIST	LINE & OTHER	Reliability - Dist	18,000.00
<b>C29431</b>	36	Farnan Rd 51 - Bluebird Road	NY	NY	DIST	LINE & OTHER	Reliability - Dist	72,000.00
<b>C29433</b>	36	Inghams 51 - Route 108	NY	NY	DIST	LINE & OTHER	Reliability - Dist	18,000.00
<b>C29434</b>	36	Middleburg 51 - Tie to Schoharie	NY	NY	DIST	LINE & OTHER	Reliability - Dist	10,800.00
<b>C29435</b>	36	Northville 52 - EJ West 51 Tie	NY	NY	DIST	LINE & OTHER	Reliability - Dist	63,000.00
<b>C29438</b>	36	Scofield Rd 53 - Tie to Corinth 51	NY	NY	DIST	LINE & OTHER	Reliability - Dist	72,000.00
<b>C31772</b>	36	Lehigh 66951 tie with Turin 65355	NY	NY	DIST	LINE & OTHER	Reliability - Dist	45,000.00
<b>C32576</b>	36	Pockets of Poor Performance - NYW	NY	NY	DIST	LINE & OTHER	Reliability - Dist	63,900.00
<b>C32577</b>	36	Pockets of Poor Performance - NYC	NY	NY	DIST	LINE & OTHER	Reliability - Dist	63,900.00
<b>C32578</b>	36	Pockets of Poor Performance - NYE	NY	NY	DIST	LINE & OTHER	Reliability - Dist	63,900.00
<b>CNC015</b>	36	Cent NY-Dist-Reliability Blanket	NY	NY	DIST	LINE & OTHER	Reliability - Dist	156,510.00
<b>CNE015</b>	36	East NY-Dist-Reliability Blanket	NY	NY	DIST	LINE & OTHER	Reliability - Dist	146,790.00
<b>CNW015</b>	36	West NY-Dist-Reliability Blanket	NY	NY	DIST	LINE & OTHER	Reliability - Dist	293,490.00
<b>RESERVE I</b>	36	Reserve for Reliability Unidentified Sp	NY	NY	DIST	LINE & OTHER	Reliability - Dist	14,895.00
<b>C19851</b>	36	REP - Dist Subs Without RTUs	NY	NY	DIST	SUB	Reliability - Dist	-
<b>C20173</b>	36	REP - Dist Subs EMS RTU DNP Plan	NY	NY	DIST	SUB	Reliability - Dist	3,000.00
<b>C22151</b>	36	NY RTU Program - DxT Subs	NY	NY	DIST	SUB	Reliability - Dist	36,000.00
<b>C28449</b>	36	Metallic Pilot Wire Protection Repl	NY	NY	DIST	SUB	Reliability - Dist	-
<b>C10968</b>	36	FH - NW Feeder Hardening	NY	NY	DIST	LINE & OTHER	Reliability - FEEDER HARDENING	316,200.00
<b>C13145</b>	36	FH - NC Feeder Hardening	NY	NY	DIST	LINE & OTHER	Reliability - FEEDER HARDENING	316,200.00
<b>C13146</b>	36	FH - NE Feeder Hardening	NY	NY	DIST	LINE & OTHER	Reliability - FEEDER HARDENING	316,200.00
<b>C04157</b>	36	Telecom and Radio Equipment	NY	NY	DIST	LINE & OTHER	Telecommunications Capital - Dist	-
<b>CNC021</b>	36	Cent NY-Dist-Telecomm Blanket	NY	NY	DIST	LINE & OTHER	Telecommunications Capital - Dist	-
<b>CNE021</b>	36	East NY-Dist-Telecomm Blanket	NY	NY	DIST	LINE & OTHER	Telecommunications Capital - Dist	-
<b>CNW021</b>	36	West NY-Dist-Telecomm Blanket	NY	NY	DIST	LINE & OTHER	Telecommunications Capital - Dist	-
<b>CN3620</b>	36	NiMo Transformer Purchases	NY	NY	DIST	LINE & OTHER	Transformers & Related Equipment	-
<b>CNC020</b>	36	Cent NY-Dist-Transf/Capac Blanket	NY	NY	DIST	LINE & OTHER	Transformers & Related Equipment	-
<b>CNE020</b>	36	East NY-Dist-Transf/Capac Blanket	NY	NY	DIST	LINE & OTHER	Transformers & Related Equipment	-

CNW020	38	West NY-Dist-Transf/Capac Blanket	NY	NY	DIST	LINE & OTHER	Transformers & Related Equipment		-

Date of Request: April 23, 2010  
Due Date: May 3, 2010

Request No. AJR-1 SUPP 2  
NMPC Req. No. NM 45 DPS 42

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Aric Rider

TO: Infrastructure and Operations Panel

Request:

The response looks like I now have a link between the distribution COR and the plant model. However, I don't seem to see the development of the sub-t, transmission, or shared services COR percentages. Am I missing something?

Response:

The attached spreadsheets are used in Cost of Removal (COR) estimation for:

- 1) Sub-Transmission: AJR-1 SUPP 2\_SubTransmission Cost of Removal Percentage Calc.xls
- 2) Transmission: AJR-1 SUPP 2\_Transmission Cost of Removal Percentage Calc.xls
- 3) Shared Services: AJR-1 SUPP 2\_Shared Services Cost of Removal Budget Estimate.xls

Sub-transmission and transmission apply a historic estimated percentage to the budgeted capital funds for the estimated COR while Shared Services uses a flat dollar estimate consistent with prior years cost of removal totals.

Name of Respondent:  
Glen DiConza

Date of Reply:  
April 29, 2010

## Transmission Cost of Removal

Sum of Amount FY	Funding Type	Total	2007 TxT	COR	Total Spend	%
2007	P_Common Plant - Capital	15,240				
	P_Electric Distribution Line	(1,261,204)				
	P_Electric Distribution Sub	144,218		3,864,762	50,900,000	7.6%
	P_Electric General Plant	594,133		<u>3,864,762</u>	<u>50,900,000</u>	<u>7.6%</u>
	P_Electric Transmission Line	1,836,241				
	P_Electric Transmission Sub	1,264,311				
	P_Gas Distribution - Capital	1,065				
	P_Gas Station - Distribution	577				
	z_Cap AlloX-Dist **PPlantUseONLY	1,270,181				
<b>2007 Total</b>		<b>3,864,762</b>				
2008	P_Common Plant - Capital	1,380				
	P_Electric Distribution Line	441,111		4,980,541	62,800,000	7.9%
	P_Electric Distribution Sub	96,994				
	P_Electric General Plant	(212,650)		<u>4,980,541</u>	<u>62,800,000</u>	<u>7.9%</u>
	P_Electric Transmission Line	3,798,494				
	P_Electric Transmission Sub	855,793				
	P_Gas Distribution - Capital	1,223				
	z_Cap AlloX-Dist **PPlantUseONLY	(1,803)				
<b>2008 Total</b>		<b>4,980,541</b>				
2009	P_Dist by Transmission Substation	31,561				
	P_Electric Distribution Line	26,060				
	P_Electric Distribution Sub	68,502		5,133,616	69,425,248	7.4%
	P_Electric GenPlant Fac IT Shared	157,082				
	P_Electric Transmission Line	3,916,294		<u>5,133,616</u>	<u>69,425,248</u>	<u>7.4%</u>
	P_Electric Transmission Sub	932,300				
	z_Cap AlloX-Dist **PPlantUseONLY	1,650				
	#N/A	169				
<b>2009 Total</b>		<b>5,133,616</b>				
<b>Grand Total</b>		<b>13,978,918</b>				
Average						
TxT						7.6%



**Common/General Plant Actuals  
by Fiscal Year - Cost of Removal**

	<b>Distribution Actuals</b>
<b>FY 2008</b>	1.7
<b>FY 2009</b>	0.8
<b>FY 2010</b>	2.3

**1.6** Historic annual average COR per year

**Use for Plan      \$      1.5 per fiscal year**

(approx. rounded  
historic annual  
average)

COST OF REMOVAL AS A PERCENTAGE OF CAPITAL SPEND  
 SUB-TRANSMISSION PROJECTS  
 Moving Annual Total (MAT) Analysis

Sum of CR Act \$	Fiscal Yr	Period											
		2008											
CHARGE		1	2	3	4	5	6	7	8	9	10	11	12
Capital		1,321,385	1,969,784	2,040,341	2,254,018	2,126,828	2,007,450	32,537	3,521,060	2,466,330	2,683,411	3,136,527	3,138,334
COR		185,636	605,135	308,675	218,665	308,522	424,716	213,101	548,550	393,905	371,897	324,651	338,969
Grand Total		1,507,020	2,574,919	2,349,016	2,472,683	2,435,349	2,432,166	245,637	4,069,610	2,860,235	3,055,308	3,461,179	3,477,303

COR	MAT %												
		15.9%	15.4%	13.9%	13.3%	13.0%	13.3%	12.0%	10.7%	10.2%	10.0%	9.5%	9.8%
		Mar-2008	Apr-2008	May-2008	Jun-2008	Jul-2008	Aug-2008	Sep-2008	Oct-2008	Nov-2008	Dec-2008	Jan-2009	Feb-2009

	<b>MAT at....</b>
10.0%	12/31/2008
10.6%	3/31/2009
12.2%	6/30/2009
10.9%	Average
10.5%-10.6%	USED

Used approximate average of the cost of removal  
 Moving Annual Total (MAT) for Sub-transmission at  
 different end of quarter points...

2009											
1	2	3	4	5	6	7	8	9	10	11	12
1,359,451	4,745,175	3,342,540	3,177,054	2,454,334	3,125,628	2,703,077	1,762,178	1,589,477	2,109,703	2,073,038	3,013,478
69,965	576,795	315,071	234,628	466,697	137,973	50,651	194,115	237,712	166,713	316,274	571,709
1,429,416	5,321,971	3,657,610	3,411,682	2,921,031	3,263,601	2,753,728	1,956,293	1,827,189	2,276,416	2,389,312	3,585,187

10.6%	10.6%	11.5%	12.2%	12.4%	12.4%
Mar-2009	Apr-2009	May-2009	Jun-2009	Jul-2009	Aug-2009

2010							Grand Total
1	2	3	4	5	6	7	
2,167,321	236,440	2,284,151	4,336,349	1,846,948	2,672,924	123,988	71,821,256
155,513	346,913	383,262	428,043	378,757	470,522	(5,723)	9,738,013
2,322,834	583,353	2,667,414	4,764,392	2,225,705	3,143,446	118,265	81,559,270

Date of Request: February 17, 2010  
Due Date: March 1, 2010

Request No. CVB-4  
NMPC Req. No. NM 51 DPS 48

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Christian Bonvin

TO: Infrastructure and Operations Panel

Request:

1. Please summarize the Distribution tree-trimming program used during the test year -- including the voltage classes covered by the program -- and indicate any changes that have been made to the program since 2002.
2. Please describe the proposed Distribution tree-trimming program for 2011 through 2013.
3. Please describe differences between National Grid's Enhance Hazard Tree Mitigation (EHTM) program and its previous Total Outage Reduction Operation (TORO) program with respect to tree removal.
4. Please provide any workpapers supporting how the Company forecasted its overall Distribution tree-trimming expenses.
5. Please provide an Excel file with the following information on a company-wide basis and for each division (East, Central, West) for the years 2002 through 2009:
  - A. Actual spending and budget for all tree trimming activities;
  - B. Actual spending and budget for cycle tree trimming;
  - C. Number of miles trimmed per year cycle trimming;
  - D. Average cost per mile;
  - E. Actual spending and budget for hazard tree removal;
  - F. Total number of hazard trees removed per year;
  - G. Average cost for removal of danger tree;
  - H. Actual spending and budget for "hot spot" trimming.
6. Please provide an Excel file with the following information on a company-wide basis and for each division (East, Central, West) for the years 2011 through 2013:
  - A. Forecasted budget for all tree trimming activities;
  - B. Forecasted budget for cycle tree trimming;
  - C. Number of miles planned to be trimmed per year;
  - D. Forecasted average costs per mile;
  - E. Forecasted budget for hazard tree removal;

- F. Total number of hazard trees expected removed per year;
- G. Forecasted average cost for removal of danger tree;
- H. Forecasted budget for “hot spot” trimming.

Response:

1. Please refer to Attachment 1 (CVB-4\_Attach 1\_Vegetation Management Strategy – June 2008) for a full description of the distribution vegetation management program used during the test year. In summary, the Company implements two reliability based vegetation management strategies. These are cycle based circuit pruning and enhanced hazard tree mitigation “EHTM”. The main purpose of these programs is to create and maintain clearance between energized distribution conductors and vegetation, primarily tree limbs. In addition, the hazard tree program is intended to minimize the frequency and damaging effects of large tree and large limb failures from along side and above the Company’s overhead primary distribution assets. This is a reliability-focused strategy designed to meet state regulatory targets. In addition, the circuit pruning program provides a measure of public safety and accessibility for line restoration and inspection. The voltage classes covered by the distribution vegetation management program are up to 15 kV on the Niagara Mohawk system.

For the cycle pruning program, a specific base pruning cycle length of 5 years has been set for all Niagara Mohawk circuits based on the general length of the growing season, the growth characteristics of the predominant tree species in each area, and clearance to be created at each pruning site. This is designed to be the optimal length between pruning events to maximize efficiency, reliability and safety.

The EHTM program uses historic reliability data, coupled with customers served and overhead circuit mileage to prioritize circuits for selection. Besides prioritizing the circuits, each circuit is then partitioned into SAIFI risk segments based on the number of customers served and location of each protection device along the circuit. The hazard tree inspection work is broken down into three intensity levels corresponding to the SAIFI risk segments, with the highest intensity inspection occurring on the section of line closest to the substation outward.

Since 2002, there have been some enhancements to the vegetation management program. In 2005 the specification was changed to include removal of all overhanging dead, dying or structurally weakened branches to minimize potential interruptions from falling limbs. In 2007 the specification changed again to include additional overhead clearance for pine species by shortening all overhanging pine species boughs beyond the overhead clearance limit to reduce the likelihood of long pine boughs loaded with ice or wet snow from drooping down or breaking onto the conductors. In addition to the specification changes, the annual pruning mileage was revised in 2007. The annual scheduled mileage

was increased by 1,000 miles to bring back circuits that were extended past the optimal cycle length of 5 years. The hazard tree removal program has also undergone some improvements. In 2007 the tree outage reduction operation "TORO" was rolled into a system wide enhanced hazard tree mitigation program "EHTM". This program still prioritized removals on three phase sections of feeders, and added a circuit prioritizing tool and criteria for prioritizing circuit segments with customer serviced levels, meaning portions of the circuit with the highest customer count have the highest priority and most intensive inspection.

2. The proposed vegetation management program for 2011 – 2013 will follow the same strategy as currently in use, with the goal of continuous assessment, improvement and evolution. An example of this strategy evolution is the proposed addition of increased hazard tree removals while pruning a circuit. The Company aims to apply knowledge and best practices from the EHTM program and apply them to the cycle pruning program, in an effort to realize reliability benefits similar to those of the EHTM program, without reaching the intensity level and higher cost of the EHTM program, where it is not necessary. As the Company continues to strive for industry leading reliability, efficiency, and safety it will continue to assess and revise the existing strategy as well as continue research, development, and application in the vegetation management field.
3. The tree outage reduction operation, TORO, program started in 2002 and remained in effect until 2007 at which time it was modified to the enhanced hazard tree mitigation (EHTM) program. Even though the EHTM program was directly modeled after TORO, the hazard tree program underwent development and improvement from 2002 to present. The main focus, intensive hazard tree removal along the critical portions of the system, has remained the same, however, in 2008, EHTM was initiated utilizing new tools to help implementation and consistency of risk mitigation. First, instead of simply selecting the top circuits with the highest customers interrupted related to trees, a model was created to look at multiple criteria, such as customers served, customer minutes interrupted per event, events per mile, and cost per change in customer minutes interrupted specific to tree related interruptions. Second, the installations of reclosers and side tap fuses under the REP program since FY07, have provided the ability to split a circuit into risk segments. The implementation of risk segments allows sections of a circuit to be prioritized and assigned risk levels. These tools ensure that work is being done on the correct circuits, at the correct area on a circuit, consistently across the system.
4. Please see Attachment 2 (CVB-4\_Attach 2\_VEG REP CY05-CY13 NY v3 Dec '09.xls.)
5. Please see attached Excel Files, as labeled for the following questions.
  - a. Attachment 3 (CVB-4\_Attach 3\_NY PSC Audit CY2002-2013)
  - b. Attachment 3 (CVB-4\_Attach 3\_NY PSC Audit CY2002-2013)

- c. Attachment 4 (CVB-4\_Attach 4\_Miles Trimmed and Trees Removed per Year NY 02-09.xls)
  - d. Attachment 4 (CVB-4\_Attach 4\_Miles Trimmed and Trees Removed per Year NY 02-09.xls)
  - e. Attachment 3 (CVB-4\_Attach 3\_NY PSC Audit CY2002-2013)
  - f. Attachment 4 (CVB-4\_Attach 4\_Miles Trimmed and Trees Removed per Year NY 02-09.xls)
  - g. Attachment 4 (CVB-4\_Attach 4\_Miles Trimmed and Trees Removed per Year NY 02-09.xls)
  - h. Attachment 3 (CVB-4\_Attach 3\_NY PSC Audit CY2002-2013)
6. Please see attached Excel Files, as labeled for the following questions.
- a. Attachment 3 (CVB-4\_Attach 3\_NY PSC Audit CY2002-2013)
  - b. Attachment 3 (CVB-4\_Attach 3\_NY PSC Audit CY2002-2013)
  - c. Attachment 5 (CVB-4\_Attach 5\_Miles Trimmed and CPM NY 11-13.xls)
  - d. Attachment 5 (CVB-4\_Attach 5\_Miles Trimmed and CPM NY 11-13.xls)
  - e. Attachment 3 (CVB-4\_Attach 3\_NY PSC Audit CY2002-2013)
  - f. Forecasted hazard tree expected removal per year is unavailable as actual field conditions and available budget dictates the number of trees removed. The Company uses an industry leading tree risk analysis protocol to define risk and necessary remediation. As this is applied systematically, actual field conditions, such as tree density, line exposure, tree size and maturity, and forest health make it hard to predict the number of trees expected to remove.
  - g. Forecasted average cost for removal of danger trees is also unavailable. Due to the variability in field conditions, the cost to remove danger trees can vary significantly from location to location and site to site. Depending on where reliability concerns are occurring, costs to remove trees may vary greatly.
  - h. Attachment 3 (CVB-4\_Attach 3\_NY PSC Audit CY2002-2013)

Name of Respondent:  
IOP panel / Sara Sankowich

Date of Reply:  
March 1, 2010



Business Plan CY 05 - CY 13

Distribution Veg Mgmt REP View - New York

	CY 05 Budget	CY 05 Actuals	CY 06 Budget	CY 06 Actuals	CY 07 Budget	CY 07 Actuals	CY 08 Budget	CY 08 Actuals	CY 09 Budget	CY 09 Actuals	CY 10 Forecast	CY 11 Forecast	CY 12 Forecast	CY 13 Forecast
<b>\$'000</b>														
<b>OPEX - VM</b>														
Cycle Trimming		12,529,729		16,970,718		22,240,813		22,410,507	19,900,329	24,425,593	28,545,608	28,937,966	29,806,128	30,700,312
Hazard Tree On-Cycle		2,079,105		2,588,159		4,076,753		4,239,284	2,018,636	4,808,963	2,998,894	3,088,861	3,181,527	3,276,973
Hazard Tree Off-Cycle						262,263		260,117	1,162,872	16,524	1,727,568	1,779,395	1,832,777	1,887,760
Worst Feeders						914,478		117,508	424,401	-	630,492	649,407	668,889	688,956
Interim/Spot Trim		222,434		165,983		461,752		1,036,638	251,270	3,010,795	291,751	237,845	233,359	240,359
Sub-T (on-road and off-road costs up to CY 09)		8,767		664		373		486	-	3,167	-	-	-	-
Sub-T (off-road and herbicide portion in Trans Budget as of FY 10)														
Police/Flagman Detail		54,752		17,479		2,809		3,133	-	149	-	-	-	-
Customer Requests		1,342,303		1,529,853		2,289,273		1,783,256	1,241,856	2,068,906	1,844,906	1,900,253	1,957,260	2,015,978
Trouble Maintenance		2,274,773		2,169,192		1,892,108		3,373,401	1,241,856	2,916,080	1,844,906	1,900,253	1,957,260	2,015,978
Other Veg Costs - Contractor		353,156		214,830		238,768		316,975	120,912	395,822	179,627	185,016	190,567	196,284
Other Veg Costs - All Other		2,612,140		2,361,311		2,316,032		2,156,817	1,656,885	2,244,698	2,551,475	2,625,319	2,701,379	2,779,721
CY 09 portion of budget not broken out by activity:									9,177,981					
<b>OPEX - VM Total</b>	<b>23,755,771</b>	<b>21,477,161</b>	<b>23,981,763</b>	<b>26,018,188</b>	<b>27,438,314</b>	<b>34,695,422</b>	<b>38,248,552</b>	<b>35,696,123</b>	<b>37,196,998</b>	<b>39,890,697</b>	<b>40,615,227</b>	<b>41,304,338</b>	<b>42,529,146</b>	<b>43,802,320</b>

Q: 6-C

Miles Planned to be Trimmed by Division and Year for New York			
Division	2011	2012	2013
East	2,300	2,300	2,300
Central	2,920	2,920	2,920
West	1,980	1,980	1,980
System	7,200	7,200	7,200

Q: 6-D

Forecasted Average Cost per Mile 2011- 2013 for NY			
Division	2011	2012	2013
East	\$ 3,833	\$ 3,948	\$ 4,067
Central	\$ 2,738	\$ 2,820	\$ 2,905
West	\$ 3,373	\$ 3,474	\$ 3,578
System	\$ 3,303	\$ 3,402	\$ 3,504

Date of Request: February 19, 2010  
Due Date: March 1, 2010

Request No. RAV-33  
NMPC Req. No. NM 54 DPS 50

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirement Panel

Request:

A. Please provide the Company's actual 2002 – 2009 and the historic test year property taxes, broken out between electric, gas, and total. Include both the dollars and annual percentage increases.

B. As shown on Exhibit RRP-4, Schedule 1, Sheets 3 and 4, to determine the rate year ending 12/31/11 electric property tax forecast, the Company used a 3% annual inflation factor and also included additional property taxes on forecasted plant additions.

Regarding this methodology, please provide the following information:

1. The basis for the 3% annual inflation factor;
2. The rationale for including additional property taxes on forecasted plant additions;
3. Fully explain why the 3% annual inflation factor, which is almost twice the rate of inflation as measured by the GDP price index, doesn't already inherently provide for additional property taxes on forecasted plant additions;
4. Fully explain why the Company assumed that the property tax rates on existing plant in service would not decline in consideration of the forecasted property being added to the tax rolls. In so doing, fully address the following example: if a county's required property tax collections in 2008 were \$10,000,000 on a county-wide property assessment base of \$1,000,000,000, the 2008 tax rate would be \$1.00 per \$1,000 of assessed property; if the 2009 county-wide assessment base increased by \$100,000,000 due to NMPC plant additions being added to the assessment rolls, the property tax rate for 2009 would decrease from \$1.00 to \$0.91 per \$100 of assessed property, all else equal [ $\$10,000,000 / \$110,000,000$ ];
5. Using the same example as in B.4 above, but assuming the county's 2009 required property tax collections in 2009 were \$10,300,000 (i.e., reflecting the annual 3% increase proposed by the Company), the 2009 property tax rate would be to \$0.94 per \$1,000 of assessed property [ $\$10,300,000 / \$110,000,000$ ]

compared to the Company's methodology which assumes the 2009 property tax rate would be \$1.03 per \$1,000 of assessed property. Please fully explain why the Company believes this example is flawed since the Company's methodology inherently assumes the tax rate would not decline despite the increase to the assessment rolls.

6. Provide a backcast of the Company's property tax methodology for the years 2007 – 2009. Include supporting calculations and explain all assumptions.

a. Use 2005 actual property taxes, add in the Company's assumed inflation factor and build in property tax increases for actual plant additions to arrive at 2007 property taxes and compare the Company's methodological result with the actual 2007 property taxes.

b. Use 2006 actual property taxes, add in the Company's assumed inflation factor and build in property tax increases for actual plant additions to arrive at 2008 property taxes and compare the Company's methodological result with the actual 2008 property taxes.

c. Use 2007 actual property taxes, add in the Company's assumed inflation factor and build in property tax increases for actual plant additions to arrive at 2009 property taxes and compare the Company's methodological result with the actual 2009 property taxes.

7. To forecast property taxes on forecasted plant additions, the Company used the 2008 "average tax rate per \$1,000 of assessed value" as set forth in Exhibit RRP-10, workpapers for Exhibit RRP-4, Schedule 1, workpaper 3. Please provide 2006, 2007 and 2009 "average tax rate per \$1,000 of assessed value." Include supporting workpapers.

Response:

A. Please refer to Attachment 1.

B. 1. The 3% annual inflation factor is a composite figure that considers three main issues. First, this inflation factor is a conservative measure of the expected increase in property tax levies by municipalities and schools. "From 2002 to 2007, property taxes rose by 6.8 percent per year on average, while inflation increased at only 2.9 percent per year [CPI]." (2009 Annual Report on Local Governments, Office of the New York State Comptroller, Division of Local Government and School Accountability, November 2009, p. 10). The report goes on to say "Many localities facing rising costs and declining tax revenues may have to turn to the property tax to help make up the difference." Second it includes a measure of the expected increase in assessed value of existing property and a historic average of normal replacement and maintenance build as shown in Exhibit RRP-4, Sheet 4, column (f). Third, using the 2009 net property tax expense as our basis included refunds, which are non-recurring and can not be expected in any future year. While Niagara Mohawk Power Corporation (NMPC) has historically managed to keep its property tax increases below the state average, the CPI, and the GDP price index, the 3 factors referred to above explain why it would be unreasonable to rely on historic experience to forecast the future rate of increase..

B. 2. As shown in Exhibit RRP-4 Sheet 4, the company is not calculating increased property taxes associated with total plant additions. In column (f) a calculation is presented for each of Transmission and Distribution that outlines a historical average of net plant additions. Also in column (f), this historical average is deducted from each year's forecasted net plant additions to derive the capital spending incremental amount that is above the historical average. The additional property taxes requested for plant additions is only on this "incremental amount", not total plant additions. The 3% inflation factor already encompasses this historical average of net plant additions.

B. 3. The 3% annual inflation factor does not already inherently provide for additional property taxes on forecasted plant additions because of the extent of the forecasted plant additions. As mentioned in the response to question B. 1, a historic average of normal replacement and maintenance build is included in the 3% annual inflation factor. However, the forecasted plant additions exceed that historical average by a significant amount each year as shown in Exhibit RRP-4, Sheet 4, column (f).

B. 4. The example provided by staff in question B. 4 is incorrect. In the initial statement, the tax levy is \$10,000,000 on a tax base of \$1,000,000,000 yielding a tax rate of \$1.00 per \$1,000 of assessed value. To calculate a tax rate as a value per \$1,000 of levy, one must first divide the tax base by 1,000, which in this case would yield 1,000,000. One must then divide the tax levy by the quotient of the previous calculation. In this example, one would divide 10,000,000 by 1,000,000 to derive a tax rate of \$10.00 per \$1,000 of assessed value.

The second portion of the example assumes an increase in the tax base of \$100,000,000. While the math is correct, yielding a tax rate of \$.91 per \$100 of assessed property, the explanation of that calculation " $10,000,000/110,000,000$ " would actually yield a tax rate of \$.09 per \$10 of assessed property. More importantly, the measurement is inconsistent with the first part of the example which was a rate per \$1,000 of assessed property. For comparison, the rate should be \$9.09 per \$1,000 of assessed property.

If tax levies were to remain constant, one could logically deduce that the tax rate would decrease against a grown tax base. However, tax levies in New York State have not only increased each year, but have outpaced the Consumer Price Index and the GDP Price Index as supported in the response to question B.1. Furthermore, tax levies are now increasing faster than the tax base which actually decreased from 2008 to 2009. The New York State Office of Real Property Services (ORPS) has two spreadsheets available at [www.orps.state.ny.us/reform/local\\_government\\_data.cfm](http://www.orps.state.ny.us/reform/local_government_data.cfm) named 2008 Local Government Data Spreadsheet and 2009 Local Government Data Spreadsheet. In these two spreadsheets is the equalized full value (fair market value) of all property in the state by municipality for the year in the file name. Excluding New York City, the State's fair market value decreased 1.6% from 1,331,074,594,962 in 2008 to 1,309,858,673,088 in 2009.

B. 5. Please see our response to B.4 above. In addition, staff's calculations in this request are inaccurate. The tax rate following staff's assumed 3% increase in tax levy would be \$9.36 per \$1,000 of assessed property  $[10,300,000/(1,100,000,000/1,000)]$ .

This example is flawed because it assumes that the tax base will increase 10% (from 1,000,000,000 to 1,100,000,000) while property tax levies increase at 3%. This would imply that 70,000,000 (70%) of the growth in the tax base (or 7%  $[70,000,000/1,000,000,000]$  of the total starting tax base) is due to new build, not replacement or maintenance which would be required to simply maintain the 1,000,000,000 tax base. At that rate, the county would double in size every 14 years  $(7\% / 100\%)$  which is not supported by the growth data from ORPS referenced in response to question B.4

B. 6. Please see our response to B.2 above demonstrating that the company is not calculating increased property taxes associated with total plant additions. Please see Attachment 2 for the calculations and responses to parts a, b and c.

Although this exercise demonstrates the Company's success in managing the rate of increase in its property taxes historically, it would be unreasonable to rely on historic experience to forecast the future rate of increase as discussed in the Company's response to question B. 1

B. 7. Please refer to Attachment 3 in response to this question. When referencing the average tax rate for a given year, note that the year given is the tax roll year, not the calendar year or NMPC fiscal year. The tax roll year is all property tax bills that are based off of the same assessment roll. There are still outstanding property tax bills to be paid on the 2009 assessment roll, so the final average tax rate cannot yet be computed.

Name of Respondent:

Shannon Larson & Stephen Adams

Date of Reply:

March 3, 2010

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 1 to RAV-33

	Total Taxes Charged	Electric Taxes Charged	Other Taxes Charged	Gas Taxes Charged	Incr./Decr \$ Annual Taxes Electric Only	Incr./Decr % Annual Taxes Electric Only
Test Year (October 2008-September 2009)						
Real Estate	\$ 92,578,686	\$ 70,695,147	\$ 834,042	\$ 21,049,496		
Special Franchise	\$ 74,229,757	57,198,801	-	17,030,956		
Total	\$ 166,808,443	\$ 127,893,949	\$ 834,042	\$ 38,080,453		
Calendar 2009						
Real Estate	\$ 92,331,929	\$ 71,611,054	\$ 874,645	\$ 19,846,231		
Special Franchise	\$ 74,031,907	57,966,983	-	16,064,924		
Total	\$ 166,363,836	\$ 129,578,037	\$ 874,645	\$ 35,911,155	\$ 2,391,460	1.88%
Calendar 2008						
Real Estate	\$ 91,095,306	\$ 70,703,731	\$ 810,643	\$ 19,580,932		
Special Franchise	\$ 72,147,219	56,482,846	-	15,664,374		
Total	\$ 163,242,525	\$ 127,186,577	\$ 810,643	\$ 35,245,306	\$ (1,600,646)	-1.24%
Calendar 2007						
Real Estate	\$ 89,819,999	\$ 71,209,859	\$ 808,671	\$ 17,801,469		
Special Franchise	\$ 71,971,705	57,577,364	-	14,394,341		
Total	\$ 161,791,704	\$ 128,787,223	\$ 808,671	\$ 32,195,810	\$ (1,649,830)	-1.26%
Calendar 2006						
Real Estate	\$ 90,770,702	\$ 71,961,017	\$ 821,292	\$ 17,988,392		
Special Franchise	\$ 73,095,008	58,476,036	-	14,618,972		
Total	\$ 163,865,710	\$ 130,437,053	\$ 821,292	\$ 32,607,364	\$ (7,532,209)	-5.46%
Calendar 2005						
Real Estate	\$ 95,748,058	\$ 75,952,714	\$ 824,105	\$ 18,971,239		
Special Franchise	\$ 77,507,117	62,016,548	-	15,490,569		
Total	\$ 173,255,176	\$ 137,969,263	\$ 824,105	\$ 34,461,808	\$ 3,649,752	2.72%
Calendar 2004						
Real Estate	\$ 92,390,015	\$ 82,734,801	\$ 652,813	\$ 9,002,401		
Special Franchise	76,047,765	51,584,710	-	24,463,055		
Total	\$ 168,437,780	\$ 134,319,511	\$ 652,813	\$ 33,465,456	\$ 5,728,430	4.45%
Calendar 2003						
Real Estate	\$ 87,889,813	\$ 81,483,727	\$ 650,297	\$ 5,755,789		
Special Franchise	73,807,973	47,107,354	-	26,700,619		
Total	\$ 161,697,786	\$ 128,591,081	\$ 650,297	\$ 32,456,408	\$ 8,152,245	6.77%
Calendar 2002						
Real Estate	\$ 93,921,212	\$ 43,915,044	\$ 25,376,230	\$ 24,629,938		
Special Franchise	81,812,603	76,523,792	-	5,288,811		
Total	\$ 175,733,815	\$ 120,438,836	\$ 25,376,230	\$ 29,918,749		

Question B. 6 (a)

2005 Actual Property Taxes	\$ 137,969,263	Exhibit 1, Line 38
3 % Annual Inflation Factor	4,139,078	
Tax impact of Plant Additions Surge	(516,280)	WP-1 Line 9 plus Line 20
Total 2007 Methodological Result	\$ 141,592,061	

Actual 2007 Results	\$ 128,787,223
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Question B. 6 (b)

2006 Actual Property Taxes	\$ 130,437,053	Exhibit 1, Line 33
3 % Annual Inflation Factor	3,913,112	
Tax impact of Plant Additions Surge	387,055	WP-1 Line 10 plus Line 21
Total 2008 Methodological Result	\$ 134,737,220	

Actual 2008 Results	\$ 127,186,577
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Question B. 6 (c)

2007 Actual Property Taxes	\$ 128,787,223	Exhibit 1, Line 28
3 % Annual Inflation Factor	3,863,617	
Tax impact of Plant Additions Surge	443,628	WP-1 Line 11 plus Line 22
Total 2009 Methodological Result	\$ 133,094,468	

Actual 2009 Results	\$ 129,578,037
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Date of Request: February 23, 2010  
Due Date: March 5, 2010

Request No. CVB-5  
NMPC Req. No. NM 76 DPS 53

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Christian Bonvin

TO: Infrastructure and Operations Panel

Request:

1. How often does the Company run the Recloser Model associated with the recloser application strategy?
2. Exhibit\_IOP-14, Schedule 2, sheet 94 states that the Company plans to install 100 reclosers per year going forward. Does the Company prioritize recloser installation based solely on the results of the Recloser Model? If not, please explain what other factors are considered to determine where the 100 reclosers per year are to be installed.
3. Please provide the information as it relates to historic installation of reclosers under the recloser application strategy:
  - A. The total number of 15kV class radial feeders that have been identified on the system as candidates to receive one or more recloser based on the Recloser Model.
  - B. The number of feeders identified for reclosers based on methods other than the Recloser Model.
  - C. Number of feeders that had one or more reclosers installed on them, by year, for FY08, FY09, and FY10.
  - D. Number of feeders forecasted to have a recloser installed on them for each fiscal year in the five year budget.
  - E. Average number reclosers installed per feeder for FY08, FY09, and FY10, by year.
  - F. Percentage of recloser installations that were for single phase applications.
4. What is the number of reclosers to be installed in each fiscal year in the five year budget associated with projects C13266, C13267, and C13268?
5. What is the average number of reclosers to be installed per feeder for each fiscal year in the five year budget?

Response:

- 1) The Company updates the recloser model once per year.
- 2) The recloser model is not the only means of selecting recloser locations. The Company utilizes the output of the recloser model, feeder hardening feeders, Engineering Reliability Review (ERR) feeders and the NYSPSC worst performing feeder lists filed in the annual Electric Service Reliability Report, in accordance with Case 90-E-1119, to select and prioritize locations for recloser installation.

As the program progresses, all remaining 13.2kV radial feeders that currently do not have a recloser (of which there are approximately 365 at this time) will be evaluated for recloser installation opportunities. In addition, there are many 5kV feeders that will be evaluated in rural areas that are good candidates for recloser installations due to their length.

- 3)
  - A) The current output from the recloser model indicates there are 253 candidate feeders for recloser installations. Of these, 239 are 13.2kV feeders. Historic data is not maintained from the recloser model since it has been updated a number of times since its inception.
  - B) The number of feeders identified by methods other than the recloser model per year is as follows:

FY08: 21 Feeder Hardening feeders  
       24 Engineering Reliability Review feeders

FY09: 22 Feeder Hardening feeders  
       41 Engineering Reliability Review feeders  
       8 NYSPSC Worst Performing feeders

FY10: 16 Feeder Hardening feeders  
       62 Engineering Reliability Review feeders  
       9 NYSPSC Worst Performing feeders

- C) The number of feeders with one or more recloser recommend per year is as follows:

FY08: 68 feeders total	25 feeders with multiple reclosers
FY09: 105 feeders total	15 feeders with multiple reclosers
FY10: 118 feeders total	50 feeders with multiple reclosers

- D) Eighty-two feeders will have recloser installations in FY11. Specific recloser locations are typically finalized 3 to 6 months prior to the beginning of the fiscal year, therefore, only FY11 data can be provided for this response.

E) The average number of reclosers installed per feeder is as follows:

FY08: 100 reclosers/68 feeders = 1.47 per feeder

FY09: 160 reclosers/105 feeders = 1.52 per feeder

FY10: 211 reclosers/118 feeders = 1.78 per feeder

F) National Grid's recloser program is presently focused on the installation of three phase units. However, the Company has installed seven single phase S&C Trip Saver reclosers under a pilot program. These units fit into a standard S&C fuse cutout holder and are designed to 'fuse save' for temporary faults. It is anticipated that the installation of these types of single phase installations will be included as part of the program once the pilot is validated.

4). The recloser budget by Division is typically set in the July/August timeframe, prior to the beginning of the fiscal year, when the feeder hardening, ERR and worst performing feeder lists become available. As such, only an FY11 breakdown of data can be provided.

FY11 Capital Budget:

C13266 – East	\$1,650,000	33 reclosers
C13267 - Central	\$1,650,000	33 reclosers
C23268 – West	\$1,700,000	34 reclosers

5) There will be 1.22 reclosers installed per feeder in FY11. As stated in the response to question 3D above, specific locations are selected on an annual basis and cannot be provided for FY12 through FY15.

Name of Respondent:

Infrastructure and Operations Panel/Rob Sheridan

Date of Reply:

March 4, 2010

Date of Request: February 23, 2010  
Due Date: March 5, 2010

Request No. RAV-37  
NMPC Req. No. NM 78 DPS 55

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Rate Design, Customer and Markets Panel

Request:

A. Please provide a summary of actual Economic Development discounts for each of the years 2002 – 2009 and the historic test year, broken down by type of discount (EZR, SC 11/12, PFJ, SC7, etc). Provide total discounts for each of the years.

B. Please provide a summary of forecasted Economic Development discounts for each of the three rate years, broken down by type of discount (EZR, SC 11/12, PFJ, SC7, etc). Provide total discounts for each of the years. Explain how these forecasted amounts were determined.

C. Please provide the actual Economic Development Program costs for each of the years 2002 – 2009 and the historic test year, broken out between external, internal and total. Briefly describe the types of internal costs included these dollar amounts.

D. Please provide the total forecasted Economic Development Program costs for each of the three rate years, broken out between external, internal, and total. Explain how these forecasted amounts were determined.

E. For each of the three rate years, what is the amount of base rate allowance that will be credited to the Company's proposed Economic Development deferral account, by type (i.e., discounts and program costs) and in total? Include exhibit references for each amount.

F. On page 119 of your pre-filed direct testimony, you recommend that the grant programs "be maintained at the current level of funding of \$12.5 million per year." Please indicate if you agree that the referenced \$12.5 million per year built into MJP base rates was intended to cover economic development program costs and incremental discounts, rather than just program costs as your pre-filed testimony suggests. If you disagree, fully

explain the basis of your disagreement and provide supporting documentation from the MJP (MJP terms, work papers, statements in support, testimony, etc).

Response:

Per a conversation between Pamela Dise and Robert Visalli on 2-24-2010 parts A and B of this request are withdrawn as they are duplicative with RAV-32. In addition, Mr. Visalli changed the time period requested for Part C to 2005 – 2009.

C. Actual Economic Development Program Costs:

	CY 2005	CY 2006	CY 2007	CY 2008	CY 2009	Historic Test Year
External	\$5,069,782	\$4,277,226	\$5,919,860	\$6,228,724	\$3,692,686	\$4,757,707
Internal (Non-Labor)	501,311	525,900	563,743	407,730	452,624	433,628
Total	\$5,571,093	\$4,803,126	\$6,483,603	\$6,636,454	\$4,145,310	\$5,191,335

Internal costs represent all non-labor operating expenses associated with the Company's Economic Development activities, including consulting, marketing, advertising, research services and organization/event sponsorships and dues.

D. Forecast Economic Development Program Costs:

	2011	2012	2013
External	\$12,500,000	\$12,500,000	\$12,500,000
Internal (Non-Labor)	447,567	455,624	464,280
Total	\$12,947,567	\$12,955,624	\$12,964,280

The external cost forecast was developed by analyzing current levels of activity and reviewing the list of projects that have been approved, but not yet completed. There is currently an accumulated balance of approximately \$8 million for projects for which the funds have been committed but not yet reimbursed to the customer. In addition the Company anticipates an increase in demand for the Renewable Energy & Economic Development program, which is a new initiative approved as part of the Company's 2010 EDP. Finally, the Company plans to introduce a new Clean Tech Incubation Program in 2011 which will also contribute to an increase in spending over recent actual spending.

The internal cost forecast was developed by taking the historic test year and applying inflation factors taken directly from Exhibit RRP-7, Summary, Sheet 1 of 1. The Company assumed that the forecast level of spending in this area would

be maintained throughout the rate period with the exception of inflationary factors.

- E. As indicated in the Revenue Requirements Panel Testimony on page 91 of 110, the Company proposes to continue the deferral treatment of the Economic Development Fund. In addition, on Exhibit RRP-8, Schedule 2, Sheet 1 of 1, the Company presents the proposed amount for rate allowance for the Economic Development Deferral Mechanism totaling \$44,363,100 for each year of the rate plan. Below is the breakout of the proposed deferral amount.

	2011	2012	2013
Economic Development Zone Discounts	\$18.6	\$18.6	\$18.6
SC11/12 (Flex Rate) Discounts	13.3	13.3	13.3
Economic Development Fund	12.5	12.5	12.5
Total	\$44.4	\$44.4	\$44.4

Source: Economic Development Zone Discounts and SC11/12 Discounts, RDCM-4, Schedule 2, 3 and 4. Economic Development Fund, RRP-2, Schedule 35, Sheet 4 of 4.

- F. The Company agrees that it recovers certain forecast rate discounts pursuant to section 1.2.4.7 of the MJP, and that it may recover up to \$12.5 million in costs associated with certain grant programs and incremental rate discounts (in excess of forecasts) pursuant to section 1.2.10 of the MJP. Rate discounts not recovered in either of these ways are presently deferred for future recovery pursuant to section 1.2.4.7 of the MJP.

Name of Respondent:  
Susan Crossett

Date of Reply:  
March 5, 2010

Date of Request: February 24, 2010  
Due Date: March 8, 2010

Request No. AJR-2  
NMPC Req. No. NM 79 DPS 56

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Aric Rider

TO: Infrastructure and Operations Panel

Request:

A. Provide a detailed timeline that describes the Company's annual electric capital expenditures budgeting process. The flow chart/timeline of the preparation and approval process should include a description and title of the Company personnel responsible for each step, approximate dates, and relevant sign-offs.

B. Referring to Exhibit \_\_\_\_ (IOP-1), Schedule 5, Sheet 2, indicate whether the proposed annual electric capital expenditure budgets for fiscal years ending 2011, 2012, 2013, and 2014 were approved by the Board of Directors.

C. Referring to Exhibit \_\_\_\_ (IOP-1), Schedule 5, Sheet 2, indicate whether the proposed annual electric capital expenditure budgets for fiscal years ending 2011, 2012, 2013, and 2014 were approved by Company management.

D. Provide the electric capital expenditure budgets presented to the Board of Directors for fiscal years ending 2006, 2007, 2008, 2009 and 2010, in the same format as Exhibit \_\_\_\_ (IOP-1), Schedule 5, Sheet 2.

E. Provide the electric capital expenditure budgets approved by the Board of Directors for fiscal years ending 2006, 2007, 2008, 2009 and 2010, in the same format as Exhibit \_\_\_\_ (IOP-1), Schedule 5, Sheet 2.

F. Provide the actual electric capital expenditures for fiscal years ending 2006, 2007, 2008, 2009 and 2010, in the same format as Exhibit \_\_\_\_ (IOP-1), Schedule 5, Sheet 2.

Response:

A. Please see Attachment 1(AJR-2\_Attach 1) which describes the Transmission and Distribution electric capital spending plan development process.

B. As stated in the response to NM 63 MI-10 MM-10, each year the Company develops a multi-year business plan. The governance process concludes with the National Grid plc Board of Directors approving the first year of the plan, which for the current forecast period is April 1, 2010 through March 31, 2011, and the Board notes the remaining years of the plan. The Company expects the FY11 budget will be considered for approval at the March 2010 Board meeting. It should be noted that IOP-1, schedule 5, sheet 2 relates to the System Capacity and Performance spending category, which is only a subset of Niagara Mohawk's proposed capital expenditure level.

C. As stated in the response to NM 63 MI-10 MM-10, the Company's Executive Committee has approved the capital investment plan included in the rate case. It should be noted that IOP-1, schedule 5, sheet 2 relates to the System Capacity and Performance spending category, which is only a subset of Niagara Mohawk's proposed capital expenditure level.

D, E & F.

For the budget years requested, the budget that has been presented to the Board has been approved without changes. It should be noted that the Board approves a budget that is an aggregate of individual regulatory jurisdiction budgets rolled up by Line-of Business.

The Company is only able to provide FY10 data in the format similar to Exhibit\_\_ (IOP-1) Schedule 5, Sheet 2 as it was the first year that budgeted projects were assigned a program/strategy in the spending rationale categories, see Attachment 2 (AJR-2 Attach 2). Attachment 2 also contains a preliminary electric capital expenditures budget for FY10 as presented in the January, 2009 CIP filing, as well as the final FY10 budget presented to and approved by the National Grid plc Board of Directors.

The budget that was presented and approved by the Board and actual spend for FY06 through FY10 is provided in Attachment 3 (AJR-2 Attach 3) in an alternative format to Exhibit\_\_ (IOP-1), Schedule 5, Sheet 2 as such budget categories were not historically assigned to projects prior to FY10.

- FY08-FY10 final budget and actuals are provided by spending rationale – figures reported are fiscal year end in our current quarterly reporting format. FY10 figures are taken from the 3Q report submitted to the PSC in February 2010.
- FY06 and FY07 were not reported in spending rationale format as they were never originally reported/mapped in this way.

Name of Respondent:  
Mark Eddy

Date of Reply:  
March 8, 2010



## Transmission & Distribution Fiscal Year Capital Spending Plan Development Schedule of Key Deliverables

	Task Name	Duration	Start Date	Finish Date	Task Initiator/Comments
	<b>Year Round Activity</b>				
1	Identify candidate projects and programs based upon planning studies, strategies, ERR's, PIWs, damage/failure and I&M inspection results.	April - March	Continuous		Project and Program sponsors and reports from field
2	Update TRAC & SRAC (capital projects list) financial forecasts to include all new programs and projects from pre-strategy phase to project close-out. All projects include Risk Score.	April - March	typically 2nd week of month	end of month	Program Management working with Investment Management
3	Review Monthly YTD Actuals vs budget	April - March	typically 2nd week of month		Finance and Investment Management
4	Update and Maintain Transmission and Distribution Related Projects Listing	April - March	typically 2nd week of month		Transmission and Distribution Investment Management with Transmission and Distribution Project Management
5	Review and provide reforecasted 2- year outlook on capital expenditures to finance	Quarterly			Finance
6	<b>April</b>				
7	Develop preliminary blanket spending levels for Upcoming FY.	1 month	1-Apr	End-April	Investment Management, LTP and Program Mgt.. Input from other depts. including Finance, Opns., Design, and Load/Economic Forecasting
8	April QPR: Primary focus: Senior Management update on most important action items to deliver new plan.	Meeting	typically 3rd week of month		QPR information is based on the quarterly financial forecast and includes updates for both financial and operational issues. Senior EDG leadership and Corporate are present at the meeting.
	<b>May</b>				
9	Develop Preliminary List of Project Proposals for upcoming 5 Fiscal Years.	1 month	1-May	End-May	Investment Management to develop list with assistance from Asset Sponsors. List will be based upon Projects listed in latest Budget/Forecast file, in PowerPlant (initiated or open status), and as submitted by asset sponsors. Project information to include description, scope, justification, cash flows, and total capex, opex, and removal costs.
	<b>June</b>				

	Task Name	Duration	Start Date	Finish Date	Task Initiator/Comments
10	Assemble Baseline 5 year FY Spending Plan	1 week	1-Jun	Mid-June	Investment Management to issue plan to asset sponsors and project management Baseline version will reflect first pass funding for blankets, programs, carryover specifics, and 5-year plan specifics. Baseline to include capex, opex, and removal funding. Out-years of the plan to include Blanket, Program, and Specific Projects, and placeholders to balance to defined capex totals for out-years.
11	Check Spending vs. commitments in each state	1 week	Mid-June	End-June	Investment Management
12	Finalize Reliability Enhancement Program Initiatives	1 week	Mid-June	End of July	Asset Strategy to lead this effort with assistance from Investment Management. Asset Strategy to be provided with the 5-year preliminary funding for programs.
13	Finalize Blanket Project Spending Levels	2 days	Mid-June	End-June	Investment Management with Finance.
14	Confirm Specific Project and Program Proposals	1 week	Mid-June	End of July	Individual project sponsors are responsible for reviewing their proposed projects. Project information in PowerPlant to include description, scope, justification, cash flows, and total capex, opex, and removal costs
15	Project Data Review & Resolution	1 week	Mid-June	End-June	Identify any projects with missing or incorrect data. Develop and submit data for such projects.
16	Check Capex related Opex and Removal Spending and Forward preliminary cut to Finance	1 week	Mid-June	End-June	Investment Management with input from Program Mgt. To also include pure Opex REP initiatives.
	<b>July</b>				
17	Business Plan kick-off. Finance provides guidance paper for 5-year Business Plan. Paper describes the process, defines deliverables, submission dates, approval process and specific guidance regarding inflation assumptions, payroll and staffing levels.	1 month	1-Jul	1-Aug	Transmission Finance
18	Global Investment Management provides project risk scoring templates overview of process for cross line of business review.	1 month	1-Jul	1-Aug	Global Investment Management
19	Review Matrix Scores of Programs and Projects	1 week	1st week in July.	1st week in July	Investment Management will publish risk scores. Investment Management and will review the scoring with each Asset Sponsor
20	Draft Proposed & Prioritized Spending Plan	1 week	1st week in July	1st week in July	Investment Management

	Task Name	Duration	Start Date	Finish Date	Task Initiator/Comments
21	Spending Plan Review and Challenge Sessions	3 weeks	2nd week in July	End-July	Challenge sessions. The Risk Scoring, scope, justification, schedule, and cash flows for each project will be subject to review and questioning. Project sponsors need to be prepared to defend their proposals.
22	July QPR: Primary Focus: Senior Management review of current 2 -year outlook as compared with current Business Plan with a high level indication for changes expected during upcoming 5 year Business Plan Cycle and forecast update.	Meeting	typically 3rd week of month		Corporate
23	Coordinate Transmission and Distribution Project Schedules	2 days	typically 1st week in July		Investment Mgt meets with Trans Inv. Mgt to synchronize project need dates, cash flows, administrative requirements, and resolve any conflicts
	<b>August</b>				
24	Develop Capital Business Plan from current TRAC extract. Include new "placeholders" for programs and projects not yet at strategy phase. Verify financial forecasts.	1 month	1-Aug	25-Aug	Transmission Investment Management
25	Confirm matrix Risk Scores for Spending Plan Programs and Projects.	1 month	1-Aug	25-Aug	Transmission Investment Management
26	Finalize proposed capex forecast, Cost of Removal and OPEX related to capex expenditures.	1 month	1-Aug	25-Aug	Transmission Investment Management
27	Load proposed budget into budget system and investment management templates for Transmission Finance and Global Investment Management review.	1 week	25-Aug	31-Aug	Transmission Investment Management
28	Finalize the Draft 5-Year Spending Plan	2 weeks	1st week in Aug.	Mid-Aug	Investment Management
29	Submit the Draft 5-Year Spending Plan for management review and approval	1 week	Mid-Aug.	End-Aug.	Investment Management
	<b>September</b>				
30	Creation and submission of full LOB Business Plan financials and commentaries on key themes to Corporate	1 month	1-Sep	30-Sep	Finance
31	Draft 5-Year Spending Plan Forwarded to Finance and to Program Mgt. for preliminary resourcing		End-Aug.	1-Sep	Investment Management
	<b>October</b>				
32	October QPR: Primary focus - Senior Management review and challenge on LOB's proposed Business Plan.	Meeting	typically 3rd week of month		Corporate
	<b>November - December</b>				

	Task Name	Duration	Start Date	Finish Date	Task Initiator/Comments
33	Conduct true-up checks of blankets, programs, and project forecast spending of Current Year vs. Upcoming Budget. Incorporate any Management Changes to spending plan. Incorporate or Task Line any necessary adjustments into Spending Plan.	1 week	Mid-Dec. & Early-March	End-Dec. & Mid-March	Investment Management
34	Review and agree on revision by LOB based on Executive feedback through the Global Investment Planning Process.	Meeting			Finance with Investment Management
	<b>January</b>				
35	January QPR: Senior Management update on current FY opex and capex plan and review of draft proposed Business Plan	Meeting	typically 3rd week of month		Finance with Investment Management
36	Prepare detailed opex and capex Work Plan for resourcing by Transmission Work Delivery and Service Provider work forces	1 month	2-Jan	31-Jan	Transmission Investment Management
	<b>February - March</b>				
37	Update Spending Plan Spreadsheet functionality. Update Program master spreadsheets and synchronize with Spending Plan preliminary entries.	1 month	February	Early-March	Investment Management
38	Review NY TxD Project List and Update Spending Plan. Incorporate TxD projects and programs into overall Spending Plan Budget Spreadsheet	1 month	February	Early-March	Investment Management with Asset Sponsors and Project Management
39	Develop Project Estimating and Scheduling Approach for 5-Year Spending Plan	1 month	February	End-February	Investment Management to work with Project Management & Planning Base upon similar completed projects to be applied to proposed projects as starter to reserve cash flows in plan.
40	Finalize Draft Business Plan for submission to National Grid Board for approval	Meeting	typically 3rd week in February		Finance
41	Review detailed opex and capex Work Plan with Transmission Work Delivery and Service Provider work forces to verify ability to deliver	2 months	1-Feb	31-Mar	Transmission Investment Management
42	Coordinate Transmission and Distribution Project Schedules	2 days	typically 1st week in March		Investment Mgt meets with Trans Inv. Mgt to synchronize project need dates, cash flows, administrative requirements, and resolve any conflicts
	<b>March</b>				
43	Confirm preliminary Program spending levels for Upcoming fiscal year and remaining out-years of 5-year spending plan.		1st week March	End-March	

	Task Name	Duration	Start Date	Finish Date	Task Initiator/Comments
44	Develop Matrix Scores for Spending Plan Line Items and Programs	On-going through August	1st week March	End-June	Investment Management and Asset Sponsors. Will include process rollout and any instructions/training. Use existing scores as part of Global scoring exercise. New projects will need to be scored.
45	National Grid Board approves Budget Year	Meeting	late March		National Grid Board
46	Conduct true-up checks of blankets, programs, and project forecast spending of Current Year vs. Upcoming Budget. Incorporate any Management Changes to spending plan. Incorporate or Task Line any necessary adjustments into Spending Plan.	1 week	Mid-Dec. & Early-March	End-Dec. & Mid-March	Investment Management
	<b>April</b>				
47	Commence new Fiscal Year				

Line Of Business	Spending Rationale	Strategy for AJR-2	Preliminary FY10 Budget as Presented in Jan 2009 CIP	Final FY10 Budget		
DIST	Asset Condition	Addressed by Multiple Overhead Strategies	359,000	441,000		
		Addressed by Multiple Substation Strategies	142,000	748,000		
		Addressed by Multiple Underground Strategies	2,366,000	911,000		
		Distribution Line Transformer	2,151,000	1,411,000		
		Distribution Overarching	-	255,000		
		EMS - Strategy to be written	200,000	614,000		
		Engineering Reliability Review	-	1,108,000		
		Feeder Hardening	6,591,000	4,576,000		
		Indoor Substation	11,405,000	15,454,000		
		Manhole/Vault/Miscellaneous UG Equipment (Capital related to I&M)	2,103,000	2,241,000		
		Manholes and Vaults	1,167,000	1,299,000		
		Open Wire Primary	3,413,000	471,000		
		Open Wire Primary	-	200,000		
		Planning - to be written	452,000	781,000		
		Primary Underground Cable	702,000	996,000		
		Primary Underground Cable	-	500,000		
		Blanket	7,661,000	8,310,000		
		Substation Battery and Related	374,000	378,000		
		Substation Battery and Related	-	250,000		
		Substation Capacitor & Switch	234,000	50,000		
		Substation Circuit Breaker & Recloser	1,511,000	425,000		
		Substation Circuit Breaker/Recloser	-	1,400,000		
		Substation Circuit Switcher	630,000	671,000		
		Substation Disconnect & MOD	47,000	50,000		
		Substation Metal Clad Switchgear	-	800,000		
		Substation Metalclad Switchgear	2,338,000	1,000,000		
		Substation Overarching	-	627,000		
		Substation Power Transformer	2,244,000	1,637,000		
		Substation Power Transformer	-	50,000		
		Substation Reactor	94,000	100,000		
		Substation Regulator & Reactor	234,000	249,000		
		UG Getaway Cable	570,000	307,000		
		URD Cable Replacement	234,000	249,000		
		Wood Pole	4,583,000	3,814,000		
		Wood Pole/ Miscellaneous OH Equipment (Capital related to I&M)	17,580,000	18,723,000		
		Pockets of Poor Performance	561,000	-		
		Asset Condition TOTAL			69,946,000	71,096,000
		Damage/Failure	Damage/Failure		1,073,000	1,850,000
			Blanket		17,128,000	18,241,000
		Damage/Failure TOTAL			18,201,000	20,091,000
		Other	Blanket		607,000	671,000
			Telecommunications		1,105,000	1,168,000
			Distribution Line		2,057,000	507,000
		Other TOTAL			3,769,000	2,346,000
		Statutory/Regulatory	New Business		-	3,332,000
			Public Requirements		-	2,926,000
			Blanket		79,167,000	82,458,000
			Statutory./Regulatory		6,729,000	5,275,000
		Statutory/Regulatory TOTAL			85,896,000	93,991,000
		System Capacity & Performance	Addressed by Multiple Overhead Strategies		823,000	150,000
			Addressed by Multiple Substation Strategies		-	100,000
			Distribution Line Regulator		-	150,000
			EMS - Strategy to be written		748,000	48,000
Engineering Reliability Review			-	1,674,000		
Open Wire Primary			140,000	174,000		
Open Wire Primary			-	100,000		
Planning - to be written			37,819,000	23,231,000		
Planning Criteria			-	7,160,000		
Recloser Application			7,482,000	7,762,000		
Blanket Load Relief			2,531,000	2,695,000		
Blanket Reliability			6,979,000	7,432,000		
Engineering Reliability Review			3,220,000	4,067,000		
Storm Damage			1,350,000	1,437,000		
Substation Circuit Breaker & Recloser			-	275,000		
Substation Mobile Transformer - to be written			449,000	40,000		
Substation Power Transformer			-	150,000		
System Capacity & Performance TOTAL				61,541,000	56,645,000	
DIST Total			239,353,000	244,169,000		
TxD	Asset Condition	Addressed by Multiple Overhead Strategies	2,068,000	619,000		
		Addressed by Multiple Substation Strategies	-	141,000		
		Distribution Line Regulator	-	350,000		
		Indoor Substation	1,000,000	1,258,000		
		Open Wire Primary	-	200,000		
		Planning - to be written	1,810,000	600,000		

	Blanket	1,242,000	1,242,000
	Substation Capacitor & Switch	500,000	200,000
	Substation Circuit Breaker & Recloser	2,645,000	420,000
	Substation Metalclad Switchgear	1,500,000	4,800,000
	Substation Power Transformer	-	160,000
	Substation Reactor	1,811,000	700,000
	Subtransmission Line Overarching	-	4,205,000
	Subtransmission Underground Cable	4,079,000	3,882,000
	Wood Pole	9,063,000	10,022,000
	Wood Pole/ Miscellaneous OH Equipment (Capital related to I&M)	4,500,000	4,500,000
<b>Asset Condition TOTAL</b>		<b>30,218,000</b>	<b>33,299,000</b>
Damage/Failure	Blanket	1,335,000	497,000
Other	Allowance for Schedule Change	(2,100,000)	(4,830,000)
Statutory/Regulatory	New Business	-	451,000
	Public Requirements	-	206,000
	Blanket	386,000	386,000
	Statutory./Regulatory	1,500,000	1,310,000
<b>Statutory/Regulatory TOTAL</b>		<b>1,886,000</b>	<b>2,353,000</b>
System Capacity & Performance	Addressed by Multiple Overhead Strategies	350,000	500,000
	Planning - to be written	1,225,000	1,075,000
	Planning Criteria	-	2,200,000
	Relay Protection - to be written	50,000	50,000
	Blanket Load Relief	99,000	99,000
	Blanket Reliability	615,000	615,000
	Substation Mobile Transformer - to be written	1,300,000	2,000,000
	Subtransmission Underground Cable	3,039,000	159,000
<b>System Capacity &amp; Performance TOTAL</b>		<b>6,678,000</b>	<b>6,698,000</b>
<b>TxD Total</b>		<b>38,017,000</b>	<b>38,017,000</b>
<b>Grand Total</b>		<b>277,370,000</b>	<b>282,186,000</b>

Niagara Mohawk Power Corporation d/b/a National Grid			Attachment 2 - Part B
Transmission Spending Rationale	Program	Preliminary FY10 Budget as Presented in Jan 2009 CIP	FY09/10 Board Approved
Asset Condition	ATB Strategy Total	590,000	590,000
	Battery Strategy Total	330,000	330,000
	Leeds SVC Strategy Total	2,200,000	2,200,000
	115kv Substation Bulk Power System Upgrades Total	100,000	100,000
	Other Asset Condition Total	(28,175,206)	(45,175,206)
	Other System Capacity & Performance Total	200,000	200,000
	Overhead Line Refurbishment Program Total	829,904	829,904
	Polymer Insulator Replacement Total	1,329,999	1,329,999
	Refurbishment (Rehabilitation) Total	8,380,000	8,380,000
	Relay Replacement Strategy Total	762,000	762,000
	RHE Breaker Replacement Total	520,000	520,000
	Shield Wire Strategy Total	11,319,000	11,319,000
	Steel Tower Strategy Total	20,752,071	20,752,071
	Substation Rebuilds Total	13,766,337	13,711,337
	System Capacity & Performance Total	1,039,279	1,039,279
	U Series Relay Strategy Total	30,000	30,000
<b>Asset Condition Total</b>		<b>33,973,384</b>	<b>16,918,384</b>
Damage/Failure	Damage/Failure	13,987,150	13,987,150
	Wood Pole Strategy	1,150,000	1,150,000
<b>Damage/Failure Total</b>		<b>15,137,150</b>	<b>15,137,150</b>
Other	Other	(200,000)	(200,000)
		3,466,832	3,571,832
<b>Other Total</b>		<b>3,266,832</b>	<b>3,371,832</b>
Statutory/Regulatory	Frontier Region Total	25,658,112	25,658,112
	Generation Total	(540,000)	(540,000)
	Load Total	(352,440)	(352,440)
	Luther Forest Total	13,098,000	13,098,000
	Other Statutory/Regulatory Total	50,800	50,800
	Reliability Criteria Compliance Total	5,995,498	5,995,498
	Clay Station Rebuild Total	317,868	317,868
	Clearance Strategy Total	1,984,175	1,984,175
	Digital Fault Recorder Strategy Total	2,674,046	2,674,046
	Other Statutory/Regulatory Total	1,068,001	1,068,001
	RTU Strategy Total	2,950,000	2,950,000
	Other Syst Capacity & Performance Total	24,000	24,000



Transmission Spending Rationale	Program	Preliminary FY10 Budget as Presented in Jan 2009 CIP	FY09/10 Board Approved
<b>Statutory/Regulatory Total</b>		<b>52,928,060</b>	<b>52,928,060</b>
System Capacity & Performance	System Capacity & Performance Total	140,000	140,000
	3A/3B Tower Strategy Total	80,000	80,000
	Circuit Switcher Strategy Total	-	-
	Other System Capacity & Performance Total	8,474,575	8,424,575
<b>System Capacity &amp; Performance Total</b>		<b>8,694,575</b>	<b>8,644,575</b>
<b>Grand Total</b>		<b>114,000,000</b>	<b>97,000,000</b>

Niagara Mohawk Electric plant Proposed Budget and Approved Budget vs Actual FY2006 through FY2010 (\$m)

	FY06 Proposed Budget	FY06 Actuals	FY07 Proposed Budget	FY07 Actuals	FY08 Proposed Budget	FY08 Actuals	FY09 Proposed Budget	FY09 Actuals	FY10 Proposed Budget	FY10 Forecasted Actuals
<b>DISTRIBUTION</b>										
Asset Condition	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Damage Failure	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Other/Non-Infrastructure	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Statutory/Regulatory	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
System Capacity & Performance	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
<b>Total</b>	135.5	160.4	169.5	169.5	206.1	206.1	213.1	216.3	244.2	242.1
<b>SUB-TRANSMISSION</b>										
Asset Condition	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Damage Failure	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Other/Non-Infrastructure	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Statutory/Regulatory	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
System Capacity & Performance	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
<b>Total</b>	8.2	12.3	27	27.0	18	18.0	28	31.4	38	41.3
<b>TRANSMISSION</b>										
Asset Condition	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Damage Failure	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Other/Non-Infrastructure	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
Statutory/Regulatory	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
System Capacity & Performance	xx	xx	xx	xx	xx	xx	xx	xx	xx	xx
<b>Total</b>	40.3	37.8	57.4	57.4	59.9	59.9	81.7	67.0	97	93.1

\* RAV-3 format as of fiscal year ends. FY10 is forecasted as it was in 9-mtd PSC quarterly report filed Feb 2010.

Date of Request: February 24, 2010  
Due Date: March 8, 2010

Request No. AJR-3  
NMPC Req. No. NM 80 DPS 57

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Aric Rider

TO: Infrastructure and Operations Panel

Request:

- A. Provide a detailed timeline that describes the Company's annual common capital expenditures budgeting process. The flow chart/timeline of the preparation and approval process should include a description and title of the Company personnel responsible for each step, approximate dates, and relevant sign-offs.
- B. Provide the electric common expenditure budgets presented to the Board of Directors for fiscal years ending 2006, 2007, 2008, 2009 and 2010.
- C. Provide the common capital expenditure budgets approved by the Board of Directors for fiscal years ending 2006, 2007, 2008, 2009 and 2010, in the same format as response B, above.
- D. Provide the actual common capital expenditures for fiscal years ending 2006, 2007, 2008, 2009 and 2010, in the same format as response B, above.

Response:

A. The Company has separate annual budgeting process flows for the "Property Services" and "Information Services" groups, both of which fall under the common capital expenditures umbrella. Please see AJR-3, Exhibit 1 for the Information Services process flow, the Property Services process flow is as follows:

The planning cycle starts in August for both opex and capital. The capital plan is developed by specific review of 3 main categories of spending:

- a. Proposed new projects where scopes and approximate timings are known.
- b. Ongoing projects with approved estimates and known spending levels.

c. Baseline Asset Long Term Projects (Preventative Maintenance and significant upgrades.

Projects are matched to overall budget guidelines for spend set by the Property Services Leadership team. Developing the spending plan is an iterative process. The Property Forum, made up of Line of Business Leaders in the U.S., reviews strategy and helps prioritize projects as well.

The Property Services capital plan is prepared by Property Services Management with Financial Services support. The capital plan is approved/sponsored by the Facilities Department VP, then submitted to the Shared Service Executive and Property Executive VP in October. The Property Services capital plan is included with the overall National Grid plc Business Plan which goes to the National Grid plc Board for approval in March each year.

B. Please see AJR-3, Exhibit 2 attached which provides the common capital expenditure budgets presented to the National Grid plc Board of Directors for fiscal years ending 2006 through 2010.

C. The National Grid plc Board of Directors approved the common capital expenditures budgets for fiscal years ending 2006 through 2010 without making any changes to the budgets presented. These are provided in AJR-3, Exhibit 2 as referenced in the response to question B above.

D. Please see AJR-3, Exhibit 2 which provides the actual common capital expenditures for fiscal years ending 2006 through 2010.

Name of Respondent:  
Mark Eddy

Date of Reply:  
March 8, 2010

**IS Investment Planning**
**AJR-3, Exhibit 1**

<b>Department</b>	<b>Process</b>	<b>Period</b>
IS Enterprise Architecture	A review of the 3-5 year Technology Route-Map and Application Route-Map is carried out and updated	February – April
IS Enterprise Architecture	Based on the Application Route-Map and the Technology Route-Map, a 3-5 year Technical Infrastructure Blueprint is produced that feeds into the IS Investment Plan in May/July	March-July
LoB/IS Business Relationship Manager (BRM)	The Application Route-Map feeds into the Line of Business Management who, with support from the IS Business Relationship Managers (BRM) develop the LoB IS Strategy	April (delivered by May)
LoB/IS BRM	Once the LoB Strategy is developed, the LoB Managers work with the IS BRM's to develop a 3-5 year Investment Plan	May-July
IS BRM/IS Finance	There is a regular review and update of the IS project portfolio which feeds into the overall IS Investment Plan in August	January - December
IS Strategic Planning/IS Enterprise Architecture	The LoB Strategy along with the LoB Investment Plan from all LoB's are fed back to IS who collate the investment information in an overall IS Investment Plan. IS Enterprise Architecture feed into this process ensuring that the investment projects still meet the application and technology road-maps. The first draft IS Investment Plan is delivered in July	May-July
IS Strategic Planning/IS Enterprise Architecture	The Investment Plan is constantly reviewed and updated with any minor changes. The Investment Plan is approved by the IS Exec and published in the middle of September.	July-September
IS Finance	The Full five year IS Business Plan is developed. The IS Investment Plan feeds into the overall Group Business plan	August-November
IS Finance	The IS Business Plan is refined and reviewed based on opex and capex Corporate expenditure constraints.	November-December
National Grid Executive	IS Business Plan endorsed by the National Grid Exec	December
National Grid Board of Directors	The IS Approved Business Plan is consolidated in to a National Grid Business Plan that is submitted to the National Grid Board. The Board approves the budget year.	February - March

**Niagara Mohawk Electric Common plant Budget vs Actual FY2006 through FY2010 (\$m)**

		FY06 Actuals		FY07 Actuals		FY08 Actuals		FY09 Actuals		FY10 Forecasted Actuals
Facilities & Other Shared Services	10.0	8.8	13.7	12.2	28.6	10.5	25.4	12.8	22.7	19.0
FY05 & FY06 Benefit capitalization adjustment				17.9						
Deferral settlement-capitalization policy change				8.9						
FY03 & FY04 Benefit capitalization adjustment						3.1				
Adjustments & Other	0.0	0.0	0.0	1.5	0.0	(0.7)	0.0	0.0	0.0	0.0
<b>Total</b>	<b>10.0</b>	<b>8.8</b>	<b>13.7</b>	<b>40.5</b>	<b>28.6</b>	<b>12.9</b>	<b>25.4</b>	<b>12.8</b>	<b>22.7</b>	<b>19.0</b>

**Niagara Mohawk Electric Common plant Budget vs Actual FY2006 through FY2010 (\$m)**

		<b>FY06 Actuals</b>		<b>FY07 Actuals</b>		<b>FY08 Actuals</b>		<b>FY09 Actuals</b>		<b>FY10 Forecasted Actuals</b>
Facilities & Other Shared Services	10.0	8.8	13.7	12.2	28.6	10.5	25.4	12.8	22.7	19.0
Adjustments & Other	0.0	0.0	0.0	28.3	0.0	2.4	0.0	0.0	0.0	0.0
<b>Total</b>	<b>10.0</b>	<b>8.8</b>	<b>13.7</b>	<b>40.5</b>	<b>28.6</b>	<b>12.9</b>	<b>25.4</b>	<b>12.8</b>	<b>22.7</b>	<b>19.0</b>

Date of Request: February 25, 2010  
Due Date: March 8, 2010

Request No. RAV-40  
NMPC Req. No. NM 98 DPS 63

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirement Panel

Request:

In its 1/31/07 Narragansett Follow-on Merger Credit Compliance filing in Case 01-M-0075, the Company forecasted a phase-in of net synergy savings allocable to NMPC's electric operations as follows:

YE 8/07 -\$2.332 million  
YE 8/08 +\$3.262 million  
YE 8/09 +\$4.975 million  
YE 8/10 +\$8.137 million  
YE 8/11 +\$8.285 million

In the current rate case, the historic test year is YE 9/09, which is only one month different from the YE 8/09 figures provided in the above noted compliance filing. Yet, in projecting rate year expenses, the Company did not make any adjustments to the historic test year to reflect the portion of Narragansett Follow-on Merger savings not fully realized as of 9/09 as it did in the aforementioned compliance filing and as it also did in this rate case for KeySpan Follow-on Merger savings.

Regarding the above, please provide the following information:

A. Is it correct that the Company's compliance filing position was that the synergy savings would not be fully realized until the fourth year after the Narragansett merger took place? If not, explain in full what the Company's position was as to when the synergy savings would be fully realized.

B. Fully explain why an adjustment was not made to the historic test year to reflect the portion of Narragansett Follow-on Merger savings not fully realized as of 9/09 as it did in the aforementioned compliance filing. If it is the Company's position that the



Narragansett Follow-on Merger savings were fully phased in / reflected in the historic test year actuals, please provide all documentation supporting that position (including studies + correspondence to top management on the accelerated phase-in + specific dates when each synergy saving was implemented + any other supporting documentation).

C. Fully explain and provide supporting detail as to why an adjustment was not made to the historic test year to reflect the portion of Narragansett Follow-on Merger savings not fully realized as of 9/09 similar / identical to the adjustment the Company made in this rate case for Keyspan Follow-on Merger savings.

Response:

A. In the Company's 1/31/07 Narragansett Follow-on Merger Credit Compliance filing, the phase-in of synergy savings related to the Narragansett Merger was based on Step 2 of Attachment 10 of the Merger Joint Proposal.

B. No adjustment was made to the historic test year to reflect the portion of Narragansett Follow-on Merger savings not fully realized as of September 2009 since all savings had been realized. There are no additional initiatives related to the Narragansett Merger which the Company plans to implement. This is reflected in the method in which the Keyspan initiatives were developed. The Keyspan synergy savings initiatives were established based on a baseline employee level in which all Narragansett Gas synergies had been achieved. See Attachment 1, sheet 1 of 2, for a schedule which shows that the baseline number of employees assumed as the starting point for the Keyspan merger initiatives was 17,763 (after Narragansett initiatives which includes a labor reduction of 151 employees). Attachment 1, sheet 2 of 2 represents that the actual level of employees at the merger date was 17,760, demonstrating that the Narragansett initiatives had been realized. See Attachment 2 for a savings initiative plan in place at the start of the Narragansett Gas merger. This labor and non-labor synergy savings plan supports a reduction of 155.5 employees (FTE's) and is summarized in Attachment 2a.

C. The Company made an adjustment in this rate case for Keyspan Follow-on Merger savings because in the case of the Keyspan merger, there are synergy savings initiatives yet to be implemented. A similar adjustment was not made to the Narragansett Follow-on Merger savings because all savings initiatives have been realized as previously stated.

Name of Respondent:

James Molloy

Date of Reply:

March 9, 2010

**FTE Baseline at Keyspan Acquisition**  
**Less: USBR & Narr Gas FTE Reductions**

		Data		
2 - Parent Level Rev	3 - Parent Level Rev			
Electric Dist & Gener	CFO Dist & Generation	66		66
	Chief Oper Officer-Elec Dist	5,800		5,800
	Customer Markets	2,365	77	2,272
	Generation			1,154
	SHES			250
Electric Dist & Generation Total			27	9,541
Gas Distribution	Chief Operating Officer-Gas		39	4,289
Gas Distribution Total			39	4,289
Group Reporting & O	Business Development NA			50
	CEO Executive		8	50
	External Affairs			70
	Gridcom			14
	Human Resources			19
	Internal Audit	33		33
	Legal & Regulation	213	8	205
	Treasury Services	71		71
Group Reporting & Other Total		527	16	511
Information Services	IS Bus Dev & Non-Regs	4		4
	IS Electric Distribution, Gen	172		172
	IS Enterprise Programme Office	14		14
	IS Finance, SS & Corporate	80		80
	IS Gas Distribution	83	14	69
	IS Management	108		108
	IS Strategy Implementation	10		10
	IS Technology Office	430	-	430
	IS Transmission	9		9
Information Services Total		910	14	896
Shared Services	Customer Financial Services	417	22	395
	Financial Services	298	10	288
	HR Services	211	8	203
	Property Services	413	3	410
	Shared Services Exec	15		15
	Supply Chain	843	12	831
Shared Services Total		2,196	55	2,141
Transmission	Construction & Services	236		236
	Network Asset Mgmt	62		62
	Network Operations	53		53
	Trans Regulation & Commercial	18		18
	Transmission Finance	15		15
	Transmission Mgmt	2		2
Transmission Total		385		385
Grand Total		17,990	77	17,763

**Niagara Mohawk Power Corporation****d/b/a National Grid****Case 10-E-0050****Attachment 1 to RAV-40****Sheet 2 of 2****Actual # of Employees at Keyspan Acquisition**

		Data
2 - Parent Level Rev	3 - Parent Level Rev	Sum of Baseline FTEs
Electric Dist & Generation	CFO Dist & Generation	65.5
	Chief Oper Officer-Elec Dist	5800
	Customer Markets	2271.5
	Generation	1154
	SHES	250
Electric Dist & Generation Total		9541
Gas Distribution	Chief Operating Officer-Gas	4288
Gas Distribution Total		4288
Group Reporting & Other	Business Development NA	49.5
	CEO Executive	50
	External Affairs	70
	Gridcom	14
	Human Resources	19
	Internal Audit	32.5
	Legal & Regulation	205
	Treasury Services	71
Group Reporting & Other Total		511
Information Services	IS Bus Dev & Non-Regs	4
	IS Electric Distribution, Gen	172
	IS Enterprise Programme Office	14
	IS Finance, SS & Corporate	80
	IS Gas Distribution	69
	IS Management	108
	IS Strategy Implementation	10
	IS Technology Office	429.5
	IS Transmission	9
Information Services Total		895.5
Shared Services	Customer Financial Services	394.5
	Financial Services	288
	HR Services	201
	Property Services	409.5
	Shared Services Exec	15
	Supply Chain	831
Shared Services Total		2139
Transmission	Construction & Services	236
	Network Asset Mgmt	62
	Network Operations	52.5
	Trans Regulation & Commercial	17.5
	Transmission Finance	15
	Transmission Mgmt	2
Transmission Total		385
Grand Total		17759.5

Date of Request: March 10, 2010  
Due Date: March 18, 2010

Request No. RAV-40 SUPP  
NMPC Req. No. NM 98 DPS 63

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirement Panel

Request:

In its 1/31/07 Narragansett Follow-on Merger Credit Compliance filing in Case 01-M-0075, the Company forecasted a phase-in of net synergy savings allocable to NMPC's electric operations as follows:

YE 8/07 -\$2.332 million  
YE 8/08 +\$3.262 million  
YE 8/09 +\$4.975 million  
YE 8/10 +\$8.137 million  
YE 8/11 +\$8.285 million

In the current rate case, the historic test year is YE 9/09, which is only one month different from the YE 8/09 figures provided in the above noted compliance filing. Yet, in projecting rate year expenses, the Company did not make any adjustments to the historic test year to reflect the portion of Narragansett Follow-on Merger savings not fully realized as of 9/09 as it did in the aforementioned compliance filing and as it also did in this rate case for KeySpan Follow-on Merger savings.

Regarding the above, please provide the following information:

A. Is it correct that the Company's compliance filing position was that the synergy savings would not be fully realized until the fourth year after the Narragansett merger took place? If not, explain in full what the Company's position was as to when the synergy savings would be fully realized.

B. Fully explain why an adjustment was not made to the historic test year to reflect the portion of Narragansett Follow-on Merger savings not fully realized as of 9/09 as it did in the aforementioned compliance filing. If it is the Company's position that the

Narragansett Follow-on Merger savings were fully phased in / reflected in the historic test year actuals, please provide all documentation supporting that position (including studies + correspondence to top management on the accelerated phase-in + specific dates when each synergy saving was implemented + any other supporting documentation).

C. Fully explain and provide supporting detail as to why an adjustment was not made to the historic test year to reflect the portion of Narragansett Follow-on Merger savings not fully realized as of 9/09 similar / identical to the adjustment the Company made in this rate case for Keyspan Follow-on Merger savings.

Response: Supplement to previous response

A. The Company did not take any position in its compliance filing as to when the synergy savings would be fully realized. The impact of following the Merger Joint Proposal, Attachment 10 methodology was that the synergy savings would be phased in over four years.

B. It is the Company's position that the Narragansett Follow-on Merger savings are fully reflected in the historic test year actual costs. The Company is in the process of tying the implementation of specific Narragansett synergy initiatives to savings reflected in the historic test year. The process of tracking savings was not done as formally as the Keyspan Synergy savings using a central repository. As a result the process of documenting the savings involves collecting information from various departments responsible for implementing the savings. This will be completed by April 15, 2010 and we will supplement this response.

Name of Respondent:

James Molloy

Date of Reply:

March 16, 2010

Date of Request: March 10, 2010  
Due Date: March 18, 2010

Request No. RAV-40 SUPP 2  
NMPC Req. No. NM 98 DPS 63

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirement Panel

Request: Subject: RAV-40

In its 1/31/07 Narragansett Follow-on Merger Credit Compliance filing in Case 01-M-0075, the Company forecasted a phase-in of net synergy savings allocable to NMPC's electric operations as follows:

YE 8/07 -\$2.332 million  
YE 8/08 +\$3.262 million  
YE 8/09 +\$4.975 million  
YE 8/10 +\$8.137 million  
YE 8/11 +\$8.285 million

In the current rate case, the historic test year is YE 9/09, which is only one month different from the YE 8/09 figures provided in the above noted compliance filing. Yet, in projecting rate year expenses, the Company did not make any adjustments to the historic test year to reflect the portion of Narragansett Follow-on Merger savings not fully realized as of 9/09 as it did in the aforementioned compliance filing and as it also did in this rate case for KeySpan Follow-on Merger savings.

Regarding the above, please provide the following information:

A. Is it correct that the Company's compliance filing position was that the synergy savings would not be fully realized until the fourth year after the Narragansett merger took place? If not, explain in full what the Company's position was as to when the synergy savings would be fully realized.

B. Fully explain why an adjustment was not made to the historic test year to reflect the portion of Narragansett Follow-on Merger savings not fully realized as of 9/09 as it did in the aforementioned compliance filing. If it is the Company's position that the Narragansett Follow-on Merger savings were fully phased in / reflected in the historic test year actuals, please provide all documentation supporting that position (including studies + correspondence to top management on the accelerated phase-in + specific dates when each synergy saving was implemented + any other supporting documentation).

C. Fully explain and provide supporting detail as to why an adjustment was not made to the historic test year to reflect the portion of Narragansett Follow-on Merger savings not fully realized as of 9/09 similar / identical to the adjustment the Company made in this rate case for Keyspan Follow-on Merger savings.

Response: Supplement to previous response

As stated in the response to RAV-40 Supplemental, the Company has compiled the attached analysis to demonstrate that the Company had completed the initiatives associated with the integration of New England Gas into National Grid prior to the test year. To support the demonstration that the Company had achieved the synergy savings associated with the integration initiatives, the Company prepared a supplemental analysis as explained below:

- First, the Company compiled a listing of 130 FTEs who had left the organization on or before June 30, 2008 (see Schedule 1 of the supplemental analysis). These FTEs were sorted by the department/sub-team that the employee worked in at the time of the acquisition. These positions are summarized by sub-team in Column (b) of the summary schedule.
- Next, the Company reviewed a list of employees still employed by National Grid but whose positions were identified as reductions in the integration savings initiatives plan in place at the acquisition. These employees were still employed by the Company at the start of the HTY, but in different capacities than at the date of acquisition. Twenty-four (24) FTE positions were identified as savings from the initial plan (see Schedule 2 of supplemental analysis). The positions are summarized by sub-team in column (c) of the summary schedule.
- The Company then took the list of 19 employees who were offered positions to remain with Southern Union's Massachusetts operation post-merger. These employees were never employed by National Grid, but their positions were identified as savings in the initial plan (see Schedule 3 of supplemental analysis). These positions are summarized in column (d) of the summary schedule.

The analysis demonstrates there were actually 173 FTE savings, column (e), a total of the three groups described above. The analysis also demonstrates that the Company has already implemented the initiatives and realized the associated savings. The savings realized would have included not only the FTE reductions themselves, but also the non-labor savings attributable to the FTE reductions. The Company does not anticipate any further Narragansett merger synergy savings in the rate years.

Schedule 4 of the Supplemental analysis is a table of the initial 155.5 FTE savings per the initial synergy savings plan. A date of completion for each sub-team reduction initiative has been added to the table.

Name of Respondent:  
James Molloy

Date of Reply:  
May 28, 2010

Date of Request: February 25, 2010  
Due Date: March 8, 2010

Request No. RAV-41  
NMPC Req. No. NM 99 DPS 64

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirement Panel

Request:

A. Regarding Exhibit RRP-2, Schedule 42, Sheet 1, in calculating the \$22.214 million KeySpan synergy savings "adjustment to reflect conditions in rate year 2011," the Company appears to have subtracted from the \$200 million total synergy savings and efficiency gains estimate the amount of such savings said to be realized in the historic test year. The Company then allocated 24.926% of this difference to NMPC electric operations. Finally, the Company added in 3.2146% inflation to restate the savings into rate year dollar.

1. Please indicate if the above accurately describes the Company's methodology to determine the \$22.214 million adjustment. If not, fully explain, in full, why you disagree with the above description of the Company's methodology.
2. Please indicate if the Company agrees that the above methodology understates the proper rate year adjustment because the 3.2146% inflation adjustment should only be applied to bring the actual historic test year (YE 9/30/09) savings realized into rate year dollars; a higher inflation rate should have been used on the \$200 million of total synergy saving and efficiency gain estimate, because the \$200 million is only stated in 2007 dollars.
3. If you agree with the observation made in A.2 above, please provide a recomputation of the rate year 2011 savings; if you disagree, explain why your methodology only produces year 2011 total synergy savings of **\$206.4** million (i.e., \$200 million x 1.032146), whereas the total synergy savings in the KeySpan merger case in year 4 (YE 8/11) were estimated to be **\$215.4** million (See 7/20/06 NG / KeySpan Joint Petition, Exhibit 2, page 1).

B. Regarding Exhibit RRP-2, Schedule 42, Sheet 3, the Company included \$19.1 million of savings associated with "HR Initiatives" in determining the amount of KeySpan synergy savings realized in the historic test year. The Company then deducted this



amount, along with other realized initiative savings, from the \$200 million total synergy saving and efficiency gain estimate in determining the KeySpan synergy savings “adjustment to reflect conditions in rate year 2011.”

1. Please indicate if the above accurately describes part of the Company’s methodology to determine the \$22.214 million adjustment. If not, explain in full why you disagree.
2. Please indicate if the Company agrees that the above methodology understates the proper rate year adjustment because the \$19.1 million of savings associated with “HR Initiatives” is not included in the \$200 million total synergy savings and efficiency gains estimate. In other words, isn’t it correct that the Company should still realize \$102.6 million of synergy savings beyond the historic test year (\$200 million of total targeted savings minus \$97.4 million of actual savings directly related to the \$200 million of total savings)? If not, provide a spreadsheet that reconciles the total \$200 million of targeted savings by component to the \$97.4 million of savings achieved through the historic test year by component, using the breakdown in Workpaper 1.
3. If you agree with the observation made in B.2 above, please provide a recomputation of the rate year 2011 savings; if you disagree, also explain why the “Day N” KeySpan merger savings of \$246.9 million shown on Workpaper 1 does not include the \$19.1 million of savings associated with “HR Initiatives.” In responding, please be sure to address whether the \$246.9 million of “Day N” savings and the \$200 million of total KeySpan synergy savings from the KeySpan proceeding are made up of the exact same components except that they are quantified differently.
4. Specifically indicate if these “HR Initiatives” were included in the Mercer presentation, which is the basis for the \$200 million total synergy saving estimate or if they represent savings over and above the \$200 million in the Mercer presentation. If they were included in the Mercer presentation, please provide specific references within that presentation.
- 5.a. What are the total estimated savings from the “HR Initiatives?”
- b. Why wasn’t an “adjustment to reflect conditions in rate year 2011” made to reflect the HR Initiative savings that were not yet realized / fully realized in the historic test year, similar to what the Company did for yet-to-be-realized KeySpan merger savings? If an adjustment is warranted, please provide the amount, with supporting documentation and calculations.

C. Regarding Exhibit RRP-2, Schedule 42, Sheet 3, in determining the amount of KeySpan synergy savings actually realized in the historic test year, the Company also included \$1.9 million of unidentified savings. This amount can only be seen by reviewing the Excel spreadsheet formula for determining the \$113.657 million “Final Total (Less Bad Debt)” amount shown on Exhibit RRP-2, Schedule 42, Sheet 3.

1. Fully explain what this \$1.9 million of unidentified actual KeySpan savings realized in the historic test year relates to.

2. Fully explain and show how the amount was determined to be \$1.9 million.
3. Fully explain why it is not included in the detailed component by component synergy savings analysis in workpaper 1.
4. Identify the specific component in workpaper 1 to which the \$1.9 million adjustment relates.
5. Include supporting documentation for this adjustment (internal correspondence, etc.) that discusses the \$1.9 million of savings and when exactly the savings were first realized.

D. As noted above, workpaper 1 quantifies “Day N” KeySpan merger savings to be \$246.9 million. However, in reviewing the Excel spreadsheet formula used to derive this amount, it appears the Company did not include \$10.749 million of Procurement savings (see cell V 463 and the formula in cell V 466). Please indicate if the Company agrees the “Day N” KeySpan merger savings should be \$257.6 million to properly include Procurement savings. If not, explain in full.

E. Please provide the following information on the aforementioned \$246.9 million of “Day N” KeySpan merger savings:

1. Fully explain how this amount was derived and how it differs from the \$200 million synergy saving estimate the Company is using in this rate case.
2. Are there any individual synergy savings initiatives which are not included in the \$200 million synergy saving estimate that are included in the \$246.9 million “Day N” synergy saving estimate, and vice versa? If so, identify all such initiatives along with the related amount of savings.
3. Is it the Company’s goal to realize the “N Day” level of synergy savings? Please provide all internal top management correspondence on this subject. If it is not the Company’s goal to realize this level of savings, what is the purpose of including the “N Day” savings in every quarterly Synergy Savings Tracking report provided to top management, as can be seen in the Company’s response to IR RAV-9?
4. Please provide the Company’s most current schedule for phased in “N Day” synergy savings. Include both fiscal year and calendar year schedules.
5. Fully explain why the Company believes rates should be set on an assumed \$200 million level of total synergy savings rather than the higher level of synergy savings provided in response to part E.4 above.
6. In what year dollars are the “N Day” synergy savings stated in? Include supporting documentation that identifies the year the savings are stated in. Also, please restate these savings with applicable inflation factors. Include supporting workpapers / calculations.

Response:

- A.1. The process detailed in Part A. above, accurately describes the Company's methodology for determining the \$22.214 million adjustment on Exhibit RRP-2, Schedule 42, Sheet 1.
- A.2. The Company agrees that the methodology described in Part A. above understates the proper rate year adjustments.
- A.3. Please see Attachment 1 for a recomputation of the rate year 2011 savings. The revised savings of \$23.065 million will be included in the Corrections and Updates.
- B.1. The Company agrees that the process in Part B. above accurately describes part of the Company's methodology to determine the \$22.214 million adjustment.
- B.2. The Company disagrees that methodology described in Part B. contributes to an understatement of the rate year adjustment. Please see response to Part E for a detailed explanation of the \$200 million target. Workpaper 1 identifies the savings by initiative achieved to date against the nominal Day N target of \$246 million. The Company does not possess a breakdown of the \$200 million target by initiative. The \$200 million was the total savings that National Grid committed to as part of the acquisition of Keyspan. It was recognized in the testimony provided by A. V. Feibleman and R. J. Levin of Oliver Wyman [Mercer?] (Case 06-M-0878) as an appropriate stretch goal requiring much work by the management to achieve this. In other words the Mercer presentation provided a list of initiatives to achieve the \$200 million target with some cushion, as it was recognized that it would not be possible to achieve all initiatives at the 100% confidence level.
- B.3. The \$19.1 million of HR Initiatives was not included in the nominal target of \$246 million. Please note on the list of initiatives provided in Workpaper 1 that some of the initiatives are less clearly defined than others. These present challenges and a degree of flexibility to management to achieve savings within their area of responsibility. As mentioned in Part B.2. above, the \$200 million target was expected to be a stretch goal. The lines of business have been challenged throughout the post integration period to identify additional synergies as it is clear that certain Mercer initiatives will not be achieved. Although these HR initiatives were not identified at the time of the Mercer presentation, they have been subsequently identified as synergies and thus should contribute to the \$200 million target. Please see response to Part E for a detailed explanation of the difference between the \$246.9 million and \$200 million.
- B.4. These savings are not listed in the Mercer presentation and as stated in the response to Part B.3. above, it is the intention that these HR Initiatives contribute to the \$200 million target.

B.5.a. The total estimated savings for the HR Initiatives is \$20.9 million.

B.5.b. These initiatives have been fully achieved and no additional savings are anticipated at this time. As mentioned in the response to Part B.4., it is the intention that these initiatives will contribute to the total \$200 million targeted savings and therefore no adjustment is warranted.

C.1. through C.4.

The \$1.9 million relates to Gas Weather hedge savings. This amount can be seen on Workpaper 1, line 220 under Gas Distribution Initiatives. For presentation purposes, this amount is included in the Bad Debt line of the quarterly synergy reports as provided in response to Request No. DPS-13 (RAV-9). In calculating the savings attributable to the operating companies, it should therefore be included, as the bill pool allocations include this amount. Hence it has been added back to ensure that the split of synergies across the operating companies is appropriate.

C.5. The savings were first realized in the March 2009 synergy report. Please see Attachment 2 to RAV-41 for documentation of internal correspondence.

D. The "Day N" total for Keyspan Integration is correctly quantified as \$246.9 million. The initiatives in Workpaper 1 listed between lines 439 and 463 inclusive, are duplicated within the initiatives listed above in the various lines of business. The reason for this is that these are procurement initiatives and both procurement and the lines of business have dual responsibility for achieving these. In order to avoid a double count, the \$10.749 million in cell V463 has not been added to the formula in cell V466.

E.1. In addition to the response to Part B.2. above, the foundation of the Synergy Savings project was laid out in the Integration Transition Workshop presentation known as the Mercer Presentation. Integration initiatives were established by National Grid with the assistance of outside consultant Oliver Wyman, formerly Mercer Management Consulting. Each line of business identified a set of initiatives relevant to its operations and established project management teams and a reporting process in an effort to ensure that the initiatives are delivered and the savings realized.

In early 2006, National Grid and KeySpan began an integration planning initiative to establish how the combined company would operate in the future and to develop detailed estimates of merger savings and cost to achieve. The initiatives are described below:

The integration team was led by senior executives of both companies and reviewed all aspects of the operations of the operating companies of National Grid and KeySpan to identify areas in which greater efficiencies could be realized or

where greater value could be provided to customers. The objectives of the integration teams were to make preliminary recommendations to the company leadership so they could make decisions regarding how to achieve synergy savings, develop service improvements for the combined company, and assure a seamless transition on the closing date of the Transaction. With regard to the synergy savings, the integration team completed an analysis from which it intended to formulate preliminary recommendations for the company leadership to decide how best to target specific synergy savings in each function of the business.

The integration team was led on a day-to-day basis by Mr. Kwong Nuey of National Grid and Mr. John Caroselli of KeySpan. Nine functional teams, reporting to Mr. Nuey and Mr. Caroselli, were established to design recommended approaches and processes for the future and to develop detailed estimates of potential merger savings and costs for their respective areas.

The nine teams were organized around the following functional areas:

- Corporate Services;
- Finance and Accounting;
- Human Resources;
- Information Technology;
- Customer Service and Marketing;
- Gas Operations;
- Electric Transmission and Distribution;
- Shared Services; and
- Generation and Energy Supply.

Each of these functional teams was led jointly by two senior managers: one from KeySpan and one from National Grid. More than 200 National Grid and KeySpan employees were involved in the work to ensure that the planning initiative benefited from the company specific knowledge and expertise of both organizations.

The methodology used by the team was similar to the methodologies used in previous mergers, including the Niagara Mohawk and EUA mergers. In each merger, a large team of individuals from both companies assessed each company's operations, identified best practices, policies, processes and systems to adopt as a combined company, designed organization structures with post-merger staffing levels, and estimated savings and costs to achieve.

The sources of savings identified by the team fall into the following broad categories:

- Consolidation of pre-merger National Grid and KeySpan organizations into a single post-merger organization (i.e. the consolidation of functions/activities that

existed on both of the legacy companies) and the elimination of redundant positions;

- Standardization and improvement of business processes and practices and adoption of best practices leading to greater efficiencies and enhanced service;
- Consolidation of information technology operations, architecture and business applications;
- Standardization and joint purchase of materials and services to enhance purchasing power and reduce costs;
- Optimization of office and operating facilities, transportation fleets, and material and supply inventory; and
- Elimination of overlapping or duplicative costs, such as outside counsel, other professional services and membership dues and fees.

The team completed its one-year effort in March 2007 and made a presentation to the National Grid-KeySpan Leadership on March 21-22, 2007. The March 21-22, 2007 presentation (the "Mercer Presentation"), consisting of more than 200 pages, provides a summary of the integration planning process and estimated savings over the 1st five years post-merger (in Chapter 1). Subsequent chapters provide additional details for each functional area, such as:

- Estimated savings and the timing of savings
- Estimated costs to achieve
- Recommended initiatives for capturing savings and operating as a combined company
- High-level organization structure and estimated staffing

The savings were given likely probabilities of achievement at high and low confidence levels. The percentages ranged from 100% probability of achieving the savings to 0% and were in increments of 25%. Therefore the \$247 million is a nominal number which would assume that all the savings would be realized for all the planned initiatives. At the high confidence level this would translate to approximately \$215 million of savings and the low confidence level \$160 million of savings.

As with any plan, changes will occur due to external factors and internal business reasons. The overall targets have been fixed and can only be changed with the approval of the Vice President of the Line of Business concerned together with the Senior Vice-President Shared Services Finance. To date no overall targets have been adjusted.

- E.2. The savings not identified within the \$246.9 million are shown in Workpaper 1. Each initiative identified in the Mercer presentation will have a Day N target in column V. Where the target is blank, this means that this is an initiative identified subsequent to Mercer. Please note that these are on lines 220-238, 468-470 and 473 on Workpaper 1.

As yet there are no initiatives within the \$246.9 million that are not included within the \$200 million. However, it has become clear that certain projects will not achieve their intended targets. For example the \$20 million of targets listed on lines 160-162 have been cancelled and no savings have been identified against them.

As a result, there is a need for the Company to identify additional initiatives to ensure that the commitment to meet the \$200 million target is achieved.

- E.3. As mentioned in the response to Part B.2. above, the “Day N” synergy level was a nominal amount at the 100% confidence level. The Company has been on public record and has stipulated its intention to achieve the \$200 million of synergy savings following the KeySpan acquisition. Thus, the Company’s goal is to achieve the \$200 million of synergy savings. Please see the statement made by Steve Holliday, CEO National Grid, on page 2 in a report to the investors on 19<sup>th</sup> November 2009.

<http://www.nationalgrid.com/NR/rdonlyres/92182128-450D-4DA4-8A29-421741140F64/38500/NGGTranscript20091119T0915.pdf>

It is accepted that the \$246.9 million target detailed in the report to senior management is of limited value as this is a nominal figure. Historically, this is how it has been reported. In addition, the amount ties back to the Mercer initiatives at the 100% confidence level and gives senior management an indication of where potential gaps may be across the lines of business.

- E.4. Please see Attachment 3 to RAV-41 which shows the nominal savings targets by run rate (?) and fiscal savings to date rate. These targets were prepared with the Global ERP (?) implementation plan timeframe. However, that project has now been cancelled and a local ERP solution is to be implemented. The design phase is currently taking place and when this has been finalized the Company will be clearer about the timeframe for implementation of the associated initiatives.
- E.5. Please see response to Part B.2 above.
- E.6. The “Day N” savings are reported using 2007 as the base year. Please see Attachment 4 to RAV-41 for a restatement of these factors with applicable inflation factors.

Name of Respondents:

James M. Molloy and Stephen Heywood

Date of Reply:

March 8, 2010



Date of Request: February 25, 2010  
Due Date: March 8, 2010

Request No. CVB-6  
NMPC Req. No. NM 102 DPS 67

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Christian Bonvin

TO: Infrastructure and Operations Panel

Request:

The following questions relate to the distribution line transformer program under system capacity and performance:

1. The distribution line transformer strategy states that heavily loaded transformers are to be systematically removed from the system over the next 15 years. When did or will the 15-year cycle begin?
2. Please provide the actual number of transformer replacements per fiscal year since the program started and the number of transformer replacements forecasted for each fiscal year of the five year budget. This information should have line items (4 in total) to report on single and three phase transformers for both overhead and underground configurations.
3. Please indicate the capital costs, cost of removal, and O&M expenses for an average 27kV single phase overhead transformer and average single phase 107KV padmount transformer replacement.

Response:

1. The 15 year cycle began in FY10 and ends in FY24. However, it should be noted that the program to replace over-loaded transformers started in FY07 with the initiation of the Reliability Enhancement Program.
2. The actual number of transformers replaced under the targeted program is detailed in Attachment 1. The figure for FY10 is a fiscal year-to-date (4/1/2009 to 03/01/2010) quantity of units actually replaced. Please also note that the Company cannot provide separate numbers for single phase vs. three phase overhead transformer replacements as it only tracks the combined number of transformer locations replaced. Lastly, transformer replacement quantities beyond FY10 are recommended annual targets to ensure the program stays on track to meet the strategy. Since the Company runs an updated report on an annual basis for over-loaded transformers and then selects from

the 'top of the list', the actual quantities by transformer type will vary from year to year.

3. Based on a discussion with Christian Bonvin, the Company is providing information for typical single phase transformer installations.

The total cost to replace an overhead transformer including all labor, material, transportation, overheads, etc. based on the multi-year average of actual costs incurred in the Overloaded Transformer Program is:

Overhead Transformer	
pu CAPITAL	\$4,485
pu O&M	\$230
pu REMOVAL	\$485
pu TOTAL	\$5,200

Notes:

- The average cost includes the replacement of ancillary distribution equipment such as the pole, cross-arms, cutouts or open wire secondary conductor that are identified on a case-by-case basis from a field inspection.
- As discussed in question 2, the Company does not track overhead transformer replacements as single or three phase installations, therefore, this is an average per unit cost with no distinction made regarding; configuration (single-phase or three phase), transformer (kVA) size, or primary/secondary voltages.

The actual cost to replace an underground/padmouted, single phase transformer based on the multi-year average of actual costs incurred in the Overloaded Transformer Program is:

Underground Transformer	
pu CAPITAL	\$3,560
pu O&M	\$150
pu REMOVAL	\$410
pu TOTAL	\$4,120

Notes:

- The average cost includes the replacement of ancillary distribution equipment such as the base or secondary connectors that are identified on a case-by case basis from a field inspection.
- This is an average per unit cost for single phase pad-mounted transformers with no distinction made regarding; transformer (kVA) size, or primary/secondary voltages.

Name of Respondent:

Brian V. Hayduk

Date of Reply:

March 7, 2010

**Attachment 1:** Overloaded Line Transformers Replaced/Targets by Fiscal Year:

	ACTUAL QTY REPLACED				TARGETED QTY TO REPLACE			
	FY07	FY08	FY09	FY10 (YTD)	FY11	FY12	FY13	FY14
1-phase & 3-phaseOVERHEAD	133	231	469	361	<i>(determined on an annual basis- see response to question 1)</i>			
1-phase UNDERGROUND	0	3	10	6				
3-phase UNDERGROUND	0	0	2	0				
<b>TOTAL</b>	133	234	481	367	639	1,278	2,109	2,679

Date of Request: February 25, 2010  
Due Date: March 8, 2010

Request No. MAS-3  
NMPC Req. No. NM 105 DPS 70

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Mary Ann Sorrentino

TO: Susan F. Tierney

Request:

A. On pages 28-29 of your pre-filed direct testimony you explain the annual RDM rate adjustment calculation and indicate that each RDM group reconciliation will reflect the difference between the allowed target revenue for a given year and the applicable actual billed revenues for that group in that year. The RDM rate adjustment for each group will then reflect that group's RDM reconciliation divided by the appropriate billing determinant for that group.

- 1) Explain how the forecasted billing determinants for the rate years ? will be determined.
- 2) Will the amount calculated in the revenue reconciliation process for a prior year (the group RDM over or under collection) be subject to any carrying charges?
- 3) Under traditional (non-RDM) ratemaking, there is a lag in actual billed revenues equaling forecasted revenues due to meter reading and billing cycles. For example, in the first month of the rate year (January 2012), actual revenues will not be the effective rate in January multiplied by billed throughput for January, as the billed rate is pro-rated (and is therefore a blend of historic and new rates). Please explain if any adjustment will be made to actual revenues to compensate for this difference. If no adjustment is proposed, explain if the company is making a reduction to its cash working capital. If not, explain why.

Response:

1. Billing determinants used in calculating the RDM rate adjustments will be based on a forecast of the Company's kWh and kW demand for the upcoming year, and will be provided to the Commission in the Company's annual RDM filing, which will be submitted as early as possible in the first quarter of each year. A separate forecast will be developed for each Reconciliation Group based upon the same methodological approaches used in developing billing determinant forecasts

provided by the Company in this rate filing (see the testimony of Dr. Alfred Morrissey.).

2. Any over or under collection of target revenue would be subject to a carrying charges as noted on page 17, line 17, of Dr. Tierney's testimony. The Company believes the appropriate rate at which carrying charges should be determined is the pre-tax weighted average cost of capital as determined appropriate by the Commission in this case. Carrying charges would be applicable during the reconciliation period as well as during any subsequent periods when any reconciliation amounts arising from over- or under-collection are refunded or recovery.
3. As noted in Dr. Tierney's testimony, the Company will track the revenue reconciliations on a monthly basis. Further, in order to differentiate revenue billed in January 2011 (rate year 1) between revenue generated from rates in effect during 2010 and revenue generated from rates approved in this proceeding, the Company will estimate the amount of revenue associated with January 2011 usage that is billed in January 2011 through the development of allocation factors. This analysis will be based on daily cycle billing units as reported from the Company's billing system and the applicable meter read dates associated with the 20 batches billed during January 2011. Based upon the 20 batches, their December 2010 and January 2011 meter read dates, the number of customers billed in each batch, and the kW and kWh sales billed in each batch, the Company can reasonably estimate the allocation of revenue between these two months to determine percentage allocators to be applied to January 2011 billed revenue for customer, demand, and energy charges, where appropriate. (Note that in other forms of revenue reconciliation, there is a continuous reconciliation from one time period to the next. Therefore, any remaining imbalance is carried and picked up in subsequent periods. In the RDM revenue reconciliation process, the intention is to fully reconcile revenue imbalances in the next annual period, so this requires a methodology such as the one described above. The process described here is akin to the one used by the Company for its natural gas RDM process.)

Name of Respondent:

Susan F. Tierney

Date of Reply:

March 8, 2010

Date of Request: February 25, 2010  
Due Date: March 8, 2010

Request No. MAS-4  
NMPC Req. No. NM 106 DPS 71

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Mary Ann Sorrentino

TO: Susan F. Tierney

Request:

A. On pages 22-24 of your pre-filed direct testimony you explain why street lighting has been included as an RDM group despite that the Company does not offer energy efficiency programs for these customers. You explain there will be a phase out of favorable pricing that has been grandfathered for certain street lighting customers.

- 1) How many customers are grandfathered into this favorable pricing?
- 2) Provide the grandfathered price, throughput, and expected price once the rate is phased out for the group of customers. Include a timeline of the anticipated phase-out.

B. You also explain that Company affiliates operate energy efficiency programs on street lighting service in other service territories, which may be offered in the Company's territory in the future.

- 1) Explain the programs offered by the affiliate. Include service territories in which the program is in operation.
- 2) Explain when you would anticipate that the programs will be offered in Grid's service territory. Provide supporting information if available.

C. Provide the rate year forecasts of annual revenues for street lighting in aggregate for the rate years; indicate what portion of the street lighting revenues are associated with fixed charges, demand charges, energy charges and non-energy related (foundation charges, arm/bracket charges, pole charges, etc) charges.

D. Provide the rate year forecast of annual revenues for street lighting associated with Company owned and maintained streetlights. Explain why revenues associated with Company owned and maintained streetlights should be subject to the RDM.

Response:

A.1. There are currently fourteen customers under the P.S.C. 214 Electricity tariff's Service Classification No. 2 (Full Service Street Lighting) who are charged "pricing exception" rates for a portion of the Company-owned and Company-maintained street lighting facilities they use. These customers are

- (1) Amherst Central School District No. 1
- (2) Town of Amherst
- (3) City of Buffalo
- (4) Chautauqua Utility District
- (5) Village of Kenmore
- (6) Town of Tonawanda
- (7) Village of Williamsville
- (8) City of Syracuse DPW
- (9) State of New York, Syracuse Armory (Museum of Science & Technology)
- (10) City of Glens Falls
- (11) City of Schenectady
- (12) Village of Kinderhook
- (13) City of Utica DPW
- (14) Town of Queensbury.

A.2. Customers receiving "pricing exception" rates pay lower charges on certain facilities charges (circuitry, foundations, etc.). Specifically, each such customer enjoys a unique selection of special facility rates on certain of their facilities, with these rates generally cheaper than normal S.C. 2 tariff rates. For their other facilities, they pay normal S.C. tariff prices. Therefore, there is not a single grandfathered price for the whole group of fourteen customers who receive pricing exceptions. Having such pricing exceptions does not affect the per-kWh rates for energy delivery charged to these customers, which are the same as those paid by all other S.C.2 customers.

Pricing exceptions will be phased out over a two-year period from 2012 to 2013, the second and third years of the Rate Plan. For 2012, each pricing exception rate will be set at the average of (a) the 2011 rate reflecting each facility's full pricing exception and (b) the standard 2013 S.C. 2 tariff rate for that particular facility. For 2013, all facilities will be subject to the standard 2013 S.C. 2 tariff rates for that particular facility.

A summary of the phaseout of these pricing exceptions can be found on pages 202-208 of Book 4 of the Rate Case filing (Exhibit JEW-4 of the Direct Testimony of John E. Walter, Manager of Outdoor Lighting). Further detail can be found on pages 175-244 of Book 25 of the Rate Case filing (Exhibit RDCM-14, Workpapers to RDCM-7 Schedules 9 and 12, Workpaper 1, Sheets 1 to 70).

B.1. In other jurisdictions, National Grid has provided incentives for energy efficiency upgrades to municipal-owned street lighting when: 1) the municipality contributed to the systems benefits charge for the electric account(s) associated with the street lighting system being treated, 2) the energy saving street lighting measure was cost effective in accordance with avoided costs tests required by that jurisdiction, and 3)

the street lighting measure did not reduce the overall light levels produced by the original street lighting luminaire.

- B.2. The Company is in the process of evaluating options for providing its streetlighting customers with programs that allow them to better manage their use of use in streetlighting applications. However, at this time, the Company has not developed specific plans or timetables for when it might provide such programs in the future.
- C. The forecasts of annual revenue for each of the three rate years can be found in Book 23 of the Rate Case filing on the following pages of the book:
- Rate Year 2011: Exhibit RDCM-7, Schedule 1, Sheet 1 of 7
  - Rate Year 2012: Exhibit RDCM-7, Schedule 7, Sheet 1 of 2
  - Rate Year 2013: Exhibit RDCM-7, Schedule 10, Sheet 1 of 2

On each Sheet, the "Proposed 12-Month Total" Revenue represents the forecast revenue at proposed rates. These are:

\$49,727,207.52 for 2011  
\$50,514,457.80 for 2012,  
\$51,303,453.22 for 2012.

These revenues are reported before gross receipts tax. The delivery revenue reported does not include any delivery charge adjustments, such as the System Benefit Charge.

Delivery and facility revenues are separately reported in Schedules 1, 7 and 10. Delivery revenues reflect revenues collected from per kWh rates, while facility revenues reflect revenues collected from other charges, including per-customer charges and charges for use of Company-owned and/or Company-maintained facilities such as foundations, arms/brackets, and poles. Per-customer charges are assessed only for customers in Service Classification 4 (Traffic Control), where a monthly location charge of \$23.14 is applied to each bill account.

Delivery revenue decreases in 2011 because a portion of it is replaced by a Merchant Function Charge, which is not subject to the Revenue Decoupling Mechanism. The relevant forecast revenues subject to the RDM are those revenues in the Delivery Revenue and Facility Revenue columns.

- D. Company-owned and Company-maintained facilities serve customers belonging to streetlighting service classifications S.C. 1 (Private Area Lighting) and S.C.2 (Full Service Street Lighting). In addition, a portion of the facilities that serve the Company's Contract Lighting customers are Company-owned and Company-maintained (the remainder are Customer-owned and Company-maintained).

The revenues forecast for S.C. 1 alone can be found at the top of each of the pages referenced above in the answer to question C: Pages 2, 31, and 50 of Book 23. The revenues forecast for S.C. 2 alone can be found on the following pages of Book 23 of the Rate Case filing: Pages 3, 32 and 51. The forecast revenue from Contract



Lighting customers serviced by Company-owned and Company-maintained facilities is \$218,870.98 for 2011 through 2013.<sup>1</sup>

Name of Respondent:

Susan F. Tierney

Date of Reply:

March 7, 2009

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<sup>1</sup> This estimate reflects revenues of \$236,509.25 for 2011 to 2013 from all Contract Lighting customers, including those with customer-owned facilities (Exhibit RDCM-7, Schedule 1, Sheet 4 of 7). The portion of total Contract Lighting forecast revenues associated with Company-owned and Company-maintained facilities is based upon Exhibit RDCM-7, Schedule 5. Revenue for Company-owned and Company-maintained facilities is based on the sum of delivery and facility revenues associated with any service in which a price is listed in the "Company Owned" column for the "Present Annual Facility Price." Proposed 12-month delivery revenue for all services with "Company owned" prices is \$167,700.56, while the corresponding facility revenue is \$51,170.42 (after scaling up the annualized totals, which are based on September inventory, using the reconciliation factors in Schedule 5).

Date of Request: February 25, 2010  
Due Date: March 8, 2010

Request No. PP/KD-6  
NMPC Req. No. NM 112 DPS 77

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Patrick Piscitelli/ Kwaku Duah

TO: Dr. Roger Morin

Request:

Does Niagara Mohawk plan to issue common equity during the rate year? If so, provide an estimate of the equity issuance expenses associated with the equity issuance.

Response:

Currently, Niagara Mohawk has no plans to issue common stock during the 2011 - 2013 rate plan period.

Name of Respondent: Andrew Dinkel III

Date of Reply: March 3, 2010

Date of Request: March 1, 2010  
Due Date: March 11, 2010

Request No. CLG-2  
NMPC Req. No. NM 115 DPS 80

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Christopher L Graves

TO: Rate Design, Customer and Markets

Request:

Has the Company considered expanding the population of customers subject to mandatory Hourly Pricing (MHP) rates by reducing the demand threshold for Hourly Pricing in Service Classification Nos. 3?

Please provide information about customers as follows:

1. For potential MHP customers who have demand between 250 kW and 499 kW:
  - a. How many customers have demand between 250 kW and 499 kW?
  - b. What is the approximate load of the customers?
  - c. How many of the customers are full service customers?
  - d. What is the approximate load of the full service customers?
  - e. How many customers would qualify for an exemption from Hourly Pricing because they receive economic development rates for power?
  - f. How much load is represented by customers who would qualify for an exemption from Hourly Pricing?
  - g. How many customers would require the installation of new interval meters?

Response:

The Company is submitting a supplemental response for CLG 2 because an error was found with the calculation of average demand which was used to classify SC3 customers within each demand group requested in CLG 1-4. The error was found when providing a response to CLG-16. Please see Attachment 1 Supp for the corrected response.

Name of Respondent:

Pamela B. Dise

Date of Reply:

June 17, 2010

**SC3 Customers with Average Demand between 250kW and 499kW**

	(A)	(B)	(C)	(D)
	<u>Total Annual kWh</u>	<u>Bill Accounts</u>	<u>Exisitng Interval Meters</u>	<u>Interval Meters Needed</u>
1 Retail Access	1,402,108,107	837	245	592
2 Full Service	<u>490,970,602</u>	<u>342</u>	<u>119</u>	<u>223</u>
3 Total	<u>1,893,078,709</u>	<u>1,179</u>	<u>364</u>	<u>815</u>
4 Exempt*	147,401,163	99	57	42

\*Exempt = EZR and PFJ

Date of Request: March 1, 2010  
Due Date: March 11, 2010

Request No. CLG-5  
NMPC Req. No. NM 118 DPS 83

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Christopher L Graves

TO: Rate Design, Customer and Markets

Request:

On February 27, 2009, Niagara Mohawk Power Corporation d/b/a National Grid filed "Two-Year Evaluation Report on Mandatory Hourly Pricing" in compliance with Commission Order in Case 03-E-0641. At pages 29 of the Evaluation Report, National Grid recommends: "... that the Commission defer any expansion of MHP program to a greater number of customers until such time as the Company can recommend an improved design for the MHP tariff with respect to capacity costs."

Is the Company prepared to make a recommendation on how capacity cost should be recovered in the MHP tariff? If yes, what are the Company's recommendations?

Response:

The Company believes two options are available for improving the recovery of capacity costs in its Mandatory Hourly Pricing (MHP) tariff. The first option is to change the spread of capacity costs to a much lower number of hours in the year based upon a peak demand threshold. This would result in much higher energy charges for certain, limited hours of the year. Customers would receive these price signals on the day prior to any day that is forecast to be above certain peak load levels. The second option is to use the "capacity tag" method which bills customers in the following year for their demand at the time of the peak demand in the present year.

The Company believes that the most appropriate means for recovering capacity costs from MHP customers is through the first option of limiting recovery of demand charges to certain high peak load hours in the year. The Company has reached this conclusion for three reasons. First, the approach maintains continuity of rate structures for the Company's current MHP customers. The Company believes that this is an important consideration because our customers have been on our MHP tariff for many years. By

recovering capacity costs through energy charges in the MHP tariff, customers will be able to better comprehend and adapt to the new rates. Second, the first option will not create a need for significant modifications to the Company's current billing systems. Third, this option would allow the Commission to compare customer reaction to different pricing methods for capacity cost recovery in New York and, in its comparison, determine which method promotes greater levels of efficient energy use and peak load reduction by customers.

As explained in the response to CLG-7, the Company will be implementing a capacity cost recovery mechanism similar to the first option discussed herein as part of its Smart Grid pilot program, which will allow it to assess whether such a mechanism will produce a significantly larger load reduction from customers under hourly pricing than have been produced to date. The Company believes that it should defer making any changes to its MHP program until it has been able to conduct this assessment.

Name of Respondent:  
Peter Zschokke

Date of Reply:  
March 11, 2010

Date of Request: March 1, 2010  
Due Date: March 11, 2010

Request No. DSM-4  
NMPC Req. No. NM 123 DPS 88

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: David Morrell

TO: Revenue Requirement Panel

Request:

1. Please provide an inventory, work papers, or other form of justification for the expected increase in floor trim acres.
2. Testimony describing the 115kV widening expense makes references to danger trees being removed outside the Right-of-way (ROW) and that trees located **outside** the ROW are the source of most tree-caused outages. In other parts of your testimony the work is described as widening within the ROW limits.

Please clarify if this work is widening work inside the ROW or Danger tree work outside the ROW.

3. Please include the inventory, work papers, or other form of justification regarding:
  - a) acres of the 115kV widening or danger tree work;
  - b) acres of non 115kV Danger tree work;
  - c) acres of Sub T-widening work.
4. Please provide the contract specification for both Danger tree work and Widening work.
5. Why are substations in this category of O&M expenses, as they are not reported in the Company's annual Part 84 filing?
6. If this Information Request is too voluminous or time consuming, please call David Morrell to work out something regarding the data that is acceptable to both the Company and Staff.



Response:

1. Page 223 of 266 of the Testimony of the Infrastructure and Operations Panel, lines 15 through 17, state "The historic test year costs for ROW floor trim sites are the result of a lower than average number of trim site acres." The response to Question A in NM 26 DPS-23 DSM-2 presented an average of actual floor trim site acres treated from the years 2006 through 2009. An increase in the allocation for trim sites in the years subsequent to the historic test year is needed because our estimated acres for 2011 through 2013 are higher than the historic test year, but closely reflect the average number of acres for the previous four years (2006 through 2009). Floor trim site acres are variable from year to year because of the selection of lines being treated each year. Since site conditions change, the Company performs detailed site-by-site inventories for each transmission line ROW prior to scheduled maintenance. These inventories are performed after the previous growing season ends and prior to the treatment of the ROW. For this reason, no inventories are available for planned work in 2011, 2012 and 2013. The floor trim acres provided in Attachment 1 (DSM-4\_Attach 1\_Trim STC Mow Sites-CY11-CY12-CY13) are based on actual data from the previous cycle and are used as the basis for the CY11, CY12 and CY13 estimate. The final numbers of acres to be trimmed will be recorded upon completion of the individual inventories in early 2011, 2012, and 2013.
2. It is typically in the area outside the ROW that trees fail, resulting in tree caused outages. The 115 kV widening expense includes removing trees that are located outside the ROW and widening the established edge of the ROW, where property rights allow. Each 115 kV line will require a different degree of widening. The 115 kV system will be prioritized by line using tools such as recorded past outage history, Line Importance Factors, recent expenditures and danger tree maintenance cycles. Widening will not be done, and is not necessary, within the ROW limits.
- 3a. (Per a conversation with David Morrell on March 5, 2010, Mr. Morrell stated he would like an explanation as to how the Company determined the miles of ROW that will be widened per year.)

The 115 kV widening program is measured in miles. The degree of widening required for each line is variable and influenced by the unique characteristics of the vegetation and the line. The average cost of widening 115 kV lines ranges from \$14,000 to \$30,000 per mile (both sides of the ROW). The range of estimated costs per mile is largely based on two completed projects, Ticonderoga-Republic #2 and Gardenville-Homer Hill 151/152 where we performed 10 to 20 feet of widening per ROW edge. The Company estimates that it will widen between 50 and 110 miles of ROW per year, resulting in annual costs of approximately \$1,500,000.

- 3b. The Danger Tree program is measured in miles. Danger Tree mileage is estimated utilizing the previous year's cost per mile to conduct danger tree work on

transmission lines. In 2008, sub-transmission danger tree work cost \$10,047 per mile, and transmission danger tree work cost \$11,400 per mile. Therefore, our 2011 budget will allow us to remove an estimated 108 miles of sub-transmission danger tree edge and 126 miles of transmission danger tree edge.

- 3.c. The sub-transmission widening program is measured in miles, which has been set at 140 miles per year. Through this program, the goal is to widen all the sub-transmission lines that have exhibited poor reliability performance, are of high importance, and have high risk forested edges as determined by the Company's foresters.
4. Contractors for our vegetation management program are required by contract to provide services in accordance with our standards for vegetation management. Section 6.1.2, pages 23 - 25 of Attachment 2 (DSM-4\_Attach 2\_2010-2011 ROW Veg Mgt Specification), provides a description of the Company's Danger Tree Program and includes requirements for Level 6 (widening) activities. Level 6 prescribes clearing the ROW to a new width specified by the Company.
5. The substation bare ground treatment program, presented as Attachment 1 in response to Question A of NM 25 DPS-22 DSM-1, is part of the Company's transmission vegetation management budget planned for the rate years. These O&M expenses are not reported in the Company's annual Part 84 Plan filing because the Plan does not include substation work.

Name of Respondent:  
Dawn Travalini

Date of Reply:  
March 10, 2010

**Projected CY2011 Floor Trim Acres**

Note: These numbers are from the previous floor trim cycle. Final numbers (acres) will be recorded upon completion of the individual inventories in early 2011.

<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
7716467	53	0.92	Brush Lands	8221	7716352	Cut, stump treat and chip	23
4535017	46	0.57	Residential	5210	4535940	Cut, stump treat and chip	23
7716471	55	0.17	Residential	5341	7716352	Cut, stump treat and chip	23
7716505	71	0.54	Residential	5241	7716352	Cut, stump treat and chip	23
7716522	78	0.26	Residential	5332	7716352	Cut, stump treat and chip	23
7716535	82	0.28	Residential	5222	7716352	Cut, stump treat and chip	23
4534987	16	0.22	Road Crossing	3221	4535940	Cut, stump treat and chip	23
5370074	13	1.08	Road Crossing	3311	5370650	Cut, stump treat and chip	23
5370089	28	0.70	Road Crossing	3331	5370650	Cut, stump treat and chip	23
7716357	3	2.63	Road Crossing	3243	7716352	Cut, stump treat and chip	23
7716389	19	0.46	Road Crossing	3331	7716352	Cut, stump treat and chip	23
7716441	40	1.40	Road Crossing	3231	7716352	Cut, stump treat and chip	23
7716565	97	0.14	Streams	1332	7716352	Cut, stump treat and chip	23
7716499	68	1.55	Woodlands	9241	7716352	Mechanical brush mowing	23
4535023	51	0.92	Residential	5310	4535940	Trim, prune tree	23
5370076	15	1.17	Residential	5320	5370650	Trim, prune tree	23
7716387	18	0.78	Residential	5321	7716352	Trim, prune tree	23
7716479	59	1.08	Residential	5320	7716352	Trim, prune tree	23
7716515	75	1.21	Residential	5320	7716352	Trim, prune tree	23
7716527	79	0.36	Residential	5310	7716352	Trim, prune tree	23
7716537	83	0.60	Residential	5320	7716352	Trim, prune tree	23
7716549	89	1.99	Residential	5331	7716352	Trim, prune tree	23
7716563	96	0.44	Residential	5310	7716352	Trim, prune tree	23
7716577	103	6.00	Residential	5321	7716352	Trim, prune tree	23
7716580	104	0.53	River Crossing	1311	7716352	Trim, prune tree	23
4534972	1	0.66	Road Crossing	3321	4535940	Trim, prune tree	23
4534997	26	0.35	Road Crossing	3111	4535940	Trim, prune tree	23
4535006	35	0.29	Road Crossing	3320	4535940	Trim, prune tree	23
5370075	14	0.16	Road Crossing	3310	5370650	Trim, prune tree	23
7716359	4	7.98	Road Crossing	3341	7716352	Trim, prune tree	23
7716443	41	3.59	Road Crossing	3341	7716352	Trim, prune tree	23
7716445	42	1.96	Road Crossing	3331	7716352	Trim, prune tree	23
7716603	115	0.79	Road Crossing	3211	7716352	Trim, prune tree	23
4531644	16	0.67	Brush Lands	8313	4535857	Cut, stump treat and chip	34.5
4531656	28	1.97	Brush Lands	8223	4535857	Cut, stump treat and chip	34.5

### Projected CY2011 Floor Trim Acres

Note: These numbers are from the previous floor trim cycle. Final numbers (acres) will be recorded upon completion of the individual inventories in early 2011.

System Id	Site Number	Site Area (Acres)	Land Use	Land Use Code	Forestry Segment	Prescription	Voltage
4532483	11	1.74	Brush Lands	8222	4535896	Cut, stump treat and chip	34.5
4532488	16	1.06	Brush Lands	8322	4535896	Cut, stump treat and chip	34.5
5308859	22	0.13	Brush Lands	8223	5323127	Cut, stump treat and chip	34.5
5308877	41	0.42	Brush Lands	8233	5323127	Cut, stump treat and chip	34.5
5308881	46	0.51	Brush Lands	8312	5323127	Cut, stump treat and chip	34.5
5309367	79	0.06	Brush Lands	8311	5323093	Cut, stump treat and chip	34.5
5309804	33	0.28	Brush Lands	8212	5323105	Cut, stump treat and chip	34.5
5309837	67	0.69	Brush Lands	8311	5323105	Cut, stump treat and chip	34.5
5310376	134	0.23	Brush Lands	8222	5323130	Cut, stump treat and chip	34.5
5310388	142	0.66	Brush Lands	8232	5323134	Cut, stump treat and chip	34.5
5310390	142	2.13	Brush Lands	8232	5323134	Cut, stump treat and chip	34.5
5310461	37	0.23	Brush Lands	8333	5323131	Cut, stump treat and chip	34.5
5310809	10	0.68	Brush Lands	8000	5323106	Cut, stump treat and chip	34.5
5369348	30	0.50	Brush Lands	8111	5370657	Cut, stump treat and chip	34.5
5369421	101	0.96	Brush Lands	8111	5370657	Cut, stump treat and chip	34.5
7444199	5	0.46	Brush Lands	8312	5323105	Cut, stump treat and chip	34.5
7444203	5	0.63	Brush Lands	8210	5323105	Cut, stump treat and chip	34.5
7444214	5	0.30	Brush Lands	8210	5323105	Cut, stump treat and chip	34.5
7444230	5	0.32	Brush Lands	8211	5323105	Cut, stump treat and chip	34.5
7444232	5	0.69	Brush Lands	8311	5323105	Cut, stump treat and chip	34.5
7444237	5	0.62	Brush Lands	8211	5323105	Cut, stump treat and chip	34.5
7444568	7	0.31	Brush Lands	8232	5323096	Cut, stump treat and chip	34.5
7463211	16	0.26	Brush Lands	8212	5323294	Cut, stump treat and chip	34.5
7463214	16	2.10	Brush Lands	8223	5323294	Cut, stump treat and chip	34.5
5310393	142	1.46	Commercial/Industrial	4211	5323134	Cut, stump treat and chip	34.5
5308874	38	0.69	Field	6211	5323127	Cut, stump treat and chip	34.5
5309874	32	0.29	Field	6210	5323106	Cut, stump treat and chip	34.5
5309902	53	0.30	Field	6000	5323106	Cut, stump treat and chip	34.5
5309921	72	0.49	Field	6311	5323106	Cut, stump treat and chip	34.5
5369357	39	2.38	Field	6110	5370657	Cut, stump treat and chip	34.5
7444185	5	0.40	Field	6220	5323105	Cut, stump treat and chip	34.5
7444187	5	0.66	Field	6111	5323105	Cut, stump treat and chip	34.5
7444198	5	1.61	Field	6211	5323105	Cut, stump treat and chip	34.5
7444205	5	0.41	Field	6311	5323105	Cut, stump treat and chip	34.5
7444563	7	1.41	Field	6211	5323096	Cut, stump treat and chip	34.5

**Projected CY2011 Floor Trim Acres**

Note: These numbers are from the previous floor trim cycle. Final numbers (acres) will be recorded upon completion of the individual inventories in early 2011.

<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
5310463	39	0.22	Pasture	7211	5323131	Cut, stump treat and chip	34.5
7444209	5	0.53	Pasture	7210	5323105	Cut, stump treat and chip	34.5
4460954	99	0.94	Residential	5211	4462161	Cut, stump treat and chip	34.5
5308839	3	0.23	Residential	5331	5323136	Cut, stump treat and chip	34.5
5308847	10	0.18	Residential	5310	5323127	Cut, stump treat and chip	34.5
5308863	27	0.54	Residential	5310	5323127	Cut, stump treat and chip	34.5
5308875	39	0.13	Residential	5320	5323127	Cut, stump treat and chip	34.5
5309330	42	0.44	Residential	5320	5323093	Cut, stump treat and chip	34.5
5309335	47	0.57	Residential	5321	5323093	Cut, stump treat and chip	34.5
5309358	70	0.61	Residential	5320	5323093	Cut, stump treat and chip	34.5
5309681	40	1.92	Residential	5323	5323085	Cut, stump treat and chip	34.5
5309780	9	1.77	Residential	5213	5323105	Cut, stump treat and chip	34.5
5309783	13	0.61	Residential	5330	5323105	Cut, stump treat and chip	34.5
5309784	14	0.35	Residential	5310	5323105	Cut, stump treat and chip	34.5
5309786	16	0.51	Residential	5322	5323105	Cut, stump treat and chip	34.5
5309789	18	1.49	Residential	5322	5323105	Cut, stump treat and chip	34.5
5309794	23	0.38	Residential	5311	5323105	Cut, stump treat and chip	34.5
5309805	34	0.92	Residential	5310	5323105	Cut, stump treat and chip	34.5
5309812	41	0.58	Residential	5211	5323105	Cut, stump treat and chip	34.5
5309819	48	0.27	Residential	5330	5323105	Cut, stump treat and chip	34.5
5309823	52	0.01	Residential	5311	5323105	Cut, stump treat and chip	34.5
5309836	66	0.23	Residential	5322	5323105	Cut, stump treat and chip	34.5
5309843	74	0.45	Residential	5311	5323105	Cut, stump treat and chip	34.5
5309853	6	0.22	Residential	5310	5323106	Cut, stump treat and chip	34.5
5309857	15	0.70	Residential	5310	5323106	Cut, stump treat and chip	34.5
5309860	18	0.35	Residential	5321	5323106	Cut, stump treat and chip	34.5
5309899	52	1.92	Residential	5210	5323109	Cut, stump treat and chip	34.5
5309901	52	0.72	Residential	5321	5323109	Cut, stump treat and chip	34.5
5309931	82	0.74	Residential	5320	5323106	Cut, stump treat and chip	34.5
5309954	107	0.63	Residential	5311	5323106	Cut, stump treat and chip	34.5
5309970	123	1.78	Residential	5331	5323106	Cut, stump treat and chip	34.5
5310268	24	0.78	Residential	5322	5323130	Cut, stump treat and chip	34.5
5310377	135	0.22	Residential	5210	5323130	Cut, stump treat and chip	34.5
5310424	16	0.17	Residential	5000	5323138	Cut, stump treat and chip	34.5
5310432	16	7.06	Residential	5310	5323138	Cut, stump treat and chip	34.5

**Projected CY2011 Floor Trim Acres**

Note: These numbers are from the previous floor trim cycle. Final numbers (acres) will be recorded upon completion of the individual inventories in early 2011.

<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
5310474	47	0.63	Residential	5322	5323131	Cut, stump treat and chip	34.5
5310773	83	2.09	Residential	5310	5323093	Cut, stump treat and chip	34.5
5310808	9	0.11	Residential	5311	5323106	Cut, stump treat and chip	34.5
5310834	16	2.86	Residential	5211	5323095	Cut, stump treat and chip	34.5
5315633	64	0.20	Residential	5212	5323287	Cut, stump treat and chip	34.5
5316172	4	0.35	Residential	5111	5323332	Cut, stump treat and chip	34.5
5319378	71	0.69	Residential	5323	5323385	Cut, stump treat and chip	34.5
5319421	114	2.60	Residential	5331	5323385	Cut, stump treat and chip	34.5
5320588	20	0.60	Residential	5222	5323406	Cut, stump treat and chip	34.5
5370320	31	0.38	Residential	5321	5370707	Cut, stump treat and chip	34.5
7444188	5	0.19	Residential	5310	5323105	Cut, stump treat and chip	34.5
7444194	5	0.83	Residential	5310	5323105	Cut, stump treat and chip	34.5
7444208	5	0.20	Residential	5310	5323105	Cut, stump treat and chip	34.5
7444216	6	1.14	Residential	5310	5323105	Cut, stump treat and chip	34.5
7444218	6	1.27	Residential	5111	5323105	Cut, stump treat and chip	34.5
7445770	42	0.50	Residential	5321	5323287	Cut, stump treat and chip	34.5
7463203	12	0.43	Residential	5211	5323294	Cut, stump treat and chip	34.5
7841137	5	0.98	Residential	4320	5370653	Cut, stump treat and chip	34.5
4460869	14	0.11	Road Crossing	3320	4462161	Cut, stump treat and chip	34.5
4460918	63	0.01	Road Crossing	3000	4462161	Cut, stump treat and chip	34.5
4532484	12	0.19	Road Crossing	3310	4535896	Cut, stump treat and chip	34.5
5308867	31	0.25	Road Crossing	3321	5323127	Cut, stump treat and chip	34.5
5309295	5	0.70	Road Crossing	3211	5323093	Cut, stump treat and chip	34.5
5310737	57	0.40	Road Crossing	3311	5323127	Cut, stump treat and chip	34.5
5310842	132	0.10	Road Crossing	3000	5323130	Cut, stump treat and chip	34.5
5315631	62	0.17	Road Crossing	3310	5323287	Cut, stump treat and chip	34.5
5320737	12	3.19	Road Crossing	3223	5323407	Cut, stump treat and chip	34.5
5370314	25	0.14	Road Crossing	3211	5370707	Cut, stump treat and chip	34.5
5370336	47	0.08	Road Crossing	3321	5370707	Cut, stump treat and chip	34.5
5370359	70	0.11	Road Crossing	3211	5370707	Cut, stump treat and chip	34.5
7444197	5	0.37	Road Crossing	3001	5323105	Cut, stump treat and chip	34.5
7444419	4	0.00	Road Crossing	3001	5370634	Cut, stump treat and chip	34.5
7462987	76	0.31	Road Crossing	3310	5323406	Cut, stump treat and chip	34.5
7463213	16	1.66	Road Crossing	3111	5323294	Cut, stump treat and chip	34.5
7841138	6	0.12	Road Crossing	3320	5370653	Cut, stump treat and chip	34.5

**Projected CY2011 Floor Trim Acres**

Note: These numbers are from the previous floor trim cycle. Final numbers (acres) will be recorded upon completion of the individual inventories in early 2011.

<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
5309359	71	0.06	Streams	1221	5323093	Cut, stump treat and chip	34.5
5309381	95	0.36	Streams	1320	5323093	Cut, stump treat and chip	34.5
5310421	16	0.06	Streams	1312	5323138	Cut, stump treat and chip	34.5
5315938	29	0.05	Streams	1322	5323294	Cut, stump treat and chip	34.5
7444233	5	0.13	Streams	1210	5323105	Cut, stump treat and chip	34.5
5309856	14	0.29	Woodlands	9322	5323106	Cut, stump treat and chip	34.5
5309858	16	0.63	Woodlands	9311	5323106	Cut, stump treat and chip	34.5
5309904	55	0.11	Woodlands	9322	5323106	Cut, stump treat and chip	34.5
5309969	122	0.04	Woodlands	9332	5323106	Cut, stump treat and chip	34.5
5310810	11	0.59	Woodlands	9321	5323106	Cut, stump treat and chip	34.5
5316176	8	0.30	Woodlands	9323	5323332	Cut, stump treat and chip	34.5
7444211	5	0.13	Woodlands	9211	5323105	Cut, stump treat and chip	34.5
5308845	8	0.80	Brush Lands	8233	5323127	Mechanical brush mowing	34.5
5309635	129	0.99	Brush Lands	8122	5323078	Mechanical brush mowing	34.5
5309653	15	1.01	Brush Lands	8213	5323084	Mechanical brush mowing	34.5
5309782	12	0.63	Brush Lands	8321	5323105	Mechanical brush mowing	34.5
5310548	18	1.15	Brush Lands	8223	5323096	Mechanical brush mowing	34.5
5319406	99	1.61	Brush Lands	8330	5323385	Mechanical brush mowing	34.5
5319413	106	0.69	Brush Lands	8333	5323385	Mechanical brush mowing	34.5
5369323	5	3.93	Brush Lands	8232	5370657	Mechanical brush mowing	34.5
5369367	49	0.52	Brush Lands	8121	5370657	Mechanical brush mowing	34.5
5369377	59	1.21	Brush Lands	8321	5370657	Mechanical brush mowing	34.5
5369402	82	0.69	Brush Lands	8233	5370657	Mechanical brush mowing	34.5
5369412	92	0.33	Brush Lands	8222	5370657	Mechanical brush mowing	34.5
5369420	100	1.56	Brush Lands	8231	5370657	Mechanical brush mowing	34.5
7443156	171	0.00	Brush Lands	8222	5241869	Mechanical brush mowing	34.5
7443163	173	0.00	Brush Lands	8323	5241869	Mechanical brush mowing	34.5
7444140	103	1.03	Brush Lands	8221	5370657	Mechanical brush mowing	34.5
7444141	103	0.91	Brush Lands	8110	5370657	Mechanical brush mowing	34.5
7463356	170	0.00	Brush Lands	8313	5241869	Mechanical brush mowing	34.5
5369359	41	1.87	Field	6222	5370657	Mechanical brush mowing	34.5
5369410	90	1.72	Field	6341	5370657	Mechanical brush mowing	34.5
7463348	166	0.00	Pasture	7332	5241869	Mechanical brush mowing	34.5
5369397	77	0.62	Residential	5111	5370657	Mechanical brush mowing	34.5
5369414	94	0.15	Residential	5321	5370657	Mechanical brush mowing	34.5

**Projected CY2011 Floor Trim Acres**

Note: These numbers are from the previous floor trim cycle. Final numbers (acres) will be recorded upon completion of the individual inventories in early 2011.

<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
5369415	95	0.85	Residential	5311	5370657	Mechanical brush mowing	34.5
7443159	172	0.00	Road Crossing	3322	5241869	Mechanical brush mowing	34.5
5369360	42	0.03	Streams	1222	5370657	Mechanical brush mowing	34.5
7443164	174	0.00	Streams	1113	5241869	Mechanical brush mowing	34.5
5309659	21	0.57	Wetlands	2222	5323084	Mechanical brush mowing	34.5
5369361	43	0.45	Wetlands	2222	5370657	Mechanical brush mowing	34.5
5369363	45	0.39	Wetlands	2222	5370657	Mechanical brush mowing	34.5
5369366	48	0.76	Wetlands	2222	5370657	Mechanical brush mowing	34.5
5369368	50	0.79	Wetlands	2322	5370657	Mechanical brush mowing	34.5
5369370	52	0.34	Wetlands	2222	5370657	Mechanical brush mowing	34.5
5309654	16	1.52	Woodlands	9133	5323084	Mechanical brush mowing	34.5
5309656	18	1.27	Woodlands	9222	5323084	Mechanical brush mowing	34.5
5309658	20	0.69	Woodlands	9233	5323084	Mechanical brush mowing	34.5
5310551	19	0.89	Woodlands	9222	5323096	Mechanical brush mowing	34.5
5369362	44	0.57	Woodlands	9341	5370657	Mechanical brush mowing	34.5
5369364	46	1.76	Woodlands	9223	5370657	Mechanical brush mowing	34.5
5369365	47	5.93	Woodlands	9341	5370657	Mechanical brush mowing	34.5
5369369	51	2.01	Woodlands	9233	5370657	Mechanical brush mowing	34.5
5369371	53	1.20	Woodlands	9221	5370657	Mechanical brush mowing	34.5
5369398	78	0.37	Woodlands	9222	5370657	Mechanical brush mowing	34.5
5369407	87	0.80	Woodlands	9232	5370657	Mechanical brush mowing	34.5
5369413	93	0.83	Woodlands	9331	5370657	Mechanical brush mowing	34.5
7443165	175	0.00	Woodlands	9212	5241869	Mechanical brush mowing	34.5
7463178	115	0.00	Woodlands	9333	5323385	Mechanical brush mowing	34.5
7463180	117	0.00	Woodlands	9333	5323385	Mechanical brush mowing	34.5
4460985	129	5.48	Brush Lands	8000	4462161	Trim, prune tree	34.5
5308851	14	0.31	Brush Lands	8312	5323127	Trim, prune tree	34.5
5308855	18	0.14	Brush Lands	8311	5323127	Trim, prune tree	34.5
5315611	44	0.06	Brush Lands	8311	5323287	Trim, prune tree	34.5
5315950	40	0.37	Brush Lands	8323	5323294	Trim, prune tree	34.5
5316191	15	2.72	Brush Lands	8213	5323332	Trim, prune tree	34.5
5316192	16	0.44	Brush Lands	8332	5323332	Trim, prune tree	34.5
5316195	19	1.97	Brush Lands	8332	5323332	Trim, prune tree	34.5
5320739	14	0.30	Brush Lands	8312	5323407	Trim, prune tree	34.5
5320887	118	3.16	Brush Lands	8003	5323407	Trim, prune tree	34.5



**Projected CY2011 Floor Trim Acres**

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5369339	21	1.01	Brush Lands	8211	5370657	Trim, prune tree	34.5
5369342	24	0.13	Brush Lands	8222	5370657	Trim, prune tree	34.5
5369346	28	0.90	Brush Lands	8311	5370657	Trim, prune tree	34.5
5369425	105	0.50	Brush Lands	8322	5370657	Trim, prune tree	34.5
7444104	19	0.92	Brush Lands	8341	5323078	Trim, prune tree	34.5
7444560	7	0.36	Brush Lands	8112	5323096	Trim, prune tree	34.5
7445769	42	0.18	Brush Lands	8002	5323287	Trim, prune tree	34.5
7445778	18	0.16	Brush Lands	8212	5323406	Trim, prune tree	34.5
7445795	45	0.08	Brush Lands	8313	5323406	Trim, prune tree	34.5
7463284	20	0.04	Brush Lands	8223	5323332	Trim, prune tree	34.5
5308841	4	0.90	Commercial/Indust	4321	5323127	Trim, prune tree	34.5
5310251	7	0.24	Commercial/Indust	4210	5323130	Trim, prune tree	34.5
5369332	14	0.95	Commercial/Indust	4233	5370657	Trim, prune tree	34.5
4460910	55	1.38	Field	6221	4462161	Trim, prune tree	34.5
5309894	52	3.86	Field	6000	5323106	Trim, prune tree	34.5
5310325	81	1.36	Field	6310	5323130	Trim, prune tree	34.5
5310338	94	0.01	Field	6310	5323130	Trim, prune tree	34.5
7583230	115	0.35	Field	6321	4462161	Trim, prune tree	34.5
5319412	105	0.28	Pasture	7323	5323385	Trim, prune tree	34.5
5320828	88	0.37	Pasture	7000	5323407	Trim, prune tree	34.5
4460863	8	0.53	Residential	5321	4462161	Trim, prune tree	34.5
4460876	21	2.11	Residential	5321	4462161	Trim, prune tree	34.5
4460878	23	2.20	Residential	5321	4462161	Trim, prune tree	34.5
4460881	26	7.68	Residential	5221	4462161	Trim, prune tree	34.5
4460885	30	0.40	Residential	5311	4462161	Trim, prune tree	34.5
4460887	32	0.58	Residential	5310	4462161	Trim, prune tree	34.5
4460889	34	2.21	Residential	5320	4462161	Trim, prune tree	34.5
4460891	36	1.70	Residential	5320	4462161	Trim, prune tree	34.5
4460903	48	0.49	Residential	5312	4462161	Trim, prune tree	34.5
4460909	54	2.37	Residential	5310	4462161	Trim, prune tree	34.5
4460912	57	0.31	Residential	5212	4462161	Trim, prune tree	34.5
4460915	60	0.34	Residential	5321	4462161	Trim, prune tree	34.5
4460917	62	2.07	Residential	5112	4462161	Trim, prune tree	34.5
4460919	64	3.68	Residential	5322	4462161	Trim, prune tree	34.5
4460921	66	1.11	Residential	5321	4462161	Trim, prune tree	34.5

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**Projected CY2011 Floor Trim Acres**

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4460924	69	9.88	Residential	5321	4462161	Trim, prune tree	34.5
4460933	78	1.81	Residential	5320	4462161	Trim, prune tree	34.5
4460936	81	7.41	Residential	5331	4462161	Trim, prune tree	34.5
4460939	84	1.80	Residential	5321	4462161	Trim, prune tree	34.5
4460965	110	2.18	Residential	5321	4462161	Trim, prune tree	34.5
4460975	119	0.42	Residential	5311	4462161	Trim, prune tree	34.5
4460980	124	0.16	Residential	5310	4462161	Trim, prune tree	34.5
4460984	128	5.05	Residential	5321	4462161	Trim, prune tree	34.5
4531645	17	1.39	Residential	5310	4535857	Trim, prune tree	34.5
5240479	92	0.26	Residential	5311	5241869	Trim, prune tree	34.5
5308850	13	0.10	Residential	5311	5323127	Trim, prune tree	34.5
5308854	17	0.41	Residential	5310	5323127	Trim, prune tree	34.5
5308870	34	2.29	Residential	5311	5323127	Trim, prune tree	34.5
5308873	37	1.12	Residential	5321	5323127	Trim, prune tree	34.5
5308879	43	0.48	Residential	5320	5323127	Trim, prune tree	34.5
5308883	48	1.40	Residential	5320	5323127	Trim, prune tree	34.5
5308887	54	0.93	Residential	5310	5323127	Trim, prune tree	34.5
5309319	29	0.81	Residential	5311	5323093	Trim, prune tree	34.5
5309327	39	0.38	Residential	5320	5323093	Trim, prune tree	34.5
5309341	52	0.94	Residential	5210	5323101	Trim, prune tree	34.5
5309368	80	1.22	Residential	5310	5323093	Trim, prune tree	34.5
5309379	93	0.43	Residential	5320	5323093	Trim, prune tree	34.5
5309383	97	0.33	Residential	5311	5323093	Trim, prune tree	34.5
5309447	3	0.69	Residential	5312	5323142	Trim, prune tree	34.5
5309611	106	0.25	Residential	5310	5323078	Trim, prune tree	34.5
5309613	108	0.43	Residential	5223	5323078	Trim, prune tree	34.5
5309626	120	0.34	Residential	5321	5323078	Trim, prune tree	34.5
5309663	25	3.11	Residential	5311	5323084	Trim, prune tree	34.5
5309674	36	0.69	Residential	5322	5323084	Trim, prune tree	34.5
5309683	40	0.83	Residential	5311	5323085	Trim, prune tree	34.5
5309697	52	0.40	Residential	5311	5323084	Trim, prune tree	34.5
5309712	4	3.06	Residential	5310	5323105	Trim, prune tree	34.5
5309797	26	0.84	Residential	5310	5323105	Trim, prune tree	34.5
5309798	27	1.58	Residential	5310	5323105	Trim, prune tree	34.5
5309801	30	2.29	Residential	5310	5323105	Trim, prune tree	34.5

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5309803	32	0.28	Residential	5310	5323105	Trim, prune tree	34.5
5309822	51	2.32	Residential	5311	5323105	Trim, prune tree	34.5
5309829	59	0.41	Residential	5311	5323105	Trim, prune tree	34.5
5309841	71	0.83	Residential	5310	5323105	Trim, prune tree	34.5
5309862	20	1.49	Residential	5310	5323106	Trim, prune tree	34.5
5309863	21	1.06	Residential	5310	5323106	Trim, prune tree	34.5
5309866	24	0.15	Residential	5310	5323106	Trim, prune tree	34.5
5309868	26	0.36	Residential	5310	5323106	Trim, prune tree	34.5
5309870	28	0.23	Residential	5310	5323106	Trim, prune tree	34.5
5309888	47	0.13	Residential	5310	5323106	Trim, prune tree	34.5
5309890	49	0.27	Residential	5000	5323106	Trim, prune tree	34.5
5309895	52	0.08	Residential	5110	5323109	Trim, prune tree	34.5
5309924	75	1.20	Residential	5310	5323106	Trim, prune tree	34.5
5309929	80	0.70	Residential	5311	5323106	Trim, prune tree	34.5
5309949	100	0.37	Residential	5000	5323106	Trim, prune tree	34.5
5309961	114	0.33	Residential	5310	5323106	Trim, prune tree	34.5
5310241	21	2.29	Residential	5233	5323095	Trim, prune tree	34.5
5310253	9	0.32	Residential	5310	5323130	Trim, prune tree	34.5
5310266	22	1.13	Residential	5321	5323130	Trim, prune tree	34.5
5310321	77	4.22	Residential	5311	5323130	Trim, prune tree	34.5
5310339	96	0.10	Residential	5310	5323130	Trim, prune tree	34.5
5310345	102	0.38	Residential	5310	5323130	Trim, prune tree	34.5
5310357	114	0.07	Residential	5310	5323130	Trim, prune tree	34.5
5310361	118	0.43	Residential	5310	5323130	Trim, prune tree	34.5
5310371	128	0.34	Residential	5322	5323130	Trim, prune tree	34.5
5310375	133	0.10	Residential	5310	5323130	Trim, prune tree	34.5
5310380	138	0.87	Residential	5310	5323130	Trim, prune tree	34.5
5310384	142	4.11	Residential	5333	5323130	Trim, prune tree	34.5
5310415	16	0.23	Residential	5310	5323138	Trim, prune tree	34.5
5310427	16	1.09	Residential	5321	5323138	Trim, prune tree	34.5
5310430	16	1.60	Residential	5320	5323138	Trim, prune tree	34.5
5310488	1	0.57	Residential	5311	5323096	Trim, prune tree	34.5
5310490	3	0.38	Residential	5333	5323096	Trim, prune tree	34.5
5310537	10	0.43	Residential	5310	5323096	Trim, prune tree	34.5
5310554	22	2.00	Residential	5321	5323096	Trim, prune tree	34.5

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5310731	2	7.54	Residential	5321	5323127	Trim, prune tree	34.5
5310733	45	0.73	Residential	5321	5323127	Trim, prune tree	34.5
5310734	50	1.04	Residential	5310	5323127	Trim, prune tree	34.5
5310772	53	6.49	Residential	5310	5323093	Trim, prune tree	34.5
5310791	29	0.25	Residential	5321	5323078	Trim, prune tree	34.5
5310793	31	1.00	Residential	5311	5323078	Trim, prune tree	34.5
5310811	12	2.86	Residential	5331	5323106	Trim, prune tree	34.5
5310835	18	3.97	Residential	5322	5323095	Trim, prune tree	34.5
5310836	23	3.44	Residential	5232	5323095	Trim, prune tree	34.5
5310837	24	3.38	Residential	5310	5323099	Trim, prune tree	34.5
5310839	60	1.21	Residential	5310	5323130	Trim, prune tree	34.5
5315565	9	0.56	Residential	5331	5323287	Trim, prune tree	34.5
5315568	12	0.42	Residential	5321	5323287	Trim, prune tree	34.5
5315585	29	1.49	Residential	5322	5323287	Trim, prune tree	34.5
5315627	58	1.68	Residential	5320	5323287	Trim, prune tree	34.5
5315629	60	0.36	Residential	5320	5323287	Trim, prune tree	34.5
5315634	65	0.58	Residential	5311	5323287	Trim, prune tree	34.5
5315918	17	0.43	Residential	5310	5323294	Trim, prune tree	34.5
5315933	24	0.05	Residential	5310	5323294	Trim, prune tree	34.5
5315934	25	2.43	Residential	5311	5323294	Trim, prune tree	34.5
5315935	26	1.91	Residential	5320	5323294	Trim, prune tree	34.5
5315937	28	0.75	Residential	5331	5323294	Trim, prune tree	34.5
5315939	30	2.06	Residential	5321	5323294	Trim, prune tree	34.5
5315940	31	0.63	Residential	5331	5323294	Trim, prune tree	34.5
5315941	32	0.86	Residential	5310	5323294	Trim, prune tree	34.5
5315943	34	0.21	Residential	5330	5323294	Trim, prune tree	34.5
5315945	36	0.84	Residential	5321	5323294	Trim, prune tree	34.5
5315948	38	0.54	Residential	5323	5323294	Trim, prune tree	34.5
5316175	7	0.81	Residential	5321	5323332	Trim, prune tree	34.5
5316189	13	0.60	Residential	5122	5323332	Trim, prune tree	34.5
5319217	18	2.26	Residential	5211	5323384	Trim, prune tree	34.5
5319286	87	0.70	Residential	5313	5323384	Trim, prune tree	34.5
5319373	66	0.59	Residential	5320	5323385	Trim, prune tree	34.5
5319393	86	0.17	Residential	5322	5323385	Trim, prune tree	34.5
5319411	104	0.41	Residential	5310	5323385	Trim, prune tree	34.5

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5320587	19	0.10	Residential	5000	5323406	Trim, prune tree	34.5
5320589	21	0.44	Residential	5310	5323406	Trim, prune tree	34.5
5320600	32	2.45	Residential	5310	5323406	Trim, prune tree	34.5
5320601	33	0.14	Residential	5312	5323406	Trim, prune tree	34.5
5320657	54	0.30	Residential	5331	5323406	Trim, prune tree	34.5
5320668	65	1.24	Residential	5111	5323406	Trim, prune tree	34.5
5320676	73	0.80	Residential	5310	5323406	Trim, prune tree	34.5
5320733	8	0.06	Residential	5320	5323407	Trim, prune tree	34.5
5320738	13	0.70	Residential	5311	5323407	Trim, prune tree	34.5
5320741	16	2.10	Residential	5311	5323407	Trim, prune tree	34.5
5320742	17	0.60	Residential	5310	5323407	Trim, prune tree	34.5
5320787	48	0.14	Residential	5311	5323407	Trim, prune tree	34.5
5320795	56	1.00	Residential	5310	5323407	Trim, prune tree	34.5
5320883	114	0.10	Residential	5310	5323407	Trim, prune tree	34.5
5320886	117	0.07	Residential	5310	5323407	Trim, prune tree	34.5
5320889	119	0.10	Residential	5301	5323407	Trim, prune tree	34.5
5369186	47	1.57	Residential	5310	5370686	Trim, prune tree	34.5
5369338	20	0.64	Residential	5311	5370657	Trim, prune tree	34.5
5369340	22	0.57	Residential	5311	5370657	Trim, prune tree	34.5
5369393	73	3.23	Residential	5310	5370657	Trim, prune tree	34.5
5369404	84	0.17	Residential	5322	5370657	Trim, prune tree	34.5
5369417	97	5.38	Residential	5310	5370657	Trim, prune tree	34.5
5369418	98	3.87	Residential	5330	5370657	Trim, prune tree	34.5
5369419	99	1.17	Residential	5321	5370657	Trim, prune tree	34.5
5369422	102	0.88	Residential	5231	5370657	Trim, prune tree	34.5
5369424	104	0.77	Residential	5322	5370657	Trim, prune tree	34.5
5369438	9	0.46	Residential	5321	5370634	Trim, prune tree	34.5
7442949	70	0.00	Residential	5331	5370686	Trim, prune tree	34.5
7443191	73	0.00	Residential	5320	5370686	Trim, prune tree	34.5
7444092	19	0.63	Residential	5222	5323078	Trim, prune tree	34.5
7444178	5	0.10	Residential	5310	5323105	Trim, prune tree	34.5
7444180	5	2.89	Residential	5311	5323105	Trim, prune tree	34.5
7444182	5	0.24	Residential	5320	5323105	Trim, prune tree	34.5
7444184	5	1.57	Residential	5310	5323105	Trim, prune tree	34.5
7444190	5	0.33	Residential	5310	5323105	Trim, prune tree	34.5

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7444202	5	0.32	Residential	5310	5323105	Trim, prune tree	34.5
7444207	5	0.18	Residential	5310	5323105	Trim, prune tree	34.5
7444234	5	0.52	Residential	5311	5323105	Trim, prune tree	34.5
7444238	6	0.76	Residential	5310	5323105	Trim, prune tree	34.5
7444417	2	0.00	Residential	5321	5370634	Trim, prune tree	34.5
7444422	7	0.00	Residential	5321	5370634	Trim, prune tree	34.5
7444537	7	0.25	Residential	5310	5323096	Trim, prune tree	34.5
7444559	7	0.32	Residential	5001	5323096	Trim, prune tree	34.5
7444561	7	1.25	Residential	5311	5323096	Trim, prune tree	34.5
7444564	7	0.61	Residential	5310	5323096	Trim, prune tree	34.5
7444566	7	0.10	Residential	5310	5323096	Trim, prune tree	34.5
7444569	7	0.72	Residential	5210	5323096	Trim, prune tree	34.5
7445639	96	0.00	Residential	5322	5323384	Trim, prune tree	34.5
7445776	82	2.05	Residential	5320	5323287	Trim, prune tree	34.5
7445784	45	0.28	Residential	5310	5323406	Trim, prune tree	34.5
7463013	126	0.00	Residential	5311	5323407	Trim, prune tree	34.5
7463209	16	0.97	Residential	5332	5323294	Trim, prune tree	34.5
7463210	16	0.82	Residential	5310	5323294	Trim, prune tree	34.5
7463218	20	0.26	Residential	5320	5323294	Trim, prune tree	34.5
4460871	16	2.59	Road Crossing	3310	4462161	Trim, prune tree	34.5
4460902	47	0.22	Road Crossing	3341	4462161	Trim, prune tree	34.5
4460911	56	0.16	Road Crossing	3321	4462161	Trim, prune tree	34.5
4460948	93	0.80	Road Crossing	3310	4462161	Trim, prune tree	34.5
4460974	118	5.04	Road Crossing	3310	4462161	Trim, prune tree	34.5
5309785	15	0.77	Road Crossing	3310	5323105	Trim, prune tree	34.5
5309909	60	0.29	Road Crossing	3000	5323106	Trim, prune tree	34.5
5309917	68	0.23	Road Crossing	3210	5323106	Trim, prune tree	34.5
5310269	25	0.21	Road Crossing	3311	5323130	Trim, prune tree	34.5
5310318	74	1.47	Road Crossing	3310	5323130	Trim, prune tree	34.5
5319208	9	0.20	Road Crossing	3000	5323384	Trim, prune tree	34.5
5319235	36	1.79	Road Crossing	3311	5323384	Trim, prune tree	34.5
5320570	6	0.14	Road Crossing	3320	5323406	Trim, prune tree	34.5
5320616	40	0.40	Road Crossing	3311	5323406	Trim, prune tree	34.5
5320651	48	0.16	Road Crossing	3312	5323406	Trim, prune tree	34.5
5320706	95	0.30	Road Crossing	3311	5323406	Trim, prune tree	34.5

**Projected CY2011 Floor Trim Acres**

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<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
5320720	109	0.40	Road Crossing	3310	5323406	Trim, prune tree	34.5
5320727	2	1.10	Road Crossing	3311	5323407	Trim, prune tree	34.5
5320754	29	0.14	Road Crossing	3312	5323407	Trim, prune tree	34.5
5369326	8	0.81	Road Crossing	3310	5370657	Trim, prune tree	34.5
5369334	16	0.07	Road Crossing	3312	5370657	Trim, prune tree	34.5
5369337	19	0.34	Road Crossing	3221	5370657	Trim, prune tree	34.5
5369347	29	0.22	Road Crossing	3320	5370657	Trim, prune tree	34.5
5369373	55	0.08	Road Crossing	3310	5370657	Trim, prune tree	34.5
5369387	69	1.04	Road Crossing	3310	5370657	Trim, prune tree	34.5
5369403	83	0.55	Road Crossing	3310	5370657	Trim, prune tree	34.5
5369405	85	3.43	Road Crossing	3311	5370657	Trim, prune tree	34.5
5369406	86	0.15	Road Crossing	3321	5370657	Trim, prune tree	34.5
5369416	96	10.47	Road Crossing	3222	5370657	Trim, prune tree	34.5
7442934	58	0.00	Road Crossing	3311	5370686	Trim, prune tree	34.5
7442939	69	0.00	Road Crossing	3321	5370686	Trim, prune tree	34.5
7442947	67	0.00	Road Crossing	3321	5370686	Trim, prune tree	34.5
7444095	19	0.89	Road Crossing	3210	5323078	Trim, prune tree	34.5
7444137	103	0.71	Road Crossing	3310	5370657	Trim, prune tree	34.5
7444186	5	0.11	Road Crossing	3310	5323105	Trim, prune tree	34.5
7444536	7	0.18	Road Crossing	3310	5323096	Trim, prune tree	34.5
7445640	97	0.00	Road Crossing	3311	5323384	Trim, prune tree	34.5
7445649	106	0.00	Road Crossing	3311	5323384	Trim, prune tree	34.5
7463281	9	0.10	Road Crossing	3310	5323332	Trim, prune tree	34.5
5320740	15	0.40	Streams	1312	5323407	Trim, prune tree	34.5
5309340	52	0.41	Wetlands	2312	5323093	Trim, prune tree	34.5
5309490	46	0.22	Woodlands	9320	5323142	Trim, prune tree	34.5
5309679	40	0.27	Woodlands	9333	5323084	Trim, prune tree	34.5
5320590	22	1.27	Woodlands	9323	5323406	Trim, prune tree	34.5
5369426	106	0.49	Woodlands	9320	5370657	Trim, prune tree	34.5
7444099	19	0.23	Woodlands	9112	5323078	Trim, prune tree	34.5
5232324	37	3.22	Woodlands	9213	5241806	Cut, stump treat and chip	46
5231853	1	0.53	Residential	5311	5241788	Mechanical brush mowing	46
5237853	23	9.43	Residential	5232	5241866	Mechanical brush mowing	46
5237854	24	1.40	Residential	5120	5241866	Mechanical brush mowing	46
5237850	20	0.86	Road Crossing	3323	5241866	Mechanical brush mowing	46

**Projected CY2011 Floor Trim Acres**

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<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
5237851	21	0.16	Road Crossing	3232	5241866	Mechanical brush mowing	46
5237849	19	0.42	Streams	1030	5241866	Mechanical brush mowing	46
5237865	35	0.34	Streams	1223	5241866	Mechanical brush mowing	46
5237855	25	1.84	Woodlands	9123	5241866	Mechanical brush mowing	46
5237859	29	3.38	Woodlands	9123	5241866	Mechanical brush mowing	46
5237860	30	0.52	Woodlands	9122	5241866	Mechanical brush mowing	46
5237862	32	1.66	Woodlands	9222	5241866	Mechanical brush mowing	46
5237864	34	0.78	Woodlands	9232	5241866	Mechanical brush mowing	46
5237866	36	3.49	Woodlands	9221	5241866	Mechanical brush mowing	46
5232295	14	0.57	Brush Lands	8312	5241806	Trim, prune tree	46
5232356	61	0.24	Brush Lands	8312	5241806	Trim, prune tree	46
5232465	145	0.40	Brush Lands	8010	5241806	Trim, prune tree	46
5369051	22	2.99	Brush Lands	8141	5370679	Trim, prune tree	46
5369052	23	0.16	Brush Lands	8120	5370679	Trim, prune tree	46
5369053	24	0.94	Brush Lands	8341	5370679	Trim, prune tree	46
5232458	139	0.44	Commercial/Industrial	4000	5241806	Trim, prune tree	46
5237721	19	0.15	Commercial/Industrial	4131	5241862	Trim, prune tree	46
5237834	5	0.77	Commercial/Industrial	4000	5241866	Trim, prune tree	46
5240467	25	0.61	Commercial/Industrial	4310	5241864	Trim, prune tree	46
5231860	8	4.58	Residential	5311	5241788	Trim, prune tree	46
5232299	17	0.37	Residential	5121	5241806	Trim, prune tree	46
5232301	19	0.44	Residential	5110	5241806	Trim, prune tree	46
5232314	28	0.43	Residential	5211	5241806	Trim, prune tree	46
5232340	49	0.57	Residential	5111	5241806	Trim, prune tree	46
5232343	51	0.30	Residential	5212	5241806	Trim, prune tree	46
5232348	55	0.43	Residential	5232	5241806	Trim, prune tree	46
5232438	124	0.56	Residential	5310	5241806	Trim, prune tree	46
5232460	141	0.57	Residential	5000	5241806	Trim, prune tree	46
5232467	146	0.55	Residential	5312	5241806	Trim, prune tree	46
5232471	149	0.03	Residential	5211	5241806	Trim, prune tree	46
5237787	20	0.67	Residential	5310	5241864	Trim, prune tree	46
5237790	23	0.58	Residential	5232	5241864	Trim, prune tree	46
5237792	28	0.30	Residential	5310	5241864	Trim, prune tree	46
5237795	31	0.29	Residential	5311	5241864	Trim, prune tree	46
5237796	32	0.77	Residential	5321	5241864	Trim, prune tree	46



**Projected CY2011 Floor Trim Acres**

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<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
5237836	7	0.67	Residential	5000	5241866	Trim, prune tree	46
5237847	17	0.60	Residential	5232	5241866	Trim, prune tree	46
5237848	18	1.34	Residential	5232	5241866	Trim, prune tree	46
5237852	22	0.23	Residential	5221	5241866	Trim, prune tree	46
5231854	2	1.52	Road Crossing	3001	5241788	Trim, prune tree	46
5232280	2	5.58	Road Crossing	3312	5241806	Trim, prune tree	46
5232291	11	4.05	Road Crossing	3210	5241806	Trim, prune tree	46
5232292	12	0.44	Road Crossing	3310	5241806	Trim, prune tree	46
5232294	13	0.85	Road Crossing	3110	5241806	Trim, prune tree	46
5232296	15	0.31	Road Crossing	3210	5241806	Trim, prune tree	46
5232298	16	2.40	Road Crossing	3211	5241806	Trim, prune tree	46
5232300	18	4.22	Road Crossing	3211	5241806	Trim, prune tree	46
5232302	20	3.62	Road Crossing	3211	5241806	Trim, prune tree	46
5232304	22	1.30	Road Crossing	3210	5241806	Trim, prune tree	46
5232306	23	0.70	Road Crossing	3212	5241806	Trim, prune tree	46
5232307	24	0.63	Road Crossing	3110	5241806	Trim, prune tree	46
5232309	25	0.31	Road Crossing	3212	5241806	Trim, prune tree	46
5232311	26	0.89	Road Crossing	3312	5241806	Trim, prune tree	46
5232312	27	3.46	Road Crossing	3211	5241806	Trim, prune tree	46
5232315	29	1.11	Road Crossing	3211	5241806	Trim, prune tree	46
5232316	30	0.68	Road Crossing	3110	5241806	Trim, prune tree	46
5232317	31	0.76	Road Crossing	3312	5241806	Trim, prune tree	46
5232320	33	0.11	Road Crossing	3212	5241806	Trim, prune tree	46
5232321	34	1.04	Road Crossing	3212	5241806	Trim, prune tree	46
5232322	35	0.14	Road Crossing	3010	5241806	Trim, prune tree	46
5232323	36	1.41	Road Crossing	3211	5241806	Trim, prune tree	46
5232325	38	0.10	Road Crossing	3312	5241806	Trim, prune tree	46
5232327	39	0.60	Road Crossing	3000	5241806	Trim, prune tree	46
5232328	40	0.65	Road Crossing	3222	5241806	Trim, prune tree	46
5232329	41	0.09	Road Crossing	3000	5241806	Trim, prune tree	46
5232331	42	0.68	Road Crossing	3322	5241806	Trim, prune tree	46
5232333	44	0.71	Road Crossing	3223	5241806	Trim, prune tree	46
5232334	45	0.03	Road Crossing	3223	5241806	Trim, prune tree	46
5232336	46	0.30	Road Crossing	3321	5241806	Trim, prune tree	46
5232337	47	0.37	Road Crossing	3211	5241806	Trim, prune tree	46

**Projected CY2011 Floor Trim Acres**

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<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
5232338	48	0.35	Road Crossing	3000	5241806	Trim, prune tree	46
5232346	53	0.16	Road Crossing	3000	5241806	Trim, prune tree	46
5232347	54	1.89	Road Crossing	3221	5241806	Trim, prune tree	46
5232349	56	0.72	Road Crossing	3311	5241806	Trim, prune tree	46
5232350	57	0.99	Road Crossing	3000	5241806	Trim, prune tree	46
5232352	58	0.37	Road Crossing	3212	5241806	Trim, prune tree	46
5232353	59	0.64	Road Crossing	3310	5241806	Trim, prune tree	46
5232355	60	1.88	Road Crossing	3212	5241806	Trim, prune tree	46
5232358	62	1.95	Road Crossing	3212	5241806	Trim, prune tree	46
5232359	63	3.48	Road Crossing	3001	5241806	Trim, prune tree	46
5232365	69	0.69	Road Crossing	3000	5241806	Trim, prune tree	46
5232386	85	7.13	Road Crossing	3321	5241806	Trim, prune tree	46
5232387	86	0.63	Road Crossing	3110	5241806	Trim, prune tree	46
5232389	88	0.21	Road Crossing	3111	5241806	Trim, prune tree	46
5232392	90	1.34	Road Crossing	3111	5241806	Trim, prune tree	46
5232394	91	0.14	Road Crossing	3311	5241806	Trim, prune tree	46
5232400	97	1.85	Road Crossing	3232	5241806	Trim, prune tree	46
5232402	98	3.03	Road Crossing	3221	5241806	Trim, prune tree	46
5232405	100	0.65	Road Crossing	3321	5241806	Trim, prune tree	46
5232409	103	2.28	Road Crossing	3211	5241806	Trim, prune tree	46
5232410	104	3.99	Road Crossing	3211	5241806	Trim, prune tree	46
5232413	106	1.01	Road Crossing	3211	5241806	Trim, prune tree	46
5232439	125	2.07	Road Crossing	3322	5241806	Trim, prune tree	46
5232441	126	1.86	Road Crossing	3321	5241806	Trim, prune tree	46
5232450	132	0.32	Road Crossing	3112	5241806	Trim, prune tree	46
5232451	133	0.29	Road Crossing	3000	5241806	Trim, prune tree	46
5232452	134	0.44	Road Crossing	3112	5241806	Trim, prune tree	46
5232454	135	1.23	Road Crossing	3000	5241806	Trim, prune tree	46
5232456	137	0.30	Road Crossing	3211	5241806	Trim, prune tree	46
5232462	143	0.56	Road Crossing	3011	5241806	Trim, prune tree	46
5232470	148	0.57	Road Crossing	3312	5241806	Trim, prune tree	46
5237647	9	0.73	Road Crossing	3311	5241860	Trim, prune tree	46
5237789	22	1.15	Road Crossing	3313	5241864	Trim, prune tree	46
5237846	17	0.67	Road Crossing	3312	5241866	Trim, prune tree	46
5240469	27	0.14	Road Crossing	3331	5241864	Trim, prune tree	46

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### Projected CY2011 Floor Trim Acres

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System Id	Site Number	Site Area (Acres)	Land Use	Land Use Code	Forestry Segment	Prescription	Voltage
5369048	19	0.69	Road Crossing	3310	5370679	Trim, prune tree	46
5369050	21	1.17	Road Crossing	3000	5370679	Trim, prune tree	46
7445538	109	1.85	Road Crossing	3211	5241806	Trim, prune tree	46
5232464	144	0.68	Streams	1212	5241806	Trim, prune tree	46
5369049	20	0.26	Streams	1003	5370679	Trim, prune tree	46
5232289	10	2.77	Woodlands	9002	5241806	Trim, prune tree	46
5232303	21	0.84	Woodlands	9211	5241806	Trim, prune tree	46
5232344	52	0.54	Woodlands	9212	5241806	Trim, prune tree	46
5232412	105	0.82	Woodlands	9221	5241806	Trim, prune tree	46
5232416	108	0.87	Woodlands	9111	5241806	Trim, prune tree	46
5232418	110	5.23	Woodlands	9211	5241806	Trim, prune tree	46
5232457	138	1.06	Woodlands	9212	5241806	Trim, prune tree	46
5232459	140	0.81	Woodlands	9212	5241806	Trim, prune tree	46
5232461	142	0.96	Woodlands	9111	5241806	Trim, prune tree	46
5237845	16	3.33	Woodlands	9222	5241866	Trim, prune tree	46
5308628	102	0.70	Residential	5310	5323091	Cut, stump treat and chip	69
5308678	149	0.52	Residential	5210	5323091	Cut, stump treat and chip	69
4533629	49	0.17	Road Crossing	3121	4535954	Cut, stump treat and chip	69
4533647	62	1.46	Road Crossing	3311	4535954	Cut, stump treat and chip	69
4533659	74	1.24	Road Crossing	3332	4535954	Cut, stump treat and chip	69
5308685	156	0.63	Field	6000	5323091	Trim, prune tree	69
4533666	89	0.59	Residential	5331	4535917	Trim, prune tree	69
5308652	125	0.46	Residential	5111	5323091	Trim, prune tree	69
5308654	127	1.67	Residential	5000	5323091	Trim, prune tree	69
4533671	96	2.19	Road Crossing	3322	4535917	Trim, prune tree	69
5308664	135	1.81	Road Crossing	3000	5323091	Trim, prune tree	69
5240520	42	0.30	Brush Lands	8322	5241908	Cut, stump treat and chip	115
7444838	21	0.00	Brush Lands	8311	5323345	Cut, stump treat and chip	115
5317742	8	0.00	Brush Lands	8233	5323345	Cut, stump treat and chip	115
5317738	4	0.11	Brush Lands	8111	5323345	Cut, stump treat and chip	115
4530831	125	4.49	Brush Lands	8331	4535836	Cut, stump treat and chip	115
5369003	307	0.83	Residential	5323	5370678	Cut, stump treat and chip	115
5369005	309	1.12	Residential	5311	5370678	Cut, stump treat and chip	115
4459249	25	0.23	Residential	5311	4462151	Cut, stump treat and chip	115
5369004	308	0.22	Residential	5223	5370678	Cut, stump treat and chip	115

**Projected CY2011 Floor Trim Acres**

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7444945	247	0.00	Residential	5111	5323345	Cut, stump treat and chip	115
4459243	19	0.73	Residential	5211	4462151	Cut, stump treat and chip	115
5239414	88	0.79	Residential	5221	5241908	Cut, stump treat and chip	115
4459245	21	1.47	Residential	5321	4462151	Cut, stump treat and chip	115
7464021	98	0.00	Residential	5211	5323179	Cut, stump treat and chip	115
5239367	43	0.61	Residential	5310	5241908	Cut, stump treat and chip	115
4459247	23	1.20	Residential	5211	4462151	Cut, stump treat and chip	115
5237072	92	1.19	Road Crossing	3331	5241841	Cut, stump treat and chip	115
5370399	299	0.68	Road Crossing	3221	5370708	Cut, stump treat and chip	115
5239365	40	0.28	Road Crossing	3211	5241908	Cut, stump treat and chip	115
5237106	124	0.89	Road Crossing	3320	5241841	Cut, stump treat and chip	115
4530751	45	1.83	Road Crossing	3331	4535836	Cut, stump treat and chip	115
7465122	120	0.00	Road Crossing	3311	4535920	Cut, stump treat and chip	115
5370388	288	0.29	Road Crossing	3312	5370708	Cut, stump treat and chip	115
4459246	22	0.50	Streams	1211	4462151	Cut, stump treat and chip	115
7444912	203	0.00	Brush Lands	8111	5323345	Mechanical brush mowing	115
5318062	203	0.53	Brush Lands	8111	5323345	Mechanical brush mowing	115
4530837	131	0.18	Residential	5341	4535836	Mechanical brush mowing	115
4530809	103	0.71	Road Crossing	3231	4535836	Mechanical brush mowing	115
7444913	203	0.00	Wetlands	2003	5323345	Mechanical brush mowing	115
5317744	10	2.12	Brush Lands	8001	5323345	Trim, prune tree	115
5313242	59	1.97	Brush Lands	8223	5323185	Trim, prune tree	115
5233100	100	0.52	Brush Lands	8311	5241756	Trim, prune tree	115
5318068	209	7.36	Brush Lands	8310	5323345	Trim, prune tree	115
4459276	50	0.30	Brush Lands	8112	4462151	Trim, prune tree	115
5320340	136	1.09	Brush Lands	8233	5323419	Trim, prune tree	115
7444869	66	0.00	Brush Lands	8313	5323345	Trim, prune tree	115
4459288	62	0.28	Brush Lands	8223	4462151	Trim, prune tree	115
5317818	43	0.39	Brush Lands	8222	5323345	Trim, prune tree	115
4530834	128	4.27	Brush Lands	8232	4535836	Trim, prune tree	115
5320338	134	1.58	Brush Lands	8232	5323419	Trim, prune tree	115
4459284	58	0.58	Commercial/Industrial	4112	4462151	Trim, prune tree	115
5369027	331	0.93	Commercial/Industrial	4310	5370678	Trim, prune tree	115
5320341	137	7.47	Field	6000	5323419	Trim, prune tree	115
4534016	161	1.90	Pasture	7321	4535920	Trim, prune tree	115

**Projected CY2011 Floor Trim Acres**

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4530207	13	0.92	Residential	5310	4535837	Trim, prune tree	115
7465125	120	0.00	Residential	5320	4535920	Trim, prune tree	115
5368431	8	0.48	Residential	5321	5370668	Trim, prune tree	115
4530836	130	4.71	Residential	5310	4535836	Trim, prune tree	115
5240904	19	0.57	Residential	5310	5241834	Trim, prune tree	115
5317923	99	0.42	Residential	5211	5323345	Trim, prune tree	115
7443673	201	0.00	Residential	5311	4535837	Trim, prune tree	115
4530750	44	1.18	Residential	5320	4535836	Trim, prune tree	115
5233036	36	0.26	Residential	5311	5241756	Trim, prune tree	115
4530833	127	1.44	Residential	5330	4535836	Trim, prune tree	115
7444944	247	0.00	Residential	5311	5323345	Trim, prune tree	115
5317787	29	2.56	Residential	5311	5323345	Trim, prune tree	115
5317783	25	0.06	Residential	5311	5323345	Trim, prune tree	115
5239440	117	0.57	Residential	5320	5241908	Trim, prune tree	115
5317959	131	1.10	Residential	5212	5323345	Trim, prune tree	115
5320339	135	2.75	Residential	5211	5323419	Trim, prune tree	115
7443017	136	0.00	Residential	5331	4535836	Trim, prune tree	115
5317780	22	0.05	Residential	5310	5323345	Trim, prune tree	115
7465134	163	0.00	Residential	5332	4535920	Trim, prune tree	115
5239538	217	1.58	Residential	5310	5241908	Trim, prune tree	115
5318073	214	0.99	Residential	5310	5323345	Trim, prune tree	115
7465059	32	0.00	Residential	5311	4535955	Trim, prune tree	115
5239396	70	0.84	Residential	5310	5241908	Trim, prune tree	115
4459292	66	1.15	Residential	5311	4462151	Trim, prune tree	115
5239413	87	1.70	Residential	5310	5241908	Trim, prune tree	115
5318060	201	0.29	Residential	5320	5323345	Trim, prune tree	115
5320354	150	1.26	Residential	5310	5323419	Trim, prune tree	115
7464022	98	0.00	Residential	5321	5323179	Trim, prune tree	115
4459248	24	0.56	Road Crossing	3000	4462151	Trim, prune tree	115
7464008	98	0.00	Road Crossing	3310	5323179	Trim, prune tree	115
5318018	188	0.08	Road Crossing	3311	5323345	Trim, prune tree	115
7444824	21	0.00	Road Crossing	3310	5323345	Trim, prune tree	115
5233027	27	0.83	Road Crossing	3003	5241756	Trim, prune tree	115
4533956	102	1.00	Road Crossing	3320	4535920	Trim, prune tree	115
7443016	135	0.00	Road Crossing	3342	4535836	Trim, prune tree	115

**Projected CY2011 Floor Trim Acres**

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<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
5240910	25	0.69	Road Crossing	3220	5241834	Trim, prune tree	115
4530745	39	2.72	Road Crossing	3312	4535836	Trim, prune tree	115
7464019	106	0.00	Road Crossing	3333	5323179	Trim, prune tree	115
4530832	126	0.46	Road Crossing	3320	4535836	Trim, prune tree	115
5368426	3	2.07	Road Crossing	3321	5370668	Trim, prune tree	115
4530801	95	0.72	Road Crossing	3342	4535836	Trim, prune tree	115
5307377	12	7.65	Road Crossing	3330	5323083	Trim, prune tree	115
7444835	21	0.00	Road Crossing	3310	5323345	Trim, prune tree	115
5233059	59	1.60	Road Crossing	3212	5241756	Trim, prune tree	115
7444827	21	0.00	Road Crossing	3310	5323345	Trim, prune tree	115
4530292	97	4.60	Road Crossing	3310	4535837	Trim, prune tree	115
5239368	46	2.12	Road Crossing	3311	5241908	Trim, prune tree	115
5233092	92	1.01	Streams	1000	5241756	Trim, prune tree	115
4530835	129	0.27	Streams	1310	4535836	Trim, prune tree	115
4553999	38	22.61	Streams	1311	4555119	Cut, stump treat and chip	230
7442749	128	0.00	Road Crossing	3310	4555119	Trim, prune tree	230
4554057	100	0.19	Residential	5310	4555119	Trim, prune tree	230
4554003	42	5.70	Streams	1211	4555119	Cut, stump treat and chip	230
4554060	103	4.48	Road Crossing	3210	4555119	Trim, prune tree	230
4554049	92	8.60	Residential	5311	4555119	Trim, prune tree	230
4554011	52	1.60	Brush Lands	8333	4555119	Trim, prune tree	230
4553969	8	0.38	Commercial/Industrial	4310	4555119	Trim, prune tree	230
4554061	104	8.40	Residential	5211	4555119	Trim, prune tree	230
4554008	47	1.10	Residential	5321	4555119	Cut, stump treat and chip	230
4554030	73	0.92	Brush Lands	8311	4555119	Trim, prune tree	230
4554053	96	2.31	Residential	5310	4555119	Trim, prune tree	230
4554012	53	1.71	Road Crossing	3310	4555119	Trim, prune tree	230
4554001	40	13.00	Residential	5311	4555119	Trim, prune tree	230
4553997	36	0.10	Residential	5311	4555119	Trim, prune tree	230
4554059	102	0.92	Residential	5000	4555119	Trim, prune tree	230
4554062	105	5.00	Streams	1211	4555119	Cut, stump treat and chip	230
4554051	94	3.68	Residential	5210	4555119	Cut, stump treat and chip	230
4554055	98	1.02	Residential	5310	4555119	Trim, prune tree	230
4555062	54	0.40	Road Crossing	3310	4555119	Trim, prune tree	230
4554006	45	4.06	Road Crossing	3311	4555119	Cut, stump treat and chip	230

**Projected CY2011 Floor Trim Acres**

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<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
4554029	72	6.75	Brush Lands	8000	4555119	Mechanical brush mowing	230
4554010	50	0.20	Brush Lands	8233	4555119	Trim, prune tree	230
5312030	1	1.34	Road Crossing	3312	5323271	Trim, prune tree	345
5312055	26	0.58	Road Crossing	3310	5323271	Trim, prune tree	345
<b>Total:</b>		<b>813.34</b>	<b>acres</b>				

**Projected CY2012 Floor Trim Acres**

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<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
7463625	85	1.32	Brush Lands	8222	5241914	Cut, stump treat and chip	23
5369131	35	0.30	Commercial/Inc	4321	5370685	Cut, stump treat and chip	23
5239909	91	0.06	Residential	5211	5241914	Cut, stump treat and chip	23
5369121	25	0.41	Residential	5320	5370685	Cut, stump treat and chip	23
5369133	37	0.26	Residential	5321	5370685	Cut, stump treat and chip	23
5239870	56	0.06	Road Crossing	3112	5241914	Cut, stump treat and chip	23
5239875	62	1.02	Road Crossing	3212	5241914	Cut, stump treat and chip	23
7463626	85	0.37	Road Crossing	3000	5241914	Cut, stump treat and chip	23
5238914	10	0.66	Brush Lands	8213	5241890	Mechanical brush mowing	23
5238916	12	0.30	Brush Lands	8223	5241890	Mechanical brush mowing	23
5240502	6	0.60	Woodlands	9233	5241890	Mechanical brush mowing	23
5238957	50	0.01	Brush Lands	8311	5241890	Trim, prune tree	23
5239844	30	0.50	Cropland	6000	5241914	Trim, prune tree	23
5239120	1	0.11	Residential	5310	5241895	Trim, prune tree	23
5239817	2	1.25	Residential	5310	5241914	Trim, prune tree	23
5239834	20	0.20	Residential	5310	5241914	Trim, prune tree	23
5239854	40	0.63	Residential	5311	5241914	Trim, prune tree	23
5239864	50	0.05	Residential	5311	5241914	Trim, prune tree	23
5239871	57	0.19	Residential	5310	5241914	Trim, prune tree	23
5239876	63	0.89	Residential	5321	5241914	Trim, prune tree	23
5239877	65	0.53	Residential	5231	5241914	Trim, prune tree	23
5239907	89	0.16	Residential	5312	5241914	Trim, prune tree	23
5240545	64	1.73	Residential	5311	5241914	Trim, prune tree	23
5369099	3	1.22	Residential	5320	5370685	Trim, prune tree	23
5369129	33	0.51	Residential	5001	5370685	Trim, prune tree	23
7463624	85	2.31	Residential	5311	5241914	Trim, prune tree	23
5369098	2	0.37	Road Crossing	3310	5370685	Trim, prune tree	23
7443486	97	0.26	Road Crossing	3111	5241914	Trim, prune tree	23
4460240	36	1.15	Brush Lands	8211	4462155	Cut, stump treat and chip	34.5
4461719	23	0.91	Brush Lands	8321	4462167	Cut, stump treat and chip	34.5
4531396	30	2.76	Brush Lands	9111	4535855	Cut, stump treat and chip	34.5
5308976	71	0.36	Brush Lands	8221	5323114	Cut, stump treat and chip	34.5
5309028	124	0.29	Brush Lands	8321	5323114	Cut, stump treat and chip	34.5
5309044	142	1.74	Brush Lands	8333	5323114	Cut, stump treat and chip	34.5
5309046	144	0.40	Brush Lands	8332	5323114	Cut, stump treat and chip	34.5



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5309094	42	0.80	Brush Lands	8222	5323115	Cut, stump treat and chip	34.5
5309135	85	1.10	Brush Lands	8221	5323115	Cut, stump treat and chip	34.5
5309217	37	2.51	Brush Lands	8232	5323117	Cut, stump treat and chip	34.5
5315162	5	2.04	Brush Lands	8322	5323177	Cut, stump treat and chip	34.5
5315675	12	1.07	Brush Lands	8323	5323289	Cut, stump treat and chip	34.5
5315693	21	0.29	Brush Lands	8311	5323289	Cut, stump treat and chip	34.5
5315706	34	0.05	Brush Lands	8313	5323289	Cut, stump treat and chip	34.5
5315959	6	0.46	Brush Lands	8213	5323295	Cut, stump treat and chip	34.5
5316032	67	1.21	Brush Lands	8212	5323295	Cut, stump treat and chip	34.5
5316047	81	0.60	Brush Lands	8313	5323295	Cut, stump treat and chip	34.5
5316049	83	1.34	Brush Lands	8230	5323295	Cut, stump treat and chip	34.5
5321776	11	1.03	Brush Lands	8331	5323454	Cut, stump treat and chip	34.5
5321812	43	0.20	Brush Lands	8312	5323454	Cut, stump treat and chip	34.5
5368576	38	1.21	Brush Lands	8332	5370674	Cut, stump treat and chip	34.5
5368711	6	0.55	Brush Lands	8311	5370676	Cut, stump treat and chip	34.5
7444432	47	0.25	Brush Lands	8311	4462166	Cut, stump treat and chip	34.5
7444463	29	0.17	Brush Lands	8311	4462167	Cut, stump treat and chip	34.5
7463230	61	0.04	Brush Lands	8323	5323295	Cut, stump treat and chip	34.5
7841030	15	0.14	Brush Lands	8340	4535869	Cut, stump treat and chip	34.5
7841038	24	0.17	Brush Lands	8241	4535869	Cut, stump treat and chip	34.5
4461582	52	0.20	Commercial/Inc	4000	4462166	Cut, stump treat and chip	34.5
5309059	7	2.77	Commercial/Inc	4310	5323115	Cut, stump treat and chip	34.5
5309192	14	2.76	Commercial/Inc	4310	5323117	Cut, stump treat and chip	34.5
5310099	67	0.61	Commercial/Inc	4220	5323118	Cut, stump treat and chip	34.5
5315656	7	0.34	Commercial/Inc	4110	5323305	Cut, stump treat and chip	34.5
5315705	33	0.56	Commercial/Inc	4312	5323289	Cut, stump treat and chip	34.5
5321804	35	0.01	Commercial/Inc	4310	5323454	Cut, stump treat and chip	34.5
7444576	8	0.10	Commercial/Inc	4321	4555137	Cut, stump treat and chip	34.5
5309085	33	0.42	Field	6110	5323115	Cut, stump treat and chip	34.5
5310093	61	11.20	Field	6111	5323118	Cut, stump treat and chip	34.5
5368955	97	2.56	Field	6111	5370677	Cut, stump treat and chip	34.5
7444429	47	1.38	Field	6310	4462166	Cut, stump treat and chip	34.5
7443856	82	0.42	Pasture	7321	4462155	Cut, stump treat and chip	34.5
7443951	24	1.10	Pasture	7310	4462166	Cut, stump treat and chip	34.5
4460275	71	0.06	Residential	5210	4462155	Cut, stump treat and chip	34.5

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4460633	75	0.63	Residential	5312	4462158	Cut, stump treat and chip	34.5
4461246	7	0.45	Residential	5221	4462164	Cut, stump treat and chip	34.5
4461301	10	1.01	Residential	5211	4462165	Cut, stump treat and chip	34.5
4461354	62	0.06	Residential	5310	4462165	Cut, stump treat and chip	34.5
4461426	92	0.53	Residential	5000	4462165	Cut, stump treat and chip	34.5
4461718	22	0.50	Residential	5341	4462167	Cut, stump treat and chip	34.5
4531395	29	2.17	Residential	5211	4535855	Cut, stump treat and chip	34.5
4531397	31	1.50	Residential	5211	4535855	Cut, stump treat and chip	34.5
5308908	1	1.49	Residential	5322	5323114	Cut, stump treat and chip	34.5
5308914	8	0.17	Residential	5331	5323114	Cut, stump treat and chip	34.5
5308921	15	1.19	Residential	5341	5323114	Cut, stump treat and chip	34.5
5308933	27	0.42	Residential	5331	5323114	Cut, stump treat and chip	34.5
5308966	61	0.93	Residential	5311	5323114	Cut, stump treat and chip	34.5
5308975	70	0.22	Residential	5221	5323114	Cut, stump treat and chip	34.5
5309015	111	0.41	Residential	5221	5323114	Cut, stump treat and chip	34.5
5309019	115	1.53	Residential	5321	5323114	Cut, stump treat and chip	34.5
5309029	125	3.87	Residential	5331	5323114	Cut, stump treat and chip	34.5
5309053	1	0.65	Residential	5331	5323115	Cut, stump treat and chip	34.5
5309054	2	1.74	Residential	5330	5323115	Cut, stump treat and chip	34.5
5309081	29	0.75	Residential	5320	5323115	Cut, stump treat and chip	34.5
5309090	38	0.86	Residential	5331	5323115	Cut, stump treat and chip	34.5
5309108	57	0.19	Residential	5323	5323115	Cut, stump treat and chip	34.5
5309113	62	0.40	Residential	5331	5323115	Cut, stump treat and chip	34.5
5309125	74	5.64	Residential	5332	5323115	Cut, stump treat and chip	34.5
5309127	76	0.16	Residential	5311	5323115	Cut, stump treat and chip	34.5
5309214	34	0.32	Residential	5312	5323117	Cut, stump treat and chip	34.5
5309226	47	0.65	Residential	5322	5323117	Cut, stump treat and chip	34.5
5309228	49	0.31	Residential	5321	5323117	Cut, stump treat and chip	34.5
5310038	3	0.57	Residential	5322	5323118	Cut, stump treat and chip	34.5
5310091	59	1.70	Residential	5211	5323118	Cut, stump treat and chip	34.5
5310111	78	0.82	Residential	5321	5323118	Cut, stump treat and chip	34.5
5310141	107	0.33	Residential	5310	5323118	Cut, stump treat and chip	34.5
5310157	118	3.82	Residential	5221	5323118	Cut, stump treat and chip	34.5
5310167	129	2.15	Residential	5211	5323118	Cut, stump treat and chip	34.5
5310173	135	0.83	Residential	5311	5323118	Cut, stump treat and chip	34.5

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**Projected CY2012 Floor Trim Acres**

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5310200	162	0.26	Residential	5213	5323118	Cut, stump treat and chip	34.5
5310816	3	0.23	Residential	5331	5323128	Cut, stump treat and chip	34.5
5313743	16	1.53	Residential	5222	5323212	Cut, stump treat and chip	34.5
5313753	25	0.34	Residential	5211	5323212	Cut, stump treat and chip	34.5
5314537	15	3.63	Residential	5220	5323245	Cut, stump treat and chip	34.5
5315694	22	0.26	Residential	5311	5323289	Cut, stump treat and chip	34.5
5315709	37	0.66	Residential	5310	5323289	Cut, stump treat and chip	34.5
5315710	38	1.95	Residential	5333	5323289	Cut, stump treat and chip	34.5
5315961	8	0.24	Residential	5311	5323295	Cut, stump treat and chip	34.5
5315963	10	1.35	Residential	5331	5323295	Cut, stump treat and chip	34.5
5316008	55	1.81	Residential	5341	5323295	Cut, stump treat and chip	34.5
5316041	75	0.17	Residential	5220	5323295	Cut, stump treat and chip	34.5
5321771	6	1.21	Residential	5330	5323454	Cut, stump treat and chip	34.5
5368642	104	0.06	Residential	5332	5370674	Cut, stump treat and chip	34.5
7463227	61	0.17	Residential	5320	5323295	Cut, stump treat and chip	34.5
7463232	61	0.25	Residential	5321	5323295	Cut, stump treat and chip	34.5
7465295	84	0.61	Residential	5231	4535909	Cut, stump treat and chip	34.5
7465304	93	0.86	Residential	5222	4535909	Cut, stump treat and chip	34.5
7716746	18	1.19	Residential	5221	4535855	Cut, stump treat and chip	34.5
7840855	11	0.75	Residential	5000	5370688	Cut, stump treat and chip	34.5
7841052	65	0.74	Residential	5322	4535869	Cut, stump treat and chip	34.5
4460242	38	5.64	Road Crossing	3221	4462155	Cut, stump treat and chip	34.5
4461265	26	0.06	Road Crossing	3331	4462164	Cut, stump treat and chip	34.5
4461331	40	1.37	Road Crossing	3000	4462165	Cut, stump treat and chip	34.5
4461717	21	0.12	Road Crossing	3321	4462167	Cut, stump treat and chip	34.5
4530936	27	0.26	Road Crossing	3221	4535869	Cut, stump treat and chip	34.5
4530963	56	0.22	Road Crossing	3223	4535869	Cut, stump treat and chip	34.5
4530980	72	0.22	Road Crossing	3231	4535869	Cut, stump treat and chip	34.5
4531375	7	0.99	Road Crossing	3231	4535855	Cut, stump treat and chip	34.5
4531377	9	1.06	Road Crossing	3221	4535855	Cut, stump treat and chip	34.5
4531394	28	1.29	Road Crossing	3223	4535855	Cut, stump treat and chip	34.5
4531398	32	0.28	Road Crossing	3221	4535855	Cut, stump treat and chip	34.5
4531405	39	0.27	Road Crossing	3231	4535855	Cut, stump treat and chip	34.5
4531407	41	0.51	Road Crossing	3210	4535855	Cut, stump treat and chip	34.5
4532510	6	1.11	Road Crossing	3212	4535909	Cut, stump treat and chip	34.5

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4532528	24	0.57	Road Crossing	3232	4535909	Cut, stump treat and chip	34.5
4532561	57	2.99	Road Crossing	3231	4535909	Cut, stump treat and chip	34.5
4532583	79	0.19	Road Crossing	3232	4535909	Cut, stump treat and chip	34.5
4532619	100	0.60	Road Crossing	3210	4535904	Cut, stump treat and chip	34.5
5308917	11	0.16	Road Crossing	3221	5323114	Cut, stump treat and chip	34.5
5309045	143	0.12	Road Crossing	3000	5323114	Cut, stump treat and chip	34.5
5309107	56	0.23	Road Crossing	3320	5323115	Cut, stump treat and chip	34.5
5309230	51	1.33	Road Crossing	3321	5323117	Cut, stump treat and chip	34.5
5310743	38	0.08	Road Crossing	3132	5323114	Cut, stump treat and chip	34.5
5313770	42	0.27	Road Crossing	3211	5323212	Cut, stump treat and chip	34.5
5313823	91	0.46	Road Crossing	3223	5323212	Cut, stump treat and chip	34.5
5314455	44	0.84	Road Crossing	3311	5323206	Cut, stump treat and chip	34.5
5315668	5	1.58	Road Crossing	3312	5323289	Cut, stump treat and chip	34.5
5315670	7	0.21	Road Crossing	3310	5323289	Cut, stump treat and chip	34.5
5315673	10	0.02	Road Crossing	3320	5323289	Cut, stump treat and chip	34.5
5315682	15	3.01	Road Crossing	3310	5323307	Cut, stump treat and chip	34.5
5315683	16	0.02	Road Crossing	3110	5323307	Cut, stump treat and chip	34.5
5315960	7	0.21	Road Crossing	3310	5323295	Cut, stump treat and chip	34.5
5315980	27	0.36	Road Crossing	3223	5323295	Cut, stump treat and chip	34.5
5319688	21	0.57	Road Crossing	3310	5323411	Cut, stump treat and chip	34.5
5319697	30	0.12	Road Crossing	3311	5323411	Cut, stump treat and chip	34.5
5321783	18	0.16	Road Crossing	3210	5323454	Cut, stump treat and chip	34.5
5321785	20	0.27	Road Crossing	3311	5323454	Cut, stump treat and chip	34.5
5368841	7	0.12	Road Crossing	3320	5370677	Cut, stump treat and chip	34.5
7443954	24	0.13	Road Crossing	3121	4462166	Cut, stump treat and chip	34.5
7840856	6	0.15	Road Crossing	3221	5370688	Cut, stump treat and chip	34.5
7841040	31	0.27	Road Crossing	3221	4535869	Cut, stump treat and chip	34.5
4461425	91	1.93	Streams	1122	4462165	Cut, stump treat and chip	34.5
5310092	60	0.28	Streams	1222	5323118	Cut, stump treat and chip	34.5
7565271	80	0.16	Streams	1223	4462165	Cut, stump treat and chip	34.5
5308915	9	0.08	Wetlands	2332	5323114	Cut, stump treat and chip	34.5
5309093	41	1.58	Wetlands	2212	5323115	Cut, stump treat and chip	34.5
5315995	42	0.41	Woodlands	9233	5323295	Cut, stump treat and chip	34.5
5316007	54	0.51	Woodlands	5332	5323295	Cut, stump treat and chip	34.5
5368623	85	0.57	Brush Lands	8131	5370674	Mechanical brush mowing	34.5

**Projected CY2012 Floor Trim Acres**

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5368626	88	0.16	Brush Lands	8111	5370674	Mechanical brush mowing	34.5
5368708	3	0.98	Brush Lands	8342	5370676	Mechanical brush mowing	34.5
7443770	30	0.50	Brush Lands	8222	4462156	Mechanical brush mowing	34.5
4460259	55	1.97	Pasture	7342	4462155	Mechanical brush mowing	34.5
4461614	83	0.12	Pasture	7312	4462166	Mechanical brush mowing	34.5
7443758	28	0.25	Residential	5212	4462156	Mechanical brush mowing	34.5
4532207	28	1.66	Woodlands	9223	4535887	Mechanical brush mowing	34.5
4532212	22	6.23	Woodlands	9232	4535887	Mechanical brush mowing	34.5
4532219	16	1.32	Woodlands	9223	4535887	Mechanical brush mowing	34.5
5368836	2	0.59	Woodlands	9222	5370677	Mechanical brush mowing	34.5
7443771	29	2.29	Woodlands	9131	4462156	Mechanical brush mowing	34.5
4460362	63	1.06	Brush Lands	8213	4462156	Trim, prune tree	34.5
4460367	68	0.14	Brush Lands	8321	4462156	Trim, prune tree	34.5
4460598	41	1.31	Brush Lands	8312	4462158	Trim, prune tree	34.5
4461291	48	0.57	Brush Lands	8311	4462164	Trim, prune tree	34.5
4461457	123	0.75	Brush Lands	8241	4462165	Trim, prune tree	34.5
4461677	146	0.45	Brush Lands	8340	4462166	Trim, prune tree	34.5
5237230	41	0.69	Brush Lands	8332	5241855	Trim, prune tree	34.5
5309037	134	0.87	Brush Lands	8223	5323114	Trim, prune tree	34.5
5309058	6	0.67	Brush Lands	8212	5323115	Trim, prune tree	34.5
5309116	65	0.57	Brush Lands	8322	5323115	Trim, prune tree	34.5
5309202	21	0.75	Brush Lands	8223	5323117	Trim, prune tree	34.5
5315681	15	0.51	Brush Lands	8310	5323307	Trim, prune tree	34.5
5315689	18	0.79	Brush Lands	8321	5323289	Trim, prune tree	34.5
5316043	77	0.26	Brush Lands	8333	5323295	Trim, prune tree	34.5
5316045	79	0.26	Brush Lands	8323	5323295	Trim, prune tree	34.5
5368618	80	1.22	Brush Lands	8331	5370674	Trim, prune tree	34.5
5368718	13	0.32	Brush Lands	8312	5370676	Trim, prune tree	34.5
5368904	45	0.12	Brush Lands	8323	5370677	Trim, prune tree	34.5
5368918	59	0.06	Brush Lands	8321	5370677	Trim, prune tree	34.5
5368926	67	0.09	Brush Lands	8323	5370677	Trim, prune tree	34.5
5368928	69	2.97	Brush Lands	8322	5370677	Trim, prune tree	34.5
7443256	22	0.79	Brush Lands	8213	5370677	Trim, prune tree	34.5
7443284	22	0.89	Brush Lands	8222	5370677	Trim, prune tree	34.5
7443568	22	0.72	Brush Lands	8312	5370677	Trim, prune tree	34.5

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7443921	139	0.49	Brush Lands	8111	5370674	Trim, prune tree	34.5
7443925	142	1.12	Brush Lands	8122	5370674	Trim, prune tree	34.5
7443927	141	0.06	Brush Lands	8321	5370674	Trim, prune tree	34.5
7443932	23	1.02	Brush Lands	8312	4462166	Trim, prune tree	34.5
7443961	24	0.10	Brush Lands	8110	4462166	Trim, prune tree	34.5
7444308	83	0.16	Brush Lands	8311	4462165	Trim, prune tree	34.5
7444443	47	0.11	Brush Lands	8110	4462166	Trim, prune tree	34.5
7463246	88	0.04	Brush Lands	4340	5323295	Trim, prune tree	34.5
4461245	6	1.31	Commercial/Inc	4311	4462164	Trim, prune tree	34.5
4461368	76	0.85	Commercial/Inc	4111	4462165	Trim, prune tree	34.5
4553954	8	0.67	Commercial/Inc	4310	4555137	Trim, prune tree	34.5
4553961	14	0.95	Commercial/Inc	4310	4555137	Trim, prune tree	34.5
5310060	28	0.25	Commercial/Inc	4310	5323118	Trim, prune tree	34.5
5310062	30	0.56	Commercial/Inc	4320	5323118	Trim, prune tree	34.5
5310169	131	0.15	Commercial/Inc	4310	5323118	Trim, prune tree	34.5
5315680	15	0.66	Commercial/Inc	4310	5323307	Trim, prune tree	34.5
5315691	19	0.21	Commercial/Inc	4000	5323308	Trim, prune tree	34.5
5315695	23	0.66	Commercial/Inc	4311	5323289	Trim, prune tree	34.5
5368547	9	0.11	Commercial/Inc	4311	5370674	Trim, prune tree	34.5
7443283	22	0.91	Commercial/Inc	4311	5370677	Trim, prune tree	34.5
7444445	47	2.04	Commercial/Inc	4310	4462166	Trim, prune tree	34.5
7444449	4	0.31	Commercial/Inc	4310	4462167	Trim, prune tree	34.5
7463484	18	0.00	Commercial/Inc	4310	5323341	Trim, prune tree	34.5
7565270	80	0.12	Commercial/Inc	4310	4462165	Trim, prune tree	34.5
4460365	66	0.14	Field	6221	4462156	Trim, prune tree	34.5
4461554	46	0.05	Field	6311	4462166	Trim, prune tree	34.5
5317716	37	1.22	Field	6322	5323351	Trim, prune tree	34.5
5368704	30	0.14	Field	6311	5370675	Trim, prune tree	34.5
5368962	104	2.74	Field	6310	5370677	Trim, prune tree	34.5
5368964	106	0.09	Field	6310	5370677	Trim, prune tree	34.5
5368988	130	0.41	Field	6310	5370677	Trim, prune tree	34.5
7443250	22	1.44	Field	6310	5370677	Trim, prune tree	34.5
7443252	22	1.45	Field	6311	5370677	Trim, prune tree	34.5
7443943	24	2.20	Field	6310	4462166	Trim, prune tree	34.5
7443952	24	1.55	Field	6310	4462166	Trim, prune tree	34.5

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4461460	126	0.69	Pasture	7341	4462165	Trim, prune tree	34.5
4461479	3	2.07	Pasture	7211	4462166	Trim, prune tree	34.5
4461480	4	0.23	Pasture	7111	4462166	Trim, prune tree	34.5
5368913	54	0.12	Pasture	7311	5370677	Trim, prune tree	34.5
5368948	90	0.92	Pasture	7310	5370677	Trim, prune tree	34.5
7443922	140	1.14	Pasture	7310	5370674	Trim, prune tree	34.5
7444431	47	1.36	Pasture	7311	4462166	Trim, prune tree	34.5
4460241	37	0.69	Residential	5310	4462155	Trim, prune tree	34.5
4460361	62	0.50	Residential	5321	4462156	Trim, prune tree	34.5
4460366	67	0.80	Residential	5311	4462156	Trim, prune tree	34.5
4460368	69	1.72	Residential	5311	4462156	Trim, prune tree	34.5
4460564	7	0.29	Residential	5211	4462158	Trim, prune tree	34.5
4460572	15	0.71	Residential	5311	4462158	Trim, prune tree	34.5
4460599	42	8.28	Residential	5311	4462158	Trim, prune tree	34.5
4460605	48	0.97	Residential	5321	4462158	Trim, prune tree	34.5
4460607	50	1.11	Residential	5310	4462158	Trim, prune tree	34.5
4461241	2	2.43	Residential	5310	4462164	Trim, prune tree	34.5
4461259	20	0.26	Residential	5311	4462164	Trim, prune tree	34.5
4461264	25	0.29	Residential	5330	4462164	Trim, prune tree	34.5
4461276	37	0.44	Residential	5310	4462164	Trim, prune tree	34.5
4461283	44	0.69	Residential	5311	4462164	Trim, prune tree	34.5
4461290	47	0.22	Residential	5311	4462164	Trim, prune tree	34.5
4461307	16	0.51	Residential	5320	4462165	Trim, prune tree	34.5
4461313	22	1.20	Residential	5000	4462165	Trim, prune tree	34.5
4461333	42	0.02	Residential	5321	4462165	Trim, prune tree	34.5
4461335	44	0.35	Residential	5221	4462165	Trim, prune tree	34.5
4461341	50	0.55	Residential	5000	4462165	Trim, prune tree	34.5
4461347	55	2.82	Residential	5000	4462165	Trim, prune tree	34.5
4461356	64	0.60	Residential	5311	4462165	Trim, prune tree	34.5
4461376	84	3.22	Residential	5000	4462165	Trim, prune tree	34.5
4461428	94	0.23	Residential	5320	4462165	Trim, prune tree	34.5
4461432	98	2.07	Residential	5321	4462165	Trim, prune tree	34.5
4461433	99	0.78	Residential	5211	4462165	Trim, prune tree	34.5
4461434	100	0.64	Residential	5211	4462165	Trim, prune tree	34.5
4461547	39	0.37	Residential	5310	4462166	Trim, prune tree	34.5

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4461549	41	0.34	Residential	5310	4462166	Trim, prune tree	34.5
4461552	44	0.25	Residential	5310	4462166	Trim, prune tree	34.5
4461578	48	0.20	Residential	5310	4462166	Trim, prune tree	34.5
4461581	51	0.10	Residential	5311	4462166	Trim, prune tree	34.5
4461589	59	0.26	Residential	5310	4462166	Trim, prune tree	34.5
4461660	129	0.40	Residential	5320	4462166	Trim, prune tree	34.5
4461680	149	0.88	Residential	5331	4462166	Trim, prune tree	34.5
4461683	152	0.79	Residential	5311	4462166	Trim, prune tree	34.5
4461692	4	0.11	Residential	5310	4462167	Trim, prune tree	34.5
4530935	26	0.73	Residential	5332	4535869	Trim, prune tree	34.5
4530937	28	0.62	Residential	5331	4535869	Trim, prune tree	34.5
4530945	38	0.35	Residential	5321	4535869	Trim, prune tree	34.5
4530947	41	12.44	Residential	5331	4535869	Trim, prune tree	34.5
4530991	80	0.71	Residential	5211	4535869	Trim, prune tree	34.5
4531383	16	1.80	Residential	5221	4535855	Trim, prune tree	34.5
5237201	12	0.72	Residential	5310	5241855	Trim, prune tree	34.5
5308919	13	0.40	Residential	5322	5323114	Trim, prune tree	34.5
5308957	52	0.35	Residential	5322	5323114	Trim, prune tree	34.5
5308973	68	0.33	Residential	5321	5323114	Trim, prune tree	34.5
5309008	104	0.91	Residential	5311	5323114	Trim, prune tree	34.5
5309026	122	0.36	Residential	5311	5323114	Trim, prune tree	34.5
5309185	6	0.43	Residential	5310	5323117	Trim, prune tree	34.5
5309201	20	0.69	Residential	5323	5323117	Trim, prune tree	34.5
5310101	69	1.78	Residential	5321	5323118	Trim, prune tree	34.5
5310143	109	0.25	Residential	5310	5323118	Trim, prune tree	34.5
5310175	137	2.01	Residential	5310	5323118	Trim, prune tree	34.5
5310221	184	1.94	Residential	5321	5323118	Trim, prune tree	34.5
5314528	5	0.77	Residential	5321	5323245	Trim, prune tree	34.5
5314572	5	0.07	Residential	5331	5323246	Trim, prune tree	34.5
5315649	1	3.77	Residential	5320	5323288	Trim, prune tree	34.5
5315651	3	0.34	Residential	5320	5323288	Trim, prune tree	34.5
5315652	4	0.22	Residential	5311	5323288	Trim, prune tree	34.5
5315666	3	2.07	Residential	5322	5323289	Trim, prune tree	34.5
5315667	4	3.66	Residential	5321	5323289	Trim, prune tree	34.5
5315669	7	1.00	Residential	5311	5323289	Trim, prune tree	34.5



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5315692	20	0.42	Residential	5320	5323289	Trim, prune tree	34.5
5315698	26	1.46	Residential	5321	5323289	Trim, prune tree	34.5
5315701	29	2.49	Residential	5331	5323289	Trim, prune tree	34.5
5315957	4	0.17	Residential	5310	5323295	Trim, prune tree	34.5
5315958	5	0.50	Residential	5311	5323295	Trim, prune tree	34.5
5315962	9	0.58	Residential	5310	5323295	Trim, prune tree	34.5
5315979	26	0.30	Residential	5310	5323295	Trim, prune tree	34.5
5315994	41	0.46	Residential	5311	5323295	Trim, prune tree	34.5
5316031	66	2.00	Residential	5323	5323295	Trim, prune tree	34.5
5316042	76	0.26	Residential	5320	5323295	Trim, prune tree	34.5
5316074	94	0.65	Residential	5321	5323295	Trim, prune tree	34.5
5316265	7	0.24	Residential	5000	5323342	Trim, prune tree	34.5
5316268	10	0.05	Residential	5311	5323342	Trim, prune tree	34.5
5316270	12	0.31	Residential	5311	5323342	Trim, prune tree	34.5
5316872	24	0.55	Residential	5000	5323339	Trim, prune tree	34.5
5317683	4	0.14	Residential	5310	5323351	Trim, prune tree	34.5
5317719	40	0.06	Residential	5322	5323351	Trim, prune tree	34.5
5317729	50	0.84	Residential	5320	5323351	Trim, prune tree	34.5
5317733	54	2.87	Residential	5322	5323351	Trim, prune tree	34.5
5318492	32	1.14	Residential	5312	5323389	Trim, prune tree	34.5
5318495	35	0.66	Residential	5321	5323389	Trim, prune tree	34.5
5318506	45	1.15	Residential	5312	5323389	Trim, prune tree	34.5
5318608	146	0.40	Residential	5311	5323389	Trim, prune tree	34.5
5318611	149	0.78	Residential	5332	5323389	Trim, prune tree	34.5
5318614	152	0.34	Residential	5322	5323389	Trim, prune tree	34.5
5318673	210	0.20	Residential	5330	5323389	Trim, prune tree	34.5
5318716	252	2.00	Residential	5321	5323389	Trim, prune tree	34.5
5318791	327	1.92	Residential	5311	5323389	Trim, prune tree	34.5
5319690	23	0.22	Residential	5311	5323411	Trim, prune tree	34.5
5321770	5	1.17	Residential	5311	5323454	Trim, prune tree	34.5
5321775	10	1.94	Residential	5310	5323454	Trim, prune tree	34.5
5321777	12	2.66	Residential	5310	5323454	Trim, prune tree	34.5
5321778	13	0.94	Residential	5330	5323454	Trim, prune tree	34.5
5321780	15	0.45	Residential	5320	5323454	Trim, prune tree	34.5
5321782	17	0.45	Residential	5310	5323454	Trim, prune tree	34.5

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5321784	19	1.34	Residential	5311	5323454	Trim, prune tree	34.5
5321789	24	0.63	Residential	5310	5323454	Trim, prune tree	34.5
5321791	26	0.95	Residential	5320	5323454	Trim, prune tree	34.5
5321809	40	2.47	Residential	5310	5323454	Trim, prune tree	34.5
5321811	42	0.54	Residential	5310	5323454	Trim, prune tree	34.5
5321813	44	1.05	Residential	5311	5323454	Trim, prune tree	34.5
5368548	10	0.60	Residential	5331	5370674	Trim, prune tree	34.5
5368560	22	0.12	Residential	5310	5370674	Trim, prune tree	34.5
5368577	39	1.38	Residential	5332	5370674	Trim, prune tree	34.5
5368620	82	0.82	Residential	5311	5370674	Trim, prune tree	34.5
5368634	96	0.12	Residential	5311	5370674	Trim, prune tree	34.5
5368638	100	0.25	Residential	5311	5370674	Trim, prune tree	34.5
5368647	109	0.27	Residential	5311	5370674	Trim, prune tree	34.5
5368728	23	0.21	Residential	5311	5370676	Trim, prune tree	34.5
5368731	26	1.33	Residential	5322	5370676	Trim, prune tree	34.5
5368783	78	0.32	Residential	5331	5370676	Trim, prune tree	34.5
5368810	105	0.53	Residential	5311	5370676	Trim, prune tree	34.5
5368840	6	0.94	Residential	5141	5370677	Trim, prune tree	34.5
5368920	61	0.09	Residential	5310	5370677	Trim, prune tree	34.5
5368922	63	1.41	Residential	5320	5370677	Trim, prune tree	34.5
5368952	94	2.07	Residential	5311	5370677	Trim, prune tree	34.5
5368953	95	0.05	Residential	5311	5370677	Trim, prune tree	34.5
5368956	98	0.06	Residential	5310	5370677	Trim, prune tree	34.5
5368960	102	0.89	Residential	5321	5370677	Trim, prune tree	34.5
5368965	107	2.53	Residential	5310	5370677	Trim, prune tree	34.5
7443248	22	0.34	Residential	5310	5370677	Trim, prune tree	34.5
7443254	22	0.50	Residential	5320	5370677	Trim, prune tree	34.5
7443282	22	2.03	Residential	5311	5370677	Trim, prune tree	34.5
7443750	7	0.39	Residential	5311	4462156	Trim, prune tree	34.5
7443776	40	0.35	Residential	5311	4462156	Trim, prune tree	34.5
7443931	23	1.00	Residential	5310	4462166	Trim, prune tree	34.5
7443942	24	0.34	Residential	5310	4462166	Trim, prune tree	34.5
7443947	24	0.24	Residential	5310	4462166	Trim, prune tree	34.5
7444168	22	2.91	Residential	5311	5370677	Trim, prune tree	34.5
7444169	22	0.68	Residential	5311	5370677	Trim, prune tree	34.5

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7444425	23	0.29	Residential	5311	4462166	Trim, prune tree	34.5
7444430	47	0.55	Residential	5310	4462166	Trim, prune tree	34.5
7444433	47	0.47	Residential	5310	4462166	Trim, prune tree	34.5
7444437	47	0.37	Residential	5310	4462166	Trim, prune tree	34.5
7444438	47	1.00	Residential	5310	4462166	Trim, prune tree	34.5
7444441	47	0.69	Residential	5311	4462166	Trim, prune tree	34.5
7444451	4	3.51	Residential	5321	4462167	Trim, prune tree	34.5
7444578	15	0.74	Residential	5321	4555137	Trim, prune tree	34.5
7463229	61	0.35	Residential	5310	5323295	Trim, prune tree	34.5
7463234	61	0.09	Residential	5310	5323295	Trim, prune tree	34.5
7463244	88	0.54	Residential	5310	5323295	Trim, prune tree	34.5
7463364	59	0.21	Residential	5311	5323351	Trim, prune tree	34.5
7587498	69	0.49	Residential	5331	5323115	Trim, prune tree	34.5
7840890	9	0.34	Residential	5331	5323214	Trim, prune tree	34.5
7841043	39	2.62	Residential	5320	4535869	Trim, prune tree	34.5
4460363	64	1.48	Road Crossing	3332	4462156	Trim, prune tree	34.5
4460565	8	0.05	Road Crossing	3211	4462158	Trim, prune tree	34.5
4460596	39	0.96	Road Crossing	3311	4462158	Trim, prune tree	34.5
4461289	46	0.32	Road Crossing	3322	4462164	Trim, prune tree	34.5
4461293	2	0.34	Road Crossing	3311	4462165	Trim, prune tree	34.5
4461304	13	4.85	Road Crossing	3310	4462165	Trim, prune tree	34.5
4461541	33	0.05	Road Crossing	3111	4462166	Trim, prune tree	34.5
4461667	136	0.55	Road Crossing	3321	4462166	Trim, prune tree	34.5
4461669	138	0.46	Road Crossing	3221	4462166	Trim, prune tree	34.5
4461760	30	0.85	Road Crossing	3310	4462167	Trim, prune tree	34.5
4530992	81	8.62	Road Crossing	3310	4535869	Trim, prune tree	34.5
4532573	69	4.84	Road Crossing	3231	4535909	Trim, prune tree	34.5
4553945	2	0.30	Road Crossing	3321	4555137	Trim, prune tree	34.5
5308920	14	2.44	Road Crossing	3330	5323114	Trim, prune tree	34.5
5309118	67	0.28	Road Crossing	3310	5323115	Trim, prune tree	34.5
5313861	4	0.52	Road Crossing	3321	5323214	Trim, prune tree	34.5
5314407	9	0.59	Road Crossing	3310	5323206	Trim, prune tree	34.5
5314524	1	0.34	Road Crossing	3310	5323245	Trim, prune tree	34.5
5315665	2	0.32	Road Crossing	3320	5323289	Trim, prune tree	34.5
5315671	8	1.57	Road Crossing	3310	5323289	Trim, prune tree	34.5

**Projected CY2012 Floor Trim Acres**

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<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
5315688	17	0.91	Road Crossing	3000	5323289	Trim, prune tree	34.5
5316853	5	0.30	Road Crossing	3310	5323339	Trim, prune tree	34.5
5316894	45	1.51	Road Crossing	3321	5323339	Trim, prune tree	34.5
5316940	16	1.93	Road Crossing	3311	5323340	Trim, prune tree	34.5
5316945	21	0.57	Road Crossing	3222	5323340	Trim, prune tree	34.5
5316954	30	0.29	Road Crossing	3311	5323340	Trim, prune tree	34.5
5317697	18	0.32	Road Crossing	3331	5323351	Trim, prune tree	34.5
5318628	166	0.50	Road Crossing	3000	5323389	Trim, prune tree	34.5
5318657	194	1.38	Road Crossing	3332	5323389	Trim, prune tree	34.5
5318675	212	0.84	Road Crossing	3000	5323389	Trim, prune tree	34.5
5319684	17	0.14	Road Crossing	3310	5323411	Trim, prune tree	34.5
5368553	15	0.20	Road Crossing	3331	5370674	Trim, prune tree	34.5
5368575	37	0.34	Road Crossing	3322	5370674	Trim, prune tree	34.5
5368578	40	2.14	Road Crossing	3212	5370674	Trim, prune tree	34.5
5368582	44	1.81	Road Crossing	3312	5370674	Trim, prune tree	34.5
5368670	4	1.14	Road Crossing	3310	5370675	Trim, prune tree	34.5
5368762	57	0.06	Road Crossing	3320	5370676	Trim, prune tree	34.5
5368828	110	0.76	Road Crossing	3320	5370676	Trim, prune tree	34.5
5368830	112	0.89	Road Crossing	3312	5370676	Trim, prune tree	34.5
5368885	27	1.06	Road Crossing	3313	5370677	Trim, prune tree	34.5
5368901	42	0.27	Road Crossing	3000	5370677	Trim, prune tree	34.5
5368979	121	1.18	Road Crossing	3310	5370677	Trim, prune tree	34.5
7443920	138	0.31	Road Crossing	3311	5370674	Trim, prune tree	34.5
7444167	22	0.42	Road Crossing	3311	5370677	Trim, prune tree	34.5
7444269	80	0.69	Road Crossing	3311	4462165	Trim, prune tree	34.5
7444302	83	0.13	Road Crossing	3311	4462165	Trim, prune tree	34.5
7444462	29	0.13	Road Crossing	3311	4462167	Trim, prune tree	34.5
7587596	1	0.30	Road Crossing	3312	5323289	Trim, prune tree	34.5
7841044	40	0.25	Road Crossing	3321	4535869	Trim, prune tree	34.5
7841053	74	0.96	Road Crossing	3221	4535869	Trim, prune tree	34.5
4461242	3	0.70	Streams	1310	4462164	Trim, prune tree	34.5
4461305	14	0.28	Streams	1331	4462165	Trim, prune tree	34.5
4461332	41	1.37	Streams	1321	4462165	Trim, prune tree	34.5
5316269	11	0.93	Streams	1323	5323342	Trim, prune tree	34.5
5368730	25	0.86	Streams	1322	5370676	Trim, prune tree	34.5

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5368812	107	1.63	Streams	1311	5370676	Trim, prune tree	34.5
7444170	22	0.12	Streams	1322	5370677	Trim, prune tree	34.5
7444450	4	0.80	Streams	1311	4462167	Trim, prune tree	34.5
5310056	23	0.92	Wetlands	2332	5323118	Trim, prune tree	34.5
4461263	24	0.43	Woodlands	9210	4462164	Trim, prune tree	34.5
5308995	91	1.44	Woodlands	9331	5323114	Trim, prune tree	34.5
5310057	24	0.40	Woodlands	9232	5323118	Trim, prune tree	34.5
5316939	15	0.23	Woodlands	9330	5323340	Trim, prune tree	34.5
5368574	36	0.18	Woodlands	9311	5370674	Trim, prune tree	34.5
5368685	11	0.14	Woodlands	9312	5370675	Trim, prune tree	34.5
5368826	108	0.12	Woodlands	9221	5370676	Trim, prune tree	34.5
5368925	66	2.02	Woodlands	9112	5370677	Trim, prune tree	34.5
7443915	135	0.25	Woodlands	9331	5370674	Trim, prune tree	34.5
5232000	101	0.53	Brush Lands	8213	5241777	Cut, stump treat and chip	46
5232167	25	0.44	Commercial/Inc	4110	5241786	Cut, stump treat and chip	46
5231814	37	0.46	Residential	5321	5241790	Cut, stump treat and chip	46
5232482	3	0.54	Residential	5312	5241759	Cut, stump treat and chip	46
5231801	25	0.32	Road Crossing	3110	5241794	Cut, stump treat and chip	46
5231997	98	0.72	Road Crossing	3320	5241777	Cut, stump treat and chip	46
7445598	3	0.00	Road Crossing	3110	5241790	Cut, stump treat and chip	46
5232534	53	0.59	Woodlands	9340	5241759	Cut, stump treat and chip	46
5232152	11	0.91	Commercial/Inc	4322	5241786	Trim, prune tree	46
5231800	24	0.94	Cropland	6000	5241794	Trim, prune tree	46
5231816	39	0.41	Residential	5310	5241790	Trim, prune tree	46
5231900	1	1.15	Residential	5330	5241777	Trim, prune tree	46
5231923	24	0.33	Residential	5212	5241777	Trim, prune tree	46
5231925	26	0.50	Residential	5320	5241777	Trim, prune tree	46
5232001	103	0.61	Residential	5311	5241777	Trim, prune tree	46
5232082	178	1.29	Residential	5312	5241777	Trim, prune tree	46
5232086	182	0.28	Residential	5311	5241777	Trim, prune tree	46
5232561	75	0.20	Residential	5320	5241759	Trim, prune tree	46
5232605	116	0.28	Residential	5321	5241759	Trim, prune tree	46
5231988	89	0.19	Road Crossing	3311	5241777	Trim, prune tree	46
5232058	154	0.84	Road Crossing	3321	5241777	Trim, prune tree	46
7841106	102	0.37	Road Crossing	3311	5241777	Trim, prune tree	46

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7566142	131	1.02	Commercial/Inc	4110	7841110	Cut, stump treat and chip	69
7566044	51	1.28	Cropland	6000	4535948	Cut, stump treat and chip	69
7304688	77	0.83	Residential	5210	7841111	Cut, stump treat and chip	69
7566137	122	0.62	Residential	5111	7841111	Cut, stump treat and chip	69
7566161	150	0.60	Residential	5111	7841110	Cut, stump treat and chip	69
7841090	104	0.95	Residential	5310	4535919	Cut, stump treat and chip	69
4533472	20	0.51	Road Crossing	3111	4535925	Cut, stump treat and chip	69
4533737	27	0.64	Road Crossing	3311	4535919	Cut, stump treat and chip	69
4533771	56	0.34	Road Crossing	3323	4535919	Cut, stump treat and chip	69
4535095	21	0.48	Road Crossing	3310	4535952	Cut, stump treat and chip	69
4535098	24	0.39	Road Crossing	3323	4535952	Cut, stump treat and chip	69
4535100	26	0.56	Road Crossing	3113	4535952	Cut, stump treat and chip	69
4535118	45	0.94	Road Crossing	3111	4535952	Cut, stump treat and chip	69
7566136	121	0.45	Road Crossing	3211	7841111	Cut, stump treat and chip	69
7566143	132	1.18	Road Crossing	3211	7841110	Cut, stump treat and chip	69
7840861	3	0.14	Road Crossing	3232	4535952	Cut, stump treat and chip	69
7566045	52	0.34	Streams	1212	4535948	Cut, stump treat and chip	69
4535117	44	1.24	Field	6000	4535952	Mechanical brush mowing	69
4535134	57	7.11	Woodlands	9322	4535952	Mechanical brush mowing	69
7840869	86	0.23	Woodlands	9212	4535952	Mechanical brush mowing	69
4533749	39	2.30	Residential	5331	4535919	Trim, prune tree	69
4535097	23	0.60	Residential	5321	4535952	Trim, prune tree	69
4535213	115	2.08	Residential	8331	4535952	Trim, prune tree	69
7566078	81	3.14	Residential	5321	7841111	Trim, prune tree	69
7566080	83	2.38	Residential	5311	7841111	Trim, prune tree	69
7566159	148	0.28	Residential	5311	7841110	Trim, prune tree	69
4533797	74	0.12	Road Crossing	3312	4535919	Trim, prune tree	69
4535186	110	0.26	Road Crossing	3321	4535952	Trim, prune tree	69
4535388	1	0.67	Road Crossing	3311	7841111	Trim, prune tree	69
7566059	63	0.36	Road Crossing	3310	7841111	Trim, prune tree	69
7566149	138	0.52	Road Crossing	3311	7841110	Trim, prune tree	69
7566151	140	0.54	Road Crossing	3331	7841110	Trim, prune tree	69
4459028	30	1.11	Brush Lands	8211	4462143	Cut, stump treat and chip	115
4531449	20	0.52	Brush Lands	8233	4535856	Cut, stump treat and chip	115
7566383	130	0.53	Brush Lands	8222	7841193	Cut, stump treat and chip	115

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7442870	268	0.00	Commercial/Inc	4320	5241933	Cut, stump treat and chip	115
7442872	270	0.00	Commercial/Inc	4330	5241933	Cut, stump treat and chip	115
7443183	12	1.32	Commercial/Inc	4310	4555128	Cut, stump treat and chip	115
7443605	182	1.69	Commercial/Inc	4210	4462143	Cut, stump treat and chip	115
7443909	62	0.72	Commercial/Inc	4331	5323207	Cut, stump treat and chip	115
4459046	48	1.76	Pasture	7311	4462143	Cut, stump treat and chip	115
7443690	18	5.14	Pasture	7332	5241743	Cut, stump treat and chip	115
4459031	33	0.62	Residential	5332	4462143	Cut, stump treat and chip	115
4459296	4	3.73	Residential	5232	4462184	Cut, stump treat and chip	115
4459314	24	5.16	Residential	5322	4462184	Cut, stump treat and chip	115
4459329	39	2.19	Residential	5322	4462184	Cut, stump treat and chip	115
4459337	47	1.10	Residential	5323	4462184	Cut, stump treat and chip	115
4459348	58	1.07	Residential	5242	4462184	Cut, stump treat and chip	115
4459393	103	0.53	Residential	5322	4462184	Cut, stump treat and chip	115
4459677	48	10.19	Residential	5221	4462185	Cut, stump treat and chip	115
5307970	212	3.31	Residential	5311	5323076	Cut, stump treat and chip	115
5310667	209	0.12	Residential	5221	5323076	Cut, stump treat and chip	115
5313542	43	1.33	Residential	5211	5323207	Cut, stump treat and chip	115
5316647	45	2.60	Residential	5311	5323337	Cut, stump treat and chip	115
5317491	7	2.45	Residential	5000	5323347	Cut, stump treat and chip	115
5317494	9	3.29	Residential	5310	5323347	Cut, stump treat and chip	115
5370140	20	4.23	Residential	5232	5370630	Cut, stump treat and chip	115
5370142	22	0.94	Residential	5210	5370630	Cut, stump treat and chip	115
5370146	26	2.47	Residential	5210	5370630	Cut, stump treat and chip	115
4459293	1	0.35	Road Crossing	3321	4462184	Cut, stump treat and chip	115
4459307	16	0.11	Road Crossing	3232	4462184	Cut, stump treat and chip	115
4459349	59	2.63	Road Crossing	3311	4462184	Cut, stump treat and chip	115
4459634	4	3.30	Road Crossing	3210	4462185	Cut, stump treat and chip	115
4531446	17	1.12	Road Crossing	3320	4535856	Cut, stump treat and chip	115
5236475	6	2.83	Road Crossing	3320	5241830	Cut, stump treat and chip	115
5236491	20	1.19	Road Crossing	3341	5241830	Cut, stump treat and chip	115
5237156	42	0.60	Road Crossing	3322	5241842	Cut, stump treat and chip	115
5307948	184	2.39	Road Crossing	3311	5323076	Cut, stump treat and chip	115
5307973	213	4.71	Road Crossing	3321	5323076	Cut, stump treat and chip	115
5313482	10	0.33	Road Crossing	3233	5323207	Cut, stump treat and chip	115

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5313486	14	0.59	Road Crossing	3313	5323207	Cut, stump treat and chip	115
5313528	34	0.25	Road Crossing	3223	5323207	Cut, stump treat and chip	115
5314142	15	0.50	Road Crossing	3220	5323218	Cut, stump treat and chip	115
5314145	19	3.90	Road Crossing	3211	5323218	Cut, stump treat and chip	115
7443910	62	0.27	Road Crossing	3321	5323207	Cut, stump treat and chip	115
7566311	81	0.23	Road Crossing	3110	7841193	Cut, stump treat and chip	115
7566327	92	0.61	Road Crossing	3221	7841193	Cut, stump treat and chip	115
7566389	136	0.74	Road Crossing	3223	7841193	Cut, stump treat and chip	115
7566443	256	0.86	Road Crossing	6000	7841195	Cut, stump treat and chip	115
4459330	40	0.07	Streams	1212	4462184	Cut, stump treat and chip	115
4459390	100	2.34	Streams	1333	4462184	Cut, stump treat and chip	115
5307788	37	0.50	Streams	1310	5323076	Cut, stump treat and chip	115
4459310	20	2.29	Woodlands	9333	4462184	Cut, stump treat and chip	115
4531581	118	0.90	Brush Lands	8323	4535867	Mechanical brush mowing	115
5307851	97	0.52	Brush Lands	8222	5323076	Mechanical brush mowing	115
5368452	6	5.93	Brush Lands	8233	5370669	Mechanical brush mowing	115
5368453	6	3.16	Brush Lands	8111	5370669	Mechanical brush mowing	115
5368467	9	10.67	Brush Lands	8223	5370669	Mechanical brush mowing	115
5368469	11	17.34	Brush Lands	8233	5370669	Mechanical brush mowing	115
5368472	14	11.39	Brush Lands	8213	5370669	Mechanical brush mowing	115
5369244	19	0.29	Brush Lands	8223	5370656	Mechanical brush mowing	115
5369312	72	4.43	Brush Lands	8121	5370656	Mechanical brush mowing	115
5370137	17	5.94	Brush Lands	8233	5370630	Mechanical brush mowing	115
5370145	25	5.68	Brush Lands	8233	5370630	Mechanical brush mowing	115
7566320	86	1.28	Brush Lands	8341	7841193	Mechanical brush mowing	115
5369240	15	2.30	Residential	5222	5370656	Mechanical brush mowing	115
7566382	129	1.43	Residential	5311	7841193	Mechanical brush mowing	115
4459118	115	0.52	Streams	1221	4462143	Mechanical brush mowing	115
5369241	16	1.10	Streams	1223	5370655	Mechanical brush mowing	115
4531579	118	0.75	Wetlands	2213	4535856	Mechanical brush mowing	115
4459008	10	3.62	Woodlands	9232	4462143	Mechanical brush mowing	115
4459117	114	6.41	Woodlands	9231	4462143	Mechanical brush mowing	115
4459119	116	2.88	Woodlands	9231	4462143	Mechanical brush mowing	115
4459160	157	1.24	Woodlands	9333	4462143	Mechanical brush mowing	115
4459220	33	0.11	Woodlands	9333	4462133	Mechanical brush mowing	115



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4459696	67	1.17	Woodlands	9231	4462185	Mechanical brush mowing	115
5369242	17	2.26	Woodlands	9223	5370656	Mechanical brush mowing	115
5369246	21	0.52	Woodlands	9223	5370656	Mechanical brush mowing	115
5369310	70	10.39	Woodlands	9132	5370656	Mechanical brush mowing	115
7304311	168	1.83	Woodlands	9222	7841194	Mechanical brush mowing	115
7443173	6	3.98	Woodlands	9223	5370669	Mechanical brush mowing	115
4459000	2	3.34	Brush Lands	8000	4462143	Trim, prune tree	115
4459069	66	4.34	Brush Lands	8311	4462144	Trim, prune tree	115
4459169	166	0.69	Brush Lands	8311	4462143	Trim, prune tree	115
4459294	2	3.41	Brush Lands	8233	4462184	Trim, prune tree	115
4459306	15	0.54	Brush Lands	8311	4462184	Trim, prune tree	115
4459375	85	2.45	Brush Lands	8322	4462184	Trim, prune tree	115
5235766	112	1.80	Brush Lands	8322	5241813	Trim, prune tree	115
5235776	122	0.78	Brush Lands	8311	5241813	Trim, prune tree	115
7445214	18	0.97	Brush Lands	8333	5241743	Trim, prune tree	115
4554205	8	2.05	Commercial/Inc	4320	4555128	Trim, prune tree	115
4554971	4	0.98	Commercial/Inc	4320	4555126	Trim, prune tree	115
7443015	32	4.95	Commercial/Inc	4311	4462148	Trim, prune tree	115
7443178	11	2.27	Commercial/Inc	4002	4555128	Trim, prune tree	115
4458459	23	2.23	Field	6310	4462148	Trim, prune tree	115
4459196	11	0.07	Field	6321	4462133	Trim, prune tree	115
7442931	37	2.15	Field	6210	4462133	Trim, prune tree	115
4459223	36	3.67	Pasture	7211	4462133	Trim, prune tree	115
4458463	27	0.47	Residential	5321	4462148	Trim, prune tree	115
4458999	1	2.63	Residential	5311	4462143	Trim, prune tree	115
4459007	9	0.21	Residential	5310	4462143	Trim, prune tree	115
4459013	15	0.81	Residential	5311	4462143	Trim, prune tree	115
4459015	17	0.16	Residential	5311	4462143	Trim, prune tree	115
4459132	129	0.71	Residential	5310	4462143	Trim, prune tree	115
4459205	19	1.72	Residential	5311	4462133	Trim, prune tree	115
4459216	29	3.74	Residential	5341	4462133	Trim, prune tree	115
4459347	57	7.68	Residential	5320	4462184	Trim, prune tree	115
4459369	79	3.72	Residential	5222	4462184	Trim, prune tree	115
4459380	90	0.15	Residential	5333	4462184	Trim, prune tree	115
4459383	93	0.64	Residential	5321	4462184	Trim, prune tree	115

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4459389	99	4.38	Residential	5321	4462184	Trim, prune tree	115
4459391	101	1.07	Residential	5321	4462184	Trim, prune tree	115
4459402	112	0.51	Residential	5310	4462184	Trim, prune tree	115
4459404	114	0.22	Residential	5310	4462184	Trim, prune tree	115
4459646	16	0.09	Residential	5321	4462185	Trim, prune tree	115
4459648	18	2.48	Residential	5311	4462185	Trim, prune tree	115
4459650	20	0.34	Residential	5310	4462185	Trim, prune tree	115
4459765	3	0.30	Residential	5311	4462182	Trim, prune tree	115
4459779	12	3.51	Residential	5321	4462182	Trim, prune tree	115
4459780	13	2.58	Residential	5311	4462182	Trim, prune tree	115
4554206	9	1.61	Residential	5330	4555128	Trim, prune tree	115
4554207	10	4.95	Residential	5331	4555128	Trim, prune tree	115
5235556	37	0.91	Residential	5220	5241812	Trim, prune tree	115
5235712	61	5.19	Residential	5321	5241813	Trim, prune tree	115
5235767	113	0.35	Residential	5311	5241813	Trim, prune tree	115
5235773	119	1.05	Residential	5000	5241813	Trim, prune tree	115
5236489	18	0.63	Residential	5320	5241830	Trim, prune tree	115
5237146	32	8.01	Residential	5000	5241842	Trim, prune tree	115
5307784	32	3.65	Residential	5321	5323076	Trim, prune tree	115
5307786	34	0.55	Residential	5321	5323076	Trim, prune tree	115
5307793	41	4.38	Residential	5110	5323076	Trim, prune tree	115
5310643	43	2.24	Residential	5321	5323076	Trim, prune tree	115
5310645	55	5.88	Residential	5211	5323076	Trim, prune tree	115
5310646	56	0.23	Residential	5000	5323076	Trim, prune tree	115
5316632	29	1.20	Residential	5000	5323337	Trim, prune tree	115
5369230	5	3.10	Residential	5331	5370656	Trim, prune tree	115
5369231	6	3.82	Residential	5321	5370656	Trim, prune tree	115
5369235	10	10.28	Residential	5332	5370656	Trim, prune tree	115
5369237	12	15.50	Residential	5001	5370656	Trim, prune tree	115
7443168	6	0.83	Residential	5321	5370669	Trim, prune tree	115
7443288	11	1.94	Residential	5310	4555128	Trim, prune tree	115
7443289	11	2.72	Residential	5310	4555128	Trim, prune tree	115
7443583	70	1.17	Residential	5311	4462185	Trim, prune tree	115
7443722	18	0.32	Residential	5313	5241743	Trim, prune tree	115
7444736	131	0.00	Residential	5311	5241830	Trim, prune tree	115

**Projected CY2012 Floor Trim Acres**

Note: These numbers are from the previous floor trim cycle. Final numbers (acres) will be recorded upon completion of the individual inventories in early 2012.

<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
4458438	2	0.15	Road Crossing	3310	4462148	Trim, prune tree	115
4458448	12	0.92	Road Crossing	3333	4462148	Trim, prune tree	115
4458457	21	0.11	Road Crossing	3331	4462148	Trim, prune tree	115
4459014	16	1.14	Road Crossing	3310	4462143	Trim, prune tree	115
4459037	39	1.04	Road Crossing	3311	4462143	Trim, prune tree	115
4459047	49	0.61	Road Crossing	3321	4462143	Trim, prune tree	115
4459066	66	1.07	Road Crossing	3331	4462144	Trim, prune tree	115
4459174	171	0.10	Road Crossing	3000	4462143	Trim, prune tree	115
4459222	35	2.18	Road Crossing	3311	4462133	Trim, prune tree	115
4459366	76	1.89	Road Crossing	3310	4462184	Trim, prune tree	115
4459694	65	1.75	Road Crossing	3310	4462185	Trim, prune tree	115
4531413	2	0.58	Road Crossing	3322	4535856	Trim, prune tree	115
4531442	13	1.00	Road Crossing	3311	4535856	Trim, prune tree	115
4531448	19	0.57	Road Crossing	3310	4535856	Trim, prune tree	115
4531510	51	0.26	Road Crossing	3312	4535856	Trim, prune tree	115
4532882	147	1.44	Road Crossing	3311	7841194	Trim, prune tree	115
5237122	8	0.60	Road Crossing	3321	5241842	Trim, prune tree	115
5237130	16	0.23	Road Crossing	3310	5241842	Trim, prune tree	115
5313460	7	3.34	Road Crossing	3111	5323178	Trim, prune tree	115
5313483	11	0.34	Road Crossing	3310	5323207	Trim, prune tree	115
5313513	19	0.22	Road Crossing	3313	5323207	Trim, prune tree	115
5313545	46	0.70	Road Crossing	3223	5323207	Trim, prune tree	115
5313551	52	0.08	Road Crossing	3223	5323207	Trim, prune tree	115
5313556	57	0.47	Road Crossing	3311	5323207	Trim, prune tree	115
5314685	37	0.51	Road Crossing	3310	5323243	Trim, prune tree	115
5369228	3	0.80	Road Crossing	3310	5370656	Trim, prune tree	115
5369236	11	0.92	Road Crossing	3110	5370656	Trim, prune tree	115
5369262	37	0.56	Road Crossing	3310	5370656	Trim, prune tree	115
5369294	54	0.11	Road Crossing	3310	5370656	Trim, prune tree	115
5369300	60	3.16	Road Crossing	3311	5370656	Trim, prune tree	115
5369304	64	0.30	Road Crossing	3310	5370656	Trim, prune tree	115
7443007	7	0.16	Road Crossing	3310	4462182	Trim, prune tree	115
7443719	37	0.29	Road Crossing	3310	4462184	Trim, prune tree	115
7463748	39	1.50	Road Crossing	3310	5323207	Trim, prune tree	115
7463756	39	2.66	Road Crossing	3000	5323207	Trim, prune tree	115

**Projected CY2012 Floor Trim Acres**

Note: These numbers are from the previous floor trim cycle. Final numbers (acres) will be recorded upon completion of the individual inventories in early 2012.

<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
4459124	121	2.03	Streams	1341	4462143	Trim, prune tree	115
4459374	84	0.91	Streams	1311	4462184	Trim, prune tree	115
4459654	24	1.34	Streams	1313	4462185	Trim, prune tree	115
5235768	114	1.15	Streams	1211	5241813	Trim, prune tree	115
5369229	4	0.46	Streams	1321	5370656	Trim, prune tree	115
5369232	7	0.23	Streams	1322	5370656	Trim, prune tree	115
5369287	47	0.80	Streams	1123	5370656	Trim, prune tree	115
4554198	2	1.15	Wetlands	2310	4555128	Trim, prune tree	115
4459067	66	1.94	Woodlands	9241	4462144	Trim, prune tree	115
5236487	16	0.46	Woodlands	9231	5241830	Trim, prune tree	115
5321617	37	0.11	Woodlands	9233	5323447	Trim, prune tree	115
5311250	104	2.24	Road Crossing	3221	5323267	Cut, stump treat and chip	345
5311232	89	2.01	Residential	5320	5323267	Trim, prune tree	345
5319719	16	7.02	Residential	5310	5323401	Trim, prune tree	345
7444684	79	0.00	Residential	5321	5323440	Trim, prune tree	345
7444128	156	0.96	Road Crossing	3312	5323267	Trim, prune tree	345
<b>Total: 884.16</b>			<b>acres</b>				

**Projected CY2013 Floor Trim Acres**

Note: These numbers are from the previous floor trim cycle. Final numbers (acres) will be recorded upon completion of the individual inventories in early 2013.

<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
5239943	4	1.69	Residential	5321	5241917	Cut, stump treat and chip	23
5239657	12	0.41	Road Crossing	3312	5241910	Cut, stump treat and chip	23
5369705	10	0.36	Brush Lands	8331	5370639	Trim, prune tree	23
5369709	14	0.61	Brush Lands	8331	5370639	Trim, prune tree	23
5369696	1	4.07	Commercial/Industrial	4320	5370639	Trim, prune tree	23
5239759	2	0.44	Field	6310	5241913	Trim, prune tree	23
5239655	10	0.18	Residential	5310	5241910	Trim, prune tree	23
5239779	25	2.14	Residential	5330	5241913	Trim, prune tree	23
5239780	26	0.22	Residential	5330	5241913	Trim, prune tree	23
5239782	28	0.55	Residential	5311	5241913	Trim, prune tree	23
5239786	32	0.36	Residential	5311	5241913	Trim, prune tree	23
5239803	49	0.23	Residential	5311	5241913	Trim, prune tree	23
5239945	6	1.57	Residential	5311	5241917	Trim, prune tree	23
5239968	27	0.23	Residential	5330	5241917	Trim, prune tree	23
7442732	1.13	0	Residential	5320	5241902	Trim, prune tree	23
5239717	1	0.26	Road Crossing	3311	5241912	Trim, prune tree	23
5239799	45	0.27	Road Crossing	3330	5241913	Trim, prune tree	23
5239807	53	0.42	Streams	1211	5241913	Trim, prune tree	23
5238849	48	0.3	Road Crossing	3310	5241888	Trim, prune tree	34.5
5369447	1	2.55	Commercial/Industrial	4311	5370635	Trim, prune tree	34.5
5369448	2	7.3	Commercial/Industrial	4310	5370635	Trim, prune tree	34.5
7463312	1.05	0.32	Brush Lands	8320	5241888	Trim, prune tree	34.5
5237246	16	1.65	Brush Lands	8322	5241849	Cut, stump treat and chip	46
5237232	2	0.22	Residential	5311	5241849	Cut, stump treat and chip	46
5237244	14	0.12	Residential	5110	5241849	Cut, stump treat and chip	46
5237256	27	1.01	Residential	5331	5241849	Cut, stump treat and chip	46
5237267	38	1.12	Residential	5221	5241849	Cut, stump treat and chip	46
5237271	42	0.48	Residential	5330	5241849	Cut, stump treat and chip	46
5237306	79	0.47	Residential	5321	5241849	Cut, stump treat and chip	46
5240435	19	0.38	Residential	5221	5241849	Cut, stump treat and chip	46
5237231	1	0.32	Road Crossing	3321	5241849	Cut, stump treat and chip	46
5237265	36	0.43	Road Crossing	3310	5241849	Cut, stump treat and chip	46
5237281	52	0.22	Road Crossing	3223	5241849	Cut, stump treat and chip	46
5237245	15	0.29	Streams	1223	5241849	Cut, stump treat and chip	46

**Projected CY2013 Floor Trim Acres**

Note: These numbers are from the previous floor trim cycle. Final numbers (acres) will be recorded upon completion of the individual inventories in early 2013.

<b>System</b>	<b>Site</b>	<b>Site Area</b>	<b>Land</b>	<b>Use</b>	<b>Forestry</b>		
<b>Id</b>	<b>Number</b>	<b>(Acres)</b>	<b>Land Use</b>	<b>Code</b>	<b>Segment</b>	<b>Prescription</b>	<b>Voltage</b>
5237278	49	0.88	Commercial/Industrial	4320	5241849	Trim, prune tree	46
5237282	53	1.35	Commercial/Industrial	4320	5241849	Trim, prune tree	46
5237247	17	0.12	Residential	5331	5241849	Trim, prune tree	46
5237264	35	1.31	Residential	5310	5241849	Trim, prune tree	46
5237257	28	0.34	Road Crossing	3311	5241849	Trim, prune tree	46
5237279	50	1.06	Road Crossing	3321	5241849	Trim, prune tree	46
5368537	3	0.11	Road Crossing	3310	5370673	Trim, prune tree	69
4530435	81.00	0.08	Brush Lands	8333	4535838	Cut, stump treat and chip	115
5235830	9.00	0.46	Brush Lands	8321	5241814	Cut, stump treat and chip	115
5236392	35.00	1.36	Brush Lands	8332	5241811	Cut, stump treat and chip	115
5236393	36.00	3.63	Brush Lands	8323	5241811	Cut, stump treat and chip	115
5308005	3.04	1.11	Brush Lands	8121	5323098	Cut, stump treat and chip	115
5308042	26.00	0.31	Brush Lands	8331	5323097	Cut, stump treat and chip	115
5316540	266.00	0.32	Brush Lands	8313	5323336	Cut, stump treat and chip	115
7445019	109.22	0.81	Brush Lands	8212	5241814	Cut, stump treat and chip	115
4530355	8.00	2.30	Residential	5311	4535838	Cut, stump treat and chip	115
4530373	24.00	1.68	Residential	5332	4535843	Cut, stump treat and chip	115
4530418	66.00	1.38	Residential	5310	4535844	Cut, stump treat and chip	115
4530357	10.00	0.80	Road Crossing	3111	4535838	Cut, stump treat and chip	115
4530365	15.00	0.68	Road Crossing	3311	4535838	Cut, stump treat and chip	115
4530370	19.00	0.27	Road Crossing	3220	4535843	Cut, stump treat and chip	115
4530449	94.00	0.86	Road Crossing	3340	4535838	Cut, stump treat and chip	115
4530451	96.00	1.04	Road Crossing	3311	4535838	Cut, stump treat and chip	115
5235831	10.00	0.62	Road Crossing	3220	5241814	Cut, stump treat and chip	115
5235916	95.00	0.66	Road Crossing	3311	5241814	Cut, stump treat and chip	115
5308009	3.08	0.73	Road Crossing	3222	5323098	Cut, stump treat and chip	115
5308017	3.16	0.17	Road Crossing	3111	5323098	Cut, stump treat and chip	115
5308025	6.00	0.42	Road Crossing	3222	5323097	Cut, stump treat and chip	115
5316410	139.00	0.63	Road Crossing	3322	5323336	Cut, stump treat and chip	115
5316549	275.00	1.25	Road Crossing	3321	5323336	Cut, stump treat and chip	115
5316842	52.00	1.34	Road Crossing	3222	5323338	Cut, stump treat and chip	115
7444979	101.10	0.35	Road Crossing	3320	5241814	Cut, stump treat and chip	115
7444995	104.17	3.05	Road Crossing	3331	5241814	Cut, stump treat and chip	115
5319113	116.00	1.92	Streams	1310	5323381	Cut, stump treat and chip	115

**Projected CY2013 Floor Trim Acres**

Note: These numbers are from the previous floor trim cycle. Final numbers (acres) will be recorded upon completion of the individual inventories in early 2013.

<b>System Id</b>	<b>Site Number</b>	<b>Site Area (Acres)</b>	<b>Land Use</b>	<b>Land Use Code</b>	<b>Forestry Segment</b>	<b>Prescription</b>	<b>Voltage</b>
4459972	182.00	5.81	Woodlands	9223	4462181	Mechanical brush mowing	115
7445044	153.05	5.45	Woodlands	9343	5241814	Mechanical brush mowing	115
4460067	264.00	1.73	Brush Lands	8140	4462181	Trim, prune tree	115
5236406	58.00	0.12	Brush Lands	8313	5241811	Trim, prune tree	115
5316499	226.00	0.11	Brush Lands	8312	5323336	Trim, prune tree	115
4459840	50.00	1.08	Pasture	7222	4462152	Trim, prune tree	115
4458472	502.00	0.36	Residential	5312	4462147	Trim, prune tree	115
4458476	506.00	0.70	Residential	5322	4462147	Trim, prune tree	115
4459794	4.00	0.75	Residential	5311	4462152	Trim, prune tree	115
4459799	9.00	0.80	Residential	5221	4462152	Trim, prune tree	115
4459816	26.00	1.21	Residential	5320	4462152	Trim, prune tree	115
4554303	25.00	3.30	Residential	5111	4555124	Trim, prune tree	115
4555050	49.00	1.00	Residential	5310	4555124	Trim, prune tree	115
5233461	129.00	0.89	Residential	5311	5241755	Trim, prune tree	115
5236358	17.00	0.05	Residential	5310	5241811	Trim, prune tree	115
5308058	40.02	4.58	Residential	5310	5323089	Trim, prune tree	115
5319102	105.00	0.56	Residential	5310	5323381	Trim, prune tree	115
7583406	49.00	2.55	Residential	5321	4462152	Trim, prune tree	115
4458473	503.00	1.11	Road Crossing	3210	4462147	Trim, prune tree	115
4458475	505.00	0.19	Road Crossing	3310	4462147	Trim, prune tree	115
4458478	508.00	0.98	Road Crossing	3331	4462147	Trim, prune tree	115
4459806	16.00	0.94	Road Crossing	3321	4462152	Trim, prune tree	115
4459990	197.03	0.30	Road Crossing	3310	4462153	Trim, prune tree	115
4460026	223.00	0.12	Road Crossing	3312	4462181	Trim, prune tree	115
4554288	10.00	1.00	Road Crossing	3310	4555124	Trim, prune tree	115
4554304	26.00	0.81	Road Crossing	3311	4555124	Trim, prune tree	115
4554369	95.00	2.11	Road Crossing	3320	4555124	Trim, prune tree	115
5235902	81.00	1.58	Road Crossing	3310	5241814	Trim, prune tree	115
5236004	130.00	0.85	Road Crossing	3210	5241814	Trim, prune tree	115
5236838	10.00	0.27	Road Crossing	3310	5241840	Trim, prune tree	115
7445020	109.23	0.59	Road Crossing	3311	5241814	Trim, prune tree	115
7445476	6.03	0.43	Road Crossing	3321	5241818	Trim, prune tree	115
7583293	106.10	0.83	Road Crossing	3332	4462181	Trim, prune tree	115
7583404	256.10	0.81	Woodlands	3321	4462181	Trim, prune tree	115

Date of Request: March 2, 2010  
Due Date: March 12, 2010

Request No. VVP-3  
NMPC Req. No. NM 167 DPS 97

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Vijay Puran

TO: Infrastructure and Operations Panel

Request:

For each transmission project listed in Exhibit\_ (IOP-14), Schedule 2, Exhibit 2 (Sheets 126 through 130 of 308), please provide the actual capital expenditures for fiscal years ending 2006, 2007, 2008, 2009, and 2010 (use budgeted capital expenditures for months where actuals are not available for FY 2010). Please also provide the total project spending for each project as of January 31, 2010. Please provide the requested information in Excel, in the same format (and project sequence) as Exhibit\_ (IOP-14), Schedule 2, Exhibit 2.

Response:

Please see WP-3 Attachment 1 (VVP-3\_Attach 1). The Transmission capital expenditures provided include actuals from FY2006 to January 31, 2010, and 2 months of forecast expenditures for February and March 2010.

Name of Respondent:  
Tom Sullivan

Date of Reply:  
March 11, 2010



Spending Rationale	Program	Project Name	Project Number	FY06	FY07	FY08	FY09	FY10 (thru 1/31)	Total FY06-10 spend (thru 1/31/10)	Feb-Mar FY10 Forecast	Total FY06-10	Risk Score
Asset Condition	3A/3B Tower Strategy	Leeds - Pleasant Valley 91/92 Tower Reinforcement - includes public safety	C08017						-	-	-	49
		New Scotland - Leeds 93/94 Tower Reinforcement - Public Safety	C07918						-	-	-	49
	<b>3A/3B Tower Strategy Total</b>								-	-	-	
	Battery Strategy	Battery Strategy FY09 Co. 36 Txt	C24239			12,372	331,071	109,104	452,547	-	452,547	22
		Battery System Replacement Program	C32957					48,204	48,204	4,523	52,727	34
		Battery Rpl Strategy Co36Txt	C33847					99,485	99,485	74,014	173,499	39
	<b>Battery Strategy Total</b>					12,372	331,071	256,793	600,236	78,537	678,772	
	Circuit Breaker Replacement Strategy	Inghams-replace 115kv OCB	C31661					13,383	13,383	(3,408)	9,975	35
		Meco - Replace 115kv PTs and circuit breakers	CNYAS24						-	-	-	35
		Mortimer 115KV - refurbish / replace circuit breakers	CNYAS39						-	-	-	35
		NY Circuit Breaker Replacement (Priority 4)	CNYAS07						-	-	-	35
		NY Circuit Breaker Replacement Priority 3)	CNYAS06						-	-	-	26
	<b>Circuit Breaker Replacement Strategy Total</b>								-	-	-	
	Flying Ground Strategy	Strategy to Replace Flying Ground Switches	CNYX30						-	-	-	22
	<b>Flying Ground Strategy Total</b>								-	-	-	
	Other Asset Condition	Alps #188 Obsolete Circuit Switcher	C28304						-	-	-	16
		Ash to Teal Cathodic Protection Upgrade	C27082						-	-	-	28
		Bristol Hill Repl SWs 46 & 47	C31005				2,401		2,401	-	2,401	28
		Butler Sta 64 -RPL LN182	C31950						-	-	-	43
		Colton Replace CBs and disconnects	C29844				10,631	20	10,651	15,980	26,631	34
		Dewitt-Rebuild 345kv	C31867					104,827	104,827	(4,827)	100,000	49
		Dunkirk 230kv Control Cable TB1	C27845				13,926	48,318	62,244	131,662	193,926	34
		Edic Station - Replace TB2, 3, 4 Metering	C31025						-	-	-	40
		EJ West-Warrensburg 9 115KV Cross Bracing	C03383						-	-	-	16
		Elm Terminal Station - HPFF Alarms	C30528						-	-	-	35
		Elnora 115KV Tap Cross Bracing	C03384						-	-	-	16
		Fenner-Cortland 3 Cross Braces	C03281						-	-	-	21
		Gardenville Control Cables	C27829				17,482	13,694	31,177	6,306	37,483	34
		Gardenville Station - HPFF Alarms	C30530						-	-	-	35
		Gibson Sta - Repl SW1602,03, R1617,18	C31004				12,129	4	12,133	(1)	12,133	28
		Greenbush- Replace TB3	C31663						-	-	-	39
		Harper Station - Replace 2023 & 2033 MODs	C29950				2,559		2,559	-	2,559	22
		Huntley Station - HPFF Alarming	C30631					3,056	3,056	(3,056)	-	35
		Lafayette - Replace Line 4 Relaying	C28044				262,311	320,086	582,397	163,414	745,811	39
		Leeds SVC-Refurbishment/Replacement	C03748	75,913	1,079	1,609	36,737	1,578,880	1,694,218	621,120	2,315,338	36
		New Gardenville - TB3 & TB#4	C27042			182	2,804,787	2,791,457	5,596,426	473,543	6,069,969	34
		NY Surge Arrester Replacement	C31658						-	-	-	36
		Oswego - Replace Special	C29216					904	904	24,096	25,000	35
		Packard Replace TB3 & TB4	C27006			182	1,655,237	21,267	1,676,687	433,793	2,110,420	41
		PIW Prospective Projects	CNYX72						-	-	-	49
		Porter Replace 11 GE 230kv RF2 Discs	C20912			6,601	1,004	2,367	9,972	633	10,605	28
		Rochester Generator and HPFF Alarms	C30532						-	-	-	39
		Rochester HPFF Cable Plant	C15988		15,802	9,628	594		26,023	-	26,023	44
		Rochester Pump - LPFF Trip Scheme	C29946				3,895		3,895	-	3,895	35
		Silver Creek switch structure - replace 115KV disconnects	CNYAS38						-	-	-	21
		Taylorville Repl SW #23	C31044				1,648		1,648	-	1,648	34
		Temple Pressuring Plant	CNYX26						-	-	-	28
		Ticonderoga-Sanford T6410R Removal	C23209						-	-	-	43
		Trinity UG Pumphouse Redesign	C11318		375	47,113	(39,162)	616	8,941	384	9,325	49
		Youngmann Terminal Station - Replace Switch #310	C29951					1,657	1,657	-	1,657	19

<b>Other Asset Condition Total</b>			75,913	17,256	65,314	4,787,835	4,885,497	9,831,816	1,863,007	11,694,822	
<b>Overhead Line Refurbishment Program</b>											
	Dunkirk - Falconer #161	CNYAS62						-	-	-	40
	Dunkirk - Falconer #162	CNYAS49						-	-	-	44
	Falconer-HH 153-154, T1160-T1170 ACR	C27422			455	455		455	-	455	39
	Gard-Dun 141-142 T1260-1270 ACR	C03389		47,107	202,708	223,013		472,827	66,987	539,814	44
	Gardenville - Buffalo Sw #146 [145]	CNYAS60						-	-	-	18
	Gardenville - Dunkirk #74	CNYAS75						-	-	-	40
	Gardenville - HH 151-152, T1950-T1280-S ACR	C27425				25,593		25,593	24,407	50,000	39
	Gardenville Lines 180-182, T1660-T1780 ACR	C27436						-	-	-	44
	Gard-HH 151-152, T1950-T1280 N ACR	C04718	587,868	564,226	165,934	388,539	8,244,389	9,950,955	4,255,611	14,206,566	49
	Homer Hill Bennett Rd 157, T1340 ACR	C27429						-	-	-	39
	Huntley - Lockport #37	CNYAS53						-	-	-	44
	Huntley - Praxair #46	CNYAS51						-	-	-	18
	Huntley-Gardenville 38 [ & 39] (refurb)	CNYAS63						-	-	-	40
	Indeck Oswego - Lighthouse Hill #2	CNYAS56						-	-	-	39
	Lockport 103- 104, T1620-T106 STR	C27432						-	-	-	40
	Lockport Mortimer 111 T1530 ACR	C03417		54,777	158,708	448,559		662,044	46,441	708,485	49
	Lockport-Batavia 112, T1510 ACR	C03422			448			448	-	448	39
	Lockport-Batavia 108 Refurb	C27431						-	-	-	29
	Lockport-Mort 113-114, T1540-T1550 LER	C18670		61,674	188,702	2,148,892	2,399,268	6,351,108	8,750,376		49
	Lockport-Mort 111 Tap T1530-1 Refurb	C33014						-	-	-	39
	Mortimer - Pannell Road #24	CNYAS65						-	-	-	40
	Pannell-Geneva 4-4A, T1860 ACR	C30889						-	-	-	37
	Porter - Rotterdam #30	CNYAS77						-	-	-	40
	Porter Rotterdam 31, T4210 ACR	C30890						-	-	-	45
	Taylorville - B 5-6 T3320-T3330 ACR	C27437				72,435	72,435	(72,435)			39
	Taylorville-Moshier 7, T3340 ACR	C24361		3,776	49,436	49,896	103,108	50,000	153,108		49
	Ticonderoga Lines 2 [ & 3] (Complete Line)	CNYAS82						-	-	-	40
	Ticonderoga-2-3, T5810-T5830 SXR	C19530			82,899	371,908	772,820	1,227,428	2,727,380	3,954,808	49
<b>Overhead Line Refurbishment Program Total</b>			587,868	564,226	416,167	1,360,904	11,985,397	14,914,562	13,449,499	28,364,060	
<b>Relay Replacement Strategy</b>											
	Browns Falls - protection replacement and new control building	CNYAS29						-	-	-	19
	Edic - Protection replacement	CNYAS31						-	-	-	19
	Geres lock Control room & Relay Strategy	CNYAS90						-	-	-	19
	Menands - new control building	CNYAS41						-	-	-	28
	North Troy - protection replacement	CNYAS26						-	-	-	19
	NY Protection & Control Replacement	CNYAS10						-	-	-	35
	Oswego - new control building	CNYAS32						-	-	-	19
	Relay Replacement Strategy - Phase 2	CNYAS88						-	-	-	19
	Riverside Control room & Relay Strategy	CNYAS89						-	-	-	19
	Yahnundasis - protection replacement	CNYAS28						-	-	-	19
<b>Relay Replacement Strategy Total</b>											
<b>RHE Breaker Replacement</b>											
	Lighthouse Hill Road - Repl R60 RHE PCB	C24299			1,128	145		1,273	-	1,273	39
	Oneida - R/R 115kV FP RHE OCB's	C18410			4,129	604		4,733	-	4,733	39
<b>RHE Breaker Replacement Total</b>					5,256	749		6,005	-	6,005	
<b>Shield Wire Strategy</b>											
	Shieldwire: Buffalo 145	C28683				1,092	570	1,662	9,430	11,082	40
	Shieldwire: Clay-Dewitt 3	C28709				20,403	31,916	52,319	28,084	80,403	40
	Shieldwire: Gardenville-Depew 54	C28706				1,397	2,699	4,095	7,301	11,397	40
	Shieldwire: Gardenville Homer 151/152	C28679				2,286	38,170	40,457	6,830	47,287	40
	Shieldwire: Huntley - Gardenville 38	C28676				10,778	29,766	40,544	10,234	50,778	40
	Shieldwire: Huntley-Lockport 36/37	C28707				7,377	31,289	38,666	40,000	78,666	40
	Shieldwire: LaFarge Pleasant VI, 8	C28678				40,246	2,522,485	2,562,731	1,523,486	4,086,217	40
	Shieldwire: Mountain-Lockport 103	C28681				8,230	628,682	636,912	721,318	1,358,230	40
	Shieldwire: Walck Rd - Huntley	C28712				5,874	39,081	44,955	40,000	84,955	40
<b>Shield Wire Strategy Total</b>						97,683	3,324,658	3,422,341	2,386,684	5,809,025	
<b>Steel Tower Strategy</b>											
	S. Oswego Lighthouse Hill Circuits	C21693			6,090	123,660	258,125	387,875	61,875	449,750	49
<b>Steel Tower Strategy Total</b>					6,090	123,660	258,125	387,875	61,875	449,750	
<b>Substation Rebuilds</b>											
	Buffalo 115kV - replace disconnects	CNYAS40						-	-	-	21
	Dunkirk Rebuild	C05155				396		396	-	396	35



Athens Generation Expansion -Permanent Line	CNYX01									1
Athens Generation Expansion -Permanent Line Reimbursable	CNYX01R									1
Athens Generation Expansion -Permanent Sub	CNYX02									1
Athens Generation Expansion -Permanent Sub Reimbursable	CNYX02R									1
BEDCO Substation Work	C23413		(1,507,314)	783,452	(1,546,832)	(2,270,693)	2,844,369	573,676		49
Cape Vincent Wind-RTU/Metering/Relay upgrades	CNYX60									49
Cape Vincent Wind-RTU/Metering/Relay upgrades-Reimbursable	CNYX60R									49
Clayton Wind-Loop in, Loop-out	CNYX70									49
Clayton Wind-Loop in, Loop-out Reimbursable portion	CNYX70R									49
Clayton Wind-RTU/Metering/Relay upgrades	CNYX71									49
Clayton Wind-RTU/Metering/Relay upgrades-Reimbursable portion	CNYX71R									49
Fairfield Wind Farm Interconnection	C29583				11,625	11,625	38,375	50,000		49
Fairfield Wind Farm Interconnection - Reimbursable Portion	C29583R						(50,000)	(50,000)		49
Fairfield Wind-loop in loop out	C29782				4,686	4,686	45,314	50,000		49
Fairfield Wind-loop in loop out(reimb)	C29782R						(50,000)	(50,000)		49
Green Power-Cody Rd-loop in,loop out	CNYX68									49
	CNYX68R									49
Green Power-Cody Rd-RTU, metering	CNYX69									49
	CNYX69R									49
Inghams SPS updates	CNYPL3									40
Jordanville Wind-Loop in,Loop out	CNYX53									49
Jordanville Wind-Loop in,Loop out Reimbursable Portion	CNYX53R									49
Jordanville Wind-RTU/metering/Relay upgrades	CNYX54									49
Jordanville Wind-RTU/metering/Relay upgrades Reimbursable Portion	CNYX54R									49
New Grange Wind-Loop in, Loop-out	CNYX65									49
New Grange Wind-Loop in, Loop-out Reimbursable portion	CNYX65R									49
New Grange Wind-RTU/Metering/Relay upgrades	CNYX66									49
New Grange Wind-RTU/Metering/Relay upgrades-Reimbursable portion	CNYX66R									49
Noble Bliss 1 - New Arcade Tap	C27745			8,339	11,479	19,819	783,091	802,909		49
Noble Bliss 1 - New Arcade Tap - Reimbursable Portion	C27745R						(799,635)	(799,635)		49
Noble Bliss Wind Farm	C24981		580,474	(570,751)	30,422	40,145	512,271	552,416		35
Noble Bliss Wind Farm - Reimbursable Portion	C24981R						(557,693)	(557,693)		49
Sherman Island Uprate-RTU/Metering/Relay upgrades	CNYX67									49
Sherman Island Uprate-RTU/Metering/Relay upgrades-Reimbursable p	CNYX67R									49
St Lawrence Wind-Loop in, Loop-out	CNYX55									49
St Lawrence Wind-Loop in, Loop-out Reimbursable Portion	CNYX55R									49
St Lawrence Wind-RTU/Metering/Relay upgrades	CNYX56									49
St Lawrence Wind-RTU/Metering/Relay upgrades-Reimbursable Portio	CNYX56R									49
West-Hill Wind -Loop in-loop out	CNYX49									49
West-Hill Wind -Loop in-loop out Reimbursable Portion	CNYX49R									49
West-Hill Wind -RTU/metering	CNYX50									49
West-Hill Wind-RTU/metering Reimbursable Portion	CNYX50R									49
<b>Generation Total</b>			(926,840)	221,041	(1,488,620)	(2,194,419)	2,766,093	571,674		
<b>Load</b>										
New Distribution for Load Growth	CNYPL8									30
Reynolds Road 115-13.2Kv Second Bank	C27423		1,149	352,462	246,417	600,027	972,857	1,572,884		35
Unifax	C29824			2,262		2,262		2,262		49
Unifax -Reimbursable Portion	C29824R									49
<b>Load Total</b>			1,149	354,724	246,417	602,289	972,857	1,575,146		
<b>Luther Forest</b>			1,424	230,750	303,728	535,901	396,272	932,173		49
<b>Luther Forest Total</b>			1,424	230,750	303,728	535,901	396,272	932,173		
<b>Northeast Region Reinforcement</b>										
Design/Build NERR	CNYX39									36
Re-conductor Rotterdam 1&2 Lines - Part of NERR	C18250		13,984	491,977	141,240	3,348,093	3,995,295	2,193,907	6,189,202	49
Rotterdam Banks - Part of NERR	CNYX39A									36
Spier Rotterdam Line#3 - Part of NERR	C31418			2,598	1,472,552	1,475,150	242,011	1,717,161		49
Turner Rd new 230-115kV Station - Part of NERR	C31326			1,304	724,094	725,398	275,906	1,001,304		49
Turner Road New Line Taps - Part of NERR	C31419			624	129,234	129,858	20,766	150,624		49
<b>Northeast Region Reinforcement Total</b>			13,984	491,977	145,766	5,673,973	6,325,701	2,732,590	9,058,291	
<b>Other Statutory/Regulatory</b>										
Repl 23 meters Interconnect/ NYISO	C29483			58,082	57,900	115,982	321,050	437,032		49



		Dunkirk Second Bus Tie- Line, part of SG075	C31460						-	-	-	19
		Dunkirk Second Bus Tie- Station, part of SG075	C31459						-	-	-	19
		Golah work for #109 Conversion - part of SG077	C24631		1,492	484	64,275	66,251	37,013	103,264	34	
		Homer Hill 115kV Capacitor Banks, part of SG075	C31457				9,727	9,727	5,279	15,006	28	
		Mortimer Work for #109 Conversion - part of SG077	C24630		2,718	270	23,892	26,880	26,108	52,988	34	
		Rebuild line #181 and #180 (Station Work), part of SG075	C24019		2,507		39,540	42,047	5,460	47,507	27	
		Rebuild line #181 and #180, part of SG075	C24018		26,703	13,568	270,561	310,831	100,000	410,831	27	
		Reconductor portions of 54 and 181, part of SG075	C31463					-	-	-	19	
		Reconductoring of #171, part of SG075	C24017		5,085	4,583	77,074	86,742	3,213	89,955	39	
		Replace HH Ckt #157 Connections, part of SG075	C31458					-	-	-	28	
		Replacement of #171 connections, part of SG075	C33884				974	974	3,026	4,000	49	
		Second 115kV bus tie at Lockport, part of SG077	C31482				46,850	46,850	10,000	56,850	34	
		Upgrade Batavia South 115kV busring, part of SG077	C31479				22,010	22,010	11,056	33,066	28	
		Upgrade capability of L107, part of SG077	C31481				22,628	22,628	27,372	50,000	34	
		<b>Reliability Criteria Compliance Total</b>			-	-	76,775	50,181	1,325,226	1,452,182	731,635	2,183,816
		Reserve	Reserve	CNYX33					-	-	-	49
		<b>Reserve Total</b>							-	-	-	
		<b>System Capacity &amp; Performance Total</b>			77,762	952,021	2,000,678	(231,756)	2,878,425	5,677,130	2,306,036	7,983,166
Non - Infrastructure	Other - Non Infrastructure	Asset Separation strategy	CNYAS87						-	-	-	39
		Flood mitigation	CNYAS46						-	-	-	22
	<b>Other - Non Infrastructure Total</b>								-	-	-	
	Physical Security	Physical Security Strategy	CNYAS86						-	-	-	40
	<b>Physical Security Total</b>								-	-	-	
<b>Non - Infrastructure Total</b>												
<b>Grand Total</b>					2,914,216	5,906,154	7,729,047	14,009,999	36,753,016	67,312,473	29,393,626	96,706,099

Date of Request: March 2, 2010  
Due Date: March 12, 2010

Request No. VVP-6  
NMPC Req. No. NM 170 DPS 100

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Vijay Puran

TO: Infrastructure and Operations Panel

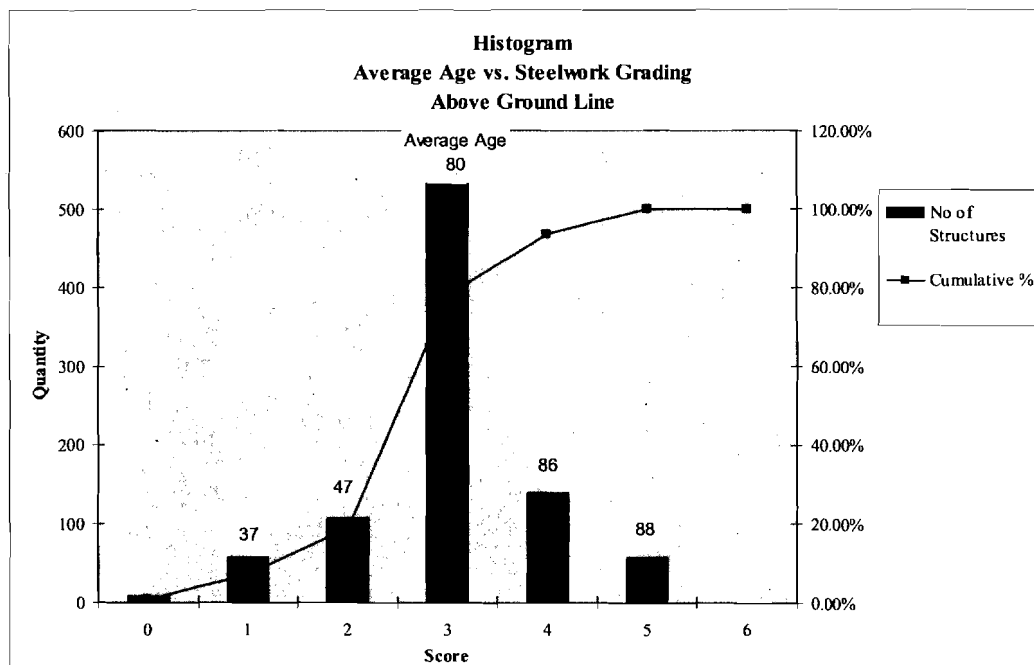
Request:

1. Referring to Exhibit (IOP-14), Schedule 2, Exhibit 18, Table 2, what is the average age of the steel towers listed as:
  - Visual Grade 1
  - Visual Grade 2
  - Visual Grade 3
  - Visual Grade 4
  - Visual Grade 5
  - Visual Grade 6
2. What is the industry recommended standard for frequency of steel tower painting?
3. What is the industry expected service life of steel towers that: (a) have not been painted; (b) have been occasionally painted; (c) have been regularly painted on an industry recommended schedule?
4. For each of the visual grades listed above, please indicate what percentage of the steel towers (a) have not been painted; (b) have been occasionally painted; (c) have been regularly painted on an industry recommended schedule.
5. On average, what is the last year the steel towers listed in each of the visual grades above was painted?

Response:

1. The data in Exhibit (IOP-14), Schedule 2, Exhibit 18, Table 2 come from the Company's Computapole inspection database that houses actual field inspection data. Figure III-2 in Exhibit (IOP-14), Schedule 1, sheet 164 of 315 illustrates our age distribution of steel structures, which comes from our plant accounting records. Plant accounting records typically do not identify individual towers and therefore we can not correlate tower age information with condition information.

During the development of the Tower Painting and Structure Replacement strategy (SG052), average ages obtained from Plant Accounting records from a sample of lines were used with engineering evaluations of tower condition to estimate the condition of the general population of steel towers. The chart below shows the results of this analysis.



Based on this analysis the average age of steel structures in visual grades 3 to 5 would be >80 years.

2. National Grid does not know of a standard industry recommended frequency for painting steel structures. To develop the current painting strategy the Company surveyed other utilities in the Northeast to determine common industry practice. We also reviewed guidance from paint manufacturers that recommended a 20 year cycle, adjusting for environmental factors or evaluations of actual 'paint wear' found through inspection. A summary of the information received from utilities is provided below:



Company	Typical Painting Cycle	Comments
Utility 1	10-20 years	Condition monitoring performed to adjust specific painting cycles, as appropriate
Utility 2	10 year (limited)	Condition based monitoring program by Osmose – work in recent years has primarily been limited to the base of towers (more like the Company's footer maintenance). Painting of top part of transmission towers has generally not been done.
Utility 3	Condition Based	Four years into an 8-9 year process of painting steel structures rated at 3 and 4 on a scale of 1 (the best) to 4 (the worst). A condition assessment was completed approximately 4 years ago.
Utility 4	None	Basically, no tower painting for the last 15-20 years. Evaluating the need for painting as towers are beginning to deteriorate.
Utility 5	20 years	A 5 year cycle is underway with about 1 year left to paint all the transmission structures. A 20 year paint life is anticipated.

The painting strategy was developed by looking into how painting will improve the remaining life of our existing transmission assets. At the time the Steel Tower Strategy (SG018) was written, evidence indicated that use of a properly<sup>1</sup> applied painting system could extend the life of steel structure with rust by 10 years<sup>2</sup>. It is conceivable the lives of some towers could be extended further with additional maintenance painting every 15-20 years. An economic analysis indicated painting towers in Category 4 condition is justified since it would extend the expected remaining life from 10 years to 20 years.

Using this information and other evidence (see reply to question 3, below), the painting strategy recommended implementing a 15-year "interim" painting cycle in New York and the maintenance of a 20-year painting cycle thereafter.

3. The industry expected service life for steel towers that have not been painted is 70 years (with a range of 45 to 80 years). For towers that have been regularly painted the anticipated life of a steel tower would be approximately 85 years<sup>3</sup> (with a range of 65 to

<sup>1</sup> Things like the application temperature, thickness, and rain impact the longevity of painting systems.

<sup>2</sup> Fuente, D., Simancas, J, and Morcillo, M. (2003). "Effect of variable amounts of rust at the steel/paint interface on the behaviour of anticorrosive paint systems." **Progress in Organic Coating**, 46, pp. 241-249, UK: Elsevier.

<sup>3</sup> With little or no pollution

120 years). Regular painting could therefore extend the life of a structure by up to 40 years. The impact of occasional painting is expected to extend the anticipated life of a steel tower less than regular painting (data is not available to estimate by how much). However, a variety of factors such as the amount of atmospheric contaminants and whether or not the structure was originally galvanized, impact how long life can be extended by regular painting.

A July 2003 report by the Woodhouse Partnership Ltd concluded that for UK steel lattice towers, the most economic strategy is to paint at approximately 18 years from the last painting. The report also concluded that the asset life for certain UK types of steel lattice towers can be extended from 60 years to 85 years if the 18 years painting policy is followed. The Northeast US environment is typically less harsh and therefore a 20 year interval is considered appropriate.

4. The Company does not have records to indicate the percentage of the steel towers that (a) have not been painted; (b) have been occasionally painted; (c) have been regularly painted on an industry recommended schedule.

The Company's painting approach is to paint steel structures on a line-by-line basis. In order to do this, the Company looks at a number of factors such as geographical location, outage constraints, refurbishment plans, and inspection condition results. Since FY2005 approximately 3,500 steel transmission structures<sup>4</sup>, have been painted. Due to vendor safety issues, the Company's program was suspended for substantial portions of calendar years 2008 and 2009.

5. The Company does not have records to show the last year steel towers in each of the visual grades were painted.

Name of Respondent:  
Art Peterson

Date of Reply:  
March 12, 2010

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<sup>4</sup> Partial structure painting is included in this value but as "equivalent" full painting. That is, two structures that are half painted are equivalent to one structure.

Date of Request: March 4, 2010  
Due Date: March 15, 2010  
DPS 102

Request No. DKS-4  
NMPC Req. No. NM 172

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid  
Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: David Shahbazian

TO: Revenue Requirement Panel

Request:

1. Book 11, page 21 of the Revenue Requirements Panel testimony references the contract for the Volney Marcy Right of Way agreement. Please provide a complete copy of the contract with all supporting schedules and appendices.
2. Exhibit RRP-10, schedule 8, workpaper 11, sheets 1-12 detail the Company's IS Investment Plan.
  - a) Please provide the current copy of the Company's IS Investment Plan, which outlines the Company's IS Strategy for electric and gas operations, including all cost/benefit analysis and supporting workpapers.
  - b) Sheets 5 - 8 of workpaper 11 reference the Service Company's return on investment of 5.83%. Please provide the workpapers and supporting schedules to support the calculation of 5.83%.
3. Exhibit RRP-10, schedule 8, workpaper 11, sheet 3, shows monies for a Reserve for Future IS Projects for the years 2012, 2013 and 2014+ of \$900k, \$900k and \$1,799k respectively.
  - a) Please provide a full explanation for these reserves, including how the company developed the estimates.
  - b) Are these costs included in any of the rate years? If so, please show where the costs are in RY expense and how they are allocated to electric operations.
4. Exhibit RRP-2, Schedule 8, sheets 10-11 of 16 shows total IS rent expense of \$7,324,968 for electric operations for the test year. The 2011 electric IS rent forecast is 9,274,450 (increase of 26%). The 2012 electric IS rent

forecast is 14,730,163 (increase of 58%). The 2013 electric IS rent forecast is 19,462,399 (increase of 32%).

- a) Please explain these dramatic increases in the rate year IS expenses. In this explanation, include why the Company feels that this elevated level of IS expense is justified and specific examples of how these additional expenses provide benefits to rate payers (e.g., reduced costs, quality of service improvements). Include any cost/benefit analyses or studies that support the Company's justification.
5. Please provide the total Company 36 IS rent expense Actual to Budget performance for the period 2005 – 2009 with breakdown between electric (T&D) and gas operations.
6. Exhibit RRP-2, Schedule 8, sheet 10 lists new IS project cost forecast for 2011. For each of the following, please provide a copy of the actual software license (rental) agreement to support the forecast dollar amount. Please also provide a copy of the INVP detail / data in support of each forecast.
  - a) Line 21 – Customer Systems Agent Desktop - INVP1656
  - b) Line 22 – Data Center Rationalization – INVP1088
  - c) Line 23 – IVR Phase 2 – INVP1306
  - d) Line 26 – Transformation KPI's – INVP1242
7. Exhibit RRP-2, Schedule 8, sheet 10 shows rate year expense of \$1,176k for other projects less than \$100k . Please provide a list of these projects and their associated rate year costs. Projects with rate year costs over \$25k should be listed separately. Projects less than \$25k can be grouped together in one line.

Response:

1. Please see the Volney-Marcy Right of Way operating agreement, as included at Attachment A.
2. a.) Please refer to the IS Investment Plan as included at Attachment B1. For discussion of the Company's IS Strategy, please refer to the testimony of David Lister at Book 3, pages 2 – 8. For cost/benefit discussion and other supporting documentation, please refer to the project summary papers at Attachment B2. Please note that Attachment B2 refers to those individual projects listed in Exhibit (RRP-2), Schedule 8, Sheets 10 and 11, Lines 18 – 46, excluding Line 24 "Reserve for Future IS Projects – Customer

- Systems”. Please refer to discussion of this project below at the response to 3a.
- b.) Service Company’s rate of return on investment of 5.803% is the interest rate due from Service Company to KeySpan Corporation under a long-term intercompany promissory note. This note is the financing vehicle for capital expenditures at the Service Company. A copy of this note is included as Attachment C.

3. a.) The Reserves for Future IS Projects – Customer Systems are put in place to allow for future necessary upgrades or modifications to the customer systems. The upgrades or modifications may be required as a result of many reasons including:
- PSC mandated changes for customer experience or regulatory reporting.
  - A system upgrade as a result of the customer system going out of support
  - Patches or bug fixes released by vendor

At the time this Plan was developed, the type and number of individual projects was unknown, as the Company will not know what is required in many cases until asked. The value forecast is based on historical expenditure.

Please note the increase from \$900k to \$1799k is because 2014+ includes 2014 and 2015 expenditure.

- b.) The Reserve for Future IS Projects 2012 and 2013 are included in the Rate Year 2012 and 2013 expense at Exhibit\_\_\_(RRP-2), Schedule 8, Sheet 11, Line 24. However, please note that Exhibit RRP-10, Schedule 8, Workpaper 11, Sheet 1 also shows a related project, Reserve for Future IS Projects 2011. Therefore, the revenue requirement shown at Exhibit\_\_\_(RRP-2), Schedule 8, Sheets 10 and 11, Line 24 is a summation of the amortization related to these projects, as follows:

<b>Project Description</b>	<b>RY 2011</b>	<b>RY 2012</b>	<b>RY 2013</b>
Reserve for Future IS Projects – Customer Systems 2011	\$69,002	\$95,423	\$89,735
Reserve for Future IS Projects – Customer Systems 2012	\$0	\$69,002	\$95,423
Reserve for Future IS Projects – Customer Systems 2013	\$0	\$0	\$69,002
Reserve for Future IS	\$0	\$0	\$0

Projects – Customer Systems 2014+			
<b>Total - Exhibit (RRP-2), Schedule 8, Sheets 10 and 11, Line 24</b>	<b>\$69,002</b>	<b>\$164,425</b>	<b>\$254,160</b>

The forecasted project spend of \$900k per year was allocated to legacy National Grid companies based on a billing pool allocation of 00229 “O&M Electric & Gas Distribution Companies – NE & NY”, under which NiMo Electric receives 44.152%, amortized over five years.

4. a.) Since the KeySpan/National Grid merger, National Grid has been developing a robust IS systems route map to ensure that it delivers improved customer experience and required operational efficiency savings.

The increases in IS rent expenses between the Test Year and 2013 are due to major project expenditures necessary for National Grid to further improve on customer experience and quality of service and also to lay the foundation for process consolidation and improvement going forward to meet required operational efficiency savings.

The main expenditure increase over the four years is on the following pieces of work:

<b>Project Description</b>	<b>Test Year</b>	<b>2011</b>	<b>2012</b>	<b>2013</b>
US SAP Back Office	\$0	\$0	\$3,798,446	\$5,252,886
Distribution/Outage Management System	\$0	\$0	\$0	\$2,534,127
Data Center Rationalization	\$0	\$452,987	\$1,044,266	\$1,584,743
Mobile – Electric Distribution Legacy Grid Mobile Expansion	\$0	\$0	\$0	\$1,316,336
Customer System Agent Desktop	\$0	\$687,924	\$951,333	\$894,626
IVR Phase 2	\$0	\$603,007	\$567,063	\$494,145
Transformation KPI	\$0	\$432,434	\$406,657	\$354,366
<b>Main Project Expenditure – Total</b>	<b>\$0</b>	<b>\$2,176,352</b>	<b>\$6,767,765</b>	<b>\$12,431,229</b>

#### **US SAP Back Office**

The Primary objective of the Back Office Project is to consolidate onto a single SAP platform, the Finance, Supply Chain and HR functionality now being delivered by the Oracle and PeopleSoft Enterprise Resource Planning Suites. This

is National Grid's first step in establishing a strategic, common platform that will improve operations and customer service. The package solution that we plan to deliver will drive a greater level of standardization that will significantly improve quality and efficiency across the supported business functions. The integrated solution will be less complex to maintain, and it will enable the elimination of many manual activities that are performed today. This integrated solution will also provide for better management of National Grid inventory levels thereby lowering costs and enabling us to be more responsive to customer requests by ensuring the right inventory is available at the right time to complete customer work orders in a timely and efficient manner.

Please also refer to the testimony of David Lister at Book 3, Page 12, Line 8 through Page 22, Line 15, as well as the project paper at Attachment B2, Sheets 1 – 17.

#### **Distribution/Outage Management System**

The DMS/OMS Project charges are related to benefits achieved with implementation of the new Distribution and Outage Management System (DMS/OMS). Implementations of the systems are needed due to the following:

- There is an existing business need to update the current upstate New York/New England OMS to a vendor supported version.
- There is a business integration need to select a platform for growth to support additional automation on the Distribution Network and Smart Grid.
- The need for integrated OMS/DMS to improve Control Center efficiency by automating manual processes, eliminating paper maps and reducing the duplication of effort required to model the network in disparate systems.
- Implementation of the new systems will result in a single view of the Distribution Network, incorporating all DMS/OMS information (ex; Customer Calls, Real Time Device Status/SCADA Integration, integrated Switch Order Writing and Tracking, Switching and Load Applications, Training Simulator) improving system operators' situational awareness, safety, reliability, and the customer experience. Additionally, the systems will provide the Control Centers with a platform to support Smart Grid initiatives:
- Measure reduction in load and associated cost, improvement in power quality and reliability
- Implement technologies that provide timely energy usage information and automation to encourage and enable customers to reduce load or otherwise alter their consumption patterns.
- Demonstrate how electric distribution grid operating efficiency can be improved measurably by improved monitoring and control.
- Support reductions in critical peak loads with the combination of technology and rate mechanisms. These lower critical peak loads reduce the overall stress on the system. Stress degrades equipment and causes reliability challenges.
- Improve feeder reliability through the implementation of improved monitoring and control of the distribution grid and the integration of automated meter outage

detection and restoration into the existing outage management systems and processes.

- Improve customer satisfaction by providing timely consumption and conservation options, automated load control and improved monitoring and control of the distribution grid.

Please also refer to the testimony of the Infrastructure and Operations Panel (IOP) at Book 26, Page 199, Line 1 through Page 200, Line 13, as well as the project paper at Attachment B2, Sheets 18 – 21.

#### **Data Center Rationalization**

National Grid US currently has 4 production data centers in total Henry Clay Blvd (Syracuse NY), Guiderland (Albany, NY,) Hicksville (Long Island, NY) and Melville (Long Island, NY). There are several additional data centers/data halls located throughout the US footprint. The intent of this project is to align with the Corporate strategy and put forth a consolidation plan to achieve a total of two regional data centers within the US footprint. The final configuration will consist of one production data center and one disaster recovery/development data center. Running under the current decentralized data center configuration will not support Corporate initiatives for savings and would increase costs, resources, and infrastructure.

Please also refer to the testimony of David Lister at Book 3, Page 10, Lines 4 – 15, as well as the project paper at Attachment B2, Sheets 38-48.

#### **Mobile – Electric Distribution Legacy Grid Mobile Expansion**

This project combines several EDOT mobile related initiatives to provide the business with the technology necessary to attain consistent processes, repeatable results, and improved storms response. The project deliverables include:

- 1) The ability to dispatch Trouble Orders from PowerOn to the Mobile workforce to allow users to create follow-up work resulting from the original Trouble Order.
- 2) The functionality required to identify and track the meter work associated with a Service Order (SO), and automate the notification that the meter work has posted and/or completed in CSS,
- 3) Utilization of mobile technology to capture “As Built” information in the field and provide the workforce real time capability to update asset location information in GIS,
- 4) Providing all Field Investigators with mobile devices to capture and collect design data in the field (e.g. redlines, photos, docs) and
- 5) Increasing the Performance Supervisor’s presence in the field by providing a true mobile office (hardware) with reliable and effective network access. The technology will facilitate completing administration functions in the field instead of the office and the time in the field will be used to more closely monitor breaks, weather conditions, arrival/departures and to provide coaching to the workforce. The technology provided with this initiative will help drive the following business objectives:



- 1) Sustainable performance improvements and deliver aggressive efficiency targets,
- 2) Creating a fundamental operating model shift and platform to support strategic growth,
- 3) Ensuring organization structure and operating model alignment and
- 4) Creating a high-performance and results-driven culture.

This initiative provides the hardware and communications the business needs to use GIS and Work Management in a mobile fashion to create simple designs from the field, capture information, etc. It will result in improved customer service and order fulfillment. Additional benefits include:

- Timely and accurate restoration data from the field.
- Timely modeling of restoration.
- Better tracking of Follow-up Work.
- Reduced Radio Chatter and efficiently get outage data to crews.
- Use of real-time interface will allow model to more efficiently be maintained (outage restorations restored/modeled quicker).
- Dispatchers efficiencies gained will support Control Center consolidation.
- Increased field presences of Performance Supervisors
- Maximized productivity, reliability and accountability of the workforce through motivation and coaching
- Increased safety and environmental compliance by reinforcing corporate policies and procedures
- Manage work in a better way with improved access to business applications/tools required for progression of work
- Better response to outages/emergencies with printing capabilities in the field for switching diagrams/ maps / TOAs

Please also refer to the testimony of David Lister at Book 3, Page 200, Line 15 through Page 201, Line 16, as well as the project paper at Attachment B2, Sheets 22-24

#### **Customer Systems Agent Desktop**

Agent desktop will improve contact center handling time and first call resolution through the installation of third party automation and integration software over the four existing billing systems (CSS, CAS, CRIS, and Advantage). These improvements will help in meeting Customer & Markets integrations savings targets and also improve overall customer experience for calls into the contact centers.

Please also refer to the testimony of Rudolph L. Wynter at Book 1, Page 12, Line 1 through Page 13, Line 21, as well as the project paper at Attachment B2, Sheets 25-36.

## **IVR Phase 2**

The IVR Replacement Project Phase 2 removes the remaining dialogs that are still being handled on two old and end of life IVR's that are also running on different platforms in Syracuse and Northborough. The project is also expanding capabilities for a couple of existing functions to better self serve our customers.

The following functions will be become available on the new IVR in Phase 2:

- Inspection Release
- Customer Survey
- Monthly Meter Reading
- Marketing Opt Out
- Direct Pay Opt Out
- Service Order Maintenance
- NG Supplier Rates
- Service Appointment Outbound calling using Global Connect

Please also refer to the testimony of Rudolph L. Wynter at Book 1, Page 14, Line 1 through Page 15, Line 18, as well as the project paper at Attachment B2, Sheets 49- 57.

## **Transformation KPI**

The Performance Management Electric Distribution Operations Transformation (EDOT) new business process has two goals. First is to establish a performance culture at National Grid and second is to show how an individual's performance has an effect on the Company as a whole. In order to accomplish these goals, the Performance Management group decided to create a hierarchy of scorecards.

These scorecards report the performance of the Executive Director of the Distribution organization all the way down to the individual worker. The Performance Management initiative as a whole is a large project with hundreds of reports that calculate variations on approximately 150 metrics to be shown on approximately 400-500 scorecards. KPI Phase I includes the calculation of 13 metrics on approximately 200 scorecards. These metrics reside in 12 data sources. These data sources are incorporated into the data warehouse. All derived scorecards are shown in a hierarchical manner that demonstrates how the performance on each scorecard affects the performance higher up on the hierarchy.

KPI Reporting is a fundamental component of the EDOT program and the ability to track and manage the performance and benefits. These reports are needed to establish a benchmark for National Grid's current performance and to show the increased performance that the EDOT program will deliver. The product of this project allows employees to better manage their work by providing valuable information about subjects important to their role, as well as trending information to show the affects of their decisions over time.

This project is an integral part in realizing the full benefits of the EDOT program.

Please also refer to the testimony of the IOP at Book 26, Page 202, Line 7 through Page 203, Line 8, as well as the project paper at Attachment B2, Sheets 61 - 101.

5. Please refer to Attachment D. Historically, IS rent expenses have not all been recorded in IS cost centers. Some major project rent expense budgets have been recorded within line of business cost centers. The budget rent expense within those cost centers is not detailed by project or asset. The attached ad-hoc report, included as Attachment D, shows the budget rent expenses from FY2006 to FY2009 that the Company believes to relate to IS assets.

Historically IS has not managed actual capital expenditure to budget based on expected rent expense. The capital investment is managed through reviewing actual project expenditure against an annual capital budget held within the IS department.

6.
  - a.) Please refer to Attachment E1 for the software license agreement pertaining to Customer Systems Agent Desktop. The supporting INVP1656 detail can be found at Attachment B2, Sheets 25 – 36.
  - b.) Currently, there are no software license agreements in place related to Datacenter Rationalization. Please refer to the supporting INVP1088 detail at Attachment B2, Sheets 38 – 48.
  - c.) All software and hardware related to IVR Phase 2 was purchased as part of IVR Phase 1 which was implemented in 2008. Phase 2 consists of application development work only. Please refer to the supporting INVP1306 detail at Attachment B2, Sheets 49 - 57.
  - d.) Please refer to Attachment E2 for the software license agreements pertaining to Transformation KPI's. Please refer to the supporting INVP1242 detail at Attachment B2, Sheets 61 – 101.
7. Please refer to a listing of projects with less than \$100,000 in Rate Year 2011 expense as included at Attachment F.

Name of Respondent:  
Melissa Little/Avron Segal

Date of Reply:  
March 17, 2010

CTA Funded Sheets 38 & 39  
1 of 2

Confidential

**CAPEX / OPEX IS Investment Proposal – Summary  
US Data Centre Rationalisation**

**CTO, Form of Control - Shared, Project No. [xxx]**

(A sanction paper by Chris Granata – 03/38/2008)

**Description**

A number of strategic projects have been identified to support the integration of National Grid US and KeySpan. This paper addresses the US Data Centre Rationalisation project – expected to deliver significant RTB reductions and one-off cost reductions. Project is funded from CTA budget.

The costs for this project will be allocated to:

- Gas Distribution - 37%
- Electric Distribution & Generation – 57%
- Electric Transmission – 5%
- Business Development & Non-Regulated – 1%

This investment proposal seeks sanction of funds for:

- Detailed requirements, analysis, design and planning
- Procurement of specialist integration support
- Engagement of specialist external support necessary to deliver as above
- Perform initial expansion activities at Henry Clay Blvd data center (Syracuse, NY) supporting integration within the data center environment

At the end of this stage our goal is to seek sanction for the next Phase of the project. We will assess if we require full sanction for the total project cost or for a portion of the total project cost.

Category: NPV

Risk score: 45, Primary Driver – loss of financial benefit

Project Classification: High

Region: US

**Finance**

Sanction Cost \$3.5M

(The money for this sanction, as well as the entire project cost, has been identified as a key integration project and is being funded through CTA)

Approximate Distribution:

Strategy:

- Labor - \$500K (Internal Labor – PM, Enterprise Operations Support, etc)
- Consultants - \$500K

Initial Expansion Activities - \$2.5M

This work is the first phase of expansion of HCB to enable the future closure of Melville and establishment of Production services in Henry Clay Blvd. Activities for expansion include:

- Replace Floor/Ceiling Tiles
- Modify Overhead Lighting
- Provide Cable Management
- General Construction (Remove/Add walls, Paint, etc)

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Ref. No. XXX

- Add CRAC Units (Computer Room Air Conditioning)
- Add PDUs (Power Distribution Units)
- Analyze Generator Capacity
- Contractor Costs

Overall indicative cost (Prospective Gross Sanction Value): \$35M

Project included in approved Business Plan? Yes - INVP1088

Other financial issues

This is a KSE integration-related investment which was included within the original Cost To Achieve (CTA)

#### Resources

Availability of internal resources to deliver project: Green

Availability of external resources to deliver project: Green

Operational impact on network system: N/A

#### Key issues

- The assumptions we are working under are that Henry Clay Blvd (Syracuse, NY) and Hicksville (Long Island, NY) will be the National Grid strategic data center locations. Below are the known risks:
- Properties is in the process of posting for a Project Manager to oversee the Upstate New York regional site consolidation. There appear to be many organizations, aside from IS, that require space at Henry Clay Blvd. Properties is unable to move forward until all areas provide their requirements and a master space plan is developed.

- Risk: Delays in Properties selection could impact progress and ultimately impact available CTA funds
- The value of money at risk is less than the CTA dollars we would lose if we delay the project at this point

- Properties has not announced the strategic Long Island facility. We are working under the assumption that Hicksville will be named the strategic site for Long Island. Properties has not given us any indication that Hicksville will or will not be the strategic Long Island facility.

- Risk: Delays in Properties selection could impact progress and ultimately impact available CTA funds
- The value of money at risk is less than the CTA dollars we would lose if we delay the project at this point

- LIPA - Once Properties identifies the strategic site on Long Island we will communicate the final data center site locations to LIPA. We will need to explain to LIPA the infrastructure that will be implemented measures that will be in place to.

#### Key milestones

- Scheme Paper Approval - April 2008
- Establish Project Review Board – April 2008
- Assess Current Strategy – May 2008
- Assess Property Risk – May 2008
- Create Detailed Design Documents – Sept 2008

*CTA Funded INVP 1092  
Sheets 153 & 154  
1042*

Confidential

**IS Investment Proposal – Summary**

**OneNet Keyspan Project Implementation – Brian Kelly, Sponsor**

**Information Services CTO, Shared, Project No. INVP1092**

A sanction paper by Bob Coffey-September 2008

**Description**

This investment proposal seeks sanction of funds for the OneNet Keyspan Project. The project is an Integration Project that will migrate Keyspan employees to the National Grid desktop, fileserver, Email and Collaboration standard configurations. Funds have been approved for the initial Requirements & Design stages of the project. At this time full sanctioning of the total project costs for the Implementation stage are sought as the Requirements and Design phase nears completion.

Category: NPV

Risk score: 45, NPV

Project Classification: Medium Region: US

**Finance**

The following funds have been sanctioned to date for the OneNet Keyspan Project:

January 18, 2008 - \$436K Capex approved for early Email Migration to support the Keyspan re-branding effort.

April 3, 2008 - \$1,980K (\$909K Opex, \$1071 Capex) approved the for Requirements and Design Stage

The funds that are required for sanctioning on this request to complete the project:

\$8,186K (\$5,478K Opex, \$2,708K Capex)

Total Project Cost - \$10,602K (\$6,387K Opex, \$4,215K Capex)

This project is CTA related to the Keyspan Merger. The CTA portion of the Opex Cost is \$3964K. The form of control funding will be split by Keyspan LOB headcount.

The breakdown of the \$8186K is as follows;

Internal Labor - \$1811K

Software – \$4563K

Hardware - \$162K

Contract Labor - \$1370K

Employee Expense \$100K

Risk – \$180K

Cost volatility: NA

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Ref. No. XXX

Probability that project cost will exceed tolerance: NA  
Project included in approved Business Plan? Yes, INVP1092, IS Global Investment plan v1 final  
Other financial issues:  
This is a KSE integration-related investment which was included within the original Cost To Achieve (CTA)

#### Resources

Availability of internal resources to deliver project: [Green]  
Availability of external resources to deliver project: [Green]  
Operational impact on network system: [Green]

#### • Key issues

- Delivery of Hardware and Software under global purchasing agreements to meet 1/9/08 deployment start.
- 

#### Key milestones

- Requirements and Design Completion – July 31, 2008
- Submit Plan for full funding – July , 2008
- Pilot migration – August, 2008
- Deployment – September 1, 2008 – March 31,2009
- Completion – March 31, 2009
- Project closure – May 31, 2009

#### Climate change

Contribution to National Grid's 2050 60% emissions reduction target: Neutral  
Impact on adaptability of network for future climate change: Neutral  
Are financial incentives (e.g. carbon credits) available? No

#### Prior sanctioning history:

- April 3, 2008 – IS Project Review Meeting – Requirements and Design
- January 18, 2008 – IS Project Review Meeting – Email Support of Rebranding

#### Recommendations

The Sanctioning Authority is invited to:

- (a) APPROVE the investment of \$8186k which includes a risk margin of \$180K by July 31, 2008
- (b) NOTE that Brian Kelly is the Project Sponsor
- (c) NOTE that Bob Coffey is the Project Manager and has the approved financial delegation to deliver the project

#### IS Finance

Date of Request: March 4, 2010  
Due Date: April 2, 2010

Request No. MJR-1 SUPP A  
NMPC Req. No. NM 173 DPS 103

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Michael Rieder

TO: Infrastructure and Operations Panel

Request:

3. For each project listed in Exhibit IOP-1, Schedule 8, identify the strategy paper and sanction paper for each project, linking each Project Number to the title and date of both the associated strategy paper and sanction paper. Provide the requested information in Excel format in the same format and project sequence as shown in Exhibit IOP-1, Schedule 8
4. Provide each strategy paper and sanction paper identified in No. 3.
5. If a project does not have a strategy paper or sanction paper, indicate that it does not and provide relevant studies and documents that fully describe, justify, and support the project's need, cost, and schedule.

Response:

SUPP-A (Transmission, non-confidential)

3. Attachment 1 (MJR-1 SUPP-A\_Tx) identifies strategy papers, sanction papers, studies, and other documentation, along with corresponding dates, for projects listed in Exhibit \_\_ (IOP-1), Schedule 8, for Transmission projects by investment category (i.e., Statutory/Regulatory, Damage/Failure, System Capacity and Performance, Asset Condition and Non-Infrastructure).
4. Non-confidential strategy papers, sanction papers, and relevant studies listed in Attachment 1 are provided. Due to their number and size, these files are being provided to the requester on diskette. Copies will also be provided to other parties upon request. The Company will be providing copies of the indicated confidential strategy papers, sanction papers, and relevant studies in accordance with a forthcoming request for protective treatment.



5. See responses to 3 and 4, above.

Name of Respondent:  
Antoinette Stores  
Legal Department

Date of Reply:  
April 14, 2010

Date of Request: March 4, 2010  
Due Date: April 2, 2010

Request No. MJR-1 SUPP A-2  
NMPC Req. No. NM 173 DPS 103

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Michael Rieder

TO: Infrastructure and Operations Panel

Request:

3. For each project listed in Exhibit IOP-1, Schedule 8, identify the strategy paper and sanction paper for each project, linking each Project Number to the title and date of both the associated strategy paper and sanction paper. Provide the requested information in Excel format in the same format and project sequence as shown in Exhibit IOP-1, Schedule 8.

4. Provide each strategy paper and sanction paper identified in No. 3.

5. If a project does not have a strategy paper or sanction paper, indicate that it does not and provide relevant studies and documents that fully describe, justify, and support the project's need, cost, and schedule.

Response:

SUPP-A-2 (Transmission, non-confidential)

3, 4, & 5. Attached hereto are Strategy Papers:

1. SG029 & SG029 v2c
2. SG018 v1
3. SG009
4. SG075

These Strategy Papers were not reflected in the spreadsheet submitted with the response to IR MJR-1-SUPP-A, nor were the papers included on the diskette that was provided with that submission.

Strategy Papers SG029 and SG029 v2c relate to Project C31141, which is a project in the Transmission, Statutory Regulatory investment category. For Project C31141, SG029 v3 was included among the Transmission, Statutory Regulatory, non-confidential documents included with the response to IR MJR-1-SUPP-A submitted on April 14, 2010. SG029 and SG029 v2c were inadvertently omitted assuming that SG029 v3 replaces these original papers. After discovering that this is not the case, SG029 and SG029 v2c are submitted here.

Strategy Paper SG018 v1 relates to Project C25539, which is a project under the Transmission, Damage Failure investment category. For Project C25539, SG018 v2 was included among the Transmission, Damage Failure, non-confidential documents included with the response to IR MJR-1-SUPP-A. SG018 v1 was inadvertently omitted assuming that SG018 v2 replaces SG018 v1. After discovering that this is not the case, SG018 v1 is now being submitted.

Strategy Paper SG009 relates to Project C11640 under the Transmission, Damage Failure investment category. For Project C11640, SG009 v2a was included among the Transmission, Damage Failure, non-confidential documents included with the response to IR MJR-1-SUPP-A. SG009 was inadvertently omitted assuming that SG009 v2a replaces SG009. After discovering that this is not the case, SG009 is now being submitted.

Strategy Paper SG075 relates to the Overhead Line Refurbishment Program under the Transmission, System Capacity and Performance investment category. SG075 v2 was included among the Transmission, System Capacity and Performance, non-confidential documents included within the response to IR MJR-1-SUPP-A. SG075 was inadvertently omitted assuming that SG075 v2 replaces SG075. After discovering that this is not the case, SG075 is submitted here.

In addition to the aforementioned papers, the Company submits a revised spreadsheet reflecting the addition of these papers.

Name of Respondent:

Antoinette Stores  
Legal Department

Date of Reply:

May 19, 2010

Network Segment	Program	Project Number	Project Name	Project Status	Sanction paper	Strategy paper	Approved Sanction/Strategy Date	Confidential (Y/N)	Risk Score	FY11	FY12	FY13	FY14	FY11-14
Transmission	Other - Non Infrastructure	CNYAS87	Asset Separation strategy	N/A	N/A	N/A	N/A	n/a	39	0	0	0	0.1	0.1
		CNYAS46	Flood mitigation	N/A	N/A	Please refer to Request No. AJR-1 - NMPC Request No. NM 45 DPS 42	N/A	No	22	0	0	2	1	3
	<b>Other - Non Infrastructure Total</b>									0	0	2	1.1	3.1
	Physical Security	CNYAS86	Physical Security Strategy	N/A	N/A	SG132	02/25/2010	Yes	40	0.1	6	3	0	9.1
	<b>Physical Security Total</b>									0.1	6	3	0	9.1
<b>Transmission Total</b>										0.1	6	5	1.1	12.2
<b>Total Non-Infrastructure</b>										3.3	11.4	10.6	6.9	32.2

3. For each project listed in Exhibit IOP-1, Schedule 8, identify the strategy paper and sanction paper for each project, linking each Project Number to the title and date of both the associated strategy paper and sanction paper. Provide the requested information in Excel format in the same format and project sequence as shown in Exhibit IOP-1, Schedule 8.
4. Provide each strategy paper and sanction paper identified in No. 3.
5. If a project does not have a strategy paper or sanction paper, indicate that it does not and provide relevant studies and documents that fully describe, justify, and support the project's need, cost, and

Network Segment	Program	Project Number	Project Name	Project Status	Sanction paper	Strategy paper	Approved Sanction / Strategy Date	Confidential (Y/N)	Risk Score	FY11	FY12	FY13	FY14	FY11-14	
Transmission	Clay Station Rebuild	C32539	Clay Station Line Project	Open	N/A	SG085	July 21, 2008	Yes	48	0.1	2	2	0	4.1	
		Clay Station Rebuild Total													
	Clearance Strategy	C31141	Oswego Lafayette 17, T2420 CCR	Open	N/A	SG029v3	April 22, 2009	No	33	0.5	0	0	0	0.5	
		C33256	Transmission Tower Clearances	Open	N/A	SG029v3	April 22, 2009	No	40	1	15	15	15	48	
	Clearance Strategy Total										1.5	15	15	15	48.5
	Digital Fault Recorder Strategy	C03726	Digital Fault Recorder Strategy	Open	AMIC07133 AMIC07121 AMIC07175 AMIC0749 NTSC0659 NTSC0658 NTSC0569 NTSC 0555 AMIC0993 AMIC0986 AMIC0832 AMIC08104	SG010v2	August 24, 2007 July 23, 2007 April 25, 2007 August 23, 2006 July 24, 2006 July 21, 2005 June 30, 2005 December 18, 2009 December 18, 2009 February 14, 2008 March 18, 2008 January 25, 2010	Yes	48	1.1	0	0	0	1.1	
		C29487	Repl DFR at Non-BPS Stations	Open	N/A	N/A	N/A	N/A	N/A	27	0	0	0	0	0
	Digital Fault Recorder Strategy Total										1.1	0	0	0	1.1
	Generation	CNYX63	Alabama Ledge Wind-Loop in, Loop-out	N/A	N/A	Study Attached	February 16, 2007	Yes	48	0.2	0.2	0	0	0.4	
		CNYX63R	Alabama Ledge Wind-Loop in, Loop-out Reimbursable portion	N/A	N/A	Study Attached	February 16, 2007	Yes	48	-0.2	-0.4	0	0	-0.5	
		CNYX64	Alabama Ledge Wind-RTU/Metering/Relay upgrades	N/A	N/A	Study Attached	February 16, 2007	Yes	48	1	0.7	0	0	1.8	
		CNYX64R	Alabama Ledge Wind-RTU/Metering/Relay upgrades Reimbursable portion	N/A	N/A	Study Attached	February 16, 2007	Yes	48	-1	-0.7	0	0	-1.6	
		CNYX01	Athens Generation Expansion -Permanent Line	N/A	N/A	N/A	N/A	N/A	N/A	1	6	10.4	25.5	26.1	68
		CNYX01R	Athens Generation Expansion -Permanent Line Reimbursable	N/A	N/A	N/A	N/A	N/A	N/A	1	-6	-10.4	-25.5	-26.1	-68
		CNYX02	Athens Generation Expansion -Permanent Sub	N/A	N/A	N/A	N/A	N/A	N/A	1	0	0	0.5	3.4	3.9
		CNYX02R	Athens Generation Expansion -Permanent Sub Reimbursable	N/A	N/A	N/A	N/A	N/A	N/A	1	0	0	-0.5	-3.4	-3.9
		C23413	BEDCO Substation Work	Open	AMIC07164	N/A	N/A	December 21, 2007	Yes	48	0.1	0	0	0	0.1
		CNYX60	Cape Vincent Wind-RTU/Metering/Relay upgrades	N/A	N/A	N/A	N/A	N/A	N/A	48	0.1	2.7	0	0	2.8
		CNYX60R	Cape Vincent Wind-RTU/Metering/Relay upgrades Reimbursable	N/A	N/A	N/A	N/A	N/A	N/A	48	-0.1	-2.7	0	0	-2.8
		CNYX70	Clayton Wind-Loop in, Loop-out	N/A	N/A	Study Attached	April 30, 2007	Yes	48	0.4	2	0	0	0	2.4
		CNYX70R	Clayton Wind-Loop in, Loop-out Reimbursable portion	N/A	N/A	Study Attached	April 30, 2007	Yes	48	-0.4	-2	0	0	0	-2.4
		CNYX71	Clayton Wind-RTU/Metering/Relay upgrades	N/A	N/A	Study Attached	April 30, 2007	Yes	48	0.2	1	0	0	0	1.3
		CNYX71R	Clayton Wind-RTU/Metering/Relay upgrades Reimbursable	N/A	N/A	Study Attached	April 30, 2007	Yes	48	-0.2	-1	0	0	0	-1.3
		C29543	Fairfield Wind Farm Interconnection	Open	AMIC07178	N/A	N/A	July 9, 2008	Yes	48	0.8	0	0	0	0.8
		C29543R	Fairfield Wind Farm Interconnection - Reimbursable	Open	AMIC07178	N/A	N/A	July 9, 2008	Yes	48	-0.8	0	0	0	-0.8
		C29742	Fairfield Wind-loop in loop out	Open	N/A	N/A	N/A	N/A	N/A	48	1	0	0	0	1

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Other Statutory/ Reserve	C29463	Repl 23 meters Interconnect/ NYISO	Open	N/A	SG127	January 8, 2010	No	49	0.8	2	1.8	1.4	5.9
	C32551	Various Station - Range Operations	Open	N/A	Study Attached	September 7, 2007	Yes	49	0.7	0	0	0	0.1
		<b>Other Statutory/Regulatory Total</b>							<b>0.8</b>	<b>2</b>	<b>1.8</b>	<b>1.4</b>	<b>5.9</b>
RTU Strategy	C03772	RTU Replacements NERC, EMS, Obsolescence	Open	NTSC0585 NTSC0655 AMIC07129 AMIC0850 AMIC0855 AMIC09119 AMIC09106 AMIC09336 AMIC09570	SG0292	May 27, 2009 August 18, 2005 July 17, 2008 September 10, 2007 June 2, 2008 July 22, 2008 December 22, 2008 February 5, 2010 October 1, 2008	Mixed						
		<b>RTU Strategy Total</b>						49	1.5	2	1.4	0	4.9
Station Unreliable	C26696	Porter sub	Open	N/A	SG094	April 22, 2009	Yes	40	0.1	12	12	0	24.1
	C28705	Clay Sub	Open	N/A	SG095	July 21, 2008	Yes	49	9.9	8	11	0	28.9
		<b>Station Unreliable Total</b>							<b>9.9</b>	<b>20</b>	<b>23</b>	<b>0</b>	<b>52.9</b>
Reserve	CNYX32	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve	49	-3.2	-10.7	-11.2	-6.6	-31.7
		<b>Reserve Total</b>							<b>-3.2</b>	<b>-18.7</b>	<b>-11.2</b>	<b>-4.6</b>	<b>-31.7</b>
		<b>Transmission Total</b>							<b>23.2</b>	<b>78.2</b>	<b>98</b>	<b>60.4</b>	<b>250.9</b>
		<b>Total Statutory/Regulatory</b>							<b>156.6</b>	<b>230.8</b>	<b>255.5</b>	<b>207.8</b>	<b>850.4</b>

Network Segment	Program	Project Number	Project Name	Project Status	Sanction paper	Strategy paper	Approved Sanction/Strategy Date	Confidential (Y/N)	Risk Score	FY11	FY12	FY13	FY14	FY11-14
Transmission	NY Inspection Projects	C26923	NY Inspection Projects - Capital	Open	AMIC08116	N/A	February 25, 2009	No	49	0.4	1	1	3	5.4
	<b>NY Inspection Projects Total</b>									<b>0.4</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>5.4</b>
	Other Damage/Failure	C29320	Curtis St- Repl LN10 & 13 Relays	Open	N/A	PIW - TS0420081267	April 11, 2008	No	26	0	0.2	0	0	0.2
		C28324	Geres Lock Sub- Repl 14 115kV Disc	Open	N/A	PIW - S0120080229	Jan. 1, 2008	No	19	0.3	0	0	0	0.3
		C32504	Getzville-Sta60 Repl Cntrl Hse Roof	Open	N/A	PIW - TS120091487	N/A	No	35	0	0	0	0	0
		C28303	Kensington Sub Repl TB#4 & 5 LTC Control	Open	AMIC09111	N/A	December 18, 2009	No	28	0	0	0	0	0
		C32964	Leeds - PV 92 T5330 Str 361	Open	N/A	N/A	N/A	N/A	40	0	0.5	0	0	0.5
		C20546	New Gardenville- Repl 230kV Bus	Open	N/A	N/A	N/A	N/A	27	0.1	0	0	0	0.1
		C22391	Oneida - TB#3 Failure	Open	AMIC0849	N/A	July 22, 2008	No	49	0.8	0	0	0	0.8
		C28964	Oneida Sub- Replace LTG & Repl Ckts	Open	N/A	PIW-128-2007	6/29/2007	No	16	0.2	0	0	0	0.2
		C32596	Porter Sub - Repl. Barre Repl. & Auto	Open	N/A	PIW - 9-2008 & DS1020081447	N/A	No	35	0	0	0	0	0
		C31660	Replace Damaged Insulators	Open	N/A	N/A	N/A	N/A	40	0.4	0	0	0	0.4
		C18952	S. Oswego R/R LN1 Tone Package	Open	N/A	N/A	N/A	N/A	33	0.2	0	0	0	0.2
		C03278	Transmission Line Replacements Budgetary	Open	AMIC0744 AMIC0782 AMIC07116 AMIC07125	Reserve	March 16, 2007 May 14, 2007 July 5, 2007 July 20, 2007 April 8,	No	49	0.2	0.2	0.2	0.2	0.8
		C03792	Transmission Station Failures - Budgetary	Open	Reserve	Reserve	Reserve	Reserve	49	1	1.4	2.7	3.1	8.2
		C03481	Transmission Storm Budgetary Reserve	Open	AMIC0797 AMIC07107 AMIC0997 AMIC07142	N/A	June 7, 2007 May 31, 2007 Oct. 23, 2009 Aug. 27, 2007 April 29, 2009	Yes, Yes, No, No, No	49	0.3	0.3	0.3	0.3	1



		C13622	Transmission UG C Budgetary Reserve - Co	Open	Reserve	Reserve	Reserve	Reserve							
									49	0	0	0	0	0	0.1
		C26144	Yahnundasis - Repl 18 & 28 Switches	Open	AMIC08125	N/A	February 2, 2009	Yes	28	0.4	0	0	0	0	0.4
	<b>Other Damage/Failure Total</b>									<b>3.8</b>	<b>2.5</b>	<b>3.2</b>	<b>3.6</b>	<b>13.2</b>	
	Steel Tower Strategy	C25539	Visual Grade 6 Tower Replacements	Open	N/A	SG018v2	December 15, 2005	No	40	0.1	0.1	0.1	0.1	0.1	0.5
	<b>Steel Tower Strategy Total</b>									<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	<b>0.1</b>	<b>0.5</b>
	Wood Pole Strategy	C11640	Wood Pole Management - NY	Open	AMIC0898 AMIC08103 AMIC0994	SG009v2a	October 22, 2008 October 28, 2008 November 25, 2009	No	43	1.8	1.5	1.6	3		7.9
	<b>Wood Pole Strategy Total</b>									<b>1.8</b>	<b>1.5</b>	<b>1.6</b>	<b>3</b>	<b>7.9</b>	
<b>Transmission Total</b>										<b>6.1</b>	<b>5.2</b>	<b>5.9</b>	<b>9.7</b>	<b>26.9</b>	
<b>Total Damage/Failure</b>										<b>30.6</b>	<b>31.1</b>	<b>32.7</b>	<b>37.4</b>	<b>131.9</b>	

Network Segment	Program	Project Number	Project Name	Project Status	Sanction paper	Strategy paper	Approved Sanction/Strategy Date	Confidential (Y/N)	Risk Score	FY11	FY12	FY13	FY14	FY11-14
Transmission	Frontier Region	C11496	Refurbishment of Huntley 220kV Station	Open	AMIC 0814 - TC0802	SG042v2	March 28, 2008 September 26, 2006	Yes	22	0	0	0.1	2.3	2.4
		C11494	Tonawanda Station - Line Work	Open	AMIC 0814 - TC0802	SG042v2	March 28, 2008 September 26, 2006	Yes	49	6.2	23	3.7	0.4	33.2
		C11495	Tonawanda Station - Station Work	Open	NTSC0618 NTSC06131 AMIC 0814-TC0802	SG042v2	May 16, 2006 February 10, 2007 March 28, 2008 September 26, 2006	Yes	49	23.1	31.3	8.5	3	65.9
<b>Frontier Region Total</b>										<b>29.3</b>	<b>54.3</b>	<b>12.3</b>	<b>5.7</b>	<b>101.6</b>
	Load	C30744	Frankhauser New Station - T Line Work	Open	N/A	SG107	February 5, 2010	No	41	0.2	0.4	0	0	0.6
		C30765	Install Second Transformer - Inman Rd	Open	N/A	SG140	March 4, 2010	No	39	0.9	0.9	0	0	1.7
		C30824	Replace TB#1 Everett Rd	Open	N/A	N/A	N/A	n/a	30	1	0.6	0	0	1.6
<b>Load Total</b>										<b>2.1</b>	<b>1.8</b>	<b>0</b>	<b>0</b>	<b>3.9</b>
	Other System Capacity & Performance	C22071	Albany Steam Add 2nd Station eye	Open	N/A	N/A	N/A	n/a	16	0.2	0.2	0	0	0.4
		C33744	BlackRiver-LHHX5-2 LB Attachment	Open	N/A	SG131	December 18, 2009	No	49	0	0.1	0	0	0.1
		C33742	BlackRiver-Taylorville#2 New Switch	Open	N/A	N/A	N/A	n/a	43	0	0.3	0	0	0.3
		CNYPL4	Boonville-Rome #4 Reconnector in	N/A	N/A	N/A	N/A	n/a	40	0	0	0.1	5	5.1
		C21353	Dewitt 345kV Breaker Install	Open	N/A	SG066	June 22, 2007	Yes	6	0	0.8	0.6	0	1.5
		C32337	East Watertown 115 Mobile tap	Open	N/A	SG121	October 8, 2009	No	49	0	0.1	0.2	0	0.3
		CNYPL7	Eastern NY 115kV Capacitor	N/A	N/A	N/A	N/A	n/a	35	0	0	0.1	2	2.1
		C28384	Farmington 11 Line Rearrangement	Open	N/A	SG089	May 6, 2008	No	49	1.5	0	0	0	1.5

		C28384R	Farmington 11 Line Rearrangement - Reimb	Open	N/A	SG089	May 6, 2008	No	49	-1.5	0	0	0	-1.5
		CNYPL14	Fourth Elm 230-23kV Bank (N-1-1)	N/A	N/A	N/A	N/A	n/a	28	0	0	0	0.1	0.1
		CNYPL13	Fourth Sawyer 230-23kV Bank (N-1-1)	N/A	N/A	N/A	N/A	n/a	26	0	0	0	0.1	0.1
		CNYPL34	Install Capacitance/T RV	N/A	N/A	N/A	N/A	n/a	33	0	0	0.3	0.7	1
		C30806	Install new Alps Site Sub-Station	Open	N/A	N/A	N/A	n/a	27	1.1	0.8	0	0	1.9
		C33619	Install new Alps Site Sub-Station Work	Open	N/A	N/A	N/A	n/a	49	0.1	0.2	0.2	0	0.4
		CNYPL29	Lake Colby - Spare SVC Transformer and Thyristor	N/A	N/A	SG115	February 5, 2010	No	28	0.1	1.7	0	0	1.8
		C32259	Lowville Automated 115 kV Switchgear	Open	N/A	SG116	October 8, 2009	No	49	0.1	0.2	0	0	0.3
		C24064	LTC Filtration Systems NY	Open	N/A	N/A	N/A	n/a	21	0.1	0	0	0	0.1
		CNYPL33	Reconductor 24 & 25 Line - Hogan Taps to Panell Road	N/A	N/A	N/A	N/A	n/a	35	0	0	0.1	1.5	1.6
		CNYPL1	Reconductor Black River Line	N/A	N/A	N/A	N/A	n/a	40	0	0	0.1	5	5.1
		C27163	Replace N. Angola 115:34.5kV Breakers	Open	N/A	SG083	February 26, 2008	No	36	0	0.4	5.3	0	5.7
		CNYPL26	Replace overdutied 115kV breakers at Central and Mohawk Valley	N/A	N/A	N/A	N/A	n/a	39	0	0.2	1	1.8	3
		CNYPL25	Replace overdutied 115kV breakers at	N/A	N/A	N/A	N/A	n/a	39	0	0.2	1	1.8	3

		CNYPL24	Replace three 115kV breakers at C2994	N/A	N/A	SG115	February 5, 2010	No	39	0	0	0.3	0.6	0.9
		C29964	Reynolds Road - Cap Blocking	Open	N/A	N/A	N/A	n/a	28	0	0	0	0	0
		C30826	Spier West 9 115kv Switch Add	Cancelled - Combined C21694	N/A	SG080 SG029v3	March 28, 2008 April 22, 2009	No	34	0	0	0.1	0.2	0.3
		C10705	Sta Homer Hill Transformers	Open	N/A	N/A	N/A	n/a	20	0	0	0	0.2	0.2
		CNYPL28	Syracuse Area Reconductoring	N/A	N/A	N/A	N/A	n/a	19	0	0	0.3	1.6	1.9
		C08376	Transmission Study Budgetary	Reserve	Reserve	Reserve	Reserve	Reserve	49	0.2	0.2	0.2	0.2	0.8
		C28708	Upgrade Breakers at Seneca	Open	N/A	SG096	October 8, 2008	Yes	40	2	1.5	0	0	3.5
		C33252	Upgrade Breakers at Volney	Open	N/A	SG096	October 8, 2008	Yes	49	2	0.5	0	0	2.5
		C29945	Upgrade Niagara-Baker #105	Open	N/A	SG103	December 4, 2008	No	40	0	0	0	0.2	0.2
<b>Other System Capacity &amp; Performance Total</b>										<b>5.8</b>	<b>7.3</b>	<b>10</b>	<b>21</b>	<b>44.1</b>
	Overhead Line Refurbishment Program	C24359	Browns Falls - Taylorville 4 Lightning Enhancements	Open	N/A	SG080	March 28, 2008	No	37	4.6	0	0	0	4.6
		C24360	Coffeen - LH 5 T2120 Lightning	Open	N/A	SG080	March 28, 2008	No	37	0.8	0	0	0	0.8
<b>Overhead Line Refurbishment Program Total</b>										<b>5.4</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>5.4</b>
	Reliability Criteria Compliance	C24014	Andover Cap Bank, part of SG075	Open	AMIC0932	SG075v2	April 24, 2009 May 15, 2009	No	39	0.4	0	0	0	0.4
		C31478	Batavia Second 115kV Cap Bank, part of SG077	Open	N/A	SG077v3	January 18, 2010	Yes	34	0.1	0.1	1.1	0	1.3

C24016	Construct Southwest Station (Line Station), part	Open	N/A	SG075v2	May 15, 2009	No	39	0.6	1.5	0.8	0	2.8
C24015	Construct Southwest Station, part of	Open	N/A	SG075v2	May 15, 2009	No	39	5	18	2	0	25
C24629	Conversion of #109 to 115kV	Open	N/A	SG077v3	January 18, 2010	Yes	34	0.2	1.6	9.2	0	10.9
C31460	Dunkirk Second Bus Tie- Line, part	Open	N/A	SG075v2	May 15, 2009	No	19	0	0.1	0.1	1.1	1.2
C31459	Dunkirk Second Bus Tie- Station,	Open	N/A	SG075v2	May 15, 2009	No	19	0	0.1	0.3	1	1.4
C24631	Golah work for #109 Conversion -	Open	N/A	SG077v3	January 18, 2010	Yes	34	0.5	2	3	0	5.5
C31457	Homer Hill 115kV Capacitor Banks, part of	Open	N/A	SG075v2	May 15, 2009	No	25	1	0.2	0	0	1.2
C24630	Mortimer Work for #109 Conversion -	Open	N/A	SG077v3	January 18, 2010	Yes	34	0.3	1.6	2.1	0	4
C24019	Rebuild line #181 and #180 (Station Work), part of SG075	Open	N/A	SG075v2	May 15, 2009	No	27	0.1	0.1	1.5	1	2.7
C24018	Rebuild line #181 and #180, part of	Open	N/A	SG075v2	May 15, 2009	No	27	1.5	2	13	20	36.5
C31463	Reconductor portions of 54 and 181, part	Open	N/A	SG075v2	May 15, 2009	No	19	0	0.2	0	0	0.2
C24017	Reconductor of #171, part	Open	N/A	SG075v2	May 15, 2009	No	39	0.8	2.3	0.2	0	3.2
C31458	Replace HH Ckt #157 Connections,	Open	N/A	SG075v2	May 15, 2009	No	28	0.1	0	0	0	0.1
C33884	Replacement of #171 connections,	Open	N/A	SG075v2	May 15, 2009	No	49	0	0.1	0	0	0.1

		C31482	Second 115kV bus tie at Lockport, part of SG077	Open	N/A	SG077v3	January 18, 2010	Yes	34	0.7	0	0	0	0.7
		C31479	Upgrade Batavia South 115kV busring, part of SG077	Open	N/A	SG077v3	January 18, 2010	Yes	28	0.1	0.2	0	0	0.3
		C31481	Upgrade capability of L107, part of SG077	Open	N/A	SG077v3	January 18, 2010	Yes	34	0.2	0	0	0	0.2
	<b>Reliability Criteria Compliance Total</b>									<b>11.6</b>	<b>29.8</b>	<b>33.3</b>	<b>23.1</b>	<b>97.7</b>
	Reserve	CNYX33	Reserve	Reserve	Reserve	Reserve	Reserve	Reserve	49	-7.8	-12.2	-4.5	-2.9	-27.4
	<b>Reserve Total</b>									<b>-7.8</b>	<b>-12.2</b>	<b>-4.5</b>	<b>-2.9</b>	<b>-27.4</b>
	<b>Transmission Total</b>									<b>46.3</b>	<b>81.1</b>	<b>51</b>	<b>46.8</b>	<b>225.3</b>
	<b>Total System Capacity &amp; Performance</b>									<b>119</b>	<b>139.7</b>	<b>121</b>	<b>122.5</b>	<b>502.3</b>







	C18670	Lockport-Mont 113	Open	AMIC9884 - TIC9814	SG080	No. No	49	1.8	0	0	0	1.8
	C33014	Lockport-Mont 111 Tap	Open	N/A	SG080	No	38	0	0	0.2	0	0.2
	CNYAS65	TJ530-L Balth.	N/A	N/A	SG080	No	40	0	0	0.1	0.1	0.2
	C30889	Boats #24	Open	N/A	SG080	No	37	0.1	0.1	0.1	14.1	14.3
	CNYAS77	Parnell-Geneva 4-4A	Open	N/A	SG080	No	40	0	0	0	0.1	0.1
	C30890	Porter Rotterdam 31	Open	N/A	SG080	No	45	0.1	0.1	0.1	9.9	10.2
	CZ437	Tyconite-B 5-5	Open	N/A	SG080	No	39	0.1	0.1	0.8	5.4	6.2
	CZ4361	Tyconite-B 6-6	Open	N/A	SG080	No	49	2.4	3.5	0	0	5.9
	CNYAS82	T3340 ACR	N/A	N/A	SG080	No	40	0	0	0.1	1	1.1
	C18530	Ticonderoga Lines 2 (8.3) (Complete Line)	Open	AMIC98107 - TIC9818	SG083v1d	No. No	49	3.2	0	0	0	3.2
	<b>Overhead Line Replacement Program Total</b>											
	CNYAS79	Browns Falls - protection replacement and new control	N/A	N/A	Please refer to January 2010 CIP Filing for	N/A	19	0	0	0	0	0
	CNYAS31	Edin - Protection replacement	N/A	N/A	Please refer to January 2010 CIP Filing for	N/A	19	0	0	0.1	0.5	0.6
	CNYAS90	Grews Lock Control room & Relay Strategy	N/A	N/A	Please refer to January 2010 CIP Filing for	N/A	12	0	0	0	0	0
	CNYAS41	Menands - new control building	N/A	N/A	Please refer to January 2010 CIP Filing for	N/A	28	0	0.3	0.3	1	1.5
	CNYAS26	North Troy - protection replacement	N/A	N/A	Please refer to January 2010 CIP Filing for	N/A	19	0	0	0	0.1	0.1
	CNYAS10	NY Precipitation & Control Replacement	N/A	N/A	Please refer to January 2010 CIP Filing for	N/A	35	0.1	0.8	3.3	4.3	8.4
	CNYAS32	Oswego - new control building	N/A	N/A	Please refer to January 2010 CIP Filing for	N/A	18	0	0	0.1	0.5	0.6
	CNYAS88	Relay Replacement Strategy - Phase 2	N/A	N/A	Please refer to January 2010 CIP Filing for	N/A	19	0	0	0	0	0
	CNYAS89	Reverse Control room & Relay Strategy	N/A	N/A	Please refer to January 2010 CIP Filing for	N/A	19	0	0	0	0	0
	CNYAS28	Yainindis - protection replacement	N/A	N/A	Please refer to January 2010 CIP Filing for	N/A	12	0	0	0	0.1	0.1
	<b>Relay Replacement Strategy Total</b>											
	C24299	Lighthouse Hill Road - Repl R60 RHE PCB	Cancelled	N/A	Please refer to January 2010 CIP Filing for	N/A	38	0.1	0.2	0	0	0.3
	C18410	Owicks - R/R 115kV FP RHE PCB's	Open	N/A	Please refer to January 2010 CIP Filing for	N/A	39	0	0.1	0.5	0	0.6
	<b>RHE Breaker Replacement Total</b>											
	C28663	Shadown Buffalo 145	Open	N/A	SG073	No	40	0.3	1.3	0	0	1.6
	C28709	Shadown Clay-Dewet 3	Open	AMIC9810 - TIC9905	SG073	Yes (AMIC Paper) No Schedule	40	1.2	1.2	0	0	2.4
	C28706	Shadown Gardenville -Dopew 54	Open	N/A	SG073	No	40	0	1.1	0	0	1.1

		C28679	Shieldwire: Gardenville Homer 151/152	Open	N/A	SG073	No	40	0	3.6	0	0	3.6
		C28676	Shieldwire: Huntley - Gardenville 38	Open	AMIC0894	SG073	No, No	40	1.5	0	0	0	1.5
		C28707	Shieldwire: Huntley - Lockport 36/37	Open	AMIC0895	SG073	No, No	40	1.5	0	0	0	1.5
		C28678	Shieldwire: LaFarge Pleasant V. 8	Open	AMIC0873 - TJC0812	SG073	No, No	40	1.7	0	0	0	1.7
		C28681	Shieldwire: Mountain - Lockport 103	Open	AMIC08100	SG073	No, No	40	1.3	0	0	0	1.3
		C28712	Shieldwire: Walck Rd - Huntley	Open	AMIC0896	SG073	No, No	40	0.6	0	0	0	0.6
		Shield Wire Strategy Total							8.2	7.2	0	0	15.3
	Steel Tower Strategy	C21853	S. Oswego Lighthouse Hill Circuits	Open	N/A	SG18v2 SG29v2c SG042	No, No, No	49	4.5	0.4	0	0	4.9
		Steel Tower Strategy Total							4.9	0.4	0	0	4.9
	Substation Rebuild	CNYAS40	Buffalo 115kV - replace disconnects	N/A	N/A	N/A	N/A	21	0	0	0	0.3	0.3
		C06155	Dunkirk Rebuild	Open	N/A	Please refer to January 2010 CIP Filing for justification	N/A	35	0	0	0.1	0.5	0.6
		CNYAS91	Elm St. Refurbishment	N/A	N/A	N/A	N/A	35	0	0	0.5	1	1.5
		C05156	Gardenville Rebuild	Open	N/A	SG112	Yes	35	0.5	2.7	36.4	23	62.6
		C30084	Gardenville Rebuild Line Location	Open	N/A	SG112	Yes	44	1	1.2	1.3	0.1	3.6
		C31662	Lighth-HH 115kV Yard Bus & cold bus	Open	N/A	N/A	N/A	35	0.3	1	5	5	11.3
		CNYAS2	Lockport Rebuild	N/A	N/A	N/A	N/A	35	0	0	0.3	1	1.3
		CNYAS44	Mohican - rebuild including transformers and oil circuit breakers	N/A	N/A	N/A	N/A	35	0.1	0.2	1	10	11.3
		C29180	N. Leroy Rebuild Station	Open	N/A	N/A	N/A	34	0.1	0	0	0	0.1
		CNYAS36	Porter 230kV - replace disconnects and PTs	N/A	N/A	N/A	N/A	28	0	0.3	1	10	11.3
		CNYAS27	Reynolds Road - protection replacement & new control building & replace Overduy 115kV Breakers	N/A	N/A	N/A	N/A	19	0	0	0.5	1	1.5
		C03778	Rome 115 kV Station	Open	N/A	SG123	No	22	0.4	2	8.7	2.1	13.2
		C17849	Rotterdam R/R 230kV EPE RJE CBs	Open	N/A	N/A	N/A	38	0.5	1.6	4	15	21.1
		Substation Rebuilds Total							2.8	8.8	59.9	68.9	139.4
	Transformer Replacement Strategy	C31656	NY 115kV Transformer Replace (Priority 4)	Open	N/A	Please refer to January 2010 CIP Filing for justification	N/A	41	4	7	7	7	25
		Transformer Replacement Strategy Total							4	7	7	7	25
	U-Series Relay Strategy	C24662	Edic PE1 - Replace U Series Relays	Open	N/A	SG012	Yes	33	0.3	0	0	0	0.3
		C24663	Leeds - Replace U Series Relays	Open	N/A	SG012	Yes	33	0.2	0.7	0	0	0.9
		C24661	LN17 - Replace Type U Relays	Open	N/A	SG012	Yes	33	1.4	0	0	0	1.4
		C05150	Westinghouse U Series Relay Strategy	Open	N/A	SG012	Yes	33	0.5	0	0	0	0.5
		U-Series Relay Strategy Total							2.3	0.7	0	0	3
	Reserve	CNYX31	Reserve	Reserve	Reserve	Reserve	N/A	49	-8	-9.2	-14.1	-18.6	-50.9
		Reserve Total							-8	-9.2	-14.1	-18.6	-50.9
	Transmission Total								56.2	57.5	139	187	429.7
	Total Asset Condition								114.2	122.9	193.1	280.5	690.9

Network Segment	Program	Project Number	Project Name	Project Status	Sanction paper	Strategy paper	Approved Sanction/Strategy Date	Confidential (Y/N)	Risk Score	FY11	FY12	FY13	FY14	FY11-14
Transmission	Other - Non Infrastructure	CNYAS87	Asset Separation Strategy	N/A	N/A	N/A	N/A	n/a	39	0	0	0	0.1	0.1
		CNYAS46	Flood mitigation	N/A	N/A	Please refer to Request No. AJR-1 - NMPC Request No. NM 45 DPS 42	N/A	No	22	0	0	2	1	3
	<b>Other - Non Infrastructure Total</b>									0	0	2	1.1	3.1
	Physical Security	CNYAS86	Physical Security Strategy	N/A	N/A	SG132	2/25/2010	Yes	40	0.1	6	3	0	9.1
	<b>Physical Security Total</b>									0.1	6	3	0	9.1
<b>Transmission Total</b>										0.1	6	5	1.1	12.2
<b>Total Non-Infrastructure</b>										3.3	11.4	10.6	6.9	32.2

Date of Request: March 4, 2010  
Due Date: March 15, 2010

Request No. RAV-42  
NMPC Req. No. NM 174 DPS 104

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirement Panel

Request:

A. Please provide a comprehensive list of all non-Mercer initiatives, along with the estimated annual savings, that the Company is currently pursuing. Provide the amounts, broken down into "those included on tab WP1 of the Company's Keyspan merger savings estimate spreadsheet," "those not included on tab WP1 of the Company's Keyspan merger savings estimate spreadsheet," and "total."

B. Please provide a breakdown of the \$200 million in KeySpan merger savings aligned with the \$246.9 million of "Day N" KeySpan merger savings shown in Column V, Rows 7 - 434 of tab WP1 of the Company's KeySpan merger savings estimate spreadsheet.

C. 1. In general terms, fully explain what is the difference between the "Day N" KeySpan merger initiative savings and the KeySpan merger "run rate" initiative savings. Why are "Day N" savings more than "run rate" savings?"  
2. Fully explain how "Day N" KeySpan merger initiative savings can be less than the

KeySpan merger "run rate" initiative savings for each of the following items:

Row Run Rate Day N

a. 9 \$2.2M \$0.7M  
b. 38 \$2.17M \$0.21M  
c. 102 \$0.97M \$0.11M  
d. 109 \$3.56M \$2.57M  
e. 164 \$1.37M \$0.73M  
f. 245 \$12.18M \$9.91M  
g. 275 \$3.62M \$2.06M  
h. 292 \$4.86M \$1.07M  
i. 335 \$1.72M \$0.75M  
j. 389 \$2.63M \$1.37M

3. Should the “Day N” savings be increased from \$246.9M to reflect the higher “run rate” savings for each of the above items a.-j? If so, by how much? If not, fully explain why not.

D. Why are there cumulative “run rate” savings of \$10.093M for initiatives in rows 220-230, but \$0 “Day N” savings for the same initiatives? Should the “Day N” savings be increased from \$246.9M to reflect these initiatives in rows 220-230? If so, by how much? If not, fully explain why not.

E. Please identify and explain the \$473K of achieved savings in row 238 (no initiative title is provided on the spreadsheet for this item).

F. Please fully explain how there can be negative synergy savings associated with each of the initiatives on rows 11-13, 15-17, 22, 280, 281, 322 and 371-372. Are these actually costs to achieve?

G. Fully explain and provide a breakdown of what the negative \$33.2M of “Day N” synergy savings associated with “Initiatives From Business Transformation” represent (row 316) and why they are included as Day N synergy savings? Are these actually costs to achieve?

H. The Company’s methodology for determining actually achieved historic test year (YE 9/09) KeySpan synergy savings is to take actual FYTD 9/09 + actual FYE 3/09 – FYTD 9/08, as shown on Exhibit RRP-2, Schedule 42, Sheet 3. However, on the below initiative rows, it is Staff’s belief that this methodology overstates the actual achieved savings in the historic test year. To illustrate this overstatement of achieved actual savings, row 244 shows actual FYTD 9/08 savings of \$0.4111M, FYE 3/09 savings of \$2.283M (which is also the run rate, meaning the savings have been fully achieved within FYE 3/09) and FYTD 9/09 (which is a 6 month period) achieved savings of \$1.1415M, or exactly 50% of the annual savings. However, the Company’s methodology for determining actual achieved historic test year (YE 9/09) savings results in \$3.0134M of such savings rather than \$2.283M of true savings (i.e., \$1.1415M + \$2.283M - \$0.4111M).

1. Please indicate if the Company agrees its methodology overstates actually achieved historic test year (YE 9/09) KeySpan synergy savings on the synergy saving initiative in row 244 for the above stated reason. If not, fully explain how it is possible to obtain more than \$2.283M of annual savings from this initiative.

2. Please provide a recalculation of actual achieved historic test year (YE 9/09) KeySpan synergy savings on the following rows, which all have the same inherent problem of overstated historic test year savings: 48, 71, 102, 109, 164, 170, 175, 244, 248, 292, 358, and 359.

3. Please indicate if you agree that the actual achieved historic test year (YE 9/09) KeySpan synergy savings should be reduced to correct for this observed overstatement. If not, explain in full why not.

Response:

- A. Please see Attachment 1 to this response for a listing of all non-Mercer initiatives. Workpaper 1 is used by the Company to record synergy savings each quarter. Therefore, all replacement initiatives which were not originally listed in the Mercer presentation have been included here. There is also the potential to include savings arising from the implementation of the Transaction Delivery Centre (TDC). The TDC would not have been possible without the acquisition of Keyspan and as a result, a proposal is to be put to the Heads of Finance Committee for their approval to include these savings against the \$200 million synergy target. Although this has been included on the listing on Attachment 1, it is not currently contributing to the synergy savings and will only do so, providing approval is received from the Heads of Finance.
- B. The Company does not maintain a breakdown of the \$200 million target by initiative. Please see the responses to Information Request RAV-41, Parts B.2. and E.1. for an explanation of the difference between the \$246.9 million Day N savings and the \$200 million in Keyspan merger savings. It is not possible to reconcile each initiative from the nominal \$246.9 million to the agreed target of \$200 million other than to apply a simple ratio against each initiative. Certain initiatives included in the nominal \$246.9 million will exceed their targets and others will not be completed at all. The \$200 million target was determined by taking the high confidence range target of \$215 million and the low confidence target of \$160 million and determining a value which would provide management with a stretch goal as detailed in the response to Information Request RAV-41, Parts B.2. and E.1.
- C.1. The response to Information Request RAV-41 Parts B.2., E.1. and E.3. explain the detail process behind the total Mercer savings target. In essence, these were a list of initiatives at the 100% confidence level for the company to achieve the stipulated \$200 million annual savings. Thus the nominal Mercer savings amount of \$246.9 million represents the Day N target. The run rate is the savings being reported against each individual initiative which will accrue during the following year. The run rate savings therefore represent the current progress against the Day N Mercer targets.
- C.2.a. The run rate savings for September 2009 were not calculated correctly from the fiscal savings. The new rate savings were adjusted downwards in the December 2009 synergy report to just under \$1 million of savings.
- C.2.b. The \$2.17 million represents labor savings across finance. The savings have been tracked in a single initiative rather than split out among the others listed in the table.
- C.2.c. A number of initiatives have been grouped together and this initiative is being used to report the total savings.

- C.2.d. An additional floor in the Company's offices in MetroTech Brooklyn was vacated enabling the company to achieve greater than planned savings.
- C.2.e. The assumptions made at the time of the Mercer targets regarding OpEx/CapEx split on the FTEs were updated, resulting in a higher actual OpEx allocation.
- C.2.f. All savings in relation to IS staff reductions for KeySpan integration are captured under the IS Functional Consolidation initiative unless they are directly associated with other identified IS initiatives. The savings target for this initiative was an estimate based on a mix of roles and numbers of people with those roles. The savings target has been exceeded as a result of the salaries of a number of people, who have left from various roles, being higher than originally estimated in the target.
- C.2.g. The September 2009 run rate was overstated. Following a review, it was noted that the savings being reported were due to "call avoidance" related savings that were not truly synergy savings. This was adjusted for the December 2009 synergy report.
- C.2.h. The original synergy savings targets were based on a reduction of 11 FTE's. However, over time there have been a significant number of organizational changes which have eliminated a number of positions. To date, the savings are based on a reduction of approximately 38 FTE's which accounts for the excess over the Mercer target.
- C.2.i. The synergy savings are reported against FIN\_TR\_12 although the savings are from across treasury which would also include initiatives FIN\_TR\_5, 8, 9, 10, 13, and 14.
- C.2.j. The additional savings are due to approximately 10 FTE's who have either left or retired and the positions are not going to be staffed.
- C.3. The \$246.9 million is a nominal target and as such has limited relevance as to the level of savings likely to be achieved on Day N. The response to Information Request RAV-41, parts B.2. and E.1. explains the overall target. The \$200 million represents a stretch goal for the Company and will be difficult to achieve. It is anticipated that some initiatives will exceed their targets while a number of others will fall short. Therefore, the Company believes at this stage that no adjustment to the Day N total is necessary.
- D. The initiatives listed in rows 220-230 have zero Day N savings because they were not part of the original Mercer project list. As Gas Distribution developed more detailed plans and analysis of the original Mercer projects, some were deemed not feasible due to regulatory, union, cost-benefit analysis or other reasons. As a result, Gas Distribution developed alternate projects to capitalize on the

integration and achieve target benefits. These projects were not specifically intended to cover the gap created by the removal of Automatic Meter Reading ("AMR") from the list of possible synergy savings, although they will contribute to filling-in the gap. Gas Distribution has no plans to replace the AMR-related savings (i.e., Day N target for Gas Distribution is \$27.8M, not \$47.8M). The Company therefore believes at this stage no adjustment to the overall Day N total is necessary.

- E. The title of the item on row 238 should be Six Sigma. This initiative is related to reducing leak expenses in New York City by applying a Six Sigma approach.
- F. The costs associated with the initiatives listed in Part F. above are not costs to achieve. Costs to achieve are one time expenses and these are ongoing business costs and the expectation is that they will occur year after year. At the time these initiatives were identified, there was a need to fill a resourcing issue within a particular function or process. In other words, that activity was not currently taking place and was required, or by introducing this resource it would enable other initiatives to achieve their savings.
- G. The synergy target for Electric Distribution, which was developed during the integration process described in RAV 41 E.1., is \$20.05 million. However, the Company embarked on a more ambitious transformation program within Electricity Distribution Operations which leveraged off of the initiatives identified during the integration process but had a wider scope. The Company is treating the first \$20.05 million of the savings associated with Electric Distribution transformation as integration savings. The \$33.65 million is an adjustment to reflect the difference between the EDO transformation savings and the designated synergy savings. It is not a cost to achieve.
- H.1. The Company did not calculate the test year savings on an individual initiative basis. Aggregate totals of all initiatives from each line of business were used to calculate the test year savings.

Continued refinement of the synergy tracking process by individual initiatives is ongoing and as a result savings reported for past periods may have been reasonable in the aggregate but not individually. This could be attributable to situations such as transfers between initiatives and organization changes. The aggregate totals smooth out any inconsistencies in information. For example, row 219 for September 2008 included the total of savings for Gas Distribution at that date. In subsequent periods these savings were allocated to other initiatives.

The Company believes that calculating initiatives on an aggregate basis from each line of business would provide a similar result as calculating the test year savings on an initiative by initiative basis. For example, in the specific rows identified in Part H. above, it is agreed that there would be an overstatement of savings against



those particular initiatives. However, for row 219 there would be an understatement.

- H.2. Please see Attachment 2 to this response which details a reduction to the test year savings of \$684k if we apply the methodology which limits the savings for these initiatives to the run rate. However, please note that this includes an adjustment of \$1.6 million of finance savings which were not included in the original submission due to a spreadsheet error.

Synergy tracking has developed since integration. Functional coordinators have been encouraged to adopt a conservative approach when reporting savings and to ensure that the savings have been achieved when they report them. During the first year there was a learning curve for all involved with integration tracking to report synergies accurately on a run rate basis. Discipline in reporting has been improved with the introduction of templates that encourage the reporting of savings on an initiative by initiative basis leading to greater clarity.

Furthermore, the method used to calculate savings is only one method of calculating the savings for the test year. An alternative approach is to take  $\frac{1}{4}$  of the run rate at the start of each quarter and add this to the difference between the run rate at the start of the quarter and the quarter end and divide by 2 to average the increase over the quarter. This would imply an adjustment to the test year level of synergy savings of \$920k. This calculation can also be seen on Attachment 2 of this response.

In terms of validity both methods have their merits and the Company chose to go with the lower amount using the aggregate savings for each LoB under the methodology described in Part H.1. above.

- H.3. The Company agrees that the historic test year savings should be adjusted for the overstatements as recalculated on Attachment 2 as well as the overstatements identified in responses to Parts C.2.a. and C.2.g. The Company will include the above adjustments as well as additional adjustments identified through a scrubbing process of the historic test year savings on Exhibit \_\_ (RRP-2), Schedule 42 in the Corrections and Updates Filing.

Name of Respondent:

James M. Molloy and Stephen Heywood

Date of Reply:

March 21, 2010

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

**List of Initiatives**

Initiative Code	Initiative	DAY N \$(000)'s	Included on tab WP1
GAS-FIN-01	NE Weather Hedge/Insurance	\$1,900.0	Yes
USUK-11	Last Mile Logistics	\$2,258.4	Yes
CUST-MS-1D	Install Automatic Meter Reading (AMR) in RI	\$1,271.0	Yes
CUST-MS-04	Improve Field Appointment Planning & Reduce Missed Appointments	\$510.0	Yes
CUST-MS-10	RI Soft Off	\$1,290.0	Yes
USUK-09	Global Gas Leakage Management	\$1,650.0	Yes
USUK-01	Keyhole/Coring Technology Strategy	\$1,600.0	Yes
CUST-MS-09	Advanced Consumption	\$1,850.0	Yes
GAS-SYS-01A	Control Center Consolidation (New England)	\$500.0	Yes
USUK-02	Eco Ring Seal Injection Process - cancel		Yes
GAS-FLD-06	Improve Damage Prevention & Data Collection	\$400.0	Yes
GAS-SYS-14	Reduce LNG Overhead	\$360.0	Yes
CUST-MS-05	Optimize Meter Shops	\$270.0	Yes
CUST-SAF-01	Improvement of Employee Safety	\$200.0	Yes
GAS-FLD-38	Consolidate LI & NY Sales Fulfillment	\$192.0	Yes
GAS-ASM-21	Governance on Design Changes	\$75.0	Yes
GAS-FLD-27	Reduce Restoration Costs	\$422.2	Yes
GAS-FLD-40	Horizontal Directional Drilling	\$0.0	Yes
GAS-FLD-41	Six Sigma	\$950.0	Yes
Additional Synergies	Keyspan LTIP	\$10,202.5	Yes
Additional Synergies	Alignment of Benefits	\$4,191.2	Yes
Additional Synergies	Alignment of Pension Assumption	\$6,500.0	Yes
<b>Total Additions</b>		<b>\$36,592.3</b>	Yes
Negative Synergy	Reservoir Woods	(\$11,500.0)	Yes
<b>Total Replacement Savings</b>	Currently being included against \$200m target	<b>\$25,092.3</b>	Yes
Potential Synergies	Transaction Delivery Centre	\$16,315.0	No
<b>Grand Total</b>	Total potentially contributing to \$200m target pending HoF's approval	<b>\$41,407.3</b>	Total

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

Initiative Code	Initiative	Fiscal Savings to Date (in thousands)			Aggregate Run Rate (in thousands)			DAY N \$	Adjusted Calculation	Original Calculation
		Sep 08	Mar 09	Sep 09	Sep 08	Mar 09	Sep 09			
FIN_PN_3	Consolidation of Management Reporting and Planning	\$56.3	\$225.0	\$112.5	\$225.0	\$225.0	\$225.0	\$2,381.9	225.0	281.2
HR_BN_01A	Consolidate benefits groups (A)	\$149.6	\$557.4	\$299.2	\$598.4	\$598.4	\$598.4	\$642.0	598.4	707.0
P_SVCS_FAC_18A	Procurement-led category sourcing - General Maintenance		\$730.5	\$487.0		\$974.0	\$974.0	\$110.0	974.0	1,217.5
SVCS_FAC_02	Facility Consolidation - NYC	\$499.0	\$2,628.3	\$1,779.5	\$2,404.0	\$3,559.0	\$3,559.0	\$2,572.0	3,559.0	3,908.8
ELEC_DO_10	Gas and Electric System Operations Dispatch (SOD)/Standardize SOD functions/SOD Conso		\$1,196.8	\$684.2		\$1,372.2	\$1,372.2	\$734.2	1,372.2	1,881.0
GAS_ASM_06C	Encroachment criteria for public works projects - High Priority		\$795.3	\$375.0		\$750.0	\$750.0	\$964.0	750.0	1,170.3
GAS_FLD_00	Adopt Process Ownership model		\$1,851.4	\$1,386.6		\$2,870.8	\$2,780.8	\$4,994.0	2,780.8	3,238.0
IS_CVD_1	Contract Volume Discounts	\$411.1	\$2,283.0	\$1,141.5	\$925.6	\$2,283.0	\$2,283.0	\$3,496.0	2,283.0	3,013.4
IS_IN_13	Service Management	\$60.8	\$259.0	\$129.5	\$0.0	\$259.0	\$259.0	\$354.0	259.0	327.7
CUST_MSG_2	Improved efficiency within existing KeySpan growth model	\$1,264.5	\$4,777.0	\$2,428.0	\$4,438.0	\$4,857.0	\$4,857.0	\$1,073.9	4,857.0	5,940.5
CORP_CS_2	Elimination of KS Board of Directors	\$552.0	\$1,585.0	\$792.5	\$1,104.0	\$1,585.0	\$1,585.0	\$1,585.0	1,585.0	1,825.5
CORP_CS_3	Elimination of KS Annual Meeting/Printing and Mailing of Annual Report	\$72.0	\$257.0	\$128.5	\$144.0	\$257.0	\$257.0	\$257.0	257.0	313.5
									19,500.4	23,824.3

Difference between original and adjusted Calculation  
Add Back Finance total which was not included in original calculation  
Adjustment to Total  
% Allocated to NiMo  
Total Adjustment

(4,323.92)  
1,580.51  
(2,743.41)  
24.93%  
(684)

Alternate Methodolgy based on Run Rate Calculations  
Original Total filed in rate case  
Alternate Adjustment  
% Allocated to NiMo  
Total Adjustment

\$64,703.6 \$128,773.9 \$140,454.9

117,347.8  
113,657.7  
3,690.08  
24.93%  
920

Date of Request: March 4, 2010  
Due Date: March 15, 2010

Request No. WEL-3  
NMPC Req. No. NM 176 DPS 106

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: William Lysogorski

TO: Infrastructure and Operations Panel

Request:

1. Exhibit (IOP-14) Schedule 2 Sheet 68, Table III-6 shows a total budget of \$12,500,000.00. The Company's RAV 3 CY-2009 and CY-2008 report shows total expenditures of \$481,118.00 and \$308,676.00 for TxD\_REP-Distribution Automation Pilots. Please provide the work papers supporting how the Company forecasted the FY10/11 – FY14/15 CIP Budgeted dollars.
2. For FY10/11-FY14/15, please provide the following: If the number of circuits (item a) data is not available, provide the estimated cost per unit of materials used and associated labor cost to install when a circuit is automated.
  - a. Number of Circuits to receive automation, location and name of circuit, and why they were chosen;
  - b. Number of reclosers per circuit;
  - c. Number of switches per circuit;
  - d. Number of repeater radios per circuit;
  - e. REFI cost, if any;
  - f. Total material cost;
  - g. Total labor cost;
  - h. Anticipated yearly maintenance cost for equipment used to automate a circuit.
3. The Company's response to IR Request No.\_PSC-85 Lysogorski (WEL-1), NMPC REQ. No. 86, Case 06-M-0878, and dated 04/10/2008 listed seven pilot programs (Response to 1d). Please provide the status of each of the programs listed. Include the total expenditure for each pilot, description of materials/devices used, and cost associated with the materials/devices, labor costs, and in service date. If a pilot program is not yet in service provide the expected in service date.

4. For the pilots that are in service, provide the reliability and operational data that has been gathered from these pilots.
5. Provide the risk score for this project (CLINESEC) and the data used to determine the score.

Response:

1.

There are no work papers for this project. At the time the capital investment plan was set, the Company had not identified specific locations or requirements but felt it was necessary to make a budget provision to enable future similar work to proceed.

Following the automation trials listed in the response to Question 3 below, the Company recognized the benefit of identifying additional projects where the installation of either Automation, Preferred / Alternate, or Sectionalizing switching schemes would provide increased reliability to the Sub-transmission network.

Our initial view, without carrying out a detailed engineering review, was that there would be at least 40 – 50 locations where this kind of work would be beneficial but no detailed lists were available. The average costs were estimated to be approximately \$250k to \$300k per location but again these were conceptual estimates and not supported by detailed cost breakdowns (the average cost of location of the six pilots identified in question 3 is approximately \$282k). The budget figure of \$12.5M was developed after internal consultation with key stakeholders, recognizing this was an estimate of the likely future costs.

The \$500k budgeted in FY10/11 will be used predominantly for engineering activities to identify candidate locations in which to implement automation schemes, the manner/methods of automations schemes, location-specific cost estimates and issue designs. The list of potential candidates for automation is currently under review and is subject to change as new information and performance data become available.

The estimated cost to implement automation may vary considerably by Sub-transmission circuit. This is due to factors such as the number of taps serving significant substation load and the distance between them, the number of automated switches or reclosers needed to segment the line, and where the nearest uplink point for communication to Control Centers is relative to the devices.

- 2a. For FY10/11 the company has selected five potential candidates to begin detailed engineering for automation. The list below shows the substations and lines being targeted for sub-transmission automation based on the numbers of customers

served by the distribution stations supplied by the sub-transmission lines and the potential time necessary to manually switch to an alternate source in the event of an interruption. The approach for automation of these stations is to supply each with a preferred supply and an alternate supply. Therefore, for loss of the preferred supply the scheme will automatically transfer the substation customers to the alternate supply. This will expose customers only to a momentary interruption of approximately 1-minute or less, thus saving these customers from experiencing a sustained interruption

Substation	Division	Line Number	Number of DA Devices	No of Customers
Birch Ave	NYE	8&9	2	1,784
Bolton	NYE	8&9	2	3,360
Fort Gage	NYE	8&9	2	2,280
French Mountain	NYE	8&9	2	534
Wilton	NYE	3&12	2	2,876

FY11/12 through FY14/15 locations for sub-transmission automation schemes will be selected in FY11 in time for FY12 project planning and budget preparation.

- 2b. The number of reclosers per circuit / installation will vary depending on the number of substations the circuit supplies, the desired segmentation of the line, and the configuration of the supply system. However, in general a preferred/alternate scheme utilizes 2-reclosers. Other schemes may utilize one or more reclosers per line. Many of the automation schemes are unique in nature and need to be developed utilizing a cost and expected benefit type analysis. Those with the greatest benefit/cost will be implemented first.
- 2c. The number of DA switches per circuit / installation will vary depending on the number of substations the circuit supplies, the desired segmentation of the line, and the configuration of the supply system. However, in general a preferred/alternate scheme utilizes two DA switches. Other schemes may utilize one or more switches per line. Many of the automation schemes are unique in nature and need to be developed utilizing a cost and expected benefit type analysis. Those with the greatest benefit/cost will be implemented first.
- 2d. The number of repeater radios per circuit is dependent on the location of the nearest uplink point for communication to the Control Centers. Therefore, each installation is unique and communication to Control Centers will vary depending on the communication system best suited for that particular area of the system. There may also be locations where cell phone technology will provide a cost effective alternative.
- 2e. Radio Equipped Fault Indicators (REFI) were not installed as originally planned due to the cost of communications. See response to Question 3; 'Boonville – Raquette Lake'.

- 2f. The material cost per circuit will vary depending on the scheme required for each installation and the number of DA devices to be installed for each circuit. However, the conceptual material cost for each DA controlled installation is \$60,000.
- 2g. The labor cost per circuit will vary depending on the scheme required for each installation and the number of DA devices to be installed for each circuit. However, the conceptual labor cost for each DA controlled installation is \$40,000.
- 2h. The yearly maintenance cost for equipment used to automate the circuit will vary depending on the particular type of system installed, the type of devices used, and the desired level of automation. At a minimum, each recloser will have an inspection performed every two months and maintenance every six years for an estimated cost of \$5,000 every six years in today's dollars not accounting for inflation.
3. The expenditure for each of the seven Sub Transmission circuits is given below:

Lowville-Boonville #22 23kV Sub Transmission Line –Project is complete

Total Expenditure \$338,029

Materials used included 3 switches, 3 switch controls, and 4 repeater radios with antennas and mounting brackets.

Material Costs \$149,867

Labor Costs \$58,786

Labor Overheads \$42,856

In Service August, 2008

Lighthouse Hill – Mallory #22 34.5kV Sub Transmission Line- Project is complete

Total Expenditure \$647,151

Materials used included 6 switches, 6 switch controls, and 13 repeater radios with antennas and mounting brackets.

Material Costs \$291,376

Labor Costs \$139,923

Labor Overheads \$100,150

In Service                      December, 2008

Cambridge-Hoosick # 3 34.5kV Sub Transmission Line-Project is complete

Total Expenditure      \$263,295

Materials used included 1 switch, 1 switch control, and 10 repeater radios with antennas and mounting brackets.

Material Costs              \$93,146

Labor Costs                \$67,280

Labor Overheads        \$50,800

In Service                      August, 2009

Battenkill-Cement Mountain # 5 34.5kV Sub Transmission Line-Project is complete

Total Expenditure      \$138,095

Materials used included 1 switch, 1 switch control, and 2 repeater radios with antennas and mounting brackets.

Material Costs              \$58,366

Labor Costs                \$28,920

Labor Overheads        \$21,558

In Service                      July, 2009

Cement Mountain-Cambridge # 2 34.5kV Sub Transmission Line-Project is complete

Total Expenditure      \$135,056

Materials used included 1 switch, 1 switch control, and 2 repeater radios with mounting brackets.

Material Costs              \$53,328

Labor Costs                \$29,973



Labor Overheads           \$22,223

In Service                   August, 2009

Chestertown-Schroon # 3 34.5kV Sub Transmission Line-Project is complete

Total Expenditure       \$171,924

Materials used included 1 recloser with universal interface module, and 6 repeater radios with antennas and mounting brackets.

Material Costs           \$67,982

Labor Costs               \$39,456

Labor Overheads       \$30,096

In Service                August, 2009

Booneville – Raquette Lake 46kV Sub Transmission Line

Preliminary DA pilot analysis included a review for adding Radio Equipped Fault Indicators (REFI) to the Booneville - Raquette Lake 46 kV circuits. At that time the communications system in the Adirondacks was very lacking, even for cell phone coverage. As a result, a large number of repeater radios would have been required and the cost for this option was deemed too large and thus cancelled as not viable in the pilot period. This technology may be considered in the future as part of an option where radio communications already exist, however, it is not expected to be included in any planned projects during the rate period.

4. Reliability and performance data of the six Sub Transmission circuits where DA was completed is given below (Note - this information does not include momentary events as these schemes are only designed to operate for sustained outages):

Lowville-Boonville #22 23kV line

There have been no interruptions on the line since the DA scheme was put in service.

Lighthouse Hill-Mallory #22 34.5kV line

There was one interruption on the line. This interruption was on April 3, 2009 and was on the Lighthouse Hill side of the line. Without the DA scheme, the customers at Sandy Creek substation would have been interrupted. The DA saved 3,781 customers from being interrupted.

Cambridge-Hoosick #3 line

There were no interruptions since the DA was placed in-service.

Battenkill-Cement Mountain # 5 line

There have been no interruptions since the DA was placed in-service.

Cement Mountain-Cambridge #2 line

There have been no interruptions since the DA was placed in-service.

Chestertown-Schroon #3 line

There have been no interruptions since the DA was placed in-service

5. The risk score for project (CLINESEC) is 39. The project score was developed utilizing two components, an impact score of 5 and a likelihood score of 5. The impact score of 5 assumes an outage event would impact on average 3 to 6 feeders. The likelihood score of 5 assumes the likelihood of an outage event would be once every 3 to 5 years.

	1	2	3	4	5	6	7
Likelihood---->	>Once in 100 yrs	Once in 20-100 yrs	Once in 10-20 yrs	Once in 5-10 yrs	Once in 3-5 yrs	Once in 1-3 yrs	>Once in 1 yr
Likelihood---->	1	2	3	4	5	6	7
Likelihood---->	1	2	3	4	5	6	7
1							
2				16	18	23	24
3				21	27	30	31
4		17	19	28	34	36	37
5	15	22	26	35	39	41	
6	20	29	33				
7	25	32					
Impact							

Name of Respondent:  
John Gavin / Rob Sheridan

Date of Reply:  
March 22, 2010

Date of Request: March 5, 2010  
Due Date: March 15, 2010

Request No. AAE-10  
NMPC Req. No. NM 177 DPS 107

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Allison Esposito

TO: Rudolph L. Wynter Jr.

Request:

1. Please update Exhibit RLW-5 for electric data from 10/1/09 – 2/28/10. In addition to the 12-month average rolling data provided in this exhibit, provide the actual write-offs on a monthly stand alone basis. Please provide monthly updates of this exhibit through the end of the rate case.
2. Does the “Normalized Bad Debt Write-Off Amounts” included in the RLW exhibits represent actual net write offs only for the periods noted or does it also include a component of anticipated additional net write-offs and/or increases in the reserve for bad debts? If it includes a component for anticipated additional net write-offs and/or increases in the reserve for bad debts, provide each amount separately and explain how the amounts were derived.
3. Please state how the LICAP amounts were allocated between electric and gas in Case 08-G-0609. To the extent that these amounts differ from the 72/28% allocation in the current case, please explain this variance and why the Company feels that such a change in methodology is appropriate.
4. Please explain the basis of the current LICAP allocation of 72/28%. Provide all supporting workpapers and calculations.
5. Exhibit RLW-6, page 3 of 3, includes data related to “Pre-Credit Arrears.” Please provide a full explanation of this heading.
6. Exhibit RLW-8, Schedule 4, Page 3 of 3, shows total net write-offs as comprised of net write-offs and LICAP. Please explain why LICAP expenses are included in this number and why the Company feels that these costs should be factored into the uncollectible rate calculation.

7. Page 35, line 7 of Wynter's testimony discusses the Company's implementation of a bad debt mitigation plan. Regarding this new plan, please provide the following:

1. A copy of the bad debt mitigation plan;
2. Dates the implementation of the plan started and ended;
3. A cost-benefit analysis of the plan;
4. A breakout of costs of the plan, by component, by month beginning 1/1/08 – 2/28/10.

Response:

1. a. Please see Attachment 1 for the update through February 2010 of RLW-5.

b. Please see Attachment 2 which is an update of RLW-6 Sheet 3 of 3 through February 2010. The monthly unallocated net write-offs can be seen in the leftmost section in the rows titled, "Net W-Off (Monthly)." The monthly allocated net write-offs to Electric and Gas are shown in the rightmost section in the rows titled, "Gas Net W-Off" and "Elect Net W-Off."

2. The "Normalized Bad Debt Write-Off Amounts" in the RLW exhibits do not include a component of anticipated additional net write-offs and/or increases in the reserve for bad debts. The normalization is fully explained in footnotes (1) and (2) of Attachment 1 and Attachment 2 herein, as well as in the testimony of Rudolph L. Wynter on page 39 of 53, lines 1-8.

3. The LICAP arrears forgiveness amounts have been allocated the exact same way in Case 10-E-0050 as they were in Case 08-G-0609: 72/28%, electric/gas. This is best illustrated in the work papers, Exhibit \_\_ (RLW-8), Schedule 4, Pages 1 – 3. The row toward the bottom titled, "Net W-Off & LICAP" is the summation of the top two rows on those pages. The bottom rows, "Gas Net W-Off" and "Elect Net W-Off" are respectively 28% and 72% of the "Net W-Off & LICAP" row. These two rows carry through to the rightmost section of RLW-6, Sheet 3 of 3 in the rows titled, "Gas Net W-Off 12-Mo Rolling" and "Elect Net W-Off 12-Mo Rolling." As indicated in 1b above, RLW-6 Sheet 3 of 3 has been updated here as Attachment 2.

4. See # 3 above. The 72/28% electric/gas allocation of the LICAP arrears forgiveness is no different than the treatment given in Case 08-G-0609. Net write-offs (exclusive of LICAP arrears forgiveness) and the reserve for uncollectible accounts have been booked to bad debt expense along this 72/28% allocation for over ten years. The basis of this allocation stems originally from a study for the *Gas Multi-Year Rate and Restructuring Proposal* of March 11, 1999. Attachment 3 contains pages 36 and 46 from Appendix F of that proposal. There have been some studies of gross write-off within the last several years that have not shown a significant deviation from the 72/28% allocation. Although LICAP arrears forgiveness is technically booked 100% to electric distribution, for

ratemaking purposes the Company has chosen (as it did in Case 08-G-0609) to recognize the practical reality that many LICAP customers are dual service customers who participate in the energy efficiency services of the program such as weatherization.

5. The term "Pre-Credit Arrears" refers to accounts receivable arrears exclusive of excess credits. In simple terms, excess credits are amounts owed to customers by the Company in excess of any money owed by the customer. These credits exist for a variety of reasons. In some system reports these credits are netted with the 30-day arrears dollars, thereby reducing the total arrears in that bucket. From a collections management perspective, these credits are usually not considered part of managed arrears, but generally are included in high-level tracking of total accounts receivable. In fiscal year 2009, these credits had an average monthly total of under \$12 million (electric and gas). In fiscal year 2010, these credits have an average monthly total of just under \$15 million (electric and gas).

6. The LICAP dollars imbedded within the net write-off figures only refer to the arrears forgiveness amounts of qualified LICAP customers. The arrears forgiveness component of LICAP has always been treated as a write-off of a receivable. These dollars are directly booked to the bad debt expense account. No other components of the LICAP program are included within the Company's net write-off figures.

7.1 Collectively, the plan constitutes the documents contained within Attachment 4.

7.2. The first phase of the Bad Debt Mitigation Plan was implemented during the mid-year of calendar 2008 with the other phases implemented afterward. The entire program is ongoing.

7.3

		<b>Field</b>		<b>Outbound</b>		<b>Account</b>		<b>Predictive</b>		
		<b>Visits</b>		<b>Calling</b>		<b>Initiative</b>		<b>Analytics</b>		<b>Total</b>
<b>FY09</b>										
<b>Cost</b>										
NG NY		1,650		1,975		150		200		3,975
<b>FY09 Reduction to Bad Debt</b>										
NG NY		1,700		2,600		200		2,500		7,000
<b>FY10</b>										
<b>Cost</b>										
NG NY		1,473		1,798		150		200		3,621

<b>FY10 Reduction to Bad Debt</b>									
NG NY		6,175		7,000		525		6,500	20,200

7.4. Please see Attachment 5 to this response.

Name of Respondent:

Paul S. Leo

Date of Reply:

March 16, 2010

# UNCOLLECTIBLE RATE CALCULATION

## GAS

Rolling 12-Mo Ending  
(\$000's)

	31-Oct-06	30-Nov-06	31-Dec-06	31-Jan-07	28-Feb-07	31-Mar-07	30-Apr-07	31-May-07	30-Jun-07	31-Jul-07	31-Aug-07	30-Sep-07
Normalized Bad Debt Net Write-Off	\$ 13,749.9	\$ 14,302.5	\$ 14,998.1	\$ 15,261.2	\$ 15,248.3	\$ 15,348.3	\$ 15,496.2	\$ 15,308.1	\$ 15,075.2	\$ 15,226.2	\$ 15,836.5	\$ 16,215.2
Total Tariff Revenue	\$ 891,898.2	\$ 878,024.3	\$ 830,074.6	\$ 782,548.1	\$ 785,157.8	\$ 791,205.3	\$ 801,743.7	\$ 809,620.1	\$ 806,061.5	\$ 805,170.0	\$ 803,710.1	\$ 800,639.0
Late Payment Revenue	\$ 3,579.5	\$ 3,560.8	\$ 3,479.5	\$ 3,391.9	\$ 3,258.2	\$ 3,248.2	\$ 3,288.3	\$ 3,422.6	\$ 3,365.4	\$ 3,384.2	\$ 3,371.7	\$ 3,380.9
POB Receivable Revenue	\$ 93,113.3	\$ 99,714.4	\$ 91,992.8	\$ 86,629.1	\$ 90,056.9	\$ 94,363.5	\$ 99,451.6	\$ 102,890.5	\$ 103,840.7	\$ 104,587.6	\$ 105,173.1	\$ 105,421.5
	\$ 988,591.0	\$ 981,299.5	\$ 925,547.0	\$ 872,569.1	\$ 878,472.9	\$ 888,817.0	\$ 904,483.6	\$ 915,933.2	\$ 913,267.8	\$ 913,141.8	\$ 912,254.9	\$ 909,441.5
Uncollectible Rate	1.3909%	1.4575%	1.6097%	1.7490%	1.7358%	1.7268%	1.7066%	1.6713%	1.6507%	1.6675%	1.7360%	1.7830%
Normalized Bad Debt Net Write-Off	\$ 16,218.4	\$ 15,941.2	\$ 15,656.5	\$ 15,574.6	\$ 15,655.8	\$ 15,525.1	\$ 15,403.2	\$ 15,436.1	\$ 15,427.0	\$ 15,600.2	\$ 16,006.3	\$ 16,008.5
Total Tariff Revenue	\$ 793,945.8	\$ 783,423.2	\$ 799,293.5	\$ 814,751.0	\$ 806,178.3	\$ 789,455.0	\$ 787,747.6	\$ 784,588.2	\$ 798,099.1	\$ 806,684.2	\$ 813,784.0	\$ 816,646.0
Late Payment Revenue	\$ 3,390.5	\$ 3,351.7	\$ 3,329.6	\$ 3,318.4	\$ 3,356.8	\$ 3,303.6	\$ 3,311.4	\$ 3,273.3	\$ 3,331.2	\$ 3,378.0	\$ 3,427.7	\$ 3,467.9
POB Receivable Revenue	\$ 105,295.7	\$ 106,605.7	\$ 111,542.6	\$ 118,346.6	\$ 120,721.2	\$ 122,329.2	\$ 125,096.3	\$ 125,346.3	\$ 128,440.0	\$ 130,272.5	\$ 132,460.9	\$ 134,350.9
	\$ 902,632.0	\$ 893,380.6	\$ 914,165.7	\$ 936,416.0	\$ 930,256.2	\$ 915,087.7	\$ 916,155.3	\$ 913,208.9	\$ 929,870.3	\$ 940,334.7	\$ 949,672.7	\$ 954,464.8
Uncollectible Rate	1.7965%	1.7844%	1.7127%	1.6632%	1.6830%	1.6966%	1.6813%	1.6903%	1.6590%	1.6590%	1.6855%	1.6772%
Normalized Bad Debt Net Write-Off	\$ 16,095.1	\$ 16,704.2	\$ 16,706.3	\$ 17,564.1	\$ 18,136.0	\$ 18,584.5	\$ 19,121.9	\$ 19,465.7	\$ 20,022.2	\$ 20,372.7	\$ 20,425.7	\$ 20,582.3
Total Tariff Revenue	\$ 820,359.9	\$ 826,763.2	\$ 820,863.3	\$ 839,607.5	\$ 848,499.4	\$ 837,487.4	\$ 819,734.1	\$ 803,816.6	\$ 785,426.2	\$ 775,087.7	\$ 767,827.2	\$ 763,533.7
Late Payment Revenue	\$ 3,493.2	\$ 3,551.2	\$ 3,616.3	\$ 3,712.2	\$ 3,801.7	\$ 3,859.5	\$ 3,951.0	\$ 3,893.1	\$ 3,820.9	\$ 3,796.6	\$ 3,707.3	\$ 3,637.4
POB Receivable Revenue	\$ 140,933.9	\$ 143,915.8	\$ 148,888.0	\$ 159,256.8	\$ 168,279.2	\$ 169,933.9	\$ 168,444.5	\$ 166,677.3	\$ 162,960.1	\$ 160,854.9	\$ 158,229.2	\$ 156,282.9
	\$ 964,786.9	\$ 974,230.2	\$ 973,165.6	\$ 1,002,576.5	\$ 1,020,580.2	\$ 1,011,280.7	\$ 992,129.6	\$ 974,387.0	\$ 952,207.2	\$ 939,539.2	\$ 929,763.8	\$ 923,454.0
Uncollectible Rate	1.6683%	1.7146%	1.7166%	1.7519%	1.7770%	1.8377%	1.9274%	1.9877%	2.1027%	2.1684%	2.1969%	2.2288%
Normalized Bad Debt Net Write-Off	\$ 21,441.6	\$ 21,211.4	\$ 20,966.8	\$ 20,394.5	\$ 19,963.4							
Total Tariff Revenue	\$ 763,769.7	\$ 757,565.1	\$ 730,782.2	\$ 703,008.1	\$ 681,183.9							
Late Payment Revenue	\$ 3,594.9	\$ 3,537.0	\$ 3,542.1	\$ 3,405.9	\$ 3,266.7							
POB Receivable Revenue	\$ 150,195.2	\$ 146,788.9	\$ 139,006.2	\$ 130,365.0	\$ 122,297.0							
	\$ 917,559.8	\$ 907,871.0	\$ 873,330.5	\$ 836,779.0	\$ 806,747.6							
Uncollectible Rate	2.3366%	2.3364%	2.4008%	2.4373%	2.4745%							

**ELECTRIC**  
Rolling 12-Mo Ending  
(\$000's)

	31-Oct-06	30-Nov-06	31-Dec-06	31-Jan-07	28-Feb-07	31-Mar-07	30-Apr-07	31-May-07	30-Jun-07	31-Jul-07	31-Aug-07	30-Sep-07
Normalized Bad Debt Net Write-Off	\$ 35,366.8	\$ 36,777.7	\$ 38,309.4	\$ 39,243.1	\$ 39,209.8	\$ 39,467.2	\$ 39,693.0	\$ 39,963.7	\$ 38,764.8	\$ 39,153.2	\$ 40,722.5	\$ 41,696.2
Total Tariff Revenue	\$ 3,109,634.5	\$ 3,123,264.5	\$ 3,120,084.3	\$ 3,099,545.0	\$ 3,107,068.6	\$ 3,128,469.3	\$ 3,137,065.0	\$ 3,160,279.9	\$ 3,180,254.0	\$ 3,186,818.8	\$ 3,177,717.4	\$ 3,185,582.5
Late Payment Revenue	\$ 14,595.0	\$ 14,475.3	\$ 14,442.9	\$ 14,626.6	\$ 14,610.3	\$ 14,584.5	\$ 14,653.0	\$ 14,904.2	\$ 14,764.8	\$ 15,044.6	\$ 15,000.5	\$ 15,182.4
POR Receivable Revenue	\$ 74,553.1	\$ 88,687.3	\$ 105,072.6	\$ 120,311.5	\$ 139,595.5	\$ 161,586.6	\$ 180,023.6	\$ 196,902.3	\$ 204,293.3	\$ 210,789.1	\$ 214,904.4	\$ 221,971.6
	\$ 3,198,782.6	\$ 3,226,427.2	\$ 3,239,599.9	\$ 3,234,483.1	\$ 3,261,274.4	\$ 3,302,640.4	\$ 3,331,741.7	\$ 3,372,086.4	\$ 3,399,312.1	\$ 3,412,652.4	\$ 3,407,622.3	\$ 3,422,716.5
Uncollectible Rate	1.1053%	1.1399%	1.1825%	1.2133%	1.2023%	1.1950%	1.1914%	1.1673%	1.1404%	1.1473%	1.1950%	1.2182%
Normalized Bad Debt Net Write-Off	\$ 41,704.4	\$ 40,991.6	\$ 40,259.5	\$ 40,048.9	\$ 40,257.9	\$ 39,921.7	\$ 39,608.3	\$ 39,692.9	\$ 39,669.4	\$ 40,114.9	\$ 41,159.0	\$ 41,164.7
Total Tariff Revenue	\$ 3,199,056.9	\$ 3,205,204.7	\$ 3,217,611.9	\$ 3,244,370.3	\$ 3,229,360.2	\$ 3,193,809.1	\$ 3,180,093.4	\$ 3,164,302.2	\$ 3,146,291.3	\$ 3,142,311.6	\$ 3,162,777.6	\$ 3,153,304.5
Late Payment Revenue	\$ 15,595.5	\$ 15,719.5	\$ 15,701.0	\$ 15,744.3	\$ 15,960.3	\$ 15,959.3	\$ 16,074.9	\$ 15,879.2	\$ 16,172.7	\$ 16,198.7	\$ 16,224.0	\$ 16,145.6
POR Receivable Revenue	\$ 230,083.4	\$ 236,243.0	\$ 244,588.5	\$ 259,160.3	\$ 267,066.4	\$ 271,559.9	\$ 275,622.9	\$ 287,859.5	\$ 297,057.4	\$ 313,254.6	\$ 331,374.4	\$ 339,505.0
	\$ 3,444,699.9	\$ 3,457,167.2	\$ 3,477,901.5	\$ 3,519,274.9	\$ 3,512,386.9	\$ 3,481,328.3	\$ 3,475,791.2	\$ 3,468,040.9	\$ 3,459,521.4	\$ 3,471,764.9	\$ 3,510,376.1	\$ 3,508,955.0
Uncollectible Rate	1.2107%	1.1857%	1.1576%	1.1380%	1.1462%	1.1467%	1.1395%	1.1445%	1.1467%	1.1555%	1.1725%	1.1731%
Normalized Bad Debt Net Write-Off	\$ 41,387.3	\$ 42,953.7	\$ 42,956.6	\$ 45,164.9	\$ 46,635.5	\$ 47,788.6	\$ 49,170.7	\$ 50,054.7	\$ 51,485.6	\$ 52,386.9	\$ 52,523.1	\$ 52,925.8
Total Tariff Revenue	\$ 3,133,055.0	\$ 3,112,613.5	\$ 3,091,280.7	\$ 3,081,245.9	\$ 3,076,984.3	\$ 3,060,286.1	\$ 3,028,875.3	\$ 2,998,174.9	\$ 2,950,238.7	\$ 2,912,193.9	\$ 2,849,751.4	\$ 2,834,349.1
Late Payment Revenue	\$ 15,932.6	\$ 15,962.9	\$ 16,147.2	\$ 16,405.2	\$ 16,322.3	\$ 16,276.4	\$ 16,420.3	\$ 16,242.7	\$ 15,798.3	\$ 15,740.2	\$ 15,356.5	\$ 14,943.8
POR Receivable Revenue	\$ 343,639.7	\$ 346,877.1	\$ 348,210.4	\$ 349,756.9	\$ 352,276.4	\$ 349,087.9	\$ 343,409.7	\$ 336,950.9	\$ 327,739.9	\$ 312,052.6	\$ 294,037.8	\$ 287,904.5
	\$ 3,492,627.3	\$ 3,475,453.5	\$ 3,455,638.3	\$ 3,447,408.0	\$ 3,445,583.0	\$ 3,425,630.5	\$ 3,368,705.3	\$ 3,351,368.5	\$ 3,293,776.8	\$ 3,239,986.7	\$ 3,159,145.6	\$ 3,137,197.5
Uncollectible Rate	1.1850%	1.2359%	1.2431%	1.3101%	1.3535%	1.3950%	1.4510%	1.4936%	1.5631%	1.6169%	1.6626%	1.6870%
Normalized Bad Debt Net Write-Off	\$ 55,135.6	\$ 54,543.7	\$ 53,914.5	\$ 52,443.1	\$ 51,334.4							
Total Tariff Revenue	\$ 2,830,718.7	\$ 2,824,630.1	\$ 2,824,675.0	\$ 2,837,570.5	\$ 2,844,630.0							
Late Payment Revenue	\$ 14,793.9	\$ 14,431.8	\$ 14,570.3	\$ 14,345.3	\$ 14,280.1							
POR Receivable Revenue	\$ 285,287.5	\$ 284,009.1	\$ 282,672.0	\$ 285,682.9	\$ 286,552.7							
	\$ 3,130,800.1	\$ 3,123,071.0	\$ 3,121,917.2	\$ 3,137,598.8	\$ 3,145,462.7							
Uncollectible Rate	1.7611%	1.7465%	1.7270%	1.6714%	1.6320%							

(1) For the month of Sept '09, total electric & gas net write-off has been normalized by removing about \$4.1 million that had been inadvertently accelerated to write-off due to a system issue. These amounts would have been written off during Oct '09 and Nov '09.

(2) For the months of Oct/Nov '09, total electric & gas net write-off has been increased by the allocated portion of the \$4.1 million that had been inadvertently accelerated in Sept'09 due to a system issue. Also, written off during Oct '09 was another \$1.5 accelerated amount that should have gone to Nov '09. Both Oct'09 & Nov'09 have been normalized by the additional figure.



12-Mo Rolling Net Write-Off (E&G Allocated)  
(\$000's)

	Jan-05	Feb-05	Mar-05	Apr-05	May-05	Jun-05	Jul-05	Aug-05	Sep-05	Oct-05	Nov-05	Dec-05
Gas Net W-Off	1,068	559	876	536	870	393	2,044	1,563	1,403	1,272	1,166	987
Gas Net W-Off 12-Mo Rolling	12,756	12,666	12,270	12,154	12,305	11,724	12,454	12,501	12,416	12,500	12,500	12,487
Elect Net W-Off	2,722	1,439	2,253	1,378	1,722	934	5,255	4,019	3,608	3,270	2,969	2,539
Elect Net W-Off 12-Mo Rolling	32,725	32,571	31,550	31,252	31,642	30,148	32,024	32,146	31,927	32,144	32,347	32,136
	Jan-06	Feb-06	Mar-06	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06
Gas Net W-Off	1,132	563	898	583	1,060	1,347	1,014	1,360	1,771	1,849	1,719	1,583
Gas Net W-Off 12-Mo Rolling	12,571	12,575	12,597	12,644	13,033	14,017	12,887	12,605	13,173	13,750	14,302	14,888
Elect Net W-Off	2,912	1,447	2,310	1,468	2,726	3,463	2,607	3,550	4,554	4,754	4,420	4,070
Elect Net W-Off 12-Mo Rolling	32,326	32,334	32,391	32,512	33,514	36,044	33,395	32,926	33,873	35,357	36,778	38,309
	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07
Gas Net W-Off	1,495	550	908	670	931	1,114	1,165	1,691	2,150	1,852	1,441	1,298
Gas Net W-Off 12-Mo Rolling	15,261	15,248	15,348	15,508	15,308	15,075	15,226	15,837	16,215	16,215	16,181	15,656
Elect Net W-Off	3,846	1,414	2,567	1,724	2,395	2,864	2,895	5,119	5,928	4,763	3,707	3,358
Elect Net W-Off 12-Mo Rolling	39,243	39,210	39,487	39,693	39,364	38,765	39,153	40,722	41,096	41,704	40,992	40,260
	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08
Gas Net W-Off	1,414	631	868	549	964	1,105	1,338	2,397	2,152	1,939	2,051	1,299
Gas Net W-Off 12-Mo Rolling	15,575	15,656	15,525	15,403	15,436	15,427	15,600	16,006	16,008	16,095	16,704	16,705
Elect Net W-Off	3,635	1,623	2,231	1,411	2,460	2,841	3,441	6,163	5,533	4,985	5,273	3,341
Elect Net W-Off 12-Mo Rolling	40,049	40,258	39,922	39,608	39,693	39,669	40,115	41,159	41,165	41,387	42,354	42,957
	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09
Gas Net W-Off	2,272	1,203	1,316	1,086	1,308	1,681	1,689	2,450	2,308	2,796	1,820	1,035
Gas Net W-Off 12-Mo Rolling	17,564	18,136	18,584	19,122	19,468	20,022	20,373	20,428	20,582	21,442	21,211	20,967
Elect Net W-Off	5,843	3,083	3,384	2,793	3,964	4,272	4,342	6,296	5,936	7,195	4,981	2,712
Elect Net W-Off 12-Mo Rolling	45,165	46,636	47,789	49,171	50,055	51,486	52,387	52,523	52,926	55,136	54,544	53,915
								(1)	(2)	(1)	(2)	(2)
	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10
Gas Net W-Off	1,700	772										
Gas Net W-Off 12-Mo Rolling	20,395	19,983										
Elect Net W-Off	4,372	1,985										
Elect Net W-Off 12-Mo Rolling	52,443	51,334										

(1) For the month of Sept '09, total electric & gas net write-off has been normalized by removing about \$4.1 million that had been inadvertently accelerated to write-off due to a system issue. These amounts would have been written off during Oct '09 and Nov '09.

(2) For the months of Oct & Nov '09, total electric & gas net write-off has been increased by the allocated portion of the \$4.1 million that had been inadvertently accelerated in Sept '09 due to a system issue.

Also, written off during Oct '09 was another \$1.5 accelerated amount that should have gone to Nov '09. Both Oct09 & Nov09 have been normalized by the additional figure.

12-Mo Rolling Avg., AR & Arrears; 12-Mo Rolling Net Write-Off (E&G)  
(\$000's)

	Jan-05	Feb-05	Mar-05	Apr-05	May-05	Jun-05	Jul-05	Aug-05	Sep-05	Oct-05	Nov-05	Dec-05
Net W-Off (Monthly)	3,780	1,998	3,129	1,913	2,392	1,297	7,798	5,582	5,011	4,542	4,165	3,526
12-mo Rolling Net W-Off	45,452	43,207	43,820	43,406	43,947	41,873	44,747	44,648	44,343	44,445	44,927	44,633
Pre-Credit Arrears (Mo-End)	183,726	178,854	186,751	187,950	201,682	198,960	184,036	181,510	170,634	168,117	177,037	171,989
Arrears (Rolling 12 Avg.)	171,724	172,522	172,380	172,665	173,386	174,405	175,623	176,817	177,929	179,066	180,324	181,920
Accounts Receivable (Mo-End)	443,719	458,952	453,739	441,080	408,422	378,992	393,449	372,223	373,670	381,405	388,203	450,680
AR (Rolling 12 Avg.)	382,227	379,674	382,192	382,545	383,043	384,979	388,336	391,657	395,175	398,881	403,004	409,678
	Jan-06	Feb-06	Mar-06	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06
Net W-Off (Monthly)	4,044	2,010	3,208	2,081	3,784	4,810	3,621	4,930	6,325	6,603	6,138	5,653
12-mo Rolling Net W-Off	44,899	44,908	44,988	45,155	46,547	50,061	46,383	45,731	47,045	48,107	51,060	53,208
Pre-Credit Arrears (Mo-End)	187,581	204,906	214,820	232,114	241,077	218,606	213,884	213,074	201,957	200,983	197,651	191,142
Arrears (Rolling 12 Avg.)	184,742	186,913	189,252	192,059	195,382	196,936	199,248	201,878	204,464	207,302	208,920	210,516
Accounts Receivable (Mo-End)	504,756	500,704	500,460	484,967	439,978	420,977	437,287	420,920	409,129	375,394	374,371	424,600
AR (Rolling 12 Avg.)	414,714	418,194	422,587	427,078	429,707	433,206	436,659	440,917	443,039	444,205	444,635	442,462
	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07
Net W-Off (Monthly)	5,341	1,964	3,586	2,394	3,327	3,978	4,460	7,110	7,677	6,615	5,148	4,637
12-mo Rolling Net W-Off	54,504	54,458	54,616	55,129	54,672	53,840	54,379	56,559	57,911	57,923	56,933	55,916
Pre-Credit Arrears (Mo-End)	207,119	205,426	221,545	244,739	261,307	246,270	252,427	233,114	226,007	220,339	216,969	214,452
Arrears (Rolling 12 Avg.)	211,311	211,955	212,967	214,653	216,958	220,278	221,848	223,978	225,591	227,334	229,276	
Accounts Receivable (Mo-End)	445,210	515,967	540,131	551,167	480,895	480,647	481,417	470,917	477,018	410,181	418,800	484,715
AR (Rolling 12 Avg.)	437,500	438,772	441,578	446,261	449,671	455,477	459,132	463,298	468,955	471,854	475,557	480,566
	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08
Net W-Off (Monthly)	5,048	2,254	3,089	1,959	3,444	3,946	4,778	8,560	7,685	6,824	7,324	4,641
12-mo Rolling Net W-Off	55,673	55,914	55,447	55,072	55,129	55,096	55,715	57,165	57,173	57,482	59,658	59,602
Pre-Credit Arrears (Mo-End)	237,284	256,641	266,184	288,897	308,605	288,431	290,278	273,529	272,313	268,382	255,221	268,346
Arrears (Rolling 12 Avg.)	231,790	236,053	236,778	243,458	247,369	250,746	253,900	257,268	261,127	265,131	268,185	272,676
Accounts Receivable (Mo-End)	545,853	598,227	585,878	584,809	544,504	545,388	526,077	527,702	516,706	441,745	472,468	529,623
AR (Rolling 12 Avg.)	485,271	485,126	488,821	502,558	507,859	512,421	516,165	520,887	524,204	526,835	531,307	535,049
	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09
Net W-Off (Monthly)	8,115	4,298	4,700	3,679	4,672	5,933	6,031	8,749	8,244	9,993	6,501	3,767
12-mo Rolling Net W-Off	67,729	64,772	66,373	68,293	69,520	71,508	72,960	72,960	73,508	76,577	75,755	74,881
Pre-Credit Arrears (Mo-End)	270,118	293,236	318,905	319,968	318,383	302,179	285,414	277,965	287,251	255,667	257,162	254,441
Arrears (Rolling 12 Avg.)	275,412	278,462	282,855	285,444	286,260	287,572	287,167	287,487	287,065	285,839	286,000	284,842
Accounts Receivable (Mo-End)	630,459	591,757	652,463	621,857	467,476	478,675	482,725	437,218	422,299	449,202	459,007	
AR (Rolling 12 Avg.)	539,797	543,483	543,167	539,628	537,740	531,248	527,148	523,399	516,776	515,155	513,216	507,332
								(1)	(2)	(1)	(2)	(2)
	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10
Net W-Off (Monthly)	6,072	2,756										
12-mo Rolling Net W-Off	72,838	71,298										
Pre-Credit Arrears (Mo-End)	258,350	257,461										
Arrears (Rolling 12 Avg.)	254,637	254,217										
Accounts Receivable (Mo-End)	578,114	604,440										
AR (Rolling 12 Avg.)	504,954	502,766										

### Correction of Bad Debt Expenses

It is the preferred Company policy to directly charge expenses between electric and gas accounts whenever an actual breakdown of costs can be determined. When an actual breakdown of costs is not known, a standard pre-determined allocation is applied.

In late 1996, the Company sold all of its receivables to NM Receivables, Inc. (and continues to sell all of its receivables on an ongoing basis). Prior to the sale of receivables to NMR, Niagara Mohawk recorded all Bad Debt expenses based on the preferred Company policy which reflected a composite electric and gas allocation derived from the actual write-offs of all customer accounts. Subsequent to the inception of NMR and continuing through the end of the historic test period, the Company applied the standard corporate allocation (17%) for all Bad Debt write-offs when it should have been using the preferred method of allocation.

The Company has since recognized this error and effective with January 1999 business, will book all Bad Debt expenses using the composite gas allocation of twenty-eight percent (28%). This composite allocation approximates past results and was derived from the actual write-offs of all customer accounts for the period twelve months ending December 31, 1998 as shown on Workpaper G-2.

Based on this correction, which is summarized on Workpaper G-3, the Company expects to incur \$10,080,000 of Bad Debt expenses in 1999 compared to \$6,524,000 in the historic test period or a total increase of \$3,556,000. The Company is not proposing any further adjustments beyond this 1999 correction and is forecasting the same level of write-offs throughout the settlement period adjusted only for inflation.

### Line of Credit Fees

The Company's current Bank Facility Agreement (BFA) expires in June 2000 (extended one year beyond its original June, 1999 expiration). The BFA is an extraordinary financing transaction that is necessary for the Company to continue to provide safe, reliable utility service across its franchise territory. Without proper financing, the Company could experience unacceptable cost increases in securing labor and materials required to service its customers. To insure the continuation of reliable service, the Company believes that it is reasonable to assume that there will be some form of a Bank Facility Agreement throughout the proposed settlement period but also recognizes that the costs should decrease as a function of the Company's improved credit rating. As summarized on Workpaper G-3, the Company expects to reduce BFA costs from the historic test year level of \$1,432,000 to \$898,000 in the year 2000, or a total reduction of \$534,000. The Company is not proposing any further adjustments beyond the Year 2000 and is forecasting the same level of BFA costs throughout the settlement period, adjusted only for inflation.

Date of Request: March 5, 2010  
Due Date: May 20, 2010

Request No. AAE-10 OG May  
NMPC Req. No. NM 177 DPS 107

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Allison Esposito

TO: Rudolph L. Wynter Jr.

Request:

1. Please update Exhibit RLW-5 for electric data from 10/1/09 – 2/28/10. In addition to the 12-month average rolling data provided in this exhibit, provide the actual write-offs on a monthly stand alone basis. Please provide monthly updates of this exhibit through the end of the rate case.

Response:

Please see Attachments #1a and #1b.

Name of Respondent:

Paul S. Leo

Date of Reply:

June 17, 2010

# UNCOLLECTIBLE RATE CALCULATION

## GAS

Rolling 12-Mo Ending  
(\$000's)

	31-Oct-06	30-Nov-06	31-Dec-06	31-Jan-07	28-Feb-07	31-Mar-07	30-Apr-07	31-May-07	30-Jun-07	31-Jul-07	31-Aug-07	30-Sep-07
Normalized Bad Debt Net Write-Off	\$ 13,749.9	\$ 14,302.5	\$ 14,898.1	\$ 15,261.2	\$ 15,248.3	\$ 15,348.3	\$ 15,436.2	\$ 15,308.1	\$ 15,075.2	\$ 15,226.2	\$ 15,836.5	\$ 16,215.2
Total Tariff Revenue	\$ 891,898.2	\$ 878,024.3	\$ 830,074.6	\$ 782,548.1	\$ 785,157.8	\$ 791,205.3	\$ 801,743.7	\$ 809,620.1	\$ 806,061.5	\$ 805,170.0	\$ 803,710.1	\$ 800,639.0
Late Payment Revenue	\$ 3,579.5	\$ 3,560.8	\$ 3,479.5	\$ 3,391.9	\$ 3,258.2	\$ 3,248.2	\$ 3,288.3	\$ 3,422.6	\$ 3,365.4	\$ 3,384.2	\$ 3,371.7	\$ 3,380.9
POR Receivable Revenue	\$ 93,113.3	\$ 99,714.4	\$ 91,992.8	\$ 86,629.1	\$ 90,056.9	\$ 94,363.5	\$ 99,451.6	\$ 102,890.5	\$ 103,840.7	\$ 104,587.6	\$ 105,173.1	\$ 105,421.5
	\$ 988,591.0	\$ 981,299.5	\$ 925,547.0	\$ 872,569.1	\$ 878,472.9	\$ 888,817.0	\$ 904,483.6	\$ 915,933.2	\$ 913,267.6	\$ 913,141.8	\$ 912,254.9	\$ 909,441.5
Uncollectible Rate	1.3909%	1.4575%	1.6097%	1.7490%	1.7358%	1.7268%	1.7066%	1.6713%	1.6507%	1.6675%	1.7360%	1.7830%
Normalized Bad Debt Net Write-Off	\$ 16,218.4	\$ 15,941.2	\$ 15,656.5	\$ 15,574.6	\$ 15,655.8	\$ 15,525.1	\$ 15,403.2	\$ 15,436.1	\$ 15,427.0	\$ 15,600.2	\$ 16,006.3	\$ 16,008.5
Total Tariff Revenue	\$ 793,945.8	\$ 783,423.2	\$ 799,293.5	\$ 814,751.0	\$ 806,178.3	\$ 789,455.0	\$ 787,747.6	\$ 784,589.2	\$ 798,099.1	\$ 806,684.2	\$ 813,784.0	\$ 816,646.0
Late Payment Revenue	\$ 3,390.5	\$ 3,351.7	\$ 3,329.6	\$ 3,318.4	\$ 3,356.8	\$ 3,303.6	\$ 3,311.4	\$ 3,273.3	\$ 3,331.2	\$ 3,378.0	\$ 3,427.7	\$ 3,467.9
POR Receivable Revenue	\$ 105,295.7	\$ 106,605.7	\$ 111,542.6	\$ 118,346.6	\$ 120,721.2	\$ 122,329.2	\$ 125,096.3	\$ 125,346.3	\$ 128,440.0	\$ 130,272.5	\$ 132,460.9	\$ 134,350.9
	\$ 902,632.0	\$ 893,380.6	\$ 914,165.7	\$ 936,416.0	\$ 930,256.2	\$ 915,087.7	\$ 916,155.3	\$ 913,208.9	\$ 929,870.3	\$ 940,334.7	\$ 949,672.7	\$ 954,464.8
Uncollectible Rate	1.7968%	1.7844%	1.7127%	1.6632%	1.6830%	1.6966%	1.6813%	1.6903%	1.6590%	1.6590%	1.6855%	1.6772%
Normalized Bad Debt Net Write-Off	\$ 16,095.1	\$ 16,704.2	\$ 16,705.3	\$ 17,564.1	\$ 18,136.0	\$ 18,584.5	\$ 19,121.9	\$ 19,465.7	\$ 20,022.2	\$ 20,372.7	\$ 20,425.7	\$ 20,582.3
Total Tariff Revenue	\$ 820,359.9	\$ 826,763.2	\$ 820,863.3	\$ 839,607.5	\$ 848,489.4	\$ 837,487.4	\$ 819,794.1	\$ 803,816.6	\$ 785,426.2	\$ 775,087.7	\$ 767,827.2	\$ 763,533.7
Late Payment Revenue	\$ 3,493.2	\$ 3,551.2	\$ 3,616.3	\$ 3,712.2	\$ 3,801.7	\$ 3,859.5	\$ 3,951.0	\$ 3,893.1	\$ 3,820.9	\$ 3,796.6	\$ 3,707.3	\$ 3,637.4
POR Receivable Revenue	\$ 140,933.9	\$ 143,915.8	\$ 148,686.0	\$ 159,256.8	\$ 168,279.2	\$ 169,933.9	\$ 168,444.5	\$ 166,677.3	\$ 162,960.1	\$ 160,654.9	\$ 158,229.2	\$ 156,282.9
	\$ 964,786.9	\$ 974,230.2	\$ 973,165.6	\$ 1,002,576.5	\$ 1,020,580.2	\$ 1,011,280.7	\$ 992,129.6	\$ 974,387.0	\$ 952,207.2	\$ 939,539.2	\$ 929,763.8	\$ 923,454.0
Uncollectible Rate	1.6683%	1.7146%	1.7166%	1.7519%	1.7770%	1.8377%	1.9274%	1.9977%	2.1027%	2.1684%	2.1969%	2.2288%
Normalized Bad Debt Net Write-Off	\$ 21,441.6	\$ 21,211.4	\$ 20,966.8	\$ 20,394.5	\$ 19,963.4	\$ 19,147.3	\$ 18,293.2	\$ 17,712.2				
Total Tariff Revenue	\$ 763,769.7	\$ 757,565.1	\$ 730,782.2	\$ 703,008.1	\$ 681,183.9	\$ 666,195.7	\$ 649,333.3	\$ 648,898.4				
Late Payment Revenue	\$ 3,594.9	\$ 3,537.0	\$ 3,542.1	\$ 3,405.9	\$ 3,266.7	\$ 3,247.8	\$ 3,038.9	\$ 2,972.1				
POR Receivable Revenue	\$ 150,195.2	\$ 146,768.9	\$ 139,006.2	\$ 130,365.0	\$ 122,297.0	\$ 117,496.2	\$ 111,943.6	\$ 111,393.1				
	\$ 917,559.8	\$ 907,871.0	\$ 873,330.5	\$ 836,779.0	\$ 806,747.6	\$ 786,939.6	\$ 764,315.8	\$ 763,263.6				
Uncollectible Rate	2.3368%	2.3364%	2.4008%	2.4373%	2.4745%	2.4331%	2.3934%	2.3206%				

**ELECTRIC**

Rolling 12-Mo Ending

(\$000's)

	31-Oct-06	30-Nov-06	31-Dec-06	31-Jan-07	28-Feb-07	31-Mar-07	30-Apr-07	31-May-07	30-Jun-07	31-Jul-07	31-Aug-07	30-Sep-07
<b>Normalized Bad Debt Net Write-Off</b>	\$ 35,356.8	\$ 36,777.7	\$ 38,309.4	\$ 39,243.1	\$ 39,209.8	\$ 39,467.2	\$ 39,693.0	\$ 39,363.7	\$ 38,764.8	\$ 39,153.2	\$ 40,722.5	\$ 41,896.2
<b>Total Tariff Revenue</b>	\$ 3,109,634.5	\$ 3,123,264.5	\$ 3,120,084.3	\$ 3,099,545.0	\$ 3,107,068.6	\$ 3,126,469.3	\$ 3,137,085.0	\$ 3,160,279.9	\$ 3,180,254.0	\$ 3,186,818.8	\$ 3,177,717.4	\$ 3,185,562.5
<b>Late Payment Revenue</b>	\$ 14,595.0	\$ 14,475.3	\$ 14,442.9	\$ 14,626.6	\$ 14,610.3	\$ 14,584.5	\$ 14,653.0	\$ 14,904.2	\$ 14,764.8	\$ 15,044.6	\$ 15,000.5	\$ 15,182.4
<b>POR Receivable Revenue</b>	\$ 74,553.1	\$ 88,687.3	\$ 105,072.6	\$ 120,311.5	\$ 139,595.5	\$ 161,586.6	\$ 180,023.6	\$ 196,902.3	\$ 204,293.3	\$ 210,789.1	\$ 214,904.4	\$ 221,971.6
	\$ 3,198,782.6	\$ 3,226,427.2	\$ 3,239,599.9	\$ 3,234,483.1	\$ 3,261,274.4	\$ 3,302,640.4	\$ 3,331,741.7	\$ 3,372,086.4	\$ 3,399,312.1	\$ 3,412,652.4	\$ 3,407,622.3	\$ 3,422,716.5
<b>Uncollectible Rate</b>	1.1053%	1.1399%	1.1825%	1.2133%	1.2023%	1.1950%	1.1914%	1.1673%	1.1404%	1.1473%	1.1950%	1.2182%
<b>Normalized Bad Debt Net Write-Off</b>	\$ 41,704.4	\$ 40,991.6	\$ 40,259.5	\$ 40,049.9	\$ 40,257.9	\$ 39,921.7	\$ 39,608.3	\$ 39,692.9	\$ 39,669.4	\$ 40,114.9	\$ 41,159.0	\$ 41,164.7
<b>Total Tariff Revenue</b>	\$ 3,199,056.9	\$ 3,205,204.7	\$ 3,217,611.9	\$ 3,244,370.3	\$ 3,229,360.2	\$ 3,193,809.1	\$ 3,180,093.4	\$ 3,164,302.2	\$ 3,146,291.3	\$ 3,142,311.6	\$ 3,162,777.6	\$ 3,153,304.5
<b>Late Payment Revenue</b>	\$ 15,595.5	\$ 15,719.5	\$ 15,701.0	\$ 15,744.3	\$ 15,960.3	\$ 15,959.3	\$ 16,074.9	\$ 15,879.2	\$ 16,172.7	\$ 16,198.7	\$ 16,224.0	\$ 16,145.6
<b>POR Receivable Revenue</b>	\$ 230,083.4	\$ 236,243.0	\$ 244,588.5	\$ 259,160.3	\$ 267,066.4	\$ 271,559.9	\$ 279,622.9	\$ 287,859.5	\$ 297,057.4	\$ 313,254.6	\$ 331,374.4	\$ 339,505.0
	\$ 3,444,699.9	\$ 3,457,167.2	\$ 3,477,901.5	\$ 3,519,274.9	\$ 3,512,386.9	\$ 3,481,328.3	\$ 3,475,791.2	\$ 3,468,040.9	\$ 3,459,521.4	\$ 3,471,764.9	\$ 3,510,376.1	\$ 3,508,955.0
<b>Uncollectible Rate</b>	1.2107%	1.1857%	1.1576%	1.1380%	1.1462%	1.1467%	1.1395%	1.1445%	1.1467%	1.1555%	1.1725%	1.1731%
<b>Normalized Bad Debt Net Write-Off</b>	\$ 41,387.3	\$ 42,953.7	\$ 42,956.6	\$ 45,164.9	\$ 46,635.5	\$ 47,788.6	\$ 49,170.7	\$ 50,064.7	\$ 51,485.6	\$ 52,386.9	\$ 52,523.1	\$ 52,925.8
<b>Total Tariff Revenue</b>	\$ 3,133,055.0	\$ 3,112,613.5	\$ 3,091,280.7	\$ 3,081,245.9	\$ 3,076,984.3	\$ 3,060,266.1	\$ 3,028,875.3	\$ 2,998,174.9	\$ 2,950,238.7	\$ 2,912,193.9	\$ 2,849,751.4	\$ 2,834,349.1
<b>Late Payment Revenue</b>	\$ 15,932.6	\$ 15,962.9	\$ 16,147.2	\$ 16,405.2	\$ 16,322.3	\$ 16,276.4	\$ 16,420.3	\$ 16,242.7	\$ 15,798.3	\$ 15,740.2	\$ 15,356.5	\$ 14,943.8
<b>POR Receivable Revenue</b>	\$ 343,639.7	\$ 346,877.1	\$ 348,210.4	\$ 349,756.9	\$ 352,276.4	\$ 349,087.9	\$ 343,409.7	\$ 336,950.9	\$ 327,739.9	\$ 312,052.6	\$ 294,037.8	\$ 287,904.5
	\$ 3,492,627.3	\$ 3,475,453.5	\$ 3,455,638.3	\$ 3,441,408.0	\$ 3,445,583.0	\$ 3,425,630.5	\$ 3,388,705.3	\$ 3,351,368.5	\$ 3,293,776.8	\$ 3,239,986.7	\$ 3,159,145.6	\$ 3,137,197.5
<b>Uncollectible Rate</b>	1.1850%	1.2359%	1.2431%	1.3101%	1.3535%	1.3950%	1.4510%	1.4935%	1.5631%	1.6169%	1.6626%	1.6870%
<b>Normalized Bad Debt Net Write-Off</b>	\$ 55,135.6	\$ 54,543.7	\$ 53,914.5	\$ 52,443.1	\$ 51,334.4	\$ 49,235.9	\$ 47,039.7	\$ 45,545.5				
<b>Total Tariff Revenue</b>	\$ 2,830,718.7	\$ 2,824,630.1	\$ 2,824,675.0	\$ 2,837,570.5	\$ 2,844,630.0	\$ 2,875,640.5	\$ 2,901,351.0	\$ 2,918,745.7				
<b>Late Payment Revenue</b>	\$ 14,793.9	\$ 14,431.8	\$ 14,570.3	\$ 14,345.3	\$ 14,280.1	\$ 14,373.4	\$ 14,068.0	\$ 14,095.5				
<b>POR Receivable Revenue</b>	\$ 285,287.5	\$ 284,009.1	\$ 282,672.0	\$ 285,682.9	\$ 286,552.7	\$ 290,639.6	\$ 292,910.3	\$ 296,946.4				
	\$ 3,130,800.1	\$ 3,123,071.0	\$ 3,121,917.2	\$ 3,137,598.8	\$ 3,145,462.7	\$ 3,180,653.5	\$ 3,208,329.3	\$ 3,229,787.6				
<b>Uncollectible Rate</b>	1.7611%	1.7465%	1.7270%	1.6714%	1.6320%	1.5480%	1.4662%	1.4102%				

(1) For the month of Sept '09, total electric & gas net write-off has been normalized by removing about \$4.1 million that had been inadvertently accelerated to write-off due to a system issue. These amounts would have been written off during Oct '09 and Nov '09.

(2) For the months of Oct&Nov '09, total electric & gas net write-off has been increased by the allocated portion of

the \$4.1 million that had been inadvertently accelerated in Sept'09 due to a system issue.  
Also, written off during Oct '09 was another \$1.5 accelerated amount that should have gone to Nov '09. Both Oct'09 & Nov'09 have been normalized by the additional figure.

12-Mo Rolling Avg., AR & Arrears; 12-Mo Rolling Net Write-Off (E&G)

(\$000's)

	Jan-05	Feb-05	Mar-05	Apr-05	May-05	Jun-05	Jul-05	Aug-05	Sep-05	Oct-05	Nov-05	Dec-05
Net W-Off (Monthly)	3,780	1,988	3,726	1,913	2,392	1,287	7,289	5,582	5,011	4,542	4,165	3,526
12-mo Rolling Net W-Off	45,452	45,237	43,820	43,406	43,947	41,873	44,477	44,648	44,343	44,645	44,827	44,633
Pre-Credit Arrears (Mo-End)	163,726	178,854	186,751	197,950	201,682	199,660	184,836	181,510	170,634	168,117	177,037	171,989
Arrears (Rolling 12 Avg.)	171,724	172,522	172,380	172,865	173,398	174,405	175,623	178,917	177,928	178,066	180,324	181,920
Accounts Receivable (Mo-End)	443,719	458,952	453,739	441,080	448,422	388,992	393,449	372,223	383,670	381,405	368,203	450,680
AR (Rolling 12 Avg.)	382,227	379,824	382,182	382,545	383,043	384,979	388,336	391,657	395,175	398,881	403,004	450,668

	Jan-06	Feb-06	Mar-06	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06
Net W-Off (Monthly)	4,044	2,010	3,208	2,081	3,764	4,810	3,621	4,930	6,325	6,803	6,138	5,653
12-mo Rolling Net W-Off	44,897	44,909	44,908	45,155	46,547	50,061	46,383	45,731	47,045	49,107	51,080	53,208
Pre-Credit Arrears (Mo-End)	197,581	204,906	214,920	232,114	241,077	218,606	212,584	213,074	201,657	200,983	197,651	191,142
Arrears (Rolling 12 Avg.)	184,742	188,913	189,252	192,089	195,382	198,938	199,248	201,878	204,664	207,202	208,920	210,516
Accounts Receivable (Mo-End)	504,756	500,704	506,660	494,987	439,978	420,877	437,287	420,820	409,729	375,394	374,371	424,500
AR (Rolling 12 Avg.)	414,714	418,194	422,387	427,078	429,077	433,206	436,659	440,917	443,039	444,205	444,635	442,462

	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07
Net W-Off (Monthly)	5,341	1,984	3,566	2,394	3,327	3,978	4,160	7,110	7,677	6,615	5,148	4,637
12-mo Rolling Net W-Off	54,504	54,616	55,129	54,672	53,840	54,379	56,559	57,911	57,923	56,933	55,916	55,916
Pre-Credit Arrears (Mo-End)	207,119	205,426	221,545	244,739	261,307	248,270	252,427	233,114	226,007	220,338	218,589	214,452
Arrears (Rolling 12 Avg.)	211,311	211,355	212,967	214,653	216,958	220,278	221,948	223,878	225,591	227,334	228,276	228,276
Accounts Receivable (Mo-End)	445,210	515,967	540,131	551,167	480,895	490,647	491,147	470,817	477,018	410,181	418,800	484,715
AR (Rolling 12 Avg.)	437,500	438,772	441,578	446,281	449,671	455,477	459,132	463,286	468,955	471,854	475,557	480,566

	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08
Net W-Off (Monthly)	5,048	2,254	3,089	1,959	3,444	3,946	4,779	8,560	7,685	6,924	7,324	4,841
12-mo Rolling Net W-Off	55,623	55,514	55,477	55,012	55,129	55,096	55,715	57,165	57,173	57,462	59,658	59,662
Pre-Credit Arrears (Mo-End)	237,284	256,641	266,184	288,897	308,605	286,431	280,278	273,529	272,313	268,382	265,221	268,346
Arrears (Rolling 12 Avg.)	231,780	236,058	239,778	243,458	247,389	250,746	253,900	257,268	261,127	265,131	268,185	272,676
Accounts Receivable (Mo-End)	549,663	586,227	585,078	594,809	544,504	545,388	526,077	527,702	518,708	441,745	472,468	529,823
AR (Rolling 12 Avg.)	488,271	495,126	498,921	502,558	507,859	512,421	516,165	520,897	524,204	526,835	531,307	535,049

	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09
Net W-Off (Monthly)	8,116	4,296	4,700	3,879	4,672	5,933	6,031	8,749	8,244	9,993	6,501	3,767
12-mo Rolling Net W-Off	62,729	64,772	66,373	68,293	69,520	71,508	72,760	72,949	73,508	75,757	75,755	74,881
Pre-Credit Arrears (Mo-End)	270,118	293,236	318,905	319,968	318,393	302,179	285,414	277,365	267,251	253,667	257,192	254,441
Arrears (Rolling 12 Avg.)	275,412	278,462	282,855	285,444	286,260	287,572	287,167	287,487	287,065	285,839	286,000	284,842
Accounts Receivable (Mo-End)	606,641	630,459	581,757	552,463	521,857	487,476	476,875	482,725	437,218	422,298	449,202	459,007
AR (Rolling 12 Avg.)	539,797	543,483	543,157	539,628	537,740	531,248	527,148	523,999	516,176	515,155	513,216	507,332

	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10
Net W-Off (Monthly)	6,072	2,756	1,786	828	2,597							
12-mo Rolling Net W-Off	72,838	71,298	68,383	65,333	63,258							
Pre-Credit Arrears (Mo-End)	268,380	287,481	297,652	315,890	302,842							
Arrears (Rolling 12 Avg.)	284,697	284,217	282,446	282,108	280,871							
Accounts Receivable (Mo-End)	578,114	604,446	564,176	552,914	525,021							
AR (Rolling 12 Avg.)	504,954	502,786	501,321	501,359	501,622							

12-Mo Rolling Net Write-Off (E&G Allocated)

(\$000's)

	Jan-05	Feb-05	Mar-05	Apr-05	May-05	Jun-05	Jul-05	Aug-05	Sep-05	Oct-05	Nov-05	Dec-05
Gas Net W-Off	1,058	559	876	536	670	363	2,044	1,563	1,403	1,272	1,166	987
Gas Net W-Off 12-Mo Rolling	12,726	12,666	12,270	12,154	12,305	11,724	12,454	12,501	12,416	12,500	12,500	12,487
Elect Net W-Off	2,722	1,439	2,253	1,378	1,722	934	5,255	4,019	3,608	3,270	2,899	2,539
Elect Net W-Off 12-Mo Rolling	32,725	32,571	31,550	31,252	31,642	30,148	32,024	32,146	31,927	32,144	32,347	32,136

	Jan-06	Feb-06	Mar-06	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sep-06	Oct-06	Nov-06	Dec-06
Gas Net W-Off	1,132	563	888	583	1,060	1,347	1,014	1,380	1,771	1,849	1,719	1,583
Gas Net W-Off 12-Mo Rolling	12,571	12,575	12,597	12,644	13,033	14,017	12,987	12,805	13,173	13,750	14,302	14,898
Elect Net W-Off	2,912	1,447	2,310	1,498	2,725	3,463	2,607	3,550	4,554	4,754	4,420	4,070
Elect Net W-Off 12-Mo Rolling	32,326	32,334	32,391	32,512	33,514	36,044	33,395	32,826	33,873	35,357	36,778	38,308

	Jan-07	Feb-07	Mar-07	Apr-07	May-07	Jun-07	Jul-07	Aug-07	Sep-07	Oct-07	Nov-07	Dec-07
Gas Net W-Off	1,495	550	998	670	931	1,114	1,165	1,891	2,150	1,852	1,441	1,288
Gas Net W-Off 12-Mo Rolling	15,261	15,248	15,348	15,436	15,308	15,075	15,226	15,837	16,215	16,218	15,941	15,656
Elect Net W-Off	3,846	1,414	2,567	1,724	2,395	2,864	2,965	5,119	5,528	4,763	3,707	3,338
Elect Net W-Off 12-Mo Rolling	39,243	39,210	39,467	39,693	39,364	38,765	39,153	40,722	41,896	41,704	40,992	40,260

	Jan-08	Feb-08	Mar-08	Apr-08	May-08	Jun-08	Jul-08	Aug-08	Sep-08	Oct-08	Nov-08	Dec-08
Gas Net W-Off	1,414	631	888	549	864	1,105	1,338	2,397	2,152	1,939	2,051	1,298
Gas Net W-Off 12-Mo Rolling	15,575	15,656	15,525	15,403	15,436	15,427	15,600	16,008	16,008	16,008	16,704	16,705
Elect Net W-Off	3,835	1,623	2,231	1,411	2,480	2,841	3,441	6,163	5,533	4,885	4,273	3,341
Elect Net W-Off 12-Mo Rolling	40,049	40,258	39,922	39,608	39,693	39,669	40,115	41,159	41,165	41,387	42,954	42,957

	Jan-09	Feb-09	Mar-09	Apr-09	May-09	Jun-09	Jul-09	Aug-09	Sep-09	Oct-09	Nov-09	Dec-09
Gas Net W-Off	2,272	1,203	1,316	1,086	1,308	1,681	1,689	2,450	2,308	2,798	1,820	1,055
Gas Net W-Off 12-Mo Rolling	17,564	18,136	18,564	19,122	19,466	20,022	20,373	20,426	20,582	21,442	21,211	20,967
Elect Net W-Off	5,843	3,093	3,384	2,793	3,384	4,272	4,342	6,299	5,938	7,195	4,881	2,712
Elect Net W-Off 12-Mo Rolling	45,165	46,636	47,789	49,171	50,055	51,086	52,387	52,523	52,926	55,136	54,544	53,915

	Jan-10	Feb-10	Mar-10	Apr-10	May-10	Jun-10	Jul-10	Aug-10	Sep-10	Oct-10	Nov-10	Dec-10
Gas Net W-Off	1,700	772	500	232	727							
Gas Net W-Off 12-Mo Rolling	20,395	19,963	19,147	18,293	17,712							
Elect Net W-Off	4,372	1,985	1,266	596	1,870							
Elect Net W-Off 12-Mo Rolling	52,443	51,334	49,236	47,040	45,546							

(1) For the month of Sept '09, total electric & gas net write-off has been normalized by removing about \$4.1 million that had been inadvertently accelerated to write-off due to a system issue. These amounts would have been written off during Oct '09 and Nov '09.

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Date of Request: March 5, 2010  
Due Date: March 15, 2010

Request No. DAG-2  
NMPC Req. No. NM 179 DPS 109

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO:

Request:

Follow-up to I/R #NM-28 (RAV-14).

In a format similar to the response to I/R #NM-28 (RAV-14), please provide the following information for each VERO employee that was a former NMPC employee; whether that employee either remained a NMPC employee; or whether, at some point, was transferred into the National Grid USA Service Co.

- A. VERO employee's name;
- B. The date of employee's retirement and salary at time of retirement;
- C. Provide the costs of the employee being VERO'ed by type of cost.
- D. Has the Company ever incurred costs associated with the same employee subsequent to the employee retiring? If yes, from the date of retirement up to the present time, please provide, in an Excel spreadsheet, the following information by calendar year:
  - 1. Number of hours the VERO employee worked for the Company as a contracted employee;
  - 2. Incurred costs for VERO employee's contractor services;
  - 3. Incurred costs for VERO employee's travel expenses;
  - 4. Incurred costs for VERO employee's lodging expenses;
  - 5. Any other incurred costs for VERO employee;
  - 6. Total costs incurred for VERO employee.
- E. Indicate whether the above costs were charged to capital or expense, along with the reason for such accounting.
- F. Indicate the date the VERO employee first performed contractor services for the Company.



G. Indicate if VERO employee is still a contracted employee; if not, indicate the last date that the employee performed contractor services for the Company.

Response:

Request A is subject to a Protective Order.

Please see Attachment 1 for responses to requests B, C, E, F and G.

Please see Attachment 2 for responses to request D.

Name of Respondent:

Date of Reply:

Ed Considine

March 22, 2010

Redacted Version

Date of Request: March 5, 2010  
Due Date: March 15, 2010

Request No. DAG-2  
NMPC Req. No. NM 179 DPS 109

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  - 4. Incurred costs for VERO employee's lodging expenses;
  - 5. Any other incurred costs for VERO employee;
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Response:

Request A is subject to a Protective Order.

Please see Attachment 1 for responses to requests B, C, E, F and G.

Please see Attachment 2 for responses to request D.

Name of Respondent:

Ed Considine

Date of Reply:

March 22, 2010

										DAG-2 VERO Employees - NMPC Employee
										Docket Number 10-E-0050
										Niagara Mohawk Power Corporation
										Attachment 1 - Confidential
Niagara Mohawk Power Corporation (Electric) d/b/a National Grid										
VERO Employees										
Last, First & MI	Employee ID	Request B: Retirement Date	Request B: Last Wage	Request C: VERO Cost - Pension *	Request C: VERO Cost - Medical	Request F: First Date as Contractor	Request G: Last Date as Contractor	Request E: Contractor Costs Accounting	Request E: Reason for Accounting	
	100029829	04/01/2002	71,801.60	27,336						
	100022486	04/01/2002	55,201.12	64,719						
	100032620	04/01/2002	61,100.00	70,030						
	100022470	04/01/2002	60,401.12	82,958						
	100030170	04/01/2002	43,700.80	85,696						
	100031800	04/01/2002	73,900.32	90,954						
	100031985	04/01/2002	75,200.32	92,554						
	100031293	04/01/2002	69,101.76	92,907						
	100022820	04/01/2002	76,100.96	93,663						
	100021978	04/01/2002	78,700.96	96,863						
	100031593	04/01/2002	65,902.00	100,418						
	100023113	04/01/2002	82,600.96	101,663						
	100028279	04/01/2002	87,201.92	107,325						
	100026556	04/01/2002	68,500.64	124,052	7,513					
	100027108	04/01/2002	48,002.24	148,691						
	100024168	04/01/2002	124,901.92	153,725						
	100028272	04/01/2002	62,601.76	178,166	13,408					
	100033203	04/01/2002	66,100.32	179,798						
	100024167	04/01/2002	45,000.80	242,303	3,987					
	100032922	04/01/2002	70,102.24	243,798	13,662					
	100027723	04/01/2002	59,300.80	272,062	1,602					
	100028271	04/01/2002	82,401.28	282,880	3,396					
	100032567	04/01/2002	79,401.92	289,841	3,396					
	100032082	04/01/2002	75,701.60	290,197	4,679					
	100032569	04/01/2002	59,101.12	292,983	3,854					
	100027035	04/01/2002	65,000.00	294,126	1,911					
	100031300	04/01/2002	67,901.60	298,097	534					
	100028179	04/01/2002	65,800.80	299,078	2,547					
	100029911	04/01/2002	68,400.80	316,502	3,064					
	100031803	04/01/2002	80,901.60	334,439	534					
	100030654	04/01/2002	75,901.28	347,652	4,282					
	100021577	04/01/2002	107,101.28	180,000						
	100027051	04/01/2002	289,500.64	180,000						
	100032785	04/01/2002	177,001.76	180,000	12,637					
	100026867	04/01/2002	93,200.64	180,000						
	100028190	04/01/2002	66,601.60	180,000	5,667					
	100025545	04/01/2002	73,101.60	180,000	4,930					
	100026639	04/01/2002	38,702.56	180,000						
	100031532	04/01/2002	41,701.92	180,000						
	100029643	04/01/2002	39,700.96	180,000						

										DAG-2 VERO Employees - NMPC Employee
										Docket Number 10-E-0050
										Niagara Mohawk Power Corporation
										Attachment 1 - Confidential
Niagara Mohawk Power Corporation (Electric) d/b/a National Grid										
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Last, First & MI	Employee ID	Request B: Retirement Date	Request B: Last Wage	Request C: VERO Cost - Pension *	Request C: VERO Cost - Medical	Request F: First Date as Contractor	Request G: Last Date as Contractor	Request E: Contractor Costs Accounting	Request E: Reason for Accounting	
	100023268	04/01/2002	42,001.44	180,000						
	100029741	04/01/2002	61,800.96	180,000	3,737					
	100025116	04/01/2002	89,600.16	180,000						
	100023618	04/01/2002	42,900.00	180,000						
	100027872	04/01/2002	49,000.64	180,000						
	100023138	04/01/2002	54,000.96	180,000						
	100023123	04/01/2002	60,101.60	180,000						
	100032563	04/01/2002	92,901.12	180,000		08/02/2005	01/28/2007	Expense	Performed Operations & Maintenance activities	
	100026882	04/01/2002	41,400.32	180,000						
	100026361	04/01/2002	54,701.92	180,000						
	100026663	04/01/2002	42,800.16	180,000						
	100023518	04/01/2002	63,700.00	180,000	7,513					
	100032957	04/01/2002	74,301.76	180,000						
	100033449	04/01/2002	42,900.00	180,000						
	100022401	04/01/2002	67,801.76	180,000						
	100027874	04/01/2002	44,200.00	180,000						
	100028191	04/01/2002	41,202.72	180,000	534					
	100029822	04/01/2002	98,500.48	180,000	1,217	04/23/2007	05/10/2009	Capital	Assisted in processing capital work orders	
	100028603	04/01/2002	43,388.80	180,000						
	100024741	04/01/2002	66,601.60	180,000						
	100025099	04/01/2002	71,801.60	180,000	10,763					
	100033040	04/01/2002	178,000.16	180,000						
	100023848	04/01/2002	73,301.28	180,000	608					
	100024776	04/01/2002	68,500.64	180,000	13,662					
	100032103	04/01/2002	66,901.12	180,000						
	100026742	04/01/2002	60,201.44	180,000	9,860					
	100023586	04/01/2002	75,100.48	180,000	3,987					
	100022749	04/01/2002	70,301.92	180,000						
	100023139	04/01/2002	62,002.72	180,000						
	100021520	04/01/2002	83,301.92	180,000	2,972					
	100031739	04/01/2002	128,202.88	180,000						
	100030937	04/01/2002	75,300.16	180,000	9,860					
	100023037	04/01/2002	72,196.80	180,000						
	100023273	04/01/2002	113,803.04	180,000						
	100021498	04/01/2002	189,300.80	180,000						
	100022483	04/01/2002	81,000.00	180,000						
	100027174	04/01/2002	80,704.00	180,000		04/19/2007	06/28/2009	Expense	Performed Operations & Maintenance activities	
	100030362	04/01/2002	61,100.00	180,000	2,547					
	100022527	04/01/2002	43,702.88	180,000						
	100023656	04/01/2002	55,100.00	180,000	5,432					

Niagara Mohawk Power Corporation (Electric) d/b/a National Grid									
VERO Employees									
Employee ID	Request B: Retirement Date	Request B: Last Wage	Request C: VERO Cost - Pension *	Request C: VERO Cost - Medical	Request F: Contractor First Date as	Request G: Contractor Last Date as	Request E: Accounting Contractor Costs	Request E: Reason for Accounting	Last, First & MI
100029332	04/01/2002	67,801.76	180,000						
100031736	04/01/2002	81,201.12	180,000						
100030257	04/01/2002	65,601.12	180,000						
100029738	04/01/2002	77,101.44	180,000	4,805					
100031911	04/01/2002	54,400.32	180,000						
100029931	04/01/2002	186,201.60	180,000						
100025610	04/01/2002	46,800.00	180,000						
100021567	04/01/2002	67,200.64	180,000						
100027177	04/01/2002	53,601.60	180,000	10,156					
100033608	04/01/2002	112,600.80	180,000						
100029739	04/01/2002	65,301.60	180,000	11,770					
100032909	04/01/2002	89,100.96	180,000	5,386					
1000333246	04/01/2002	66,701.44	180,000						
100023964	04/01/2002	68,101.28	180,000						
100030863	04/01/2002	53,000.48	180,000	5,205					
100026234	04/01/2002	56,001.92	180,000						
100022088	04/01/2002	75,200.00	180,000	10,362					
100025575	04/01/2002	69,700.80	180,000						
100030348	04/01/2002	66,000.48	180,000						
100026591	05/01/2002	41,500.16	40,830						
100033230	05/01/2002	62,601.76	62,130						
100025540	05/01/2002	42,600.48	170,483	14,956					
100030163	05/01/2002	99,401.00	181,760						
100022468	05/01/2002	65,000.00	225,635	4,271					
100032566	05/01/2002	88,501.92	228,083						
100026752	05/01/2002	47,700.64	242,634	4,167					
100031289	05/01/2002	48,201.92	255,089	5,219					
100030676	05/01/2002	47,700.64	180,000						
100023852	05/01/2002	67,901.60	180,000	1,274					
100026545	05/01/2002	93,801.76	180,000						
100023524	05/01/2002	47,800.48	180,000						
100029820	05/01/2002	59,092.80	180,000						
100031306	05/01/2002	46,901.92	180,000						
100029143	05/01/2002	61,703.20	180,000	1,217					
100033096	05/01/2002	54,901.60	180,000						
100025702	05/01/2002	96,990.40	180,000	8,914					
100024727	05/01/2002	66,200.16	180,000						
100031741	05/01/2002	67,701.92	180,000						
100021869	05/01/2002	65,501.28	180,000						
100028295	05/01/2002	71,801.60	180,000						

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DAG-2 ZERO Employees - NMPC Employee  
Docket Number 10-E-0050  
Niagara Mohawk Power Corporation  
Attachment 1 - Confidential

DAG-2 VERO Employees - NMPC Employee Docket Number 10-E-0050 Niagara Mohawk Power Corporation Attachment 1 - Confidential	Niagara Mohawk Power Corporation (Electric) d/b/a National Grid									
	VERO Employees									
Last, First & MI	Employee ID	Retirement Date	Request B: Last Wage	Request C: VERO Cost - Pension *	Request C: VERO Cost - Medical	Request F: Contractor First Date as Contractor	Request C: Contractor Last Date as Contractor	Request E: Accounting Costs	Request E: Reason for Accounting	Employee ID
	100030127	04/01/2004	61,008.00	111,147						
	100019328	04/01/2004	111,001.28	136,615		04/05/2006	Still employed	Expense	Performed administrative tax activities	
	100019204	04/01/2004	150,001.28	252,803						
	100019410	04/01/2004	83,604.00	286,442	2,277					
	100028758	04/01/2004	105,804.00	394,316	854					
	100019332	04/01/2004	74,701.12	118,780		04/14/2004	12/31/2005	Expense	Performed finance activities	
	100020717	04/01/2004	63,708.00	41,655						
	100019588	05/01/2004	51,012.00	58,511						
	100019320	06/01/2004	82,301.44	106,755						
	100020543	06/01/2004	65,808.00	536,231						
	100030027	07/01/2004	80,801.76	106,323		01/29/2007	06/12/2009	Expense	Performed Operations & Maintenance activities	
	100033777	07/01/2004	99,408.00	122,348						
	100031683	07/01/2004	88,608.00	484,831	1,262					
	100019585	08/01/2004	94,008.00	183,298						
	100030793	09/01/2004	67,908.00	28,025						
	100022376	09/01/2004	70,608.00	29,196						
	100034436	09/01/2004	78,204.00	56,294						
	100021790	09/01/2004	61,404.00	57,065						
	100028760	09/01/2004	69,108.00	63,792						
	100020700	09/01/2004	75,000.64	96,222						
	100029729	09/01/2004	78,312.00	96,384						
	100019531	10/01/2004	74,604.00	85,215		05/31/2005	11/26/2006	Expense	Performed Operations & Maintenance activities	
	100019207	10/01/2004	126,301.76	155,446						
	100019227	10/01/2004	114,000.64	310,504						
	100019415	11/01/2004	66,204.00	27,612						
	100033955	11/01/2004	82,908.96	28,888		10/26/2009	Still employed	Capital	Performed Substation support activities	
	100019562	11/01/2004	83,940.48	33,962						
	100020822	11/01/2004	67,608.00	83,981						
	100027594	11/01/2004	70,104.00	86,282						
	100034018	11/01/2004	82,908.96	102,042		10/23/2007	04/22/2008	Expense	Performed Control Center activities	
	100024060	11/01/2004	85,400.04	105,108		11/04/2004	Still employed	Capital	Assisted in processing capital work orders	
	100029996	11/01/2004	83,007.48	109,433		05/02/2006	08/09/2009	Capital	Performed Engineering Support activities	
	100021795	11/01/2004	82,908.96	109,909		04/11/2007	05/12/2007	Expense	Performed Operations & Maintenance activities	
	100019380	11/01/2004	75,000.64	110,513						
	100032098	11/01/2004	82,908.96	115,439		04/11/2007	05/12/2007	Expense	Performed Operations & Maintenance activities	
	100028924	11/01/2004	97,320.00	119,778						
	100027354	11/01/2004	98,532.00	121,270						
	100020843	11/01/2004	66,504.00	166,483						
	100033899	11/01/2004	100,003.92	195,842						

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Niagara Mohawk Power Corporation									
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Niagara Mohawk Power Corporation (Electric) d/b/a National Grid									
VERO Employees									
Last, First & MI	Employee ID	Request B: Retirement Date	Request B: Last Wage	Request C: VERO Cost - Pension *	Request C: VERO Cost - Medical	Request F: First Date as Contractor	Request G: Last Date as Contractor	Request E: Contractor Costs Accounting	Request E: Reason for Accounting
	100020083	11/01/2004	84,901.44	261,394					
	100019492	11/01/2004	67,008.00	347,360	285	12/06/2004	08/14/2009	Expense	Performed Operations & Maintenance activities
	100019383	11/01/2004	67,008.00	369,768	569				
	100033823	11/01/2004	80,801.76	409,641	1,622	08/30/2005	02/27/2009	Expense	Performed training support activities
	100019557	11/01/2004	61,800.96	105,670					
	100020074	11/01/2004	65,208.00	109,261		02/13/2006	11/14/2008	Expense	Performed Engineering Support activities
	100024292	10/01/2007	77,529.83	64,545					
	100019378	10/01/2007	82,314.16	71,381					
	100031242	10/01/2007	140,058.72	201,704					
	100027583	10/01/2007	64,104.00	437,881	950				
	100019581	10/01/2007	83,934.73	211,945					
	100021564	10/01/2007	78,853.84	220,201					
	100019234	10/01/2007	115,608.00	283,354					
	100019211	10/01/2007	131,413.32	313,140					
	100034201	10/01/2007	87,553.79	457,117	5,056				
	100025808	10/01/2007	170,738.40	403,464					
	100021049	10/01/2007	131,033.04	443,186					
	100027335	11/01/2007	41,783.04	145,587					
	100019524	11/01/2007	50,483.68	168,777					
	100019439	11/01/2007	53,701.44	385,095	19,750				
	100019497	11/01/2007	72,509.27	213,551					
	100033756	11/01/2007	80,408.10	220,177					
	100027804	11/01/2007	162,000.00	378,450		10/22/2008	11/19/2008	Expense	Performed gas operations support activities
	100019244	11/01/2007	153,816.00	535,852		02/14/2008	Still employed	Expense	Worked on Human Resources administrative projects
	100019697	12/01/2007	49,528.96	151,192					
	100019614	12/01/2007	44,172.96	198,007	4,076				
	100025814	12/01/2007	56,500.20	160,644					
	100019407	12/01/2007	58,992.72	189,375					
	100026071	12/01/2007	70,303.80	189,564					
	100020683	12/01/2007	71,750.40	209,866					
	100033814	12/01/2007	59,186.03	308,024	7,763				
	100019536	12/01/2007	93,757.64	245,529					
	100019539	12/01/2007	83,397.79	254,303					
	100019593	12/01/2007	90,652.46	294,808					
	100031548	12/01/2007	124,560.72	446,665	7,738				
	100019238	12/01/2007	96,736.15	494,590	10,997				
	100033289	12/01/2007	98,004.00	544,824	37,326				
	100025803	01/01/2008	114,475.20	277,907		11/16/2004	Still employed	Expense	Performed administrative tax activities
	100019478	01/01/2008	119,134.61	290,407					
	100019116	01/01/2008	161,221.62	782,386	14,339				

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Niagara Mohawk Power Corporation (Electric) d/b/a National Grid									
VERO Employees									
Last, First & MI	Employee ID	Request B: Retirement Date	Request B: Last Wage	Request C: VERO Cost - Pension *	Request C: VERO Cost - Medical	Request F: First Date as Contractor	Request G: Last Date as Contractor	Request E: Contractor Costs Accounting	Request E: Reason for Accounting
	100019114	10/01/2008	31,464.00	939,316	8,388				
	100019408	11/01/2008	92,402.36	239,072					
	100021151	11/01/2008	76,067.05	440,199	1,485				
	100021193	12/01/2008	74,088.78	212,439					
	100026340	12/01/2008	93,394.52	244,753		02/02/2009	Still employed	Expense	Performed Operations & Maintenance activities
	100029719	12/01/2008	86,338.62	277,458					
	100031604	12/01/2008	83,145.18	303,454		12/15/2008	Still employed	Expense	Performed accounting support activities
	100003205	12/01/2008	87,630.40	376,621					
	100022355	01/01/2009	81,987.41	282,541		03/02/2009	Still employed	Expense	Worked on safety support activities
	100021199	03/01/2009	95,131.46	138,973					
	100019698	03/01/2009	95,220.04	140,044					
	100034439	03/01/2009	100,304.20	164,756					
	100028380	03/01/2009	86,800.57	183,067					
	100023820	03/01/2009	84,800.00	188,955					
	100031670	03/01/2009	77,159.34	209,657					
	100019346	03/01/2009	82,307.30	288,541					
	100019210	03/01/2009	130,906.99	680,043	20,682				
	100022364	03/01/2009	71,196.04	119,850		09/28/2009	Still employed	Expense	Worked on Human Resources administrative projects
	100034440	04/01/2009	82,289.22	137,412					
	100025389	04/01/2009	74,120.86	162,375					
	100019535	04/01/2009	80,809.39	242,194					
	100019451	04/01/2009	173,900.00	185,409					
	100029071	04/01/2009	81,882.61	210,920					
	100025804	04/01/2009	75,072.19	284,909					
	100025854	04/01/2009	79,866.12	381,636	3,790				
	100019370	04/01/2009	88,267.99	434,211		11/01/2009	Still employed	Expense	Performed administrative tax activities
	100024349	04/01/2009	85,837.64	464,713	2,030				
	100019465	05/01/2009	101,590.06	327,248					
	100034123	06/01/2009	84,820.07	229,790	9,607				
	100019454	06/01/2009	136,435.24	402,902		09/14/2009	Still employed	Expense	Performed Operations & Maintenance activities
	100023009	06/01/2009	86,991.06	254,018	12,306				
	100024358	06/01/2009	86,844.44	243,194					
	100034432	07/01/2009	214,411.64	442,389					
	100019502	07/01/2009	98,091.10	309,107		08/03/2009	Still employed	Expense	Performed administrative finance activities
	100019368	07/01/2009	107,646.13	542,878					
	100032992	07/01/2009	127,551.29	327,293	3,146				
	100034061	07/01/2009	105,811.44	211,094		07/23/2009	Still employed	Capital	Assisted in processing capital work orders
	100028820	08/01/2009	109,903.97	265,650		09/01/2009	Still employed	Expense	Performed Operations & Maintenance activities
	100019473	08/01/2009	85,325.65	225,850		09/24/2009	Still employed	Expense	Worked on Human Resources administrative projects
	100019197	09/01/2009	121,726.46	304,541		10/19/2009	Still employed	Expense	Worked on collections support

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Niagara Mohawk Power Corporation (Electric) d/b/a National Grid									
VERO Employees									
Last, First & MI	Employee ID	Request B: Retirement Date	Request B: Last Wage	Request C: VERO Cost - Pension *	Request C: VERO Cost - Medical	Request F: First Date as Contractor	Request G: Last Date as Contractor	Request E: Contractor Costs Accounting	Request E: Reason for Accounting
	100021061	09/01/2009	92,287.00	113,684		10/26/2009	Still employed	Expense	Worked on billing activities
	100019611	09/01/2009	95,409.65	251,170					
	100019630	09/01/2009	50,132.16	296,700	368	03/08/2010	Still employed	Expense	Worked on Human Resources administrative projects
	100023486	10/01/2009	112,012.56	272,236		11/16/2009	Still employed	Expense	Performed administrative tax activities
	100022310	10/01/2009	102,683.62	234,356		11/02/2009	Still employed	Expense	Performed accounting support activities
	100019440	01/01/2010	83,052.12	113,806					
	100019371	01/01/2010	76,503.58	198,003					
	100019199	04/01/2010	135,255.08	198,152					
	100020977	04/01/2010	84,872.81	226,204					
	100024621	07/01/2010	82,908.00	141,804					
	100020677	08/01/2010	125,596.22	266,576					
	100021353	09/01/2010	97,753.08	232,280					
	100019519	09/01/2010	102,322.79	254,138					
* The pension costs for some of the 2002 VEROs are listed as \$180,000, which is the average pension cost for the 2002 VEROs. As agreed to with the PSC, this figure was used due to missing data.									

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Annual Contract Expenses for former Employees Who Accepted a VERO										
Nagarsa Mohawk Power Corporation (Electric) d/b/a National Grid										
DAG-2 VERO Employees - NMPC Employee										
Docket Number 10-E-0050										
Nagarsa Mohawk Power Corporation										
Attachment 2										
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100030256	Hours worked as a contractor						1,792	1,502	874	
	Amount paid as a contractor	5,944.88	65,106.64	72,676.93	75,539.78	61,407	62,720.00	52,552.50	34,960.00	
	Amount paid for air travel					0.00	0.00	0.00	0.00	
	Amount paid for room and board					0.00	3055.94	2021.03	1265.6	
	All other amounts paid					318.76	4690.66	2421.98	1610.25	
	Total amount paid	0.00	65,106.64	72,676.93	75,539.78	61,725.76	70,466.60	56,995.51	37,835.85	0.00
Number of round trip flights to/from Syracuse										
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100032963	Hours worked as a contractor					1,162	953	969	860	76
	Amount paid as a contractor			28,763.00	28,051.80	25,003.13	25,429.69	22,561.88	1,995.00	
	Amount paid for air travel			0.00	0.00	0.00	0.00	0.00	0.00	
	Amount paid for room and board					0.00	0.00	0.00	0.00	
	All other amounts paid					467.50	382.50	437.00	42.50	
	Total amount paid	0.00	0.00	0.00	28,763.00	28,519.30	25,470.63	25,812.19	22,998.88	2,037.50
Number of round trip flights to/from Syracuse										
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100027682	Hours worked as a contractor					1,696.00				
	Amount paid as a contractor		53,294.57	77,639.17	67,840.00					
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid					2,854.77				
	Total amount paid	0.00	0.00	53,294.57	77,639.17	70,694.77	0.00	0.00	0.00	0.00
Number of round trip flights to/from Syracuse										
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100026611	Hours worked as a contractor						49	669		
	Amount paid as a contractor					1,960.00				
	Amount paid for air travel					0.00				
	Amount paid for room and board					0.00				
	All other amounts paid					471.3				
	Total amount paid	0.00	0.00	0.00	0.00	2,431.30	26,760.00	0.00	0.00	0.00
Number of round trip flights to/from Syracuse										
Number of round trip flights to/from Syracuse										

[illegible]

Niagara Mohawk Power Corporation (Electric) d/b/a National Grid  
Annual Contract Expenses for former Employees Who Accepted a VERO

Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100022355	Hours worked as a contractor								1,000	266
	Amount paid as a contractor								39,682.50	10,413.00
	Amount paid for air travel								0	0.00
	Amount paid for room and board								8,014.76	0.00
	All other amounts paid								8,594.60	336.23
	Total amount paid	0.00	0.00	0.00	0.00	0.00	0.00	0.00	56,291.86	10,749.23
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100026123	Hours worked as a contractor									
	Amount paid as a contractor		1,222.21							
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid									
	Total amount paid	0.00	1,222.21	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100031604	Hours worked as a contractor							44	980	141
	Amount paid as a contractor							1,760.00	39,200.00	5,640.00
	Amount paid for air travel							0.00	0.00	0.00
	Amount paid for room and board							0.00	0.00	0.00
	All other amounts paid							0.00	0.00	0.00
	Total amount paid	0.00	0.00	0.00	0.00	0.00	0.00	1,760.00	39,200.00	5,640.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100022193	Hours worked as a contractor					110	1,108	620		
	Amount paid as a contractor					4,070.00	40,977.50	2,296.46		
	Amount paid for air travel					0.00	0.00	0.00		
	Amount paid for room and board					0.00	847.72	0.00		
	All other amounts paid					0.00	197.05	216.00		
	Total amount paid	0.00	0.00	0.00	0.00	4,070.00	42,022.27	2,512.46	0.00	0.00
	Number of round trip flights to/from Syracuse									

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										DAG-2 VERO Employees - NMPC Employee
										Docket Number 10-E-0050
										Niagara Mohawk Power Corporation
										Attachment 2
Niagara Mohawk Power Corporation (Electric) d/b/a National Grid										
Annual Contract Expenses for former Employees Who Accepted a VERO										
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100022364	Hours worked as a contractor								485	336
	Amount paid as a contractor								16,601.55	11,501.28
	Amount paid for air travel								0.00	1846.99
	Amount paid for room and board								0.00	3040.72
	All other amounts paid								0.00	426.72
	Total amount paid	0.00	0.00	0.00	0.00	0.00	0.00	0.00	16,601.55	16,815.71
	Number of round trip flights to/from Syracuse									5
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100026365	Hours worked as a contractor								759	112
	Amount paid as a contractor								30,337.13	4,377.75
	Amount paid for air travel								0.00	0.00
	Amount paid for room and board								2086.49	358.71
	All other amounts paid								3001.12	1391.39
	Total amount paid	0.00	0.00	0.00	0.00	0.00	0.00	0.00	35,424.74	6,127.85
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100032580	Hours worked as a contractor					1,193	1,108	620		
	Amount paid as a contractor	16,183.70	47,680.46	66,091.93	73,521.60	46,648.25	40,977.50	2,296.46		
	Amount paid for air travel					0.00	0.00	0.00		
	Amount paid for room and board					345.36	847.72	3986.74		
	All other amounts paid					2715.53	197.05	10718.45		
	Total amount paid	0.00	47,680.46	66,091.93	73,521.60	49,709.14	42,022.27	17,001.65	0.00	0.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100020695	Hours worked as a contractor				1,117	496				
	Amount paid as a contractor				40,031.25	17,491.25				
	Amount paid for air travel					0.00				
	Amount paid for room and board					0.00				
	All other amounts paid				4,974.78	0.00				
	Total amount paid	0.00	0.00	0.00	45,006.03	17,491.25	0.00	0.00	0.00	0.00
	Number of round trip flights to/from Syracuse									



DAG-2 VERO Employees - NMPC Employee  
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**Niagara Mohawk Power Corporation (Electric) d/b/a National Grid  
 Annual Contract Expenses for former Employees Who Accepted a VERO**

Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100020994	Hours worked as a contractor					1216	1,460	679	674	
	Amount paid as a contractor					26,700.00	29,200.00	12,570.00	14,159.25	
	Amount paid for air travel					0.00	0.00	0.00	0.00	
	Amount paid for room and board					0.00	0.00	0.00	0.00	
	All other amounts paid					0.00	0.00	0.00	0.00	
	Total amount paid	0.00	0.00	3,074.00	25,130.00	26,700.00	29,200.00	12,570.00	14,159.25	0.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100026856	Hours worked as a contractor					563	1,809.50			
	Amount paid as a contractor					20,807.50	66,876.25			
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid					1,705.19	12,609.07			
	Total amount paid	0.00	0.00	0.00	22,512.69	79,485.32	0.00	0.00	0.00	0.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100029996	Hours worked as a contractor					1386	1,632	1,573	880	
	Amount paid as a contractor					58980	67,000.00	62,920.00	36,256.00	
	Amount paid for air travel					0.00	0.00	0.00	0.00	
	Amount paid for room and board					549.25	3305.68	914.73	18063.25	
	All other amounts paid						3260.06	44176.28		
	Total amount paid	0.00	0.00	0.00	0.00	62,789.31	99,649.71	108,011.01	54,319.25	0.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100027180	Hours worked as a contractor					434	759	615	382	35
	Amount paid as a contractor					13,872.00	26,565.00	21,507.50	23,730.00	1,225.00
	Amount paid for air travel					0.00	0.00	0.00	0.00	0.00
	Amount paid for room and board						0.00	0.00	0.00	0.00
	All other amounts paid					128.43	906.54	55.44	175.94	199.25
	Total amount paid	0.00	0.00	22,832.09	22,832.09	14,000.43	27,471.54	21,562.94	23,905.94	13,551.75
	Number of round trip flights to/from Syracuse									

DAG-2 VERO Employees - NMPC Employee  
Docket Number 10-E-0050  
Niagara Mohawk Power Corporation  
Attachment 2

# Niagara Mohawk Power Corporation (Electric) d/b/a National Grid

## Annual Contract Expenses for former Employees Who Accepted a VERO

Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
1000193398	Hours worked as a contractor							373	900	
	Amount paid as a contractor							15,180.00	36,810.00	
	Amount paid for air travel							0.00	0.00	
	Amount paid for room and board							0.00	0.00	
	All other amounts paid							0.00	0.00	
	Total amount paid	0.00	0.00	0.00	0.00	0.00	0.00	15,180.00	36,810.00	0.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100020548	Hours worked as a contractor								401	208
	Amount paid as a contractor								16,842.00	8,736.00
	Amount paid for air travel								0.00	0.00
	Amount paid for room and board								0.00	0.00
	All other amounts paid								0.00	0.00
	Total amount paid	0.00	0.00	0.00	0.00	0.00	0.00	0.00	16,842.00	8,736.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100032098	Hours worked as a contractor									26
	Amount paid as a contractor									1,040.00
	Amount paid for air travel								0.00	0.00
	Amount paid for room and board								0.00	0.00
	All other amounts paid								0.00	0.00
	Total amount paid	0.00	0.00	0.00	0.00	0.00	1,040.00	0.00	0.00	0.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100032971	Hours worked as a contractor					40	2,134	1,489	895	
	Amount paid as a contractor					1,582.40	89,320.00	59,804.83	35,800.00	
	Amount paid for air travel							1067		
	Amount paid for room and board							3,044.43		
	All other amounts paid							94.8		
	Total amount paid	0.00	0.00	0.00	0.00	1,582.40	89,320.00	64,011.06	35,800.00	0.00
	Number of round trip flights to/from Syracuse									3

**Niagara Mohawk Power Corporation (Electric) d/b/a National Grid**  
**Annual Contract Expenses for former Employees Who Accepted a VERO**

DAG-2 VERO Employees - NMPC Employee Docket Number 10-E-0050 Niagara Mohawk Power Corporation Attachment 2	Niagara Mohawk Power Corporation (Electric) d/b/a National Grid									
	Annual Contract Expenses for former Employees Who Accepted a VERO									
Employee ID 100029825 Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010	
	Hours worked as a contractor				2076.5	1,988	1,928	781		
	Amount paid as a contractor			25,452.03	88,676.95	68,771.75	66,387.75	63,648.75	25,756.50	
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid							43.2		
	Total amount paid	0.00	0.00	25,452.03	88,676.95	74,386.55	66,585.63	64,039.48	25,799.70	0.00
	Number of round trip flights to/from Syracuse									
	Hours worked as a contractor									
	Amount paid as a contractor									
Employee ID 100026698 Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010	
	Hours worked as a contractor						105	440		
	Amount paid as a contractor						4,553.25	17,147.13		
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid									
	Total amount paid	0.00	0.00	0.00	0.00	0.00	5,443.69	19,222.58	0.00	
	Number of round trip flights to/from Syracuse									
	Hours worked as a contractor									
	Amount paid as a contractor									
Employee ID 100032225 Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010	
	Hours worked as a contractor									
	Amount paid as a contractor									
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid									
	Total amount paid	0.00	13,418.66	11,444.62	0.00	0.00	0.00	0.00	0.00	
	Number of round trip flights to/from Syracuse									
	Hours worked as a contractor									
	Amount paid as a contractor									
Employee ID 100025572 Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010	
	Hours worked as a contractor									
	Amount paid as a contractor									
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid									
	Total amount paid	0.00	810.03	0.00	0.00	0.00	0.00	0.00	0.00	
	Number of round trip flights to/from Syracuse									
	Hours worked as a contractor									
	Amount paid as a contractor									

DAG-2 VERO Employees - NMPC Employee  
 Docket Number 10-E-0050  
 Niagara Mohawk Power Corporation  
 Attachment 2

Niagara Mohawk Power Corporation (Electric) d/b/a National Grid  
 Annual Contract Expenses for Former Employees Who Accepted a VERO

Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100033177	Hours worked as a contractor									
	Amount paid as a contractor		353.50	574.44						
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid									
	Total amount paid	0.00	0.00	574.44	0.00	0.00	0.00	0.00	0.00	0.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100019244	Hours worked as a contractor							1,307	974	167
	Amount paid as a contractor							53,106.40	31,793.76	5,333.44
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid									
	Total amount paid	0.00	0.00	0.00	0.00	0.00	0.00	53,106.40	31,793.76	5,333.44
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100030460	Hours worked as a contractor									
	Amount paid as a contractor	7,385.53	29,288.95							
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid									
	Total amount paid	7,385.53	29,288.95	0.00	0.00	0.00	0.00	0.00	0.00	0.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100019329	Hours worked as a contractor					2111	1,988	2,033	900	170
	Amount paid as a contractor			69,749.18	83,626.40	70,661.53	70,574.00	67,650.00	31,950.00	6,035.00
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid									
	Total amount paid	0.00	0.00	69,749.18	83,626.40	70,661.53	70,574.00	67,650.00	31,950.00	6,035.00
	Number of round trip flights to/from Syracuse									
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DAG-2 VERO Employees - NMPC Employee	Docket Number 10-E-0050	Niagara Mohawk Power Corporation	Attachment 2							
Niagara Mohawk Power Corporation (Electric) d/b/a National Grid										
Annual Contract Expenses for former Employees Who Accepted a VERO										
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100028397	Hours worked as a contractor				2,603	2,161	2,019	1,811	771	58.5
	Amount paid as a contractor	4,171.28	134,566.12	95,247.43	85,622.39	73,856.92	69,924.50	29,176.39	4,095.00	
	Amount paid for air travel				1,088.00	15,545.00	11,714.10	4,805.50	207.90	
	Amount paid for room and board				1,061.07	13,719.21	9,537.49	3,896.16	210.53	
	All other amounts paid				39,540.53	40,562.37	13,536.96	10,476.74	3,988.97	118.25
	Total amount paid	4,171.28	134,566.12	134,787.96	118,880.62	116,658.09	101,652.83	41,867.02	4,631.68	
	Number of round trip flights to/from Syracuse					2	38	21	10	0
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100032743	Hours worked as a contractor							117		
	Amount paid as a contractor							5,162.50		
	Amount paid for air travel									
	Amount paid for room and board							1424.19		
	All other amounts paid									
	Total amount paid	0.00	0.00	0.00	0.00	0.00	0.00	6,586.69	0.00	0.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100033823	Hours worked as a contractor				632	1949.5	2,010	1,937	336	
	Amount paid as a contractor				24,628.50	76,030.50	81,724.50	78,692.25	13,104.00	
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid				7,660.13	18,850.35	19,568.51	17,863.21	170.5	
	Total amount paid	0.00	0.00	0.00	32,288.63	94,880.85	102,310.01	96,555.46	13,274.50	0.00
	Number of round trip flights to/from Syracuse									
Employee ID	Expenses	2002	2003	2004	2005	2006	2007	2008	2009	2010
100034018	Hours worked as a contractor						411	160		
	Amount paid as a contractor						17,398.89	6,596.83		
	Amount paid for air travel									
	Amount paid for room and board									
	All other amounts paid							3349.77		
	Total amount paid	0.00	0.00	0.00	0.00	0.00	17,398.89	9,946.60	0.00	0.00
	Number of round trip flights to/from Syracuse									



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Date of Request: March 5, 2010  
Due Date: March 15, 2010

Request No. DAG-2 SUPP  
NMPC Req. No. NM 179 DPS 109

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO:

Request:

Follow-up to I/R #NM-28 (RAV-14).

In a format similar to the response to I/R #NM-28 (RAV-14), please provide the following information for each VERO employee that was a former NMPC employee; whether that employee either remained a NMPC employee; or whether, at some point, was transferred into the National Grid USA Service Co.

- A. VERO employee's name;
- B. The date of employee's retirement and salary at time of retirement;
- C. Provide the costs of the employee being VERO'ed by type of cost.
- D. Has the Company ever incurred costs associated with the same employee subsequent to the employee retiring? If yes, from the date of retirement up to the present time, please provide, in an Excel spreadsheet, the following information by calendar year:
  - 1. Number of hours the VERO employee worked for the Company as a contracted employee;
  - 2. Incurred costs for VERO employee's contractor services;
  - 3. Incurred costs for VERO employee's travel expenses;
  - 4. Incurred costs for VERO employee's lodging expenses;
  - 5. Any other incurred costs for VERO employee;
  - 6. Total costs incurred for VERO employee.
- E. Indicate whether the above costs were charged to capital or expense, along with the reason for such accounting.
- F. Indicate the date the VERO employee first performed contractor services for the Company.
- G. Indicate if VERO employee is still a contracted employee; if not, indicate the last date that the employee performed contractor services for the Company.

Response:

The Company would like to supplement its response to this question. Please see Supplement 2 Attachment 1 for additional employees who accepted a VERO from NMPC from 2002 through 2010.

Request A is subject to a Protective Order.

Please see Supplement 2 Attachment 1 for responses to requests B, C, E, F and G.

D. The Company has not incurred any costs associated with any of the employees in Supplement 2 Attachment 1 after the employee retired.

Name of Respondent:  
Ed Considine

Date of Reply:  
4/22/10

DAG-2 VERO Employees - NMPC Employee									
Docket Number 10-E-0050									
Niagara Mohawk Power Corporation									
Attachment 1 Supplement 2									
Niagara Mohawk Power Corporation (Electric) d/b/a National Grid									
VERO Employees									

Employee ID	Request B: Retirement Date	Request B: Last Wage	Request C: VERO Cost - Pension *	Request C: VERO Cost - Medical	Request F: First Date as Contractor	Request G: Last Date as Contractor	Request E: Contractor Costs Accounting	Request E: Reason for Accounting
	01/01/2009	\$63,398.40	79,248	0				
	07/01/2008	\$63,398.40	116,551	0				
	07/01/2008	\$63,398.40	77,380	0				
	07/01/2008	\$55,463.20	79,317	0				
	01/01/2009	\$66,398.40	108,399	0				
	01/01/2009	\$63,398.40	133,176	0				
	01/01/2009	\$51,126.40	143,594	0				
	01/01/2009	\$51,126.40	84,305	0				
	07/01/2008	\$30,272.52	128,492	0				
	01/01/2009	\$66,476.80	187,901	0				
	07/01/2008	\$63,398.40	88,907	0				
	07/01/2008	\$63,398.40	90,618	0				
	01/01/2009	\$63,398.40	177,992	0				
	07/01/2008	\$55,463.20	137,314	0				
	07/01/2008	\$20,925.60	130,603	0				
	08/01/2008	\$63,398.40	132,895	0				
	01/01/2009	\$63,398.40	75,359	0				
	07/01/2008	\$9,422.76	95,101	0				
	01/01/2009	\$51,126.40	104,457	0				
	01/01/2009	\$51,126.40	67,378	0				
	01/01/2009	\$63,398.40	72,379	0				
	07/01/2008	\$63,398.40	110,263	0				
	08/01/2008	\$63,398.40	186,333	0				
	01/01/2009	\$51,126.40	28,546	0				
	01/01/2009	\$51,126.40	65,469	0				
	01/01/2009	\$60,746.40	117,688	0				
	01/01/2009	\$63,398.40	109,307	0				
	07/01/2008	\$55,463.20	120,964	0				
	07/01/2008	\$63,398.40	165,384	0				
	01/01/2009	\$63,398.40	125,762	0				
	01/01/2009	\$51,126.40	44,474	0				
	01/01/2009	\$51,126.40	33,444	0				

								<b>DAG-2 VERO Employees - NMPC Employee</b>
								<b>Docket Number 10-E-0050</b>
								<b>Niagara Mohawk Power Corporation</b>
								<b>Attachment 1 Supplement 2</b>
<b>Niagara Mohawk Power Corporation (Electric) d/b/a National Grid</b>								
<b>VERO Employees</b>								
<b>Employee ID</b>	<b>Request B: Retirement Date</b>	<b>Request B: Last Wage</b>	<b>Request C: VERO Cost - Pension *</b>	<b>Request C: VERO Cost - Medical</b>	<b>Request F: First Date as Contractor</b>	<b>Request G: Last Date as Contractor</b>	<b>Request E: Contractor Costs Accounting</b>	<b>Request E: Reason for Accounting</b>
	08/01/2008	\$51,126.40	109,329	0				
	01/01/2009	\$63,398.40	98,215	0				
	01/01/2009	\$51,126.40	128,420	0				
	01/01/2009	\$55,463.20	57,141	0				
	01/01/2009	\$63,398.40	182,793	0				
	07/01/2008	\$63,398.40	128,883	0				
	07/01/2008	\$55,463.20	79,152	0				
	01/01/2009	\$63,398.40	181,595	0				
	01/01/2009	\$51,126.40	56,738	0				
	01/01/2009	\$63,398.40	91,551	0				

Date of Request: March 5, 2010  
Due Date: March 15, 2010

Request No. DAG-3  
NMPC Req. No. NM 180 DPS 110

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirements Panel

Request:

The Company lists various vendors and cost estimates on page 216 of Exhibit \_\_ (RRP-10) to support its rate year estimate for incremental rate case expenses. For each vendor listed on worksheet page 216, provide the following:

1. A copy of the contract and purchase order the Company has with the vendor that supports and identifies the work being performed.
2. A copy of all historic test year invoices with supporting documentation for total historic test year costs incurred and charged to Niagara Mohawk (company #36) either directly or indirectly. The supporting documentation should include the actual accounting applied so that verification of costs incurred can be reconciled with the historic test year worksheets provided in Exhibit \_\_ (RRP-10).

Response:

1. Attached are the contracts and purchase orders the Company has with vendors identified on page 216 of Exhibit \_\_ (RRP-10). Per discussion with Denise Gerbsch, the Company did not provide documentation for newspapers or advertisements as these items were invoiced.

Foster and Associates (Attachment 1)  
Analysis Group (Attachment 2)  
Black and Veatch (Attachment 3)  
Hiscock & Barclay (Attachment 4)  
Cullen & Dykeman (Attachment 5)  
Alston & Bird (Attachment 6)  
Towers Perrin (Attachment 7)  
WarRoom (Attachments 8 and 9)

Roger Morin (Attachment 10)

2. There were no incremental costs during the historic test year.

Name of Respondent:  
James Molloy

Date of Reply:  
March 19, 2010



Date of Request: March 5, 2010  
Due Date: March 15, 2010

Request No. RAV-48  
NMPC Req. No. NM 185 DPS 115

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirements Panel & Infrastructure and Operations Panels

Request:

A. On page 84 of the Revenue Requirement Panel's pre-filed direct testimony, the "Transmission Hydro-One Transformer Project" is shown to have a 12/31/10 forecasted balance of \$4.1 million.

Please provide a brief description of the project, why it is needed and what purpose it will serve. Include the project's cost benefit summary / analysis.

Please provide a breakdown of the costs that make up the project's \$4.1 million estimate.

Please provide documentary support for the 12/31/10 in-service date.

B. On page 84 of the Revenue Requirement Panel's pre-filed direct testimony, the proposed treatment for the \$4.1 million of Transmission Hydro-One Transformer Project costs is to amortize the costs over a 36 month period.

Fully explain the basis for the 36 month amortization period?

What is the useful life of the project? How does this useful life period tie into the project's cost benefit analysis?

At the end of the 36 month amortization period, what are the Company's plans for this asset? Sell it? Retire it? Continue using it? Explain in full.

C. Footnote 5 on page 84 of the Revenue Requirement Panel's pre-filed direct testimony states that the Company is requesting authority to capitalize costs of O&M associated with the work the Company is performing for Hydro-One and requests to defer and amortize these costs over three years. Footnote 5 also states that the costs are included in the testimony of the Infrastructure and Operations Panel.

Please indicate where in the Infrastructure and Operations Panel's 266 pages of testimony, these costs are discussed.

How much O&M, by cost component, is the Company requesting be capitalized? Over what period of time will these costs be incurred?

Is the O&M amount in C.2 above included in the \$4.1 million estimate? If not, where in the Company's filing are these O&M costs reflected?

Fully explain the basis for the Company's request to defer these O&M costs? To be eligible for deferral, the Commission has a materiality threshold which the Company has previously addressed and acknowledged in numerous responses to Staff information requests and proceedings before the Commission. Do these O&M costs meet the Commission's materiality threshold in order to be eligible for deferral? If so, explain how and provide the impact of such O&M costs on net operating income after income taxes.

Response:

A.1. The full description of the Hydro-One project - why it is needed, what purpose it will serve - is provided on pages 166-169 of the Infrastructure and Operations Panel ("IOP") Testimony. The cost benefit analysis for the replacement of the BP76 Transformer was based on the economic analysis performed by New York ISO, which calculates the day-ahead congestion shortfall resulting from the concurrent outages of the BP76 Transformer and 345kV outages on New York Power Authority system. The New York ISO economic analysis is provided in Attachment 1 (RAV-48 Attachment 1\_NYISO Hydro One Economic Analysis). As indicated on page 168 of the IOP Testimony, the cost benefit analysis indicates there is an economic justification for replacement of the transformer.

A.2. As indicated in the IOP Testimony on pages 166-167, the replacement costs shown are an estimate of \$9 million, based on information from Hydro-One at the time of the filing. A specific breakdown of the replacement costs is not yet available. Hydro One is in process of tendering bids for the project and determining the detailed project cost estimate and schedule. Pursuant to the terms of the Interconnection Facilities Agreement described on page 167 of the IOP Testimony, National Grid's cash outlay will be 50% of Hydro One's total cost to procure and install the new regulating transformer. The estimated National Grid cost for this project reflects an estimated September 2010 \$4.5 million cash outlay to Hydro, whereas the \$4.1 million in question reflects the unamortized deferred debit balance associated with this payment as of December 31, 2010 assuming the proposed 36 month amortization period. The exact timing and cash outlay amount will be based on Hydro One's detailed project cost estimate and the commercial arrangement with National Grid, which are in development and expected to be finalized later in 2010.

A.3. Documented support for the in-service date for the transformer will be based on the bids received later in 2010, along with Hydro One's detailed project schedule that is still in development. The current estimate for the in-service date is end of 2012. As noted on page 72 of the Revenue Requirements Panel Testimony, the Company will adjust the in service date if necessary at the time the Company submits Corrections and Updates in this proceeding.

B.1. National Grid proposes to spread the expense payment for replacement of the Hydro-One transformer over several years to lessen the impact on customers. Given that National Grid has proposed a three-year rate plan, a 36 month amortization period from the date of payment is a reasonable time period in this instance for rate stability.

B.2. We estimate the useful life of the project to be approximately 45 years based on similar assets owned by National Grid. The economic analysis by the NYISO was performed for a five month period and analyzed the operational scenario where the BP76 Transformer outage is combined with major transmission outages in the same region of New York. This operational scenario resulted in congestion costs to customers that would justify the replacement of the BP76 Transformer. We can expect congestion savings to take place over the useful life of the facility based on transmission outages required on the New York system.

B.3. The facility in question is owned by Hydro One. The replacement regulating transformer will continue to be located at Beck substation in Ontario, Canada and owned by Hydro One. Ownership and responsibility for normal maintenance of the associated with the BP76 regulating transformer rests with Hydro One, consistent with the terms of the Interconnection Facilities Agreement.

C.1. This is indicated in response A.1. above.

C.2. National Grid is requesting to capitalize the total unamortized deferred debit balance associated with the total amount expended for the expense payment to Hydro One, estimated at \$4.5 million at the time of the rate plan proposal (reflecting 50% of the total transformer replacement costs). The Company is seeking to recover this cost over a 36 month amortization period.

C.3. This is explained in responses A.2. and C.2. above.

C.4. National Grid has asked for deferred recovery of these costs for rate stability purposes as explained in response B.1. above. National Grid believes these O&M costs would be eligible for deferral because (i) the Company is not expected to be over-earning in 2010; (ii) the estimated payment exceeds the \$2 million materiality threshold per the merger rate plan; and (iii) these costs were not anticipated at the time of the Merger Rate Plan and thus are incremental to the original 10-year forecasts underlying the rates agreed to in the Merger Joint Proposal. Based on 12 months ended September 30, 2009, materiality thresholds of 3% and 5% of net income would be \$3.2 million and \$5.4 million. Because the Company projects 2010 net income to be lower than 2009, it is expected that the \$4.5 million projected payment will meet the materiality threshold.

Name of Respondent:  
Bill Malee/James Molloy

Date of Reply:  
03/15/10

Western\_NY\_Export DCR Allocation for BP76/PA301(PA302) for Spring 2009

Date	Daily Total \$	Cost Basis	Assumed Daily DCR \$	20 week Fall 2010 cost estimate \$	21 day Fall 2009 cost estimate \$
3/24/2009	(\$468,427.23)	Spring 2009	(\$313,000)	(\$43,820,000)	(\$6,573,000)
3/25/2009	(\$293,923.83)	Fall 2008	(\$555,000)	(\$77,700,000)	(\$11,655,000)
3/26/2009	(\$175,258.32)				
3/27/2009	(\$216,930.25)				
3/28/2009	(\$199,520.87)				
3/29/2009	(\$178,630.26)				
3/30/2009	(\$188,900.28)				
3/31/2009	(\$193,971.61)				
4/1/2009	(\$474,008.92)				
4/2/2009	(\$533,498.10)				
4/3/2009	(\$215,419.56)				
4/4/2009	(\$552,711.65)				
4/5/2009	(\$362,293.98)				
4/6/2009	(\$60,310.75)				
4/7/2009	(\$333,632.37)				
4/8/2009	(\$500,037.77)				
4/9/2009	(\$442,079.70)				
4/10/2009	(\$413,660.82)				
4/11/2009	(\$276,103.75)				
4/12/2009	(\$145,193.94)				
4/13/2009	(\$438,718.72)				
4/14/2009	(\$424,154.52)				
4/15/2009	(\$381,563.55)				
4/16/2009	(\$226,846.86)				
4/17/2009	(\$141,310.15)				
<b>Totals</b>	<b>(\$7,837,107.76)</b>				
Outage-day Stdev	\$141,790.95				
Outage-day Max	(\$60,310.75)				
Outage-day Min	(\$552,711.65)				

Date of Request: March 18, 2010  
Due Date: March 29, 2010

Request No. RAV-48 (Supplement)  
NMPC Req. No. NM 185 DPS 115

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirements Panel & Infrastructure and Operations Panel

Request:

A. On page 84 of the Revenue Requirement Panel's pre-filed direct testimony, the "Transmission Hydro-One Transformer Project" is shown to have a 12/31/10 forecasted balance of \$4.1 million.

Please provide a brief description of the project, why it is needed and what purpose it will serve. Include the project's cost benefit summary / analysis.

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Please provide documentary support for the 12/31/10 in-service date.

B. On page 84 of the Revenue Requirement Panel's pre-filed direct testimony, the proposed treatment for the \$4.1 million of Transmission Hydro-One Transformer Project costs is to amortize the costs over a 36 month period.

Fully explain the basis for the 36 month amortization period?

What is the useful life of the project? How does this useful life period tie into the project's cost benefit analysis?

At the end of the 36 month amortization period, what are the Company's plans for this asset? Sell it? Retire it? Continue using it? Explain in full.

C. Footnote 5 on page 84 of the Revenue Requirement Panel's pre-filed direct testimony states that the Company is requesting authority to capitalize costs of O&M associated with the work the Company is performing for Hydro-One and requests to defer and amortize these costs over three years. Footnote 5 also states that the costs are included in the testimony of the Infrastructure and Operations Panel.

Please indicate where in the Infrastructure and Operations Panel's 266 pages of testimony, these costs are discussed.

How much O&M, by cost component, is the Company requesting be capitalized? Over what period of time will these costs be incurred?

Is the O&M amount in C.2 above included in the \$4.1 million estimate? If not, where in the Company's filing are these O&M costs reflected?

Fully explain the basis for the Company's request to defer these O&M costs? To be eligible for deferral, the Commission has a materiality threshold which the Company has previously addressed and acknowledged in numerous responses to Staff information requests and proceedings before the Commission. Do these O&M costs meet the Commission's materiality threshold in order to be eligible for deferral? If so, explain how and provide the impact of such O&M costs on net operating income after income taxes.

Response:

Upon further discussion with Staff, the Company seeks to clarify the following regarding Footnote 5:

The Company acknowledges that Footnote 5 could have been more descriptive. The Company is requesting authority to capitalize the expense payment of its share of the work for the Hydro One project (i.e., replacement of the regulating transformer). As described in the respective responses to B.3. and A.2. of RAV-48 submitted on March 16, 2010, Hydro One owns and is responsible for maintenance of the BP76 regulating transformer and National Grid will be responsible to pay 50% of Hydro One's total cost to procure and install the new regulating transformer, in accordance with the Interconnection Facilities Agreement described on page 167 of the Infrastructure and Operations Panel Testimony.

Name of Respondent:  
Bill Malee

Date of Reply:  
03/25/10

Date of Request: March 5, 2010  
Due Date: March 15, 2010

Request No. RAV-49  
NMPC Req. No. NM 186 DPS 116

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirements Panel

Request:

On pages 87-88 of the Revenue Requirement Panel's pre-filed direct testimony, it is stated that for fiscal year 2009, the Company changed its method of accounting for routine repair maintenance costs for federal income tax purposes, resulting in a tax benefit of approximately \$200 million. Regarding this change in accounting, please provide the following information:

- A. Please provide the back-up to this approximate \$200 million tax benefit.
- B. Fully explain if this accounting change resulted in any tax refund to the Company.
- C. Please provide both the electric and gas tax benefits associated with this accounting change.
- D. Indicate whether the Company agrees that it should be recording a deferred credit for the electric cash flow enhancement related to this accounting change under Clause 1.2.4.2 of the MJP. If not, explain in full.
- E. Due to the timing of this accounting change, please indicate the Company's position as to which gas settlement agreement terms determine the proper ratemaking for this accounting change, those from the 6/12/00 gas settlement agreement in Case 99-G-0336 or those from the 2/13/09 gas settlement agreement in Case 08-G-0609. Briefly explain the Company's rationale for its position.
- F. Depending on your answer to Part D. above:  
Indicate whether the Company agrees that it should be recording a deferred credit for the gas cash flow enhancement related to this accounting change under Clause V.B.6 of the 6/12/00 gas settlement agreement in Case 99-G-0336 . If not, explain in full.

Indicate whether the Company agrees that it should be recording a deferred credit for the gas cash flow enhancement related to this accounting change under Clause 4.2.1 of the 2/13/09 gas settlement agreement in Case 08-G-0609. If not, explain in full.

G. Provide separate calculations of the electric and gas cash flow benefits the Company has realized / will realize as a result of this accounting change from the date first realized up through 12/31/10. Include supporting workpapers and explain any assumptions.

H. On page 88, the Panel states that the Company is providing the full benefit of the tax credit in rate year rate base and requests authorization to defer for future recovery from ratepayers the amount of any future adjustments or disallowances with carrying charges at the weighted average cost of capital approved in this proceeding. If in response to Parts D. and F. the Company states that it does not agree that ratepayers are entitled to deferred credits for the cash flow enhancement related to this accounting change pre-rate year, fully explain the reasonableness and equity of this requested rate year deferral of the potential cash flow loss (which only involves any disallowed portion of the \$200 million). In other words, why does the Company believe is it fair for stockholders to retain 100% of the pre-rate year cash flow enhancement on the \$200 million tax benefit, while making ratepayers pay 100% of the rate year cash flow loss on the portion of the \$200 million the IRS possibly disallows?

I. Fully explain how the Company derived the forecasted repair allowance related tax benefits for the periods post-FYE 3/09. Explain how and why these post-FYE 3/09 tax benefits differ from the amount claimed on the FYE 3/09 tax return. Include supporting workpapers for the forecasted amounts.

Response:

- A. The \$200 million refers only to the electric segment. Please see Exhibit \_\_ (RRP-10) Workpapers to Exhibit \_\_ (RRP-6), Schedule 3, Workpaper 1, Sheet 1 (Page 272 of Book19) Fiscal 2009 true up line for the \$208,438,765 estimate. This amount is made up five numbers pulled from page 14 of that workpaper that compares the Fiscal 2009 accrual to the Fiscal 2009 return. Below is a description of each of these.

Total Federal change	228,378,861
Less FIT on State change	(19,120,002)
Plus COR Federal change	14,712
Less FIT on State change	(1,306)
Less COR DIT change	<u>(833,500)</u>
Total	208,438,765

- B. Although the Revenue Requirements Panel's testimony indicates that the Company changed its method of accounting, this testimony requires clarification. In 2009, the Company for the first time took a tax deduction for routine repairs and maintenance costs that had been capitalized and



depreciated. The Company's actions did not represent a change in accounting, but rather reflected a change in its interpretation of its rights under the Internal Revenue Code. As discussed in the testimony, the Company's interpretation is subject to audit. The Company received a refund as a result of overpayments during FYE 3/09.

- C. As stated in response to B, the Company has not changed its accounting, it has taken an incremental tax deduction. Please see part A for the Electric segment and Attachment 1, page 2 to this response for a calculation of the Gas segment.
- D. The Company does not agree that it should be recording a deferred credit for the electric cash flow enhancement related to this incremental tax deduction under Clause 1.2.4.2 of the MJP. Clause 1.2.4.2.1 addresses externally imposed tax and accounting changes and Clause 1.2.4.2.2 addresses internally imposed changes in Accounting Policies. As discussed in response to B, there has been no change in tax law or accounting policy, therefore this item does not fall under either clause of the MJP. The Company is simply taking a tax deduction for the first time.
- E. As stated in response to B, the Company has not changed its accounting, it has taken an incremental tax deduction. The Company believes that the transaction would be covered under the terms of gas settlement agreement in Case 08-G-0609 as the effects of the transaction only affect post rate plan costs.
- F. The Company does not agree that it should be recording a deferred credit for the gas cash flow enhancement related to this incremental tax deduction under Clause 4.2.1. Clause 4.2.1 addresses regulatory, legislative and accounting changes. As stated in part D, because there has been no change in tax law or accounting this item does not fall under this clause of the settlement agreement in Case 08-G-0609. The Company is simply taking a tax deduction for the first time.
- G. As stated in response to B, the Company has not changed its accounting, it has taken an incremental tax deduction. Please see Attachment 2 to this response.
- H. The Company is not proposing to charge customers for any period before the customers received the benefit. Any interest charges assessed for disallowance for the period from the initial deduction until the effective date will be shareholders responsibility, so there is a matching between the benefits and costs.
- I. Please see Workpaper 1 to Schedule 3 to Exhibit \_\_\_\_ (RRP-6) (Page 271 to 285 of Book 19). Post FYE 3/09 repair deductions are assumed to be 50% of plant additions. FYE 3/09 repair deduction included a catch-up from FYE 03/0x to FYE 3/09.

Name of Respondent:  
Tax Department  
James Molloy

Date of Reply:  
April 19, 2010

**NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID**  
**Fiscal 2009 Accrual to Return Adjustment - ELECTRIC**

	<b><u>Fiscal 09</u></b> <b><u>Accrual</u></b>	<b><u>Fiscal 09</u></b> <b><u>Return</u></b>	<b><u>Change</u></b>	<b><u>Balance Sheet</u></b> <b><u>Tax Effect</u></b>
Plant Related Changes:				
Tax Depreciation - Federal	(249,547,192)	(192,681,468)	56,865,724	
Tax Depreciation - State	(203,291,841)	(185,559,608)	17,732,233	
Repair Allowance - Federal	0	(708,949,368)	(708,949,368)	
Repair Allowance - State	0	(786,721,424)	(786,721,424)	
CIAC - Electric Only	17,894,200	11,792,826	(6,101,374)	
Asset Retirements	0	0	0	
Salvage - 100% Electric	0	5,332,601	5,332,601	
Capitalized Interest - Electric Only	1,446,491	1,787,876	341,385	
Federal @ 35%			(652,511,032)	(228,378,861)
State @ 7.1%			(769,416,579)	(54,628,577)
FIT on SIT				19,120,002
Cost of Removal - Electric Only	(34,741,673)	(34,794,215)	(52,542)	(14,712) Federal @ 80% x 35% (3,730) State @ 7.1% 1,306 FIT on SIT
Reversal of COR DIT - Electric Only	5,973,500	6,807,000	833,500	833,500 Federal Only
Total Electric Adjustments				(208,438,765)

Note this is the same as Sheet 14 of Workpaper 1 to Schedule 3 of Exhibit \_\_\_ RRP-6

**NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID**  
**Fiscal 2009 Accrual to Return Adjustment - GAS**

	<b><u>Fiscal 09</u></b> <b><u>Accrual</u></b>	<b><u>Fiscal 09</u></b> <b><u>Return</u></b>	<b><u>Change</u></b>	<b><u>Balance Sheet</u></b> <b><u>Tax Effect</u></b>
Plant Related Changes:				
Tax Depreciation - Federal	(80,585,355)	(65,770,885)	14,814,470	
Tax Depreciation - State	(65,648,285)	(51,562,540)	14,085,745	
Repair Allowance - Federal	0	(143,046,216)	(143,046,216)	
Repair Allowance - State	0	(145,916,444)	(145,916,444)	
CIAC - Gas Only	5,105,800	4,285,825	(819,975)	
Asset Retirements	0	0	0	
Salvage - 100% Gas	0	(13,663)	(13,663)	
Capitalized Interest - Gas Only	162,509	200,863	38,354	
Federal @ 35%			(129,027,030)	(45,159,461)
State @ 7.1%			(132,625,983)	(9,416,445)
FIT on SIT				3,295,756
Cost of Removal - Gas Only	(4,167,454)	(4,114,912)	52,542	14,712 Federal @ 80% x 35% 3,730 State @ 7.1% (1,306) FIT on SIT
Reversal of COR DIT - Gas Only	707,500	897,000	189,500	189,500 Federal Only
Total Gas Adjustments				(41,660,799)

**NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID**  
**Repair Tax Deduction Cash Flow Benefits**

	Total	Electric	Gas
Fiscal 2009 (Attachment 1)	250,099,564	208,438,765	41,660,799
Fiscal 2010 (Page 2)	54,500,567	45,606,276	8,894,291
Fiscal 2011 through December (Page 2)	40,099,213	33,538,209	6,561,004
Total	344,699,344	287,583,250	57,116,094

**NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID**  
**Repair Tax Deduction Cash Flow Benefits**

	Total	Electric	Gas
<b>Fiscal 2010</b>			
Total Plant Additions	506,000,000	419,980,000	86,020,000
Repair Additions	202,400,000	167,992,000	34,408,000
<b>Pre Repair Depreciation</b>			
Current Year	6,476,643	7,226,337	1,720,400
Prior Years	55,877,682	45,641,907	10,235,774
Total Pre Repair Tax Depreciation	62,354,325	52,868,244	11,956,174
<b>Post Repairs Expense</b>			
Current Years	202,400,000	167,992,000	34,408,000
Prior Years	-	-	-
Total Post Repair Tax Depreciation	202,400,000	167,992,000	34,408,000
<b>Tax Calculation</b>			
Total Change in Depreciation/Expense	(140,045,675)	(115,123,756)	(22,451,826)
Federal Tax	(49,015,986)	(40,293,315)	(7,858,139)
State Tax	(9,943,243)	(8,173,787)	(1,594,080)
Federal on State Tax	3,480,135	2,860,825	557,928
Net Tax Change Fiscal 2010	(55,479,094)	(45,606,276)	(8,894,291)
<b>Fiscal 2011 through December (9 months)</b>			
Total Plant Additions	366,299,076	304,028,233	62,270,843
Repair Additions	146,519,630	121,611,293	24,908,337
<b>Pre Repair Depreciation</b>			
Current Year	6,476,643	5,231,226	1,245,417
Prior Years	38,820,690	31,719,689	7,101,001
Total Pre Repair Tax Depreciation	45,297,333	36,950,916	8,346,417
<b>Post Repair Depreciation</b>			
Current Years	146,519,630	121,611,293	24,908,337
Prior Years	-	-	-
Total Post Repair Tax Depreciation	146,519,630	121,611,293	24,908,337
<b>Tax Calculation</b>			
Total Change in Depreciation	(101,222,297)	(84,660,378)	(16,561,920)
Federal Tax	(35,427,804)	(29,631,132)	(5,796,672)
State Tax	(7,186,783)	(6,010,887)	(1,175,896)
Federal on State Tax	2,515,374	2,103,810	411,564
Net Tax Change Fiscal 2011 through Dec	(40,099,213)	(33,538,209)	(6,561,004)
Repair Rate	40%		

Date of Request: May 3, 2010  
Due Date: May 13, 2010

Request No. RAV-49 SUPP  
NMPC Req. No. NM 186 DPS 116

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirements Panel

Request:

In reviewing the Co's response to IR RAV-49, Part B, I just noticed that the Co stated that it "received a refund as a result of overpayments **during FYE 3/09**" [emphasis added].....I'd like to know the exact date(s) during FYE 3/09 when the refund was received. If the refund came in stages, please provide the amounts received on each date.

Response:

- A. The timing needs to be clarified. The Company did not receive any refund in FYE 3/09 rather the refunds related to overpayments of our estimated FYE 3/09 taxes. As can be seen in Attachment A (Federal Intercompany tax payments trueup), NMPC received its portion of the refund of estimated taxes paid – \$266,937,221 – in April 2010. NMPC is part of a group filing a consolidated federal tax return under National Grid Holdings Inc. ("NGHI"). NGHI received the group's entire refund of estimated taxes in December 2009 and distributed it to the group members in accordance with the provisions of the tax sharing agreement.

Name of Respondent:  
James Molloy

Date of Reply:  
May 13, 2010

TO: Accounting Team Metrotech DATE: 4/28/10 10:30 AM  
FROM: Charles Derosa Metrotech FILE: see below  
SUBJECT: Federal intercompany tax payments trueup due for fiscal year ended 3/31/09

The following cash intercompany tax payments will be processed by wire transfer on April 30, 2010. These payments are the true-up amounts due to/from each company with respect to its share of the consolidated federal corporate income tax liability for the fiscal year ended March 31, 2009.

Our intercompany tax allocation agreement requires a transfer of cash among the companies participating in the consolidated tax return.

The payments computed below are based upon the federal tax true-up calculations prepared for March 31, 2009. Please refer to the attached worksheet for amounts by company.

Business Unit	Company Name	Project	Work Order	UK Account Number	Activity 236200
70001	NGHI	X05122	9000037089	620001	583,585,356
70003	NGUS LLC	X05122	9000037089	620001	32,052
00001	NGUSA	X05122	9000037089	620001	25,300,000
00004	NANT ELECTRIC	X05122	9000037089	620001	(4,710,263)
00005	MASS ELECTRIC	X05122	9000037089	620001	(83,596,440)
00010	NEPCO	X05122	9000037089	620001	(56,644,556)
00020	NEET	X05122	9000037089	620001	(103,654)
00021	NGTSC	X05122	9000037089	620001	(18,398)
00041	GRANITE STATE	X05122	9000037089	620001	(4,060,078)
00048	NARR GAS	X05122	9000037089	620001	(7,045,621)
00049	NARR ELECTRIC	X05122	9000037089	620001	(40,647,097)
00070	WAYFINDER	X05122	9000037089	620001	(183,737)
00082	GA HOLDINGS	X05122	9000037089	620001	(15,359)
00085	NEES ENERGY	X05122	9000037089	620001	(4,886)
00086	EUA EI	X05122	9000037089	620001	(21,848)
00099	NGUSA SC	X05122	9000037089	620001	2,218,807
00035	NMHI	X05122	9000037089	620001	857,910
00037	ONAI	X05122	9000037089	620001	(1,006)
NMPROP	NM Properties, Inc.	X05122	9000037089	620001	(24,748)
Co 60	KeySpan				(147,979,213)
	TOTAL				-

These payments should be charged/credited to the respective company's Accrued Federal Corporation Income Tax Account, Activity 236200.

Date of Request: May 13, 2010  
Due Date: May 24, 2010

Request No. RAV-49 SUPP 2  
NMPC Req. No. NM 186 DPS 116

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirements Panel

Request:

This response (RAV-49 SUPP) totally contradicts what the Company provided in Attachment 2 of its response to RAV-49. On Attachment 2, the Company provided cash flow benefits for this repair tax deduction of \$250M in FY 2009. How could there be any cash flow benefit in FY 2009, given this supplemental response states that the refund was not received until December 2009? At a bare minimum, the original Attachment 2 needs to be explained as to what the Company meant by stating there were cash flow benefits in FY 2009, and Attachment 2 might also need to be modified for "real" cash flow benefits in FY 2009, FY 2010 and FY 2011 thru 12/10, depending on your explanation.

Response:

Attachment 2 of our RAV-49 response provided an estimate of the cash flow benefit associated with three separate tax years. There was no cash flow benefit that actually occurred during fiscal 2009. The confusion likely stems from the layout of the schedule that showed a cash flow benefit with respect to fiscal 2009. The Company did not "stat[e] there were cash flow benefits in FY 2009." (emphasis added).

During fiscal 2009, the Company paid estimated tax for fiscal 2009 activity per Treasury Regulations. To comply with estimate tax requirements both prior year taxable income and current year activity are considered. None of these estimated tax payments were effected by the repairs deduction because the repairs study was not completed when the Company's estimated tax payments were due. When the Company filed its fiscal 2009 federal tax return in December 2009 the impact of our repairs study was estimated and caused taxable income to be less than what was estimated when the installment tax payments were due. Therefore, the IRS returned the Company's estimated tax payments made with respect to fiscal 2009. The Company received a refund in December of 2009.



Please also note that the fiscal 2009 numbers in Attachment 2 of our RAV-49 response are based on schedules prepared prior to the tax return being filed. The schedule included estimates.

Finally, please see the Attachment and the response to RAV 134 Part D for the impact on estimated tax payments.

Name of Respondent:  
Aaron Russell/James Molloy

Date of Reply:  
5/19/2010

# **Niagara Mohawk's Cash Flow Benefit of Repairs Project**

Date	Cash Flow Amount (E)    Cash Flow Amount (G)		Total	Electric                      83% Gas                              17%	
				Cash Flow Benefit	
12/15/2009	\$ -	\$ -	\$ -		
12/22/2009	\$ 221,557,893	\$ 45,379,328	\$ 266,937,221	\$ 266,937,221	
03/15/2010	\$ 14,525,000	\$ 2,975,000	\$ 17,500,000	17500000	
06/15/2010	\$ 14,525,000	\$ 2,975,000	\$ 17,500,000	17500000	
09/15/2010	\$ 14,525,000	\$ 2,975,000	\$ 17,500,000	17500000	
12/15/2010	\$ 14,525,000	\$ 2,975,000	\$ 17,500,000	17500000	
03/15/2011	\$ -	\$ -	\$ -		
06/15/2011	\$ -	\$ -	\$ -		
09/15/2011	\$ -	\$ -	\$ -		
12/15/2011	\$ -	\$ -	\$ -		

Date of Request: March 9, 2010  
Due Date: March 19, 2010

Request No. DKS-6  
NMPC Req. No. NM 196 DPS 126

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: David Shahbazian

TO: Revenue Requirement Panel

Request:

1. In a format identical to the schedule presented in the Injuries and Damages workpapers #183-184 (Exhibit \_\_ RRP-10), please provide the detailed information for each of the following historical years (electric amounts should reconcile to the electric amounts shown on workpaper #185):  
10/01/2003 - 9/30/2004  
10/01/2004 - 9/30/2005  
10/01/2005 - 9/30/2006  
10/01/2006 - 9/30/2007  
10/01/2007 - 9/30/2008
2. In a format identical to the schedule presented in the Injuries and Damages workpaper #186 (Exhibit \_\_ RRP-10), please provide the detailed information for each of the following historical years:  
10/01/2003 - 9/30/2004  
10/01/2004 - 9/30/2005  
10/01/2005 - 9/30/2006  
10/01/2006 - 9/30/2007  
10/01/2007 - 9/30/2008
3. Injuries & Damages workpaper #185 shows a grand total electric claims expense amount of \$3,760,357. Exhibit \_\_ (RRP-2) Schedule 34, Sheet 5 of 7, shows total historic year electric claims expense of \$4,005,827. Please explain the difference and provide detail supporting the difference of \$245,470.
4. Exhibit RRP-2, schedule 34, sheet 7, shows the Insurance Premium Tax per book amount of \$1.17 million as of September 30, 2009. Please provide all workpapers Form 103 Form 103

and supporting calculations that support the Insurance Premium Tax recorded, including the reclass entries as noted on workpaper #186.

5. Please identify any insurance carrier providing coverage to Company 36 that provides 'continuity credits' or any other type of credit / rebate to its clients for loyalty (successive annual renewals), or any other reason including reduced number of claims paid for a given period of time.
6. Exhibit \_\_ (RRP-2), schedule 34, sheet 7, outlines the Company's Injuries & Damages Historic Year Ended September 30, 2009 as adjusted amount of \$6,406,683 for Niagara Mohawk. Workpaper #186 shows the historic test year per book amount of \$5,445,492. For each component listed on Exhibit \_\_ (RRP-2) Schedule 34, Sheet 7, provide a detailed calculation showing the flow from the historic test year to the adjusted historic test, along with an explanation and supporting justification and documentation of what the adjustment to the historic test year is for.
7. Please provide the following for each insurance policy charged to the Company in support of the 'Adjusted Book Amounts' of \$6,406,683 as shown on Exhibit \_\_ (RRP-2), schedule 34, sheet 7.
  - a) The Declaration page(s) for showing the term / dates of coverage.
  - b) The total premium amount.
  - c) The listing showing the Insured covered by each policy.
  - d) The allocation methodology as it applies to each policy and breakdown among all affiliates / service companies covered by the policy.
8. With reference to the insurance coverage purchased on behalf of Company 36, please provide copies of all current insurance brokerage agreements that show the brokerage fee, and term of agreement as well as originating organization for each.
9. Exhibit RRP-2, schedule 34, sheet 7, and workpaper #185 from Exhibit \_\_ (RRP\_10) outlines the Company's Historical Claim and presents historical averages for 3, 4, 5, and 6 year averages. Please provide the reasoning behind the Company's ultimate selection of a 3 year average (versus a 4 or 5 year average, etc) in its presentation of claim data and for use in for forecasting rate year claims expense.

Response:

1. Attachment 1 provides information for the summary of Claims paid in the format similar to workpaper page 185 as per conversation with the David Shahbazian. Attachments 2 to 13 provides a list of all claims paid for the periods requested. The amounts do not reconcile to the electric amounts shown on work paper #185. This is because payment information queries are run for cases closed in the period only, as of a specific point in time. We ran the queries for the historical test period data, at 11/16/09, the information gathered was for total payments for the various time periods based on close date. The new reports provide data at 3/18/10. Differences arise from the fact that claims can be reopened after being closed. When this happens the claim retains the original close date in the system.

2. Attachment 14 presents the a schedule similar to workpaper 183 and 184( Exhibit \_\_\_ RRP -10) for the 12 month periods ended 9/30/05 to 9/30/08. The identical page 186 was not available for these years. Per conversation with PSC requestor David Shahbazian I am providing similar actual recorded information for those periods by the same insurance premium categories. 9/30/04 data was not available due to the transition to a new accounting system in that year.
3. The \$3,760,357 on workpaper 185 represents total claims paid in the period as detailed in response to question 1 above. The \$4,005,827 represents the total booked expense for claims that contains various accounting accruals. The Company is forecasting claims expenses on a three year average of actual claims paid during the periods. This is the same methodology applied in the Company's Gas filing in Case 08-G-0609.

4. Please see Attachment 15 for the supporting workpaper.

5. There are three insurance carriers that provide coverage to Company 36 that may provide continuity credits based on successive annual renewals or a dividend based on claims paid out. These continuity credits or dividends are not guaranteed or contractual and are subject to the insurance carrier's determination to declare and pay them.

The insurance carriers are Global Aerospace Underwriting Managers Ltd., Associated Electric & Gas Insurance Services (AEGIS) and Energy Insurance Mutual (EIM)

6. The \$6,406,683 represents both the Electric and Gas portion of the adjusted Book amounts. The Electric allocated amount is \$4,811,899 as referenced on Schedule 34. This amount is also referenced in the table at the top of workpaper 186 and is compared with the actual Electric booked amounts in the column to the left. The adjustments to the historical year as presented on workpapers 186 and 187 represent the annualization of the most current premiums of \$75,995 and an adjustment to normalize for a prior period charge related to premium tax payments of (\$709,587).
- 7 a) See Attachment 16 for copies of insurance policy Declaration pages.  
b, c, d) See Attachment 17 for a table listing insurance policies, premium amounts, percentage and amount allocated to Niagara Mohawk and Billing Pool reference; see Attachment 18 for copies of insurance premium invoices and payment requests. Attachment 19 provides copies of insurance premium tax payments.
8. See the attachment 20 for the McGriff, Seibels and Williams, Inc.:  
BSA below is for the period 12/01/09 to 12/01/10.  
The agreement with Marsh USA BSA is not finalized and will be provided when it is completed.

9. The Company selected the 3-year average for forecasting rate year claims expense because the period is more representative of recent claims activity. At present, there are seven cases on the books with potential for excessive settlements or verdicts.

Also recent trends in increased asbestos litigation and Verizon lawsuits are some of the reasons for increased claims in recent years.

The Company did not select the 5-year average (\$4,816,882), 6-year average (\$4,816,882) or average of averages (\$5,167,094) because each is less representative of current claims activity. It is believed that each scenario understates recent activity.

Name of Respondent:

James Molloy/Pete Luvera

Date of Reply:

3/26/2010

Insurance Premium Tax 10/1/08 - 9/30/09

Request No. DKS-6  
NMPC Req. No. NM 196 DPS 126  
Response to RFI No. 4

From Schedule 34, Sheet 7:

Category	Description	Niagara Mohawk
Ins Premium Tax	2009	173,455
	2009	149,141
	2008	854,825
		\$ 1,177,520
Removal of 2008 Tax adjustment		(854,925)
Adjusted Ins Premium Tax		\$ 322,595

Reconcile Insurance Premium Tax to Workpapers  
and Schedule 34, sheet 7

Reconcile Insurance Premium Tax to Workpapers and Schedule 34, sheet 7										Federal Excise Tax (FET)					NY Surplus Line Tax				Total Tax				
										Allocation Code:		00380	00382	00380	00380	00382	Direct						
										PeopleSoft Activity:		AG0275	AG0278	AG0278	AG0278	AG0278	AG0275	AG0278	AG0278	AG0278			
										Payment Date:		Jan-09	Apr-09	May-09	Jul-09	Sep-09	Jan-09	Aug-09	Aug-09	Aug-09		10/1/08 - 9/30/09	
												(a)	(b)	(c)	(d)	(e)	(f)		(g)		(h)		(i)
BUSI		EXP	ORIG	CHG	ORIG																		
UNIT	SEG	TYPE	DEPT	DEPT	BUSI UNIT	STATE		AMOUNT	AMOUNT	AMOUNT	AMOUNT	AMOUNT		AMOUNT	AMOUNT	AMOUNT	AMOUNT		AMOUNT				
00036	DIST	400	12230	12230	00099	NY		\$5,620.96	\$44,771.01	\$38.76	\$9,550.47	\$1,025.24		\$103,251.62	\$41,733.00	\$39,276.00	\$3,361.00		\$248,828.06				
00036	GAS	400	12230	12230	00099	NY		\$1,308.99	\$8,539.27	\$9.03	\$2,223.98	\$195.55		\$24,044.90	\$7,960.00	\$8,332.00	\$783.00		\$53,396.72				
00036	TRAN	400	12230	12230	00099	NY		\$769.99	\$5,985.38	\$5.31	\$1,308.38	\$137.06		\$14,144.06	\$5,579.00	\$5,317.00	\$460.00		\$33,706.18				
TOTAL								\$7,699.94	\$59,295.66	\$53.10	\$13,082.83	\$1,357.85	\$141,440.58	\$55,272.00	\$52,925.00	\$4,604.00	\$335,730.96						

- (a) Tax Filed Jan-09: \$14,519.70 FET for 12/1/08-09 D&O for legacy NG (\$13,950.30 legacy KS; total tax \$28,470.00).  
 (b) Tax Filed Apr-09: \$187,924.00 FET for 4/1/09-10 NGICL insurance.  
 (c) Tax Filed May-09: \$100.69 FET interest on year 2000-2007 filings.  
 (d) Tax Filed Jul-09: \$24,812.86 FET interest on year 2000-2007 filings.  
 (e) Tax Filed Sep-09: \$4,309.39 Additional FET for 12/1/08-09 D&O.  
 (f) Tax Filed Jan-09: \$141,440.58 NYS interest on year 2002-2006 filings.  
 (g) Tax Filed Aug-09: \$108,777.00 NYS surplus line tax for 4/1/09-10 Ex GL.  
 (h) Tax Filed Aug-09: \$101,209.00 NYS surplus line tax for 4/1/09-10 NGICL insurance.  
 (i) Tax Filed Aug-09: \$8,185.00 NYS surplus line tax for 4/1/09-10 Property Terrorism.

Reconcile to WP Final Exhibit

(b+c+d+e)	(g+h+i)
\$59,295.66	
\$53.10	\$55,272.00
\$13,082.83	\$52,925.00
\$1,357.85	\$4,604.00
\$73,789.44	\$112,801.00

Reconcile to WP 3 Insurance

AG0278	AG0275
(b+e+g+h+i)	(a+f)
\$59,295.66	
\$1,357.85	
\$55,272.00	
\$52,925.00	\$7,699.94
\$4,604.00	\$141,440.58
\$173,454.51	\$149,140.52

Niagara Mohawk Power Corporation  
Historical Claim Data  
Electric Distribution and Transmission only

Valued as of 11/16/09

**Request No. DKS-6**  
**NMPC Req. No. NM 196 DPS 126**  
**Response to RFI No. 1 - Provide Detailed Info.**  
**Variance explanation of Historical Claim Payments**  
**(11/16/09 reports) to Detail Reports (3/18/10 reports)**

See Notes.

Witness: Revenue Requirement Panel

Exhibit (RRP-10)  
Workpapers to Exhibit RRP-2  
Schedule 34  
Worksheet 2  
Sheet 1 of 1

Period	Litigated	General Liability	Non-Litigated	Litigated	Automobile Liability	Non-Litigated	Total	Auto Liab	Gen Liab	Total	Grand	Claim Pmts Variance from 11/15/09 Rpts	GL & Auto 11/15/09 Rpts	Detail Reports at 3/18/10
10/01/03 - 09/30/04	46,689.77	1,183,142.66	1,080.96	200,486.94	1,229,832.43	201,567.90	1,431,400.33	1,431,400.33	1,431,400.33	1,431,400.33	1,431,400.33	(27,608.09)	(x)	(y)
10/01/04 - 09/30/05	163,366.57	1,257,423.25	4,620.92	290,450.62	1,420,789.82	295,071.54	1,715,861.36	1,715,861.36	1,715,861.36	1,715,861.36	1,715,861.36	48,117.02	(z) = (y) - (x)	(y)
10/01/05 - 09/30/06	1,216,872.92	1,270,876.23	1,664,661.79	195,973.60	2,487,749.15	1,860,635.39	4,348,384.54	4,348,384.54	4,348,384.54	4,348,384.54	4,348,384.54	(29,354.33)	(x)	(y)
10/01/06 - 09/30/07	5,967,910.91	2,007,200.27	153,583.14	475,965.61	7,975,111.18	629,548.75	8,604,659.93	8,604,659.93	8,604,659.93	8,604,659.93	8,604,659.93	337,304.19	(x)	(y)
10/01/07 - 09/30/08	2,584,804.58	1,802,614.78	937,054.86	330,673.45	4,387,419.36	1,267,728.31	5,655,147.67	5,655,147.67	5,655,147.67	5,655,147.67	5,655,147.67	340,186.92	(x)	(y)
10/01/08 - 09/30/09	285,320.20	1,447,542.13	1,631,378.03	396,116.54	1,732,862.33	2,027,494.57	3,760,356.90	3,760,356.90	3,760,356.90	3,760,356.90	3,760,356.90	(76,566.24)	(x)	(y)
3 Yr Avg - Electric	2,946,011.90	1,752,452.39	907,338.68	400,918.53	4,698,464.29	1,308,257.21	6,006,721.50	6,006,721.50	6,006,721.50	6,006,721.50	6,006,721.50	200,308.29	(x)	(y)
4 Yr Avg - Electric	2,513,727.15	1,632,058.35	1,096,669.46	349,682.30	4,145,785.51	1,446,351.76	5,592,137.26	5,592,137.26	5,592,137.26	5,592,137.26	5,592,137.26	142,892.64	(x)	(y)
5 Yr Avg - Electric	2,043,655.04	1,557,131.33	878,259.75	337,835.96	3,600,786.37	1,216,095.71	4,816,882.08	4,816,882.08	4,816,882.08	4,816,882.08	4,816,882.08	123,937.51	(x)	(y)
6 Yr Avg - Electric	1,710,827.49	1,494,799.89	732,063.28	314,944.46	3,205,627.38	1,047,007.74	4,252,635.12	4,252,635.12	4,252,635.12	4,252,635.12	4,252,635.12	98,679.91	(x)	(y)
Avg. of Averages - Electric	2,303,555.30	1,600,110.49	903,582.79	359,845.31	3,917,645.89	1,254,625.11	5,167,093.99	5,167,093.99	5,167,093.99	5,167,093.99	5,167,093.99	141,454.59	(x)	(y)
10/01/03 - 09/30/04	1,289	1,027	1	114	1,299	115	1,414	1,414	1,414	1,414	1,414	1,395	(x)	(y)
10/01/04 - 09/30/05	16	1,027	4	129	1,043	133	1,176	1,176	1,176	1,176	1,176	979	(x)	(y)
10/01/05 - 09/30/06	24	861	5	96	885	101	986	986	986	986	986	1,237	(x)	(y)
10/01/06 - 09/30/07	21	901	2	330	922	332	1,254	1,254	1,254	1,254	1,254	1,031	(x)	(y)
10/01/07 - 09/30/08	22	844	6	161	866	167	1,033	1,033	1,033	1,033	1,033	1,142	(x)	(y)
10/01/08 - 09/30/09	16	1,011	5	135	1,027	140	1,167	1,167	1,167	1,167	1,167	1,124	(x)	(y)
3 Yr Avg - Electric	20	919	4	209	938	213	1,151	1,151	1,151	1,151	1,151	1,137	(x)	(y)
4 Yr Avg - Electric	21	904	5	181	925	185	1,110	1,110	1,110	1,110	1,110	1,097	(x)	(y)
5 Yr Avg - Electric	20	929	4	170	949	175	1,123	1,123	1,123	1,123	1,123	1,106	(x)	(y)
6 Yr Avg - Electric	18	989	4	161	1,007	165	1,172	1,172	1,172	1,172	1,172	1,154	(x)	(y)
Avg. of Averages - Electric	20	935	4	180	955	186	1,130	1,130	1,130	1,130	1,130	1,124	(x)	(y)
10/01/03 - 09/30/04	10	1,289	1	114	1,299	115	1,414	1,414	1,414	1,414	1,414	1,395	(x)	(y)
10/01/04 - 09/30/05	16	1,027	4	129	1,043	133	1,176	1,176	1,176	1,176	1,176	979	(x)	(y)
10/01/05 - 09/30/06	24	861	5	96	885	101	986	986	986	986	986	1,237	(x)	(y)
10/01/06 - 09/30/07	21	901	2	330	922	332	1,254	1,254	1,254	1,254	1,254	1,031	(x)	(y)
10/01/07 - 09/30/08	22	844	6	161	866	167	1,033	1,033	1,033	1,033	1,033	1,142	(x)	(y)
10/01/08 - 09/30/09	16	1,011	5	135	1,027	140	1,167	1,167	1,167	1,167	1,167	1,124	(x)	(y)
3 Yr Avg - Electric	20	919	4	209	938	213	1,151	1,151	1,151	1,151	1,151	1,137	(x)	(y)
4 Yr Avg - Electric	21	904	5	181	925	185	1,110	1,110	1,110	1,110	1,110	1,097	(x)	(y)
5 Yr Avg - Electric	20	929	4	170	949	175	1,123	1,123	1,123	1,123	1,123	1,106	(x)	(y)
6 Yr Avg - Electric	18	989	4	161	1,007	165	1,172	1,172	1,172	1,172	1,172	1,154	(x)	(y)
Avg. of Averages - Electric	20	935	4	180	955	186	1,130	1,130	1,130	1,130	1,130	1,124	(x)	(y)

Notes: Claim Payment values from the database are specific to a given point in time. Therefore, the values run on 11/16/09 differ from those run on 3/18/10. This is because Claims Paid can only be run for claims with a Closed status. It is, however, possible for a claim to be re-opened, if warranted, for new charges of liability or if a lawsuit is filed.



NMPC  
Summary of Claims and Insurance Premiums  
Charged in Expense type 400 to Company 36  
By Electric and Gas

Fiscal Yr	(All)	Injuries and Damages
Period	(All)	HTY ending Sept 30, 2005
Regulatory Acct Des	(All)	
Regulatory Acct	(All)	
Business Unit	00036	
Jrnl Id	(All)	
Expense Type	400	
Chrg Dept L3	(All)	
Chrg Dept L2	(All)	

Sum of Posted Jml \$				Segment															
Orig Business Unit	Activity	Chrg Dept L4	Activity Descr	DIST	GAS	TRAN	Grand Total	Costs associated with Insurance	Costs associated with Claims	Costs associated with All Other	Costs associated with Insurance	Costs associated with Claims	Costs associated with All Other	Total					
00036	AG0235	LEGAL SERVICES	General Legal Claims		2,425.95		2,425.95		2,425.95					2,425.95					
	AG0485	CORPORATE COMM	Provide Safety & Health Se		1,867.25		1,867.25			1,867.25				1,867.25					
		INTEGRATED HEALTH	Provide Safety & Health Se		16,551.03	1,825.50	1,421.99			17,973.02			1,825.50	19,798.52					
		LEGAL SERVICES	Provide Safety & Health Se		300.00		300.00			300.00				300.00					
		SAFETY SERVICES	Provide Safety & Health Se		32,939.99	4,429.86	2,605.78			35,545.77			4,429.86	39,975.63					
	AG0271	INSURANCE	U.S. Insurance-Liability		1,254,318.62	574,066.61	358,058.82	1,612,377.44			574,066.61			2,186,444.05					
	AG0276	INSURANCE	U.K. Insurance-Property		686,508.00	283,229.45	166,605.55	853,113.55			283,229.45			1,138,343.00					
	AG0281	CUST OPERATIONS	Claims-Liability - Excl. Auto		9,461.76		9,461.76		9,461.76					9,461.76					
		IS ELEC DIST GEN RTB	Claims-Liability - Excl. Auto		2,181.26		2,181.26		2,181.26					2,181.26					
		US TREASURY	Claims-Liability - Excl. Auto		563.14	470.19	1,033.33		563.14			470.19		1,033.33					
		CLAIMS	Claims-Liability - Excl. Auto		1,596,315.39	146,842.75	10,081.17		1,606,396.56			146,842.75		1,753,239.31					
	AG0282	US TREASURY	Claims-Liability - Auto Only		2,565.11		2,565.11		2,565.11					2,565.11					
		CLAIMS	Claims-Liability - Auto Only		380,540.66	18,432.48	398,973.14		380,540.66			18,432.48		398,973.14					
	AG0283	CLAIMS	Claims-Accrual (Reserve)		1,041,913.45	264,893.25	459,148.30		1,501,061.75			264,893.25		1,765,955.00					
	AG0289	FLEET MGMT	Claims Group-Dept Operat		(308.14)	(71.66)	(42.00)		(350.14)			(71.66)		(421.80)					
		INSURANCE	Claims Group-Dept Operat		60.00		60.00		60.00					60.00					
		REWARDS OE LABOR RE	Claims Group-Dept Operat		(562,226.28)		(562,226.28)		(562,226.28)					(562,226.28)					
		INVESTMENT RECOVERY	Claims Group-Dept Operat		(101.68)	(23.64)	(13.86)		(115.54)			(23.64)		(139.18)					
		INVENTORY MGMT	Claims Group-Dept Operat		(335.41)	(77.98)	(45.72)		(381.13)			(77.98)		(459.11)					
	AG1050	INSURANCE	Claims		(0.00)		(0.00)		(0.00)					(0.00)					
		REWARDS OE LABOR RE	Claims		5,061.90		5,061.90		5,061.90					5,061.90					
		NON DEPARTMENTAL	Claims		36,472.83		36,472.83		36,472.83					36,472.83					
00036 Total					4,507,074.83	*****	997,820.03	2,465,490.99	2,983,717.83	55,686.04	857,296.06	430,485.39	6,255.36	6,798,911.67					
00049	AG0282	CLAIMS	Claims-Liability - Auto Only		49.00		49.00		49.00					49.00					
00049 Total					49.00		49.00		49.00					49.00					
00099	AG0485	CORPORATE COMM	Provide Safety & Health Se		3,557.36	828.40	487.31			4,044.67			828.40	4,873.07					
		HR BUS PARTNERS	Provide Safety & Health Se		568.10	132.27	77.83			645.93			132.27	778.20					
		INTEGRATED HEALTH	Provide Safety & Health Se		8,408.54	1,609.08	1,108.82			9,517.36			1,609.08	11,126.44					
		SAFETY SERVICES	Provide Safety & Health Se		14,569.49	3,392.90	1,995.85			16,565.34			3,392.90	19,958.24					
	AG0271	INSURANCE	U.S. Insurance-Liability		293,393.01	68,325.35	40,191.09	333,584.10			68,325.35			401,909.45					
	AG0276	INSURANCE	U.K. Insurance-Property		18,685.00	(4,854.00)	(2,855.00)	15,830.00			(4,854.00)			10,976.00					
	AG0281	CLAIMS	Claims-Liability - Excl. Auto		2,917.66	679.50	399.58		3,317.24			679.50		3,996.74					
	AG0283	CLAIMS	Claims-Accrual (Reserve)		24,600.19	5,728.85	3,370.22		27,970.41			5,728.85		33,699.26					
	AG0289	ENERGY SOLUTION SERV	Claims Group-Dept Operat		28.17	6.56	3.86		32.03			6.56		38.59					
		INSURANCE	Claims Group-Dept Operat		7,166.54	1,668.97	981.67		8,148.21			1,668.97		9,817.18					
		CLAIMS	Claims Group-Dept Operat		83.37	19.42	11.42		94.79			19.42		114.21					
00099 Total					373,977.43	77,537.30	45,772.65	349,414.10	39,562.68	30,773.30	63,471.35	8,103.30	5,962.65	497,287.38					
Grand Total					4,881,101.26	*****	1,043,592.68	2,814,905.09	3,023,329.51	86,459.34	920,767.41	438,568.69	12,218.01	7,296,248.05					

NMPC

Summary of Claims and Insurance Premiums  
Charged in Expense type 400 to Company 36

By Electric and Gas

Fiscal Yr	(All)	Injuries and Damages
Regulatory Acc	(All)	
Regulatory Acc	(All)	
Period	(All)	
Business Unit	00036	
Jrnl Id	(All)	
Expense Type	400	
Chrg Dept L3	(All)	
Chrg Dept L2	(All)	

Sum of Posted Jrnl \$				Segment				Electric			Gas			Total
Orig Business	Activity	Chrg Dept L4	Activity Descr	DIST	GAS	TRAN	Grand Total	Costs associated with Insurance	Costs associated with Claims	Costs associated with All Other	Costs associated with Insurance	Costs associated with Claims	Costs associated with All Other	
00010	AG1050	REWARDS_OE_LABOR_REL	Claims	44,248.26	10,304.38	6,061.41	60,614.05			50,309.67			10,304.38	60,614.05
00010 Total				44,248.26	10,304.38	6,061.41	60,614.05			50,309.67			10,304.38	60,614.05
00036	AG0235	LEGAL SERVICES	General Legal Claims	46,036.54	122.98	72.34	46,231.86		46,108.88	17,398.73		122.98	2,063.20	19,461.93
	AG0485	INTEGRATED HEALTH	Provide Safety & Health Serv	18,185.11	2,063.20	1,213.62	19,461.93			300.00			300.00	19,461.93
		LEGAL SERVICES	Provide Safety & Health Serv	300.00			300.00			36.45			36.45	300.00
		PUBLIC AFFAIRS	Provide Safety & Health Serv	36.45	7.47		43.92			5,791.05			5,791.05	43.92
		SAFETY SERVICES	Provide Safety & Health Serv	5,128.30	1,126.61	682.75	6,917.66						1,126.61	6,917.66
	AG0271	ENVIRONMENTAL	U.S. Insurance-Liability	4,118.59			4,118.59	4,118.59						4,118.59
		INSURANCE	U.S. Insurance-Liability	1,924,406.20	494,101.32	302,615.49	2,721,123.01	2,227,021.69			494,101.32			2,721,123.01
	AG0278	INSURANCE	U.K. Insurance-Property	720,849.60	167,869.08	98,746.50	987,465.18	819,596.10			167,869.08			987,465.18
	AG0281	NETWORK STRAT ELEC	Claims-Liability - Excl. Auto	337.56			337.56		337.56					337.56
		OPS & CONSTRUCT-NYUP	Claims-Liability - Excl. Auto		137.70		137.70						137.70	137.70
		US TREASURY	Claims-Liability - Excl. Auto	5,644.15			5,644.15		5,644.15					5,644.15
		CLAIMS	Claims-Liability - Excl. Auto	1,327,417.74	171,621.19	8,063.38	1,507,102.31		1,335,481.12			171,621.19		1,507,102.31
	AG0282	US TREASURY	Claims-Liability - Auto Only	(1,264.47)			(1,264.47)		(1,264.47)					(1,264.47)
		CLAIMS	Claims-Liability - Auto Only	296,693.93	29,512.53		326,206.46		296,693.93			29,512.53		326,206.46
	AG0283	CLAIMS	Claims-Accrual (Reserve)	2,058,805.00	523,425.00	907,270.00	3,489,500.00		2,966,075.00			523,425.00		3,489,500.00
	AG0289	INSURANCE	Claims Group-Dept Operations	696.61			696.61							696.61
00036 Total				6,405,391.31	1,389,987.08	1,318,644.08	9,114,022.47	3,050,736.38	4,649,772.78	23,526.23	661,970.40	724,819.40	3,197.28	9,114,022.47
00099	AG0485	CORPORATE COMM	Provide Safety & Health Serv	2,455.02	571.69	336.31	3,363.02			2,791.33			571.69	3,363.02
		CUST OPERATIONS	Provide Safety & Health Serv	57.25	13.33	7.84	78.42			65.09			13.33	78.42
		HR BUS PARTNERS	Provide Safety & Health Serv	51.65	12.02	7.08	70.75			58.73			12.02	70.75
		INTEGRATED HEALTH	Provide Safety & Health Serv	1,305.49	289.48	170.29	1,765.26			1,475.78			289.48	1,765.26
		NETWORK STRAT ELEC	Provide Safety & Health Serv	208.90	48.65	28.82	286.17			237.52			48.65	286.17
		SAFETY SERVICES	Provide Safety & Health Serv	9,607.85	2,237.41	1,316.12	13,161.38			10,923.97			2,237.41	13,161.38
		TRANS PLANNING	Provide Safety & Health Serv	67.03	15.61	9.18	91.82			76.21			15.61	91.82
	AG0234	DISTRIBUTION SUPPORT	Environmental Safety Audit	291.94	67.99	39.99	399.92			331.93			67.99	399.92
	AG0271	INSURANCE	U.S. Insurance-Liability	165,969.66	(495.90)	(291.47)	165,182.29	165,678.19			(495.90)			165,182.29
	AG0278	INSURANCE	U.K. Insurance-Property	99,589.46	23,192.59	13,641.85	136,423.90	113,231.31			23,192.59			136,423.90
	AG0283	CLAIMS	Claims-Accrual (Reserve)	502.05	122.20	69.50	693.75		571.55			122.20		693.75
	AG0289	INSURANCE	Claims Group-Dept Operations	4,299.97	950.14	588.92	5,839.03		4,888.89			950.14		5,839.03
		CLAIMS	Claims Group-Dept Operations	29.04	6.77	3.98	39.79		33.02			6.77		39.79
00099 Total				284,435.31	27,031.98	15,928.21	327,395.50	278,909.50	5,493.46	15,960.56	22,696.69	1,079.11	3,256.18	327,395.50
Grand Total				6,734,074.88	1,427,323.44	1,340,633.70	9,502,032.02	3,329,645.88	4,655,266.24	69,796.46	694,667.00	725,898.51	16,757.84	9,502,032.02

NMPC  
Summary of Claims and Insurance Premiums  
Charged in Expense type 400 to Company 36  
By Electric and Gas

Period	(All)	Injuries and Damages
Fiscal Yr	(All)	HTY ending Sept 30, 2007
Regulatory Acct Descr	(All)	
Regulatory Acct	(All)	
Business Unit	00036	
Jrnl Id	(All)	
Expense Type	400	
Chrg Dept L3	(All)	
Chrg Dept L2	(All)	

Sum of Posted Jrnl \$						Segment			Electric			Gas			Total
Orig Business Unit	Activity	Chrg Dept L4	Activity Descr	DIST	GAS	TRAN	Grand Total		Costs associated with Insurance	Costs associated with Claims	Costs associated with All Other	Costs associated with Insurance	Costs associated with Claims	Costs associated with All Other	
00001	AG0271	INSURANCE	U.S. Insurance-Liability	(13,752.09)	(3,202.54)	(1,883.85)	(18,838.48)		(15,635.94)			(3,202.54)			(18,838.48)
00001 Total				(13,752.09)	(3,202.54)	(1,883.85)	(18,838.48)		(15,635.94)			(3,202.54)			(18,838.48)
00005	AG0282	CLAIMS	Claims-Liability - Auto Only	2,431.00			2,431.00			2,431.00					2,431.00
00005 Total				2,431.00			2,431.00			2,431.00					2,431.00
00010	AG0271	INSURANCE	U.S. Insurance-Liability	(2,390.54)			(2,390.54)		(2,390.54)						(2,390.54)
00010 Total				(2,390.54)			(2,390.54)		(2,390.54)						(2,390.54)
00036	AG0235	LEGAL SERVICES	General Legal Claims	50,546.93	215.16	25.68	50,787.77								50,787.77
	AG0485	INTEGRATED HEALTH	Provide Safety & Health Serv	13,157.00	2,524.67	1,485.16	17,166.83			50,572.61	14,642.16		215.16	2,524.67	17,166.83
		LEGAL SERVICES	Provide Safety & Health Serv	219.00	51.00	30.00	300.00							51.00	300.00
		SAFETY SERVICES	Provide Safety & Health Serv	12,341.59	1,567.31	921.97	14,830.87				13,263.56			1,567.31	14,830.87
	AG0271	INSURANCE	U.S. Insurance-Liability	711,465.20	243,147.30	154,130.47	1,108,742.97	665,595.67				243,147.30			1,108,742.97
	AG0273	INSURANCE	U.S. Insurance-Workers Comp	521,400.72	121,422.09	71,424.78	714,247.59	592,825.50				121,422.09			714,247.59
	AG0275	INSURANCE	U.K. Insurance-Liability	233,410.37	54,636.51	32,139.15	320,186.03	265,549.52				54,636.51			320,186.03
	AG0276	INSURANCE	U.K. Insurance-Property	874,126.69	98,143.47	57,731.44	1,030,001.60	931,858.13				98,143.47			1,030,001.60
	AG0281	CUST. OPERATIONS	Claims-Liability - Excl. Auto	1,870.65	1,064.50		2,935.15		1,870.65				1,064.50		2,935.15
		OPS. & CONSTRUCT-N	Claims-Liability - Excl. Auto		1,064.50		1,064.50						1,064.50		1,064.50
		US. TREASURY	Claims-Liability - Excl. Auto	3,736.09	75.00		3,811.09		3,736.09				75.00		3,811.09
		CLAIMS	Claims-Liability - Excl. Auto	1,300,533.32	106,426.92	7,362.28	1,414,322.52		1,307,895.80			106,426.92			1,414,322.52
	AG0282	US. TREASURY	Claims-Liability - Auto Only	1,030.94			1,030.94			1,030.94					1,030.94
		CLAIMS	Claims-Liability - Auto Only	464,642.82	6,214.32	500.00	471,357.14		465,142.82			6,214.32			471,357.14
	AG0283	CLAIMS	Claims-Accrual (Reserve)	6,136,500.00	652,500.00	960,599.76	7,749,599.76		7,097,099.76			652,500.00			7,749,599.76
	AG1050	PUBLIC AFFAIRS	Claims	54.75	12.75	7.50	75.00			62.25			12.75		75.00
00036 Total				10,325,036.07	1,289,065.50	1,286,358.19	12,900,459.76	2,655,828.82	8,927,410.72	28,154.72	517,349.37	787,573.15	4,142.98	*****	*****
00099	AG0485	CUST. OPERATIONS	Provide Safety & Health Serv	160.90	37.47	22.04	220.41				182.94			37.47	220.41
		EMPL SERV & ADMIN	Provide Safety & Health Serv	1,029.59	239.76	141.04	1,410.39				1,170.63			239.76	1,410.39
		HR BUS PARTNERS	Provide Safety & Health Serv	349.27	81.35	47.85	478.47				397.12			81.35	478.47
		INTEGRATED HEALTH	Provide Safety & Health Serv	388.36	42.43	24.97	455.76				413.33			42.43	455.76
		LEARNING DEVELOP	Provide Safety & Health Serv	3,953.70	920.70	541.60	5,416.00				4,495.30			920.70	5,416.00
		SAFETY SERVICES	Provide Safety & Health Serv	29,003.74	6,656.69	3,915.84	39,576.27				32,919.58			6,656.69	39,576.27
	AG0271	INSURANCE	U.S. Insurance-Liability	838,236.55	230,223.94	103,347.30	1,171,807.79	941,583.65				230,223.94			1,171,807.79
	AG0273	INSURANCE	U.S. Insurance-Workers Comp	84,049.63	19,572.37	11,513.55	115,135.55	95,563.18				19,572.37			115,135.55
	AG0275	INSURANCE	U.K. Insurance-Liability	794,451.58	184,998.57	108,825.43	1,088,275.58	903,277.01				184,998.57			1,088,275.58
	AG0276	INSURANCE	U.K. Insurance-Property	76,207.51	17,745.72	10,439.02	104,392.25	86,646.53				17,745.72			104,392.25
	AG0281	CLAIMS	Claims-Liability - Excl. Auto	30,219.24	4,176.47	159.25	34,554.96		30,378.49				4,176.47		34,554.96
	AG0282	US. TREASURY	Claims-Liability - Auto Only	(10,858.39)	(75.00)		(10,933.39)		(10,658.39)				(75.00)		(10,733.39)
		CLAIMS	Claims-Liability - Auto Only	2,783.93	219.54		3,003.47		2,783.93				219.54		3,003.47
	AG0283	CLAIMS	Claims-Accrual (Reserve)	751,980.00	175,120.00	103,020.00	1,030,120.00		655,000.00			175,120.00			1,030,120.00
	AG0289	INSURANCE	Claims Group-Dept Operations	3,044.96	685.45	301.48	4,031.89		3,346.44				685.45		4,031.89
		CLAIMS	Claims Group-Dept Operations	112.80	26.27	15.45	154.52			128.25			26.27		154.52
00099 Total				2,605,313.37	640,671.73	342,314.82	3,588,299.92	2,027,070.57	880,978.72	39,578.90	452,540.60	180,152.73	7,978.40	3,588,299.92	*****
Grand Total				12,916,837.81	1,928,534.69	1,626,769.16	16,469,961.66	4,684,872.91	9,810,820.44	57,733.62	966,687.43	947,725.88	12,121.38	*****	*****

NMPC  
Summary of Claims and Insurance Premiums  
Charged in Expense type 400 to Company 36  
By Electric and Gas

Injuries and Damages  
HTY ending Sept 30, 2008

Fiscal Yr	(All)
Regulatory Acct Des	(All)
Regulatory Acct	(All)
Business Unit	00036
Jrnl Id	(All)
Expense Type	400
Chrg Dept L3	(All)
Chrg Dept L2	(All)

Sum of Posted Jrnl \$				Segment				Electric			Gas			Total
Orig Business Unit	Activity	Chrg Dept L4	Activity Descr	DIST	GAS	TRAN	Grand Total	Costs associated with Insurance	Costs associated with Claims	Costs associated with All Other	Costs associated with Insurance	Costs associated with Claims	Costs associated with All Other	
00005	AG0485	INTEGRATED HEALTH	Provide Safety & Health Serv	191.63	44.63	26.25	262.51			217.88			44.63	262.51
				(191.63)	(44.63)	(26.25)	(262.51)			(217.88)			(44.63)	(262.51)
	AG0281	SAFETY SERVICES	Provide Safety & Health Serv	(316.50)			(316.50)		(316.50)					(316.50)
		CLAIMS	Claims-Liability - Excl. Auto											
00005 Total				(316.50)	-	-	(316.50)	-	(316.50)	-	-	-	-	(316.50)
00036	AG0235	LEGAL SERVICES	General Legal Claims	23,481.13			23,481.13		23,481.13					23,481.13
	AG0485	CUST_OPERATIONS	Provide Safety & Health Serv	1,205.86	167.24	98.38	1,471.48			1,304.24			167.24	1,471.48
		INTEGRATED HEALTH	Provide Safety & Health Serv	8,488.51	1,551.92	912.89	10,953.32			9,401.40			1,551.92	10,953.32
		NETWORK STRAT ELEC	Provide Safety & Health Serv	43.80	10.20	6.00	60.00			49.80			10.20	60.00
		SAFETY SERVICES	Provide Safety & Health Serv	11,178.06	1,805.08	1,061.81	14,044.95			12,239.87			1,805.08	14,044.95
	AG0271	INSURANCE	U.S. Insurance-Liability	(277,702.09)	(129,540.00)	(39,697.39)	(446,939.48)	(317,399.48)			(129,540.00)			(446,939.48)
	AG0276	INSURANCE	U.K. Insurance-Property	274,328.38	169,304.97	99,591.16	543,224.51	373,919.54			169,304.97			543,224.51
	AG0281	CUST_OPERATIONS	Claims-Liability - Excl. Auto	7,128.94	647.59		7,776.53		7,128.94			647.59		7,776.53
		OPS & CONSTRUCT-NY	Claims-Liability - Excl. Auto		135.00		135.00					135.00		135.00
		US TREASURY	Claims-Liability - Excl. Auto	5,575.86	506.83	298.14	6,380.83		5,874.00			506.83		6,380.83
		CLAIMS	Claims-Liability - Excl. Auto	#####	64,226.26	4,030.80	1,429,277.30		#####			64,226.26		#####
	AG0282	CUST_OPERATIONS	Claims-Liability - Auto Only		650.00		650.00					650.00		650.00
		CLAIMS	Claims-Liability - Auto Only	221,504.43	21,502.15	24.90	243,031.48		221,529.33			21,502.15		243,031.48
	AG0283	CLAIMS	Claims-Accrual (Reserve)	#####	65,000.00	(500,000.00)	3,533,970.32		#####			65,000.00		#####
	AG0289	INSURANCE	Claims Group-Dept Operations	129.20	6.80	4.00	140.00					6.80		140.00
		CLAIMS	Claims Group-Dept Operations	832.20	193.80	114.00	1,140.00					193.80		1,140.00
	AG1050	REWARDS OE LABOR R	Claims	(9,934.50)	(2,313.51)	(1,360.89)	(13,608.90)		(11,295.39)			(2,313.51)		(13,608.90)
00036 Total				#####	193,854.33	(434,916.20)	5,355,188.47	56,520.06	#####	22,995.31	39,764.97	150,554.92	3,534.44	#####
00048	AG0281	CLAIMS	Claims-Liability - Excl. Auto	(16,811.95)			(16,811.95)					(16,811.95)		(16,811.95)
00048 Total				(16,811.95)			(16,811.95)					(16,811.95)		(16,811.95)
00099	AG0485	CONSTRUCT DELIVERY	Provide Safety & Health Serv	12.57	2.93	1.72	17.22			14.29			2.93	17.22
		CORPORATE COMM	Provide Safety & Health Serv	2,270.25	528.73	311.00	3,109.98			2,581.25			528.73	3,109.98
		CUST_OPERATIONS	Provide Safety & Health Serv	4,436.04	911.96	536.44	5,884.44			4,972.48			911.96	5,884.44
		ENERGY SOLUTION SER	Provide Safety & Health Serv	969.85	225.85	132.85	1,328.55			1,102.70			225.85	1,328.55
		INTEGRATED HEALTH	Provide Safety & Health Serv	978.63	(50.55)	(29.73)	898.35			948.90			(50.55)	898.35
		LEARNING DEVELOP	Provide Safety & Health Serv	1,030.65	240.00	141.18	1,411.83			1,171.83			240.00	1,411.83
		REWARDS OE LABOR R	Provide Safety & Health Serv	34.04	7.93	4.66	46.63			38.70			7.93	46.63
		SAFETY SERVICES	Provide Safety & Health Serv	44,867.81	8,137.87	4,912.45	57,918.13			49,780.26			8,137.87	57,918.13
	AG0271	INSURANCE	U.S. Insurance-Liability	#####	523,003.99	263,529.91	2,710,273.65	#####			523,003.99			#####
	AG0273	INSURANCE	U.S. Insurance-Workers Comp	788,916.29	183,720.30	108,070.73	1,080,707.32	896,987.02				183,720.30		#####
		REWARDS OE LABOR R	U.S. Insurance-Workers Comp	-	-	-	-					-		-
	AG0275	INSURANCE	U.K. Insurance-Liability	589,573.66	137,305.97	80,766.88	807,646.51	670,340.54			137,305.97			807,646.51
	AG0276	INSURANCE	U.K. Insurance-Property	681,487.86	158,699.79	93,353.29	933,540.94	774,841.15			158,699.79			933,540.94
	AG0279	INSURANCE	Insurance Group-Dept Operat	18.39	4.28	2.52	25.19	20.91			4.28			25.19
	AG0281	CLAIMS	Claims-Liability - Excl. Auto	9,301.19	1,654.58		10,955.77		9,301.19			1,654.58		10,955.77
	AG0282	CLAIMS	Claims-Liability - Auto Only	4,414.95			4,414.95							4,414.95
	AG0283	CLAIMS	Claims-Accrual (Reserve)	22,559.40	5,253.60	3,090.60	30,903.60		25,650.00			5,253.60		30,903.60
	AG0289	INSURANCE	Claims Group-Dept Operations	1,214.08	243.55	120.81	1,578.44		1,334.89			243.55		1,578.44
		CLAIMS	Claims Group-Dept Operations	338.19	76.37	34.66	449.22		372.85			76.37		449.22
	AG1050	REWARDS OE LABOR R	Claims	9,934.50	2,313.51	1,360.89	13,608.90		11,295.39			2,313.51		13,608.90
00099 Total				#####	#####	556,340.86	5,664,719.62	#####	52,369.27	60,610.41	#####	9,541.61	10,004.72	#####
00431	925010	INSURANCE	Om-A&G-Empl Inj&Dam	22,897.52	6,361.07	3,532.63	32,791.22	26,430.15				6,361.07		32,791.22
00431 Total				22,897.52	6,361.07	3,532.63	32,791.22	26,430.15				6,361.07		32,791.22
Grand Total				#####	#####	124,957.29	11,035,570.86	#####	#####	83,605.72	#####	143,264.56	13,536.16	#####

Date of Request: March 10, 2010  
Due Date: March 22, 2010

Request No. AAE-14  
NMPC Req. No. NM 200 DPS 130

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Allison Esposito

TO: Revenue Requirement Panel

Request:

1. Pages 79-80 of the Revenue Requirements Panel testimony discuss the Company's inclusion of non-utility plant costs in the SIR deferral account. Please provide a list of non-utility properties for which the Company has included remediation costs in the SIR deferral. For each property, please provide the following:

- A. The location of the property
- B. The total amount of costs that have been included in the SIR deferral, broken out by expense type and acquisition cost.
- C. The specific wording within each Commission Order that allows the Company to defer these incremental costs associated with remediation including current O&M and remediation.
- D. The cost/benefit analysis showing that the reduction in overall remediation expenses associated with the purchase exceed the costs of the purchase and on-going remediation and maintenance of the property.

2. Page 79, lines 16-17 of the RRP testimony state that certain non-utility remediation costs were included in the SIR deferral account "pursuant to agreements with Staff." Please fully explain what these agreements with Staff are and when they were reached. In addition, please provide copies of every such agreement.

Response:

Responses to Items 1.A, 1.B, and 1.D are provided by site below.

1. C. For clarity and in reference to SIR projects, O&M is a technical term which refers to "Operations and Maintenance" of a site remedy after remediation is completed (sampling, repair of soil caps, maintenance of groundwater treatment systems, etc.) rather than accounting terminology.

The Commission Order allows recovery of costs associated with site investigation and remediation. Pursuant to environmental laws and Orders on Consent with the NYS DEC and US EPA, Niagara Mohawk is required to address contamination associated with former utility operations, regardless of where the contamination is currently located. For example, former MGP plants operated by Niagara Mohawk and its predecessors operated in a period spanning the 1840's to 1960's. The formerly owned properties were either sold after the plants were decommissioned or were converted to other utility use, such as gas regulator stations, operations centers, etc. Contamination from the plants may have migrated onto adjacent properties or water bodies; were transported to remote locations; and/or were deposited on other properties, or water bodies. Therefore, Niagara Mohawk is required to address contamination from the former MGP operations located on property owned by Niagara Mohawk (utility and non-utility property), as well as property not owned by Niagara Mohawk.

During the investigation of a property that is not owned by Niagara Mohawk, the property is initially evaluated (following soil and/or water sampling results) to determine if the current use can be maintained. The NYS DEC has generic concentration thresholds that are protective of industrial, commercial, restricted residential, and unrestricted residential use. If the sampling indicates that concentrations in excess of unrestricted use are attributable to former MGP operations, the future (or current) property use will need to be restricted. Property owners are often either unwilling to place deed restrictions on their property (as required by the NYS DEC in the event that impacted material will remain following remediation), or unable to, considering the current property use (i.e., existing residence). Since the Company has no legal power to enforce a deed restriction on an unwilling property owner, the Company must remediate the site to unrestricted use levels. In those situations, a purchase analysis is conducted to determine if it is cost effective to purchase the property from the owner, and remediate the site to a lower cleanup level (such as commercial or industrial), or to compensate the property owner (typically the property value) to maintain a deed restriction on the land.

#### 1. A, B, and D

The non-utility properties listed, for which the Company has charged related remediation costs in the SIR deferral, are listed below along with responses to questions A., B., and D. The total costs that have been included in the SIR deferral are listed below by Expense Type for each non-utility property, and are total deferral costs-to-date charged to the SIR site. The Company tracks SIR spending by site, not by individual parcels of land within the site.

##### Cohoes

A. Address: 0 Linden Street

B. Costs: Acquisition cost \$442,577

Deferral Costs: See Attachment - "Site Expense Type Totals Report.xls"

D. Purchase Analysis: See Attachment - "Site Expense Type Totals Report.xls"

##### Fort Edward

- B. Cost: Acquisition cost \$70,000  
Deferral Costs: See Attachment - "Site Expense Type Totals Report.xls"
- D. Purchase Analysis: See attached

Rome (Kingsley Ave)

- A. Address: Voci and Vecchio Properties, adjacent to the site
- B. Cost: Acquisition costs: \$80,000 (Voci) and \$74,000 (Vecchio) respectively.  
Note: The recent Vecchio property purchase cost is currently residing in the SIR deferral, and is temporarily included in the SIR Rome (Kingsley Ave) spending total. A copy of the JE Request to move this cost to FERC 121000 is attached.  
Deferral Costs: See Attachment - "Site Expense Type Totals Report.xls"
- D. Purchase Analysis: See attached

Rome (Jay & Madison) MGP

- A. Address: Woodrow Avenue
- B. Cost: Acquisition cost \$190,000  
Deferral Costs: See Attachment - "Site Expense Type Totals Report.xls"
- D. Purchase Analysis: See attached

Saratoga Springs

- A. Address: Excelsior Avenue
- B. Cost: Acquisition cost \$1,003,000  
Deferral Costs: See Attachment - "Site Expense Type Totals Report.xls"
- D. Purchase Analysis: Due to the presence of contamination relating to past MGP operations, Niagara Mohawk was required to remediate the property. The property was purchased in order to lower the cleanup standards to commercial standards (agreed to by US EPA) and enable Niagara Mohawk to retain control of the property during the remedial program versus a more expensive remedy which would have involved cleanup to residential standards had the property not been purchased.

Note D: For those sites identified above, the purchase analysis documentation is provided as Attachment "PSC AAE-14 Item 1 Cost-Benefit.pdf".

2. The "agreements with Staff" mentioned in the RRP testimony in connection with certain non-utility remediation costs included in the SIR deferral account refer to the following:

1993 Final Commission Order

In the 1993 Final Commission Order (cases 93-G-0162, 93-E-0376, and 93-E-0378) it is stated "Judge Lynch endorsed staff's proposal that Niagara Mohawk be required in all future rate cases to justify affirmatively in pre-filed direct testimony and exhibits the recovery of site investigation and remediation (SIR) costs for non-utility (also known as "other physical property") sites."

November 6, 2003 meeting with PSC staff and Email Correspondence Spanning June 2004 through April 2008

In the November 2003 meeting, Niagara Mohawk identified its legal obligations to remediate contaminated sites and requested PSC Staff guidance as to which property purchase costs should be included in the deferral. The email correspondence presents a dialogue between Niagara Mohawk and PSC staff, culminating with a suggestion regarding land purchases for the SIR program and use of the deferral for those purchases. In summary, the April 21, 2008 email from Mr. Visalli to Mr. Fletcher suggests that the Company put "qualifying" land costs in the SIR deferral. Mr. Visalli also goes on to suggest that along with each purchase, that a cost/benefit analysis be documented (and therefore in the Company's opinion based on cost effectiveness is deemed a qualifying cost).

An excerpt of the 1993 Final Commission Order (relating to the statement above) the above-referenced emails between Niagara Mohawk and PSC Staff are provided in Attachment "PSC AAE-14 Item 2 Agreement.pdf".

Name of Respondent:

Brian Stearns  
Michael Bogan

Date of Reply:

March 22, 2010





Rome (Sentinel)  
Niagara Mohawk Power Company  
d/b/a National Grid  
Case 10-E-0050  
Attachment AAE-14 Item 1 Cost Benefit  
Page 67 of 68

David H. King  
Executive Director, Environmental Affairs

Phone: (315) 428-5127  
FAX: (315) 428-3549  
E-mail: kingD@nimo.com

September 23, 1998

Mr. George B. Waters  
President and Editor  
Rome Sentinel Company  
333 W. Dominick Street  
P.O. Box 471  
Rome, N.Y. 13440-0471

***Re: Proposed AutoZone, Inc. Redevelopment Project on Rome Sentinel Property***

Dear Mr. Waters:

I have been asked to respond to your letter of September 10, 1998 letter to Mr. William Davis, Chairman and CEO of Niagara Mohawk, regarding the above-referenced project.

It is unfortunate that Rome Sentinel's property has been impacted by residual byproducts or constituents associated with the former coal gas manufacturing plant (MGP) which operated many decades ago on Niagara Mohawk's adjacent property. As you may be aware, this former MGP site is one of twenty-three such sites located within my company's service territory which are subject to a multi-site Order on Consent with the New York State Department of Environmental Conservation (NYSDEC).

As is the case for most of Niagara Mohawk's other MGP sites, this former Rome MGP site is subject to an ongoing site investigation effort which, depending upon the results of investigations, remedial evaluations, and reviews by affected landowners, the public, and the NYSDEC/New York State Department of Health (NYSDOH), will likely lead to remedial actions. Please be assured that we have attempted to expedite the traditional regulatory process in order to support AutoZone, Inc.'s proposed redevelopment of Rome Sentinel's property.

The NYSDEC provided us with comments on our proposed Interim Remedial Measures Excavation Plan for Rome Sentinel's property on September 15, 1998. We will share these comments with your legal counsel, Ms. Doreen Simmons, Esq. of Hancock & Estabrook, quickly respond to the NYSDEC, finalize the work plan, and competitively procure the services of a remedial contractor to implement the plan. If we receive timely approval of these plans, we should be able to perform the excavation work at your property in mid- to late October, 1998.

In an attempt to further address Rome Sentinel's and AutoZone, Inc.'s concerns about the environmental impacts identified on your property, we asked the NYSDEC (via a July 20, 1998 letter) to issue a letter indicating that the NYSDEC will rely upon our commitment (and obligations) to address MGP contamination on the subject property and hold harmless Rome Sentinel or the prospective purchaser.

Even after we perform the proposed excavation activities, some residual groundwater contamination will likely remain on the property and, per NYSDEC requirements, the site will be subjected to long-

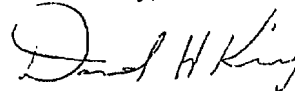
George B. Waters  
Rome Sentinel Company  
September 23, 1998  
Page 2

term monitoring, deed restrictions, and, as required, potential additional remedial actions aimed at addressing groundwater contamination. AutoZone, Inc. or any other prospective owners of this property would need to adhere to deed restrictions on the property to prevent potential future use of site groundwater and residential use. This should not technically nor legally prohibit AutoZone, Inc.'s proposed commercial use of this property. This situation is similar to those experienced by the developers of most brownfield sites.

At the close of your letter to Mr. Davis, you suggested that "There should be no further delay in the purchase of it..." (your property) "...by NMPC plus reimbursement of our legal and other costs." Neither Rome Sentinel nor your counsel has made any prior, formal requests for Niagara Mohawk to purchase your property. Should Rome Sentinel wish to pursue such a transaction, we are willing to consider it on the basis of achieving fair and reasonable economic and legal terms, and on the basis of continuing to promote the property's redevelopment by AutoZone, Inc. or by some other commercial developer. Should Rome Sentinel not desire to pursue such a transaction with Niagara Mohawk, we will continue to respond to your concerns and to promote the proposed redevelopment effort the very best that we can.

To move this process forward, I suggest that you have your counsel call Mr. Charles Sullivan, Esq. of the NYSDEC and Niagara Mohawk's Mr. William Weiss, Esq. to discuss how best to continue promoting AutoZone, Inc.'s proposed project at your property.

Sincerely,



David H. King  
Executive Director, Environmental Affairs

JAN-06-95 FRI 16:21

NMPC ENVIRO AFFAIRS

FAX NO. 315 428 3549

P.02

*Final Commission Order*

CASES 93-G-0162, 93-E-0376, and 93-E-0378

Henceforth, Niagara Mohawk will have the same obligation as other New York utilities to quantify how implementation of management audit recommendations has affected rate year revenue requirement.<sup>1</sup>

Site Investigation and Remediation Cost

Judge Lynch endorsed staff's proposal that Niagara Mohawk be required in all future rate cases to justify affirmatively in prefiled direct testimony and exhibits the recovery of site investigation and remediation (SIR) costs ~~for~~<sup>for</sup> ~~non-utility sites~~<sup>also known as "other physical property" sites</sup>.<sup>2</sup> He also agreed with Niagara Mohawk that SIR costs for these sites should be recovered in full when the property is actually used for utility purposes, even if it is otherwise recorded on the company's books. Finally, the Judge recommended against CPB's proposal that Niagara Mohawk be required to absorb 20% of all SIR costs.<sup>2</sup>

Niagara Mohawk asks for clarification that it will be required only to file such documentation as is reasonably available to it at the time of its rate case filing and that

<sup>1</sup> See Cases 92-E-1055 et al., Central Hudson Gas & Electric Corporation - Rates, Opinion No. 94-3 (issued February 11, 1994), mimeo p. 66 and Case 93-G-0002, Long Island Lighting Company - Rates, Opinion No. 92-23 (issued December 23, 1993), mimeo p. 31.

<sup>2</sup> R.D., pp. 105.

**Willard, Charles F.**

---

**From:** Fletcher, James J.  
**Sent:** Thursday, June 03, 2004 3:42 PM  
**To:** Willard, Charles F.  
**Subject:** RE: SIR property purchases

No. I would keep a copy of the email that I copied Bob on. If he has a concern he should express it upon receiving the e-mail.

-----Original Message-----

**From:** Willard, Charles F.  
**Sent:** Thursday, June 03, 2004 9:33 AM  
**To:** Fletcher, James J.  
**Subject:** RE: SIR property purchases

Jim,

Will we receive anything in writing back from Bob? If so, any idea on timing?

Chuck

-----Original Message-----

**From:** Fletcher, James J.  
**Sent:** Wednesday, June 02, 2004 9:53 AM  
**To:** Willard, Charles F.  
**Cc:** 'denise\_gerbsch@dps.state.ny.us'; robert\_visalli@dps.state.ny.us  
**Subject:** RE: SIR property purchases

Talked to Bob Visalli. He said that the Staff agreed with the idea of purchasing sites to mitigate clean up costs, as long as the purchase is cost justified.

-----Original Message-----

**From:** Willard, Charles F.  
**Sent:** Wednesday, May 26, 2004 8:19 AM  
**To:** Fletcher, James J.  
**Subject:** SIR property purchases

Jim,

Any word back from the PSC regarding the purchase of property by SIR? We are currently evaluating the purchase of two properties.

Chuck

**Stearns, Brian M.**

**Subject:** FW: land purchases for the SIR program / SIR deferral

---

**From:** robert\_visalli@dps.state.ny.us [mailto:robert\_visalli@dps.state.ny.us]  
**Sent:** Monday, April 21, 2008 10:34 AM  
**To:** Fletcher, James J.  
**Cc:** Willard, Charles F.; denise\_gerssch@dps.state.ny.us  
**Subject:** RE: land purchases for the SIR program / SIR deferral

Jim,

Sorry for the delays. I think part of the delay is that we are not really sure what you are looking for from us. If it's for some kind of blanket pre-approval that all future land purchases for the SIR program are "good" deferral \$\$\$ and not subject to future audit and possible disallowance, I don't think that will happen. I also don't think the Company or Staff wants a petition filed every time the Company wants to purchase land for SIR program purposes.....my suggestion is for the Company to just put "qualifying" land costs in the SIR deferral, and either attach the cost/benefit as part of that month's Attachment 11 filing or simply provide us the cost/benefit analysis separate from the Attachment 11 filing but at the same time the costs are recorded in the deferral account.

Personally, I think the timing of each cost/benefit analysis is important. I think it would be problematic for the Company to wait to see if we ask for the cost/benefit analyses as part of some future SIR deferral account audit, and, if we do, then the Company puts together some sort of cost/benefit analysis after the fact for these land purchases. Again, just an observation / suggestion.

Bottom line is that the Company has the burden of proof to show that each such purchase of land included in the SIR deferral account is cost beneficial. As such, the Company should do whatever it believes is the best course of action to protect its interests / investments.

Bob V

"Fletcher, James J."  
<James.Fletcher@us.ngrid.com>

To <denise\_gerssch@dps.state.ny.us>

cc <robert\_visalli@dps.state.ny.us>, "Willard, Charles F." <Charles.Willard@us.ngrid.com>

04/19/2008 08:39 PM

Subject RE: land purchases for the SIR program / SIR deferral

I know everyone is much busier than we should be, and I'm trying not to be a pest - any word?

---

**From:** Fletcher, James J.  
**Sent:** Wednesday, April 09, 2008 9:32 AM  
**To:** 'denise\_gerssch@dps.state.ny.us'  
**Cc:** 'robert\_visalli@dps.state.ny.us'; Willard, Charles F.  
**Subject:** RE: land purchases for the SIR program / SIR deferral

I believe the last time this was discussed, you were going to talk to Jane about how to proceed. If this is correct, can you bring us up to speed?

---

**From:** Fletcher, James J.  
**Sent:** Monday, March 10, 2008 10:28 AM  
**To:** 'denise\_gerssch@dps.state.ny.us'  
**Cc:** 'robert\_visalli@dps.state.ny.us'; Willard, Charles F.  
**Subject:** RE: land purchases for the SIR program / SIR deferral

03/15/2010

We purchased 3 properties for \$624K. See my SIR analysis (the Excel spreadsheet)> Go to the tab called "prop pur". Two of the purchases were removed from the deferral, as shown on this tab. They were removed because in NE, they don't record purchases into a deferral, until the land is sold. A purchase of \$65K remained in the deferral but should have been removed since my analysis.

I would like to talk about this. This issue is due to my inexperience in regulatory matters. As you can see from the attached email, I had the impression that we had "permission" to utilize this strategy. Since we talked several weeks ago, I contacted Rob Hoaglund, and asked him to talk to Jane about a potential filing. Jane was on vacation when I had this conversation.

Let me know when you want to talk.

---

**From:** denise\_gerbsch@dps.state.ny.us [mailto:denise\_gerbsch@dps.state.ny.us]  
**Sent:** Friday, March 07, 2008 4:15 PM  
**To:** Fletcher, James J.  
**Cc:** robert\_visalli@dps.state.ny.us  
**Subject:** land purchases for the SIR program / SIR deferral

I'm looking over JEs now, and I came across this JE. We need to discuss this, as I'm not aware that you were given permission from the PSC to do land purchases as part of your SIR program / SIR deferral. Mike Bogan's e-mail dated 1/26/2007 indicates the company had recently received approval from the PC to charge SIR land purchases to the deferral. I don't know how many of these land purchases you have done, you might want to find out.

Denise A. Gerbsch  
Office of Accounting, Finance and Economics  
NYS Dept of Public Service  
300 Erie Blvd West  
Syracuse, NY 13202  
Office: (315) 428-5308  
Fax: (315) 428-5460  
e-mail: denise\_gerbsch@dps.state.ny.us

\*\*\*\* For your information: KeySpan is now part of National Grid.\*\*\*\*

\*\*\*\*\*

This e-mail and any files transmitted with it, are confidential to National Grid and are intended solely for the use of the individual or entity to whom they are addressed. If you have received this e-mail in error, please reply to this message and let the sender know.

Date of Request: March 10, 2010  
Due Date: March 22, 2010

Request No. RAV-55  
NMPC Req. No. NM 202 DPS 132

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Rate Design, Customer and Markets Panel

Request:

Per Exhibit RDCM-4, Schedule 1, historic test year late payment charges (LPCs) were \$15,093,100 and service classification (SC) revenues were \$2,856,854,394. This results in an historic test year LPC:SC revenue ratio of 0.005283. Per Exhibit RDCM-4, Schedule 2, rate year 2011 LPCs are only forecasted to be \$14,579,172 despite the fact that SC revenues are forecasted to increase to \$3,046,063,116. This results in a rate year LPC:SC revenue ratio of only 0.004786.

A. Fully explain why the Company has assumed LPC will decline by 3.4% from the historic test year to the rate year even though SC revenues are forecasted to increase by 6.6% from the historic test year level to the rate year level.

1. Is the Company assuming customer will pay their bills in a more timely manner? If so, what is the basis for this assumption and what is the expected rate year cash flow enhancement?
2. Is the Company making some kind of normalization adjustment to the historic test year LPCs? If so, fully explain what the normalization adjustment is, why it is needed and provide documentary support from the Company's books which quantify the amount of the normalizing adjustment.

B. Fully explain why the rate year 2011 LPC forecast should not be 6.6% higher than the historic test year amount (\$16,089,244 versus \$15,093,100) considering SC revenues are forecasted to increase by 6.6% from the historic test year level to the rate year level.

C. Fully explain why the Company's 2012 LPC forecast on Exhibit RDCM-4, Schedule 3 increases from 2011 forecasted levels by the % increase in 2012 forecasted SC revenues over 2011 forecasted SC revenues, while the same relationship does not hold true for: (1) 2011 LPCs (i.e., by the % increase in 2011 forecasted SC revenues over historic test year SC revenues); or, depending on your answer to part A, (2) 2011 LPCs (i.e., by the % increase in 2011 forecasted SC revenues over normalized historic test year SC revenues).

Response:

A&B The historic test year LPC:SC revenue ratio is equal to .004786 as shown on Exhibit\_\_\_\_RDCM-4, Schedule 5, Sheet 7. This ratio was developed using (in \$000's) SC revenues of \$2,834,349.1 as shown in Exhibit\_\_\_\_RLW-5, plus Purchase of Receivables (POR) of \$287,904.5 as shown in Exhibit\_\_\_\_RLW-5, for total revenue of \$3,122,253.7 as shown in Exhibit\_\_\_\_RDCM-4, Schedule 5, Sheet 7.

C The SC revenues shown in Exhibit\_\_\_\_RDCM-4, Schedule 1 in the amount of \$2,856,854,394 include disputed station service and Borderline revenues, whereas, the SC revenues used to calculate the historic test year LPC:SC revenue ratios does not include disputed station service or Borderline revenues. The disputed station service revenues are not included in the calculation of the LPC:SC revenue ratio because although the Company was still billing these accounts during the historic test year, a monthly journal entry reversed both principal and late payment charges associated with these accounts. The borderline revenues are not included in the calculation of the LPC:SC revenue ratio because these revenues are deemed to be fully collectible by the Company. The historic test year revenues compared to the 2011 forecast revenues shown on Attachment A, increased by 7.47%, at the same rate as LPC's increased. The forecast LPCs for rate years 2012 and 2013 increased by 1.2% and 1.75%, respectively, at the same rate as revenues increased, as shown on Attachment A.

Name of Respondent:  
Pamela B. Dise

Date of Reply:  
March 22, 2010



NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID  
Historical Test Year Ending September 30, 2009 and Rate Year Ending 12/31/11, 2012, 2013  
Miscellaneous Revenue - Late Payment Charges  
(\$000's)

Line	Late Payment Charges	Source Ref.	Test Year Ending Sep 30, 2009	Normalized Adjustments	Rate Year Ending 2011	Normalized Adjustments	Rate Year Ending 2012	Normalized Adjustments	Rate Year Ending 2013
1	Total Electric Retail Revenue (excl Disp Station Svc)		\$ 2,834,349.1	\$ 211,713.6	\$ 3,046,062.7	\$ 34,155.6	\$ 3,080,218.3	\$ 53,789.1	\$ 3,134,007.4
2	ESCO Electric Commodity Revenue		\$ 287,904.5	\$ (287,904.5)	\$ -	\$ -	\$ -	\$ -	\$ -
3	Total		\$ 3,122,253.7	\$ (76,190.9)	\$ 3,046,062.7	\$ 34,155.6	\$ 3,080,218.3	\$ 53,789.1	\$ 3,134,007.4
4	Late Payment Charges (Less Disp Station Svc)		\$ 14,943.8	\$ (364.7)	\$ 14,579.2	\$ 163.5	\$ 14,742.6	\$ 257.4	\$ 15,000.1
5	LPC adjustments disputed Station Svc		\$ 149.2	\$ (149.2)	\$ -	\$ -	\$ -	\$ -	\$ -
6	Total		\$ 15,093.1	\$ (513.9)	\$ 14,579.2	\$ 163.5	\$ 14,742.6	\$ 257.4	\$ 15,000.1
7	LPC as a % of retail revenues (including ESCO Commodity)		0.4786%		0.4786%		0.4786%		0.4786%
8	Total Electric Retail Revenue (excl Disp Station Svc)		\$ 2,834,349	\$	\$ 3,046,063	\$	\$ 3,080,218	\$	\$ 3,134,007
9	LPC re: Electr Retail Revenues		\$ 13,566	\$	\$ 14,579	\$	\$ 14,743	\$	\$ 15,000
10	% Difference in Revenues				7.47%		1.12%		1.75%
11	% Difference in LPC's				7.47%		1.12%		1.75%

Date of Request: March 11, 2010  
Due Date: March 22, 2010

Request No. CVB-8  
NMPC Req. No. NM 223 DPS 134

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Christian Bonvin

TO: Infrastructure and Operations Panel

Request:

1. For each inspection code contained in the tables in Exhibit \_\_IOP-14, Schedule 1, pages 308 through 315, please indicate whether the repair is typically capitalized or expensed.
2. Please explain how the information provided in response to the previous question supports the following statements made in the Infrastructure Panel Testimony:
  - Level II deficiencies, which must be addressed within 12 months of identification, are expected to lead to remediation efforts which will be more evenly balanced between expense activities and capital expenditures (page 213 line 20).
  - Typically, Level III-type of situations would be less likely to be addressed through maintenance activities, and instead more likely to be remedied through capital expenditures (page 214 line 8).
3. Please provide the actual O&M expenses incurred for repairs made in response to the inspection findings listed in the tables in Exhibit \_\_IOP-14, Schedule 1, pages 308 through 315, and the number of findings addressed. The expenses and number of repairs should be separated for level I, level II and level III activities.
4. Please provide the workpapers for how the Company determined the forecasted incremental expense levels indicated in Exhibit IOP-8, Schedule 1.

Response:

- 1) See attachment 1 (CVB-8\_Attach 1\_Inspection Code Expense Type) for a listing of the maintenance codes and the default capital or expense charge type.
- 2) The majority of Level II items found typically have 1 year time frame to perform the maintenance, whereas level III items have a 3 year time frame. Most of the larger capital items such as pole or transformer replacements are captured as a Level 3. The inspection

system is designed such that when replacing a pole all the expense items captured at that pole location will automatically be closed out when the pole is replaced.. For example in Exhibit \_\_ (IOP-14) Schedule 1, Sheet 310 of 315 in the overhead distribution table we have collected 909 poles to be replaced as Level 2 and 3,990 as Level 3. This example supports the statement that Level 3 derives more capital work when compared to level 2, which results in a higher percentages of level 3 expenses being capitalized.

3) The actual O&M expenses incurred for repairs made in response to the inspection findings listed on the tables in Exhibit \_\_ IOP-14 Schedule 1 are shown in the table below. Please refer to attachment 2 (CVB-8\_Attach 2\_completed repair to date for items in Exhibit IOP\_14) for the number of repairs completed. The O&M cost corresponds to all Level II and Level III repairs completed as of 03/14/2010 for all the inspection findings between 12/01/2008 – 08/10/2009. Please note that some of Level III work automatically rolls into a Level II if both priorities are at the same locations except for street light bonding code, which will impact the actual cost Level II repairs. Level I repairs are carried out under Damage/Failure blanket projects and are not tracked or budgeted separately.

	Priority	Actual Operating Expenses
Distribution OH	Level 2	\$1,060,026
	Level 3	\$1,344,491
<b>Distribution OH IM Total</b>		<b>\$2,404,517</b>
Underground	Level 2	\$179,408
<b>Underground IM Total</b>		<b>\$179,408</b>
Sub-Transmission	Level 2	\$3,285
<b>Sub-Transmission IM Total</b>		<b>\$3,285</b>
<b>Grand Total</b>		<b>\$2,587,210</b>

4) Please refer to attachment 3 (CVB-8\_Attach 3\_NY Expense Estimates Work Paper) for the forecasted incremental expense levels provided in Exhibit \_\_ (IOP-8), Schedule 1. The strategy estimate plan was developed in 2009 with the Level III scheduled as shown in table1 in Attachment 3. As part of a recent budget revaluation, the Level III work plan schedules have changed based on actual costs, work plan and forecast, which was submitted in data request NM 183 DPS 113 RAV-46 for austerity measures.

Name of Respondent:  
John Gavin

Date of Reply:  
March 21, 2010

## CVB-8

## Attachment 1

Note: Some codes such as damaged handholes will be assigned to the local design group for evaluation and an expense or capital order can be created at that time.

code	Description	Exp/Cap
98	Street Light Hazard Condition	E
99	Street Light - Not Bonded	E
100	Street Light - Not Bonded to Standards	E
101	Pole - Osmose Priority	C
102	Pole - Osmose Reject	C
103	Pole - Down Ground & Rod Present	E
106	Pole - Double Wood - NG transfer req'd	C
107	Pole - Double Wood - Tel transfer req'd	C
108	Pole - Double Wood - CATV transfer req'd	E
110	Pole - Broken / Severely damaged	C
111	Pole - Visual rotting ground line	C
113	Pole - Cu Nap Treated Birth Mark Yr	C
114	Pole-Woodpecker Holes	C
115	Pole - Riser guard required	E
116	Pole - Visual rotting pole top	C
117	Pole - Leaning pole	E
118	Pole - Stencil / Correction Req'd	E
119	Pole - Birds nest (Osprey)	E
120	Crossarm - Damage arm	E
121	Crossarm - Loose/defective pins	E
122	Crossarm - Wooden pins 13.2 kv	E
123	Crossarm - Loose brace, hardware	E
124	Crossarm - Damage double crossarm	E
125	Crossarm - Damage alley arm	E
126	Crossarm - Wood Brace Required/BIL	E
127	Primary on Crossarm	E
130	Insulator - Broken/Cracked/Flashed	E
131	Insulator - Floating	E
132	Insulator-I-7 aluminum caps	E
133	Insulator - non standard for voltage	E
134	Insulator - AL cap assoc with switch/fus	E
135	Insulator - Covered Wire on Porcelain	E
139	Insulator - Other (use comments)	E
140	Primary - Insuff. grnd clearance	E
141	Primary - Dmgd. cond/brkn strands	E
142	Primary - Limbs on Primary	E
145	Primary - Damaged stirrups/Connector	E
146	Primary - Improper Sag	E
147	Primary - L.A. Missing Transition	E
148	Primary - L.A. Missing End of Line	E
149	Primary-LA Blown	E
150	Transformer - Oil weeping	C
151	Transformer - Bushings brkn/cracked	C
152	Transformer - Missing ground wire	E
153	Transformer - LA blown/missing/improper	E

155	Transformer - Animal guards required	E
156	Transformer - NonStd Installation of Gap	E
157	Transformer - Improper/missing Bond	E
160	Capacitor - Oil weeping	C
161	Capacitor - Bulging	C
162	Capacitor - Bushings brkn/cracked	C
163	Capacitor - Missing ground wire	E
164	Capacitor - Blown fuse	E
165	Capacitor - Improper/missing Bond	E
166	Capacitor - Animal Guard Missing	E
167	Capacitor - L.A.blown/missing/improper	E
168	Capacitor - Control Cab Height/ground	E
169	Capacitor - Out of Service	E
170	Regulator - Oil weeping	C
171	Regulator - Bushings brkn/cracked	C
172	Regulator - Missing ground wire	E
174	Regulator Control Cab. height/ground	E
175	Regulator - Improper/missing Bond	E
176	Regulator - Animal Guard Missing	E
177	Regulator - L.A. blown/missing/improper	E
180	Sectionalizer - oil weeping	C
181	Sectionalizer - Bushings brkn or crack	C
182	Sectionalizer - Missing ground wire	E
183	Sectionalizer - Control Cab Height/Grnd	E
184	Sectionalizer - Improper/missing bond	E
185	Sectionalizer - Animal Guard Missing	E
186	Sectionalizer - LA blown/miss/improper	E
190	Recloser - Oil weeping	C
191	Recloser - Bushings brkn or crack	C
192	Recloser - Missing ground wire	E
193	Recloser - Control Cab Height/Ground	E
194	Recloser - Improper/missing bond	E
195	Recloser - Animal Guard Missing	E
196	Recloser - L.A. blown/missing/improper	E
203	Switch - Gang Operated defective	C
204	Switch - Single phase defective	C
205	Switch - Improper/missing bond	E
207	Switch - L.A. blown/missing/improper	E
208	Switch - Handle Not Bonded	E
210	Ground - Ground wire broken/loose	E
211	Ground - Hazard condition	E
212	Ground - Guard Req'd	E
213	Ground - non standard	E
214	Ground - Not Bonded to Neutral	E
220	Guy - Guy Wire marker	E
221	Guy - Guy Insulator Required	E
222	Guy - Excessive slack in guy	E
223	Guy - Broken guy wire	E
225	Guy - non standard bonding or insulation	E
226	Anchor req'd - joint owned	E
227	Anchor req'd - sole NG	E
231	Secondary - limb on secondary	E

232	Secondary - Improper sag	E
234	Secondary - Floating	E
240	Service - Ins. loose from house	E
241	Service - limb on service	E
243	Service - non std or unsecured NG action	E
250	ROW - Brush/Tree/Washout	E
260	GIS map doesn't match field	E
261	GIS Pole/line numbering in error on GIS	E
262	GIS Equipment/hardware missing in GIS	E
263	GIS Equip removed in fld, remv from GIS	E
269	GIS Other GPS/GIS errors	E
270	Spacer Cable - Damaged/Missing spacer	E
271	Spacer Cable - Bracket Damage	E
272	Spacer Cable - Bracket not bonded	E
273	Spacer Cable - Messenger not bonded	E
274	Spacer Cable - Messenger Guard Missing	E
276	Spacer Cable - Uncovered Splice	E
280	Cutout - Defective cutout	E
281	Cutout - Potted Porcelain	E
282	Cutout - Banded Porcelain	E
283	Cutout - Enclosed	E
284	Cutout - Non Porcelain	E
285	Cutout-Potted Hybrid	E
286	Spur Tap - Not Fused	E
289	Cutout - Other - Use Comments	E
290	Riser - Improper cable support/terminate	E
291	Riser - Improper/missing bond	E
292	Riser - Animal Guard Missing	E
293	Riser - L.A. blown/missing/improper	E
400	Infrared- Problem-Switch	E
401	Infrared- Problem-Cutout	E
402	Infrared-Problem- Splice	E
403	Infrared-Problem- Other	E
600	Handholes - Broken/damaged/unsecured	C
602	Handholes - Missing nomenclature	E
603	Handholes - Secondary needs repair	E
604	Handholes - Other (use comments)	E
651	Switchgear - Barrier broken/damaged/unse	C
652	Switchgear - Base broken/damaged	C
654	Switchgear - Cable Not Bonded	E
656	Switchgear - Door Broken/Damaged	E
657	Switchgear - excessive vegetation	E
659	Switchgear - Missing ground	E
660	Switchgear - Missing Nomenclature	E
661	Switchgear - Other	E
662	Switchgear - Rusted/Paint peeling	E
673	PM Transf - Door Broken/damaged/unsecu	E
675	PM Transf - Elbows/Terminator tracking/burn	E
676	PM Transf - Excessive Vegetation	E
680	PM Transf - Missing Ground	E
681	PM Transf - Missing Nomenclature	E
682	PM Transf - Mud/Debris	E

684	PM Transf - Oil Weeping	C
685	PM Transf - Pad broken/damaged	E
686	PM Transf - Protection (ballards) dama	E
687	PM Transf - Rusted/ Paint peeling	E
688	PM Transf - Pad Pushed off Base	E
740	Enclosures - Base Broken/Cracked	C
741	Enclosures - Door Broken/damaged/unsec	E
742	Enclosures - Elbows Tracking/Burned	E
743	Enclosures - Excessive Vegetation	E
745	Enclosures - Missing Nomenclature	E
746	Enclosures - Rusted/Paint Peeling	E
801	Osmose - Identified Priority Pole	C
802	Osmose - Identified Reject Pole	C
803	Osmose - Excessive Chkg (NR) offrd	N/A
804	Osmose - Climbing Insp Req'd(not reject)	N/A
	<b>Total</b>	

code	Description	Exp/Cap
260	GIS map doesn't match field	E
261	GIS Pole/line numbering in error on GIS	E
262	GIS Equipment/hardware missing in GIS	E
263	GIS Equip removed in fld, remv from GIS	E
269	GIS Other GPS/GIS errors	E
600	Handholes - Broken/damaged/unsecured	C
602	Handholes - Missing nomenclature	E
603	Handholes - Secondary needs repair	E
604	Handholes - Other (use comments)	E
610	Manhole - Ground Rods Missing	E
611	Manholes - Cable/Joint leaking	E
612	Manholes - Cables bonded/Grid defective	E
614	Manholes - Cracked/broken	C
615	Manholes - Fire proofing	E
616	Manholes - Improper grade	E
617	Manholes - Missing nomenclature	E
620	Manholes - Rerack	E
621	Manholes - Ring/cover repair/replace	E
622	Manholes - Roof Condition - Use Comments	C
623	Manholes - Chimney Condition - Comments	C
624	Manholes - Manhole Needs Cleaning	E
625	Manhole - Secondary Needs Repair	E
626	Manholes - No Holes in Manhole Cover	E
630	Network Protector - Barriers broken/dama	C
632	Network Protector - Oil leak	E
633	Network Protector - Worn/damaged gasket	C
635	Network transformer - Bushing Broken/Cra	C
637	Network transformer - Low oil	E
638	Network transformer - Missing Ground	E
639	Network transformer - Missing nomenclatu	E
642	Network transformer - Oil Weeping	C
643	Network transformer - Rusted/ Paint peel	E
651	Switchgear - Barrier broken/damaged/unse	C
652	Switchgear - Base broken/damaged	C
654	Switchgear - Cable Not Bonded	E
656	Switchgear - Door Broken/Damaged	E
657	Switchgear - excessive vegetation	E
659	Switchgear - Missing ground	E
660	Switchgear - Missing Nomenclature	E
661	Switchgear - Other	E
662	Switchgear - Rusted/Paint peeling	E
672	Transformer - Bushing Broken/Cracked	C
673	Transformer - Door Broken/damaged/unsecu	E
675	Transformer - Elbows/Terminator tracking/burned	E
676	Transformer - Excessive Vegetation	E
680	Transformer - Missing Ground	E
681	Transformer - Missing nomenclature	E
682	Transformer - mud/debris	E
684	Transformer - Oil Weeping	C
685	Transformer - Pad broken/damaged	C
686	Transformer - Protection (ballards) dama	C



687	Transformer - Rusted/ Paint peeling	E
690	Trench - Exposed Cable	E
692	Trench Path - Sunken	E
700	Vaults - Cable missing bond	E
702	Vaults - Cracked/broken	C
703	Vaults - Damaged/broken cover	E
704	Vaults - Damaged/broken door	E
705	Vaults - Damaged/broken ladder	E
706	Vaults - Improper grade	E
707	Vaults - Improper nomenclature	E
708	Vaults - Light not working	E
712	Vaults - Sump pump broken	C
713	Vault - Secondary Needs Repair	E
720	Submersible equip. - Excess corrosion	C
721	Submersible equip. - Physical damage	C
722	Submersible equip. - Leaking	C
730	Anodes - Missing	E
731	Anodes - Need replacement	E
	Unknown	E
	<b>Total</b>	

code	Description	Exp/Cap
510	POLE - Broken	C
511	POLE - Visual Rotting	C
512	POLE - Leaning	E
513	POLE - Replace Single Arms	C
514	POLE - Replace Double Arms	C
515	POLE - Repair Braces	E
516	POLE - Replace Braces	E
517	POLE - Replace Anchor	E
518	POLE - Install Anchor	C
519	POLE - Repair/Replace Guy Wire	E
521	POLE - Tighten Guy Wire	E
522	POLE - Replace/Install Guy Shield	E
524	POLE - Guy Not Bonded	E
525	POLE - Lightning Damage	C
526	POLE - Woodpecker Damage	E
527	POLE - Insects	E
528	POLE - Aerial Number Missing	E
531	TOWER - Tower Legs Broken	E
532	TOWER - Numbers Missing	E
534	TOWER - Loose Bolts/Hard	E
535	TOWER - Repair Anti-Climb	E
536	TOWER - Vegetation on Tower	E
537	TOWER - Structure Damage	E
538	TOWER - Straighten Tower	E
539	TOWER - Arms Damaged	E
541	CONDUCTOR - Conductor	E
542	CONDUCTOR - Static	E
543	CONDUCTOR - Ground Wire	E
544	CONDUCTOR - Sleeve/Conn	E
546	CONDUCTORS - Under 25 ft	E
547	Infrared Problem Identified	E
551	LINE HDW - Insulators/Dam	C
552	LINE HDW - Insulator Plumb	E
553	LINE HDW - Hardware Dam	E
555	LINE HDW - Lightning Arrestor	C
563	FOUNDATION - Erosion	E
571	RIGHT OF WAY - Erosion	E
572	RIGHT OF WAY - Encroachments	E
573	RIGHT OF WAY - Debris	E
574	RIGHT OF WAY - Danger Tree	E
575	RIGHT OF WAY - Gate Broke	E
576	RIGHT OF WAY - Oil/Gas Leak	E
581	MISC - Stencil Structure	E
582	MISC - Switch Damaged	E
583	MISC - Damaged Switch Ground	E
584	MISC - Install Warning Sign	E
585	MISC - Replace Signs	E
586	MISC - Remove Steps	E
587	MISC - Add Dirt and Tamp	E
760	GIS map doesn't match field	E
761	GIS Equipment stenciling in error on GIS	E

762	GIS Equipment/hardware missing in GIS	E
763	GIS Equip removed in fld, remv from GIS	E
769	GIS Other GPS/GIS errors	E
901	Osmose - Identified priority pole	C
902	Osmose - Identified reject pole	C
903	Osmose - Insp excessive check (not rej)	C
904	Osmose - Climbing Insp re'q ( not rej)	C
	<b>Totals</b>	

Date of Request: March 11, 2010  
Due Date: March 22, 2010

Request No. RAV-57  
NMPC Req. No. NM 224 DPS 135

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Rate Design, Customer and Markets Panel

Request:

In response to IR RAV-40, Part B, a schedule showing the baseline number of employees assumed as the starting point for measuring KeySpan merger savings, was provided, as was a schedule for the savings initiative in place at the start of the Narragansett Gas merger. For each schedule, provide the exact date these attached schedules were produced. Include supporting documentation for the exact date (e.g., internal e-mail correspondence sending the schedules to senior management, etc).

Response

In response to RAV-40, a schedule was provided representing that the baseline number of employees assumed as the starting point for the Keyspan merger initiatives was 17,763. In addition, a second schedule was provided to show that the actual level of employees at the merger date was 17,760, demonstrating that the Narragansett initiatives had been realized. Both of these schedules were derived from a larger excel file created on September 24, 2007 which is create date/time-stamped on the file. Not included in the Company's initial response is a word document which details how the baseline number was derived. This file has a create date/time stamp of October 26, 2008 and was attached to an internal e-mail of the same date.

Also included in our initial response to RAV-40 was a schedule of savings initiatives. This data was taken from an excel file with a create date/time stamp of January 16, 2004. Although this date is more than two years prior to the Narragansett Gas merger, the Company believes that this was an original Mercer consulting template created by Mercer in 2004 and then used for the Narragansett Merger purpose at a later date. This file has a create date/time stamp of April 1, 2007. There is also a print date time/stamp on the file of October 31, 2006. It is the Company's belief that these later dates are indicative of work specific to the Narragansett Gas merger.

Name of Respondent:  
James Molloy

Date of Reply:  
March 20, 2010

Date of Request: March 12, 2010  
Due Date: March 22, 2010

Request No. DAG-4  
NMPC Req. No. NM 227 DPS 138

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirement Panel

Request: Expense Type #400 – Other Expenses

1. In the workpapers for Other Expenses (Book 16 of Exhibit \_\_ (RRP-10)), pages #10-37 show a listing of costs by project for the HYE 9/30/09. The label at the top of page states, “Other Expense Type 400, General Ledger Review by Project.”

a. Please explain in detail what this project and cost listing is supposed to represent, and if all the costs for the HYE 9/30/09 that are identified by the “difference” column are contained as part of the total Expense type #400 costs per book for the HYE 9/30/09 of (\$8,199,600) – electric allocation is (\$15,025,400); gas allocation is (\$6,825,800). If the costs in their entirety are not part of Expense type #400, please provide details as to what expense types (and/or construction accounts) the projects relate to and associated amounts.

b. Workpaper pages #10-37 contains almost 2,000 listed projects. Please provide both a detailed explanation of the process the Company undertook, as well as any and all analyses done, to determine what projects and the associated costs should either be removed or left in the historic test year base, and what normalizing adjustments were required from the historic test year to the rate years.

c. Referencing workpaper pages #10-37, please provide the following:

- (1) Explain and provide details on Project #X00078 – Misc Project Support;
- (2) Explicitly identify the adjustments made in the rate case filing to remove historic year charges for Project #X05684 – KeySpan Integration in the amount of \$21,203,514;
- (3) Explicitly identify the adjustments made in the rate case filing to remove historic year charges for Project #E00802 – SIR Program costs in the amount of \$19,160,251;
- (4) Explicitly identify the adjustments made in the rate case filing to remove historic year charges for Project #X09545 – NM Management Audit 2008 in the amount of \$2,986,573;
- (5) Explicitly identify the adjustments made in the rate case filing to remove historic year charges for Project #X10407 – Global ERP Write-off in the amount of \$2,636,042;

(6) (a) Explain and provide details on Project #X06704 – Transformation; (b) explicitly identify where in the workpapers, the historic year charges of \$9,154,185 can be found; and (c) why the costs for this should not be considered costs to achieve;

(7) (a) Explain and provide details on Project #X08686 – INVP 1242; (b) explicitly identify where in the workpapers, the historic year charges of \$1,141,864 can be found; and (c) why the costs for this should not be considered costs to achieve, but instead should remain in the historic test year base;

(8) (a) Explain and provide details on Project #X09966 – INVP 1185 - DMS; (b) explicitly identify where in the workpapers, the historic year charges of \$626,152 can be found; and (c) why the costs for this should remain in the historic test year base;

(9) (a) Explicitly identify the adjustments made in the rate case filing to remove historic year charges for Project #X07264 – Non CTA Exceptional in the amount of \$258,799; (b) Explain and provide details on Project #X02771 – CSS Consolidation Project; (c) explicitly identify where in the workpapers, the historic year charges of \$117,297 can be found and (d) why the costs for this should remain in the historic test year base;

11 (a) Explain and provide details on Project #X09465 – US T Global Transformation Project; (b) explicitly identify where in the workpapers, the historic year charges of \$98,507 can be found; and (c) why the costs for this should remain in the historic test year base.

Response:

1.a. The listing at Exhibit \_\_ (RRP-10), Schedule X, Sheets 10-37 represents the twelve months ended September 30, 2008 and the twelve months ended September 30, 2009 NMPC Electric departmental operating expenses, by PeopleSoft project number and description, for all expense types. The third column “Difference” represents the delta between the two periods. Please note the total of column “Total Sept 09” agrees to the total historical test year Electric departmental operating expenses shown at Exhibit \_\_ (RRP-2), Summary, Sheet 1. These costs represent all expense types. Please refer to Exhibit \_\_ (RRP-2), Summary, Sheet 1 for a breakdown of column “Total Sept 09” by expense type.

b. Project descriptions were scrutinized for terms which may be neither NMPC nor Electric business related. For example, projects containing phrases such as KeySpan, MA, RI, or Gas were flagged to be removed from the Historical test year. The Company also investigated large or unexpected variances year over year.

c. Please note, the amounts referenced in the above request at part (c) refer to the “Difference” column at Book 16, Exhibit \_\_ (RRP-10), pages #10-37. Amounts reflected in the historical test year would be those shown in column “Total Sept 09”, and therefore the Company refers to the test year amounts in its response to part (c) below.

(1) Project #X0078 Misc Project Support: This project relates to SBC, RPS and Energy Efficiency activities and the internal labor and overheads associated with those activities. Please refer to Attachment C1 for detail and workpaper references.

(2) Project #X05684 – KeySpan Integration: Of the project total (\$14,115,741), \$12,220,998 was excluded from the historical test year as cost to achieve. The remaining \$1,894,742 relates to non-VERO related internal labor and overhead costs incurred to deliver merger initiatives. Please refer to Attachment C2 for detail and workpaper references which identify adjustments made in the filing to remove these projects costs from the historical test year.

(3) Project #E00802 – SIR Program: SIR program costs were not removed from the Historical test year. Of the project total (\$37,484,707), \$36,825,249 is included as SIR costs at Exhibit \_\_ (RRP-2), Schedule 40, Sheet 1, net of deferrals recorded to a blank project. Please refer to the detailed listing of project costs at Attachment C3. The remaining project amount of \$659,457 consists mainly of non-incremental labor & benefits charges related to SIR programs.

(4) Project #X09545 – NM Management Audit 2008: \$667,001 was removed from the historical test year expense, under expense type 400, at Exhibit \_\_ (RRP-2), Schedule 7, Sheet 4, Line “To remove one time costs related to the Management Audit”. \$667,001 represents amounts expensed for NorthStar Consulting Group, who conducted the audit. Because the Company would not have incurred these costs had it not been for the Management Audit, and such an audit is not anticipated in the Rate Years, and the Company therefore removed NorthStar Consulting costs from the historical test year base. However, in responding to this request, the Company has discovered an additional \$139,878 in charges from NorthStar Consulting, which were not removed from the test year. The Company will include this reduction in its Corrections & Updates filing. The remaining costs (\$2,320,325) consist mainly of internal labor and benefits as well as external legal counsel expense. Those costs were considered normal and ongoing operating expenses, and therefore were not removed from the historic test year.

(5) X10407 Global ERP Writeoff \$2,636,042: This amount was removed from the Historical test year at Exhibit \_\_ (RRP-2), Schedule 7, Sheet 4, Line “To remove one time costs related to the W/O of ERP System”.

(6) Project #X06704 – Transformation \$16,617,910: Please refer to the detailed listing of project costs at Attachment C6. \$10.97M of this project relates to the EDO Transformation. A description of the EDO Transformation project is included in the Infrastructure and Operations Panel (IOP) Testimony (Book 26) beginning on Page 44. \$4.8M of this project relates to the Global Procurement Transformation project. A description of this project is included in the IOP testimony at Book 26, pages 43-44. \$451k relates to a Station & Protection Standards project for Substation Engineering. Costs consist of consultant & contractor expenses. The goal of this project is to update & revise procedures surrounding the Project Management process for T&D project management groups, making standards as consistent as possible across the New York and New England regions. \$351K of Project X06704 relates to Shared Services Transformation, which seeks to identify opportunities to standardize processes and increase efficiencies across the US and UK Shared Services groups. Costs consist of consulting and legal expense, as well as internal labor and benefits expense. The



Company views all Transformation costs as ongoing business expense, as the Company will continue to seek more opportunities through the Rate Years to run its businesses more efficiently, in order to realize cost savings and productivity savings. Therefore, the Company believes such Transformation expenses should remain in the historical test year base.

(7) Project #X08686 – INVP 1242: This project relates to the requirements and design phase costs as well as software maintenance costs incurred with the build of the new Transformation KPI Reporting software. This software supports EDO Transformation initiatives. The Company believes these costs should remain in the historical test year as it expects to incur ongoing maintenance costs associated with the KPI Reporting system through the Rate Years. Please refer to the detailed listing of project costs at Attachment C7.

(8) Project #X09966 – INVP 1185: This project relates to the requirements and design phase costs incurred with the build of the new Distribution Management System (DMS). The Company believes these costs should remain in the historical test year as it expects to incur ongoing maintenance costs associated with the DMS system through the Rate Years. Please refer to the detailed listing of project costs at Attachment C8.

(9) Project #X07264 –Non CTA Exceptional: Costs under this project mainly relate to Transformation initiatives, such as the Call Center Improvement, Global Procurement and US Shared Services Transaction Delivery Center (TDC), as well as the Regulatory Cost Structure initiative. The Global Procurement Transformation project is described in the IOP testimony at Book 26, pages 43-44. The TDC is described in the testimony of Andrew F. Sloey at Book 5, pages 24-26. The Regulatory Cost Structure (RCS) project seeks to align regulatory and line of business views for more timely and effective reporting to both management and regulatory bodies. RCS also involves software development. The Company views all Transformation costs as ongoing business expense, as the Company will continue to seek more opportunities through the Rate Years to run its businesses more efficiently, in order to realize cost savings and productivity savings. Therefore, the Company believes such Transformation expenses should remain in the historical test year base. Likewise, the Company believes it is continuously aiming to improve its reporting mechanisms and expects it will incur ongoing maintenance costs associated with RCS software. Therefore, such RCS expenses should remain in the historical test year base. Please refer to the detailed listing of project costs at Attachment C9.

(10) Project #X02771 – CSS Consolidation: This Project consists of internal labor and benefits costs associated with maintaining the CSS system updates installed in conjunction with the NY CSS/ NE CIS consolidation project. As the related capital asset was projected to have a ten-year useful life beginning January 2008, the Company expects similar CSS operating & maintenance costs to continue into the Rate Years. Please refer to the detailed listing of project costs at Attachment C10.

(11) Project #X09465 – US T Global Transformation: This project relates to an initiative to share best practices and standardize processes across the US and UK Transmission businesses. The charges of \$112,280 allocated to NiMo Electric in the test year consist mainly of internal labor and benefits costs. The Company considers initiatives such as this one to be ongoing business expense, as the Company continues to seek to run the Transmission business more efficiently. Current examples of similar initiatives include Global Transmission Asset Management Workstreams: (1) Standardization of Engineering Design; (2) Strategic Resource Management; and (3) Virtual Design Center of Excellence. The Company therefore believes these costs should remain in the historical test year base and into the Rate Year. Please refer to the detailed listing of project costs at Attachment C11.

**Workpaper References:**

For those expense types listed in the Attachments to Part (c ), please refer to the following workpapers:

<b>Expense Type</b>	<b>Workpaper : Exhibit __ (RRP-10)</b>
100 & 105- Consultants	Book 14, Schedule 1
110, 112 & 115 - Contractors	Book 14, Schedule 2
150 - Donations	Book 14, Schedule 3
200 – Employee expenses	Book 15, Schedule 4
300 – Hardware	Book 15, Schedule 5
350 – Software	Book 15, Schedule 6
400, 401 & 410 – Other	Book 16, Schedule 7
500, 505 & 510 – Rents	Book 16, Schedule 8
A10 through A65 – Overheads	Books 16 – 17, Schedules 9 - 17
A70 – Sales tax	Book 17, Schedule 18
B01 through B08 – Benefits	Book 17, Schedules 19-28
B09 – Payroll tax	Book 17, Schedule 27
M10 – M50 – Materials	Book 17, Schedules 28-30
P expense types – Labor	Book 18, Schedule 31
T10 – Transportation	Book 18, Schedule 32

Name of Respondent:  
Melissa Little

Date of Reply:  
March 23, 2009

**NIAGARA MOHAWK POWER CORPORATION**

**d/b/a National Grid**

**Case 10-E-0050**

**Attachment C1 to DAG-4**

**Sheet 1 of 1**

**Project X00078**

**For the Historical Test Year ended September 30, 2009**

**Bus Unit D Niagara Mohawk Power Corp**

Sum of Posted Jml \$							Segment	
Project	Project Descr	Rate Case Expense	Expense Type	Activity	Activity Descr	DIST	Grand Total	
X00078	Misc Project Support	Acctg Services Corp Overheads	A65	AG0080	Regulatory Filing Activities	36	36	
				AG0205	DSM Regulatory Related Activit	104	104	
		Acctg Services Corp Overheads Total					140	140
		Benefits	B01	AG0080	Regulatory Filing Activities	109	109	
				AG0195	DSM General Evaluation Work	3,047	3,047	
				AG0200	DSM Planning	1,963	1,963	
				AG0205	DSM Regulatory Related Activit	1,351	1,351	
			B02	AG0080	Regulatory Filing Activities	4	4	
				AG0195	DSM General Evaluation Work	250	250	
				AG0200	DSM Planning	98	98	
				AG0205	DSM Regulatory Related Activit	83	83	
			B03	AG0080	Regulatory Filing Activities	72	72	
				AG0195	DSM General Evaluation Work	3,277	3,277	
				AG0200	DSM Planning	1,473	1,473	
				AG0205	DSM Regulatory Related Activit	1,117	1,117	
			B04	AG0080	Regulatory Filing Activities	11	11	
				AG0195	DSM General Evaluation Work	168	168	
				AG0200	DSM Planning	159	159	
				AG0205	DSM Regulatory Related Activit	161	161	
			B06	AG0080	Regulatory Filing Activities	51	51	
				AG0195	DSM General Evaluation Work	3,837	3,837	
				AG0200	DSM Planning	1,637	1,637	
				AG0205	DSM Regulatory Related Activit	494	494	
			B07	AG0080	Regulatory Filing Activities	21	21	
				AG0195	DSM General Evaluation Work	851	851	
				AG0200	DSM Planning	566	566	
				AG0205	DSM Regulatory Related Activit	426	426	
			B08	AG0080	Regulatory Filing Activities	(2)	(2)	
				AG0195	DSM General Evaluation Work	24	24	
				AG0200	DSM Planning	(2)	(2)	
				AG0205	DSM Regulatory Related Activit	(21)	(21)	
		Benefits Total					21,225	21,225
		Employee Expenses		200	AG0205	DSM Regulatory Related Activit	747	747
		Employee Expenses Total					747	747
		Energy Efficiency	110	AG0200	DSM Planning	3,270	3,270	
			200	AG0195	DSM General Evaluation Work	351	351	
				AG0200	DSM Planning	781	781	
			400	AG0195	DSM General Evaluation Work	6,250	6,250	
			A65	AG0195	DSM General Evaluation Work	(130)	(130)	
		Energy Efficiency Total					10,672	10,672
		Labor	P15	AG0080	Regulatory Filing Activities	736	736	
				AG0195	DSM General Evaluation Work	24,268	24,268	
				AG0200	DSM Planning	14,911	14,911	
				AG0205	DSM Regulatory Related Activit	10,393	10,393	
			P30	AG0080	Regulatory Filing Activities	226	226	
				AG0195	DSM General Evaluation Work	2,467	2,467	
				AG0200	DSM Planning	2,254	2,254	
				AG0205	DSM Regulatory Related Activit	1,059	1,059	
			P50	AG0080	Regulatory Filing Activities	129	129	
				AG0195	DSM General Evaluation Work	4,345	4,345	
				AG0200	DSM Planning	2,547	2,547	
				AG0205	DSM Regulatory Related Activit	1,652	1,652	
		Labor Total					64,989	64,989
		Payroll taxes	B09	AG0080	Regulatory Filing Activities	71	71	
				AG0195	DSM General Evaluation Work	2,305	2,305	
				AG0200	DSM Planning	1,467	1,467	
				AG0205	DSM Regulatory Related Activit	998	998	
		Payroll taxes Total					4,841	4,841
		System Benefits Charge	110	AG0205	DSM Regulatory Related Activit	-	-	
			400	AG0205	DSM Regulatory Related Activit	36,129,739	36,129,739	
				AG0207	DSM SBC NIMO	36,169,375	36,169,375	
		System Benefits Charge Total					72,299,114	72,299,114
		Renewable Portfolio Standard	400	AG0205	DSM Regulatory Related Activit	11,999,432	11,999,432	
				AG0207	DSM SBC NIMO	11,999,430	11,999,430	
		Renewable Portfolio Standard Total					23,998,862	23,998,862
		Grand Total						96,400,590

a\ agrees to Exhibit (RRP-10), Schedule 33, Workpaper 2, Sheet 1

b\ agrees to Exhibit (RRP-2), Schedule 43, Sheet 1

c\ agrees to Exhibit (RRP-2), Schedule 39, Sheet 1

**NIAGARA MOHAWK POWER CORPORATION**

d/b/a National Grid

Case 10-E-0050

Attachment C2 to RAV-38

Sheet 1 of 2

**Project X05684**

**All charges**

**For the Historical Test Year ended September 30, 2009**

Sum of Posted Jnl \$			Segment			CTA Adjustment	X05684
Project	Project Descr	Expense Type	DIST	TRAN	Grand Total	Per Sheet 2	Remaining
X05684	Keyspan Integration	100	(297,448)	(70,696)	(368,144)	(368,144)	(0)
		110	1,260,968	129,345	1,390,314	1,390,314	-
		150	2,208	348	2,556	2,556	-
		200	244,563	14,294	258,857	258,857	-
		300	21,680	2,970	24,650	24,650	-
		350	1,406	-	1,406	1,406	-
		400	(1,417,766)	(205,169)	(1,622,935)	(1,622,935)	-
		401	15,599	2,462	18,061	-	18,061
		410	19	3	22	-	22
		500	10,567	-	10,567	10,567	-
		A50	10,431	-	10,431	-	10,431
		A60	-	-	-	-	-
		A65	874	98	972	-	972
		A70	205	0	206	-	206
		B01	312,492	35,709	348,201	270,455	77,746
		B02	1,784	233	2,017	-	2,017
		B03	55,182	3,042	58,223	-	58,223
		B04	2,044	261	2,305	-	2,305
		B05	(0)	-	(0)	-	(0)
		B06	10,629,898	1,447,126	12,077,024	12,021,477	55,547
		B07	8,038	779	8,818	-	8,818
		B08	(155)	(19)	(174)	-	(174)
		B09	21,133	612	21,745	-	21,745
		M10	229,795	1,900	231,695	231,695	-
		M20	101	-	101	101	-
		M50	21	-	21	-	21
		P15	495,756	24,478	520,234	-	520,234
		P20	26,735	-	26,735	-	26,735
		P21	14,060	-	14,060	-	14,060
		P25	8,085	-	8,085	-	8,085
		P26	2,374	-	2,374	-	2,374
		P30	743,579	235,171	978,750	-	978,750
		P50	76,566	3,728	80,294	-	80,294
		T10	7,564	708	8,272	-	8,272
X05684 Total			12,488,358	1,627,383	14,115,741	12,220,998	1,894,742
Grand Total			12,488,358	1,627,383	14,115,741		

**NIAGARA MOHAWK POWER CORPORATION****d/b/a National Grid****Case 10-E-0050****Attachment C2 to RAV-38****Sheet 2 of 2****Project X05684****Keyspan and NEG Integration Costs to Achieve****For the Historical Test Year ended September 30, 2009**

Line	Sum of Posted Jrnl \$	Segment CAT Project		ELECTRIC Total	Grand Total
		ELECTRIC			
	Expense Type	X05683	X05684		
1	100		(368,144)	(368,144)	(368,144)
2	110		1,390,314	1,390,314	1,390,314
3	150		2,556	2,556	2,556
4	200	7,747	258,857	266,604	266,604
5	300		24,650	24,650	24,650
6	350		1,406	1,406	1,406
7	400,401,410	1,436	(1,622,935)	(1,621,499)	(1,621,499)
8	500,505,510		10,567	10,567	10,567
9	B01		270,455	270,455	270,455
10	B06		12,021,477	12,021,477	12,021,477
11	M10		231,695	231,695	231,695
12	M20		101	101	101
13	<b>Grand Total</b>	<b>9,183</b>	<b>12,220,998</b>	<b>12,230,181</b>	<b>12,230,181</b>

agrees to Sheet 1

Line Notes:	Source:
1	Exhibit__ (RRP-2), Schedule 1 Sheet 4
2	Exhibit__ (RRP-2), Schedule 2 Sheet 4
3	Exhibit__ (RRP-2), Schedule 3 Sheet 4. Booked below the line.
4	Exhibit__ (RRP-2), Schedule 4 Sheet 4
5	Exhibit__ (RRP-2), Schedule 5 Sheet 4
6	Exhibit__ (RRP-2), Schedule 6 Sheet 4
7	Exhibit__ (RRP-2), Schedule 7 Sheet 4
8	Exhibit__ (RRP-2), Schedule 8 Sheet 4
9	Exhibit__ (RRP-2), Schedule 19 Sheet 4
10	Exhibit__ (RRP-2), Schedule 24 Sheet 4
11	Exhibit__ (RRP-2), Schedule 28 Sheet 4
12	Exhibit__ (RRP-2), Schedule 29 Sheet 4
13	Sum (Lines 1 - 12)

**NIAGARA MOHAWK POWER CORPORATION**

**d/b/a National Grid**

**Case 10-E-0050**

**Attachment C3 to DAG-4**

**Sheet 1 of 3**

**Project E00802**

**For the Historical Test Year Ended September 30, 2009**

**Bus Unit Descr Niagara Mohawk Power Corp**

Sum of GL Act \$					Rate Case Segment	
Project	Project Descr	Charged Dept	Chrg Dept Descr	Expense Type	ELECTRIC	Grand Total
E00802	SIR Program Costs - NY	11999	Acctg Services Corp Overheads	A65	1,890	1,890
				P30	40,903	40,903
		11999 Total			42,793	42,793
		15550	Real Estate-NY Cent	110	478	478
				500	212	212
		15550 Total			690	690
		15890	NY Facilities-Frontier	110	5,748	5,748
				P10	1,151	1,151
				P50	204	204
		15890 Total			7,103	7,103
		15900	NY Facilities-Southwest	A70	5	5
				M10	54	54
		15900 Total			58	58
		15920	NY Facilities-Central	110	284	284
				A70	22	22
				P10	278	278
				P50	50	50
				T10	23	23
		15920 Total			658	658
		15930	NY Facilities-Northern	M10	6	6
				P10	132	132
				P50	24	24
				T10	16	16
		15930 Total			178	178
		15950	NY Facilities-Capital	M10	121	121
		15950 Total			121	121
		15960	NY Facilities-Northeast	110	585	585
				A70	41	41
				P10	1,199	1,199
				P50	205	205
				T10	218	218
		15960 Total			2,248	2,248
		16999	Human Resources Corp Overhead	B01	16,883	16,883
				B02	957	957
				B03	13,436	13,436
				B04	1,443	1,443
				B06	12,662	12,662
				B07	4,707	4,707
				B08	(118)	(118)
		16999 Total			49,969	49,969
		18000	Legal Services	100	(4,468)	(4,468)
		18000 Total			(4,468)	(4,468)
		18340	Ethics Risk & Compliance	P15	290	290
				P50	53	53
		18340 Total			343	343
		26020	Gas Construction NY	110	618	618
		26020 Total			618	618
		26050	Vegetation Management	110	2,350	2,350
		26050 Total			2,350	2,350
		38320	Site Investig & Remed Admin-NY	200	485	485
				400	173	173
				P15	15,067	15,067
				P50	2,625	2,625
		38320 Total			18,350	18,350
		38340	Site Investig & Remed Admin-NY	200	19,026	19,026
				400	481	481
				P15	154,294	154,294
				P50	25,555	25,555
		38340 Total			199,356	199,356

**NIAGARA MOHAWK POWER CORPORATION**

**d/b/a National Grid**

**Case 10-E-0050**

**Attachment C3 to DAG-4**

**Sheet 2 of 3**

**Project E00802**

**For the Historical Test Year Ended September 30, 2009**

**Bus Unit Descr**    **Niagara Mohawk Power Corp**

Sum of GL Act \$					Rate Case Segment			
Project	Project Descr	Charged Dept	Chrg Dept Descr	Expense Type	ELECTRIC	Grand Total		
		38360	Site Investig & Remed-NY	100	10,164,511	10,164,511		
				105	5,271	5,271		
				110	22,835,209	22,835,209		
				200	10,669	10,669		
				300	188	188		
				400	2,889,716	2,889,716		
				402	113,430	113,430		
				404	660,664	660,664		
				500	800	800		
				A70	530	530		
				M10	143,816	143,816		
				M20	194	194		
				M50	43	43		
				P10	1,636	1,636		
				P15	281,128	281,128		
				P50	47,427	47,427		
				T10	209	209		
		38360 Total				37,155,440	37,155,440	
		62330	Trans Line Serv-NY	P15	440	440		
				P50	80	80		
				T10	52	52		
		62330 Total				571	571	
		62340	Trans Line Serv Construct-NY	200	789	789		
				P10	661	661		
				P50	124	124		
				T10	139	139		
		62340 Total				1,712	1,712	
		62360	Distribution Construction-NY	I10	618	618		
		62360 Total				618	618	
		83500	Travelling Operators-West	T10	113	113		
		83500 Total				113	113	
		83510	Power Delivery-Buffalo	200	84	84		
				P10	3,684	3,684		
				P20	573	573		
				P21	286	286		
				P50	737	737		
				T10	523	523		
		83510 Total				5,887	5,887	
		SIR Program Costs - NY Total					37,484,707	37,484,707
		E00802 Total					37,484,707	37,484,707
Grand Total					37,484,707	37,484,707		

Sum 1\ =                    36,825,249

**NIAGARA MOHAWK POWER CORPORATION**

**d/b/a National Grid**

**Case 10-E-0050**

**Attachment C3 to DAG-4**

**Sheet 3 of 3**

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

**Site Investigation Remediation**

**SIR Charged Department - 38360**

Sum of Amount Posted				Segment		
Charged Dept	Project	Project Descr	Expense Type	ELECTRIC	Grand Total	
38360			100	4,005	4,005	
			110	(1,736)	(1,736)	
			200	-	-	
			300	(0)	(0)	
			400	(26,930,825)	(26,930,825)	
			A70	49	49	
			M20	-	-	
			M50	(10)	(10)	
			Total		(26,928,516)	(26,928,516)
			CAP036	Capital Overheads	400	28,142
	CAP036 Total			28,142	28,142	
	E00802	SIR Program Costs - NY	100	10,164,511	10,164,511	
			105	5,271	5,271	
			110	22,835,209	22,835,209	
			200	10,669	10,669	
			300	188	188	
			400	2,889,716	2,889,716	
			402	113,430	113,430	
			404	660,664	660,664	
			500	800	800	
			A70	530	530	
			M10	143,816	143,816	
			M20	194	194	
			M50	43	43	
			T10	209	209	
			E00802 Total			36,825,249
	F00252	Cash Reconciliations	110	1,612	1,612	
A70			123	123		
F00252 Total			1,736	1,736		
Grand Total				9,926,610	9,926,610	

a\ agrees to Sheet 2

b\ per Exhibit\_\_(RRP-2), Schedule 40, Sheet 1



**NIAGARA MOHAWK POWER CORPORATION**

**d/b/a National Grid**

**Case 10-E-0050**

**Attachment C6 to DAG-4**

**Sheet 1 of 1**

**Project X06704**

**For the Historical Test Year Ended September 30, 2009**

Bus Unit Descr	Niagara Mohawk Power Corp
----------------	---------------------------

Sum of Posted Jml \$					Rate Case Segment				
Project	Project Descr	Work Order	Work Order Descr	Expense Type	ELECTRIC	Grand Total			
X06704	Transformation	9000064394	Project Management	A65	(4)	(4)			
				B01	105	105			
				B02	8	8			
				B03	96	96			
				B04	8	8			
				B06	128	128			
				B07	28	28			
				B08	1	1			
				P15	798	798			
				P30	109	109			
				P50	144	144			
				9000064394 Total				1,420	1,420
				9000064395	Station & Protection Standards	100	324,670	324,670	
						110	127,113	127,113	
				9000064395 Total				451,783	451,783
				9000076168	EDO Transformation-Phase 1, Ana	100	5,606,827	5,606,827	
						110	690,481	690,481	
		200	441,586			441,586			
		300	4,205			4,205			
		400	15,154			15,154			
		A60	0			0			
		A65	23,806			23,806			
		A70	253			253			
		B01	314,269			314,269			
		B02	14,561			14,561			
		B03	203,656			203,656			
		B04	22,838			22,838			
		B06	184,959			184,959			
		B07	68,178			68,178			
		B08	4,500			4,500			
		M10	60,734			60,734			
		P10	94,738			94,738			
		P15	2,192,400			2,192,400			
		P20	9,573			9,573			
		P21	5,271			5,271			
		P25	7,546			7,546			
		P26	3,279			3,279			
		P30	587,295			587,295			
		P50	388,771			388,771			
		T10	26,997			26,997			
		9000076168 Total					10,971,876	10,971,876	
		9000082161	Global Procurement Transformat			100	247,504	247,504	
						110	3,249,765	3,249,765	
						200	41,315	41,315	
						300	1,102	1,102	
						400	1,066,754	1,066,754	
						A60	-	-	
						A65	2,436	2,436	
				A70	48	48			
				B01	19,583	19,583			
				B02	859	859			
				B03	12,979	12,979			
				B04	1,595	1,595			
				B06	13,322	13,322			
				B07	4,981	4,981			
				B08	(140)	(140)			
				M10	258	258			
				P15	135,277	135,277			
				P30	21,857	21,857			
				P50	22,719	22,719			
				9000082161 Total				4,842,215	4,842,215
		9000084515	Global Shared Services-BPO	100	321,888	321,888			
				200	28,728	28,728			
		9000084515 Total				350,616	350,616		
X06704 Total					16,617,910	16,617,910			
Grand Total					16,617,910	16,617,910			

**NIAGARA MOHAWK POWER CORPORATION**

d/b/a National Grid

Case 10-E-0050

Attachment C7 to DAG-4

Sheet 1 of 1

Project X08686  
For the Historical Test Year Ended September 30, 2009

Bus Unit Descr	Niagara Mohawk Power Corp
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Sum of Posted Jnl \$					Rate Case Segment		
Project	Project Desor	Expense Type	Charged Dept	Chrg Dept Descr	ELECTRIC	Grand Total	
X08686	INVP 1242	100	17109	IS Elec Dist & Gen Projects	-	-	
		<b>100 Total</b>				-	-
		110	17103	Inspection Maint Mgmt Systems	(3,334)	(3,334)	
			17109	IS Elec Dist & Gen Projects	649,697	649,697	
			17190	IS Customer & Markets-NM	1,842	1,842	
		<b>110 Total</b>				<b>648,204</b>	<b>648,204</b>
		200	17109	IS Elec Dist & Gen Projects	6,139	6,139	
			17190	IS Customer & Markets-NM	389	389	
		<b>200 Total</b>				<b>6,528</b>	<b>6,528</b>
		300	17109	IS Elec Dist & Gen Projects	1,226	1,226	
		<b>300 Total</b>				<b>1,226</b>	<b>1,226</b>
		350	17109	IS Elec Dist & Gen Projects	235,216	235,216	
		<b>350 Total</b>				<b>235,216</b>	<b>235,216</b>
		A60	11999	Acctg Services Corp Overheads	-	-	
		<b>A60 Total</b>				-	-
		A65	11999	Acctg Services Corp Overheads	2,635	2,635	
		<b>A65 Total</b>				<b>2,635</b>	<b>2,635</b>
		A70	17109	IS Elec Dist & Gen Projects	148	148	
		<b>A70 Total</b>				<b>148</b>	<b>148</b>
		B01	16999	Human Resources Corp Overheads	24,263	24,263	
		<b>B01 Total</b>				<b>24,263</b>	<b>24,263</b>
		B02	16999	Human Resources Corp Overheads	1,288	1,288	
		<b>B02 Total</b>				<b>1,288</b>	<b>1,288</b>
		B03	16999	Human Resources Corp Overheads	17,976	17,976	
		<b>B03 Total</b>				<b>17,976</b>	<b>17,976</b>
		B04	16999	Human Resources Corp Overheads	2,133	2,133	
		<b>B04 Total</b>				<b>2,133</b>	<b>2,133</b>
		B06	16999	Human Resources Corp Overheads	15,961	15,961	
		<b>B06 Total</b>				<b>15,961</b>	<b>15,961</b>
		B07	16999	Human Resources Corp Overheads	6,285	6,285	
		<b>B07 Total</b>				<b>6,285</b>	<b>6,285</b>
		B08	16999	Human Resources Corp Overheads	(74)	(74)	
		<b>B08 Total</b>				<b>(74)</b>	<b>(74)</b>
		P10	17109	IS Elec Dist & Gen Projects	3,194	3,194	
		<b>P10 Total</b>				<b>3,194</b>	<b>3,194</b>
		P15	17109	IS Elec Dist & Gen Projects	168,925	168,925	
		<b>P15 Total</b>				<b>168,925</b>	<b>168,925</b>
		P30	11999	Acctg Services Corp Overheads	26,347	26,347	
		<b>P30 Total</b>				<b>26,347</b>	<b>26,347</b>
		P50	17109	IS Elec Dist & Gen Projects	28,732	28,732	
		<b>P50 Total</b>				<b>28,732</b>	<b>28,732</b>
<b>X08686 Total</b>					<b>1,188,987</b>	<b>1,188,987</b>	
<b>Grand Total</b>					<b>1,188,987</b>	<b>1,188,987</b>	

**NIAGARA MOHAWK POWER CORPORATION**

**d/b/a National Grid**

**Case 10-E-0050**

**Attachment C8 to DAG-4**

**Sheet 1 of 1**

**Project X09966**

**For the Historical Test Year Ended September 30, 2009**

**Bus Unit Descr    Niagara Mohawk Power Corp**

Sum of Posted Jnl S					Segment	
Project	Project Descr	Expense Type	Charged Dept	Chrg Dept Descr	DIST	Grand Total
X09966	INVP 1185 - DMS	100	17109	IS Elec Dist & Gen Projects	239,602	239,602
		100 Total			239,602	239,602
		200	17109	IS Elec Dist & Gen Projects	33,648	33,648
			17110	Customer Applications	280	280
			38050	Dist Disp Center Wbro Ctrl	489	489
			87300	Regional Control-West	1,341	1,341
		200 Total			35,759	35,759
		300	17109	IS Elec Dist & Gen Projects	138	138
			38050	Dist Disp Center Wbro Ctrl	39	39
		300 Total			177	177
		350	17109	IS Elec Dist & Gen Projects	305	305
		350 Total			305	305
		A60	11999	Acctg Services Corp Overheads	-	-
		A60 Total			-	-
		A65	11999	Acctg Services Corp Overheads	2,275	2,275
		A65 Total			2,275	2,275
		B01	16999	Human Resources Corp Overheads	35,804	35,804
		B01 Total			35,804	35,804
		B02	16999	Human Resources Corp Overheads	1,618	1,618
		B02 Total			1,618	1,618
		B03	16999	Human Resources Corp Overheads	19,925	19,925
		B03 Total			19,925	19,925
		B04	16999	Human Resources Corp Overheads	2,227	2,227
		B04 Total			2,227	2,227
		B06	16999	Human Resources Corp Overheads	21,876	21,876
		B06 Total			21,876	21,876
		B07	16999	Human Resources Corp Overheads	6,724	6,724
		B07 Total			6,724	6,724
		B08	16999	Human Resources Corp Overheads	172	172
		B08 Total			172	172
		M10	17109	IS Elec Dist & Gen Projects	723	723
		M10 Total			723	723
		P15	17109	IS Elec Dist & Gen Projects	169,196	169,196
			87000	Dispatch & Control Mgmt-NY	23,839	23,839
			87300	Regional Control-West	3,274	3,274
		P15 Total			196,309	196,309
		P30	11999	Acctg Services Corp Overheads	29,142	29,142
		P30 Total			29,142	29,142
		P50	17109	IS Elec Dist & Gen Projects	28,757	28,757
			87000	Dispatch & Control Mgmt-NY	4,081	4,081
			87300	Regional Control-West	452	452
		P50 Total			33,289	33,289
		T10	17109	IS Elec Dist & Gen Projects	226	226
		T10 Total			226	226
X09966 Total					626,152	626,152
Grand Total					626,152	626,152

**NIAGARA MOHAWK POWER CORPORATION**

**d/b/a National Grid**

**Case 10-E-0050**

**Attachment C9 to DAG-4**

**Sheet 1 of 1**

**Project X07264**

**For the Historical Test Year Ended September 30, 2009**

**Bus Unit Descr Niagara Mohawk Power Corp**

Sum of Posted Jnl \$					Segment				
Project	Project Descr	Work Order	Work Order Descr	Expense Type	DIST	TRAN	Grand Total		
X07264	Non CTA Exceptional	9000067940	KeySpan integration costs--Non	100	41,489	5,629	47,118		
				P30	26,321	3,602	29,923		
				KeySpan integration costs--Non Total		67,810	9,231	77,041	
		9000067940 Total			67,810	9,231	77,041		
		9000088118	Customer Transformation-Call C	100	195,030		195,030		
				110	61,022		61,022		
				200	1,819		1,819		
				Customer Transformation-Call C Total		257,870		257,870	
		9000088118 Total			257,870		257,870		
		9000089267	Global Procurement Transformat	200	356	56	412		
				400	497	78	575		
				B01	2,827	446	3,273		
				B03	2,828	446	3,275		
				B05	0	0	0		
				B06	6,063	957	7,020		
				B07	653	103	756		
				B09	1,807	285	2,092		
				P15	20,003	3,157	23,160		
				P30	3,274	517	3,791		
				P50	3,171	500	3,671		
				Global Procurement Transformat Total		41,478	6,546	48,024	
				9000089267 Total			41,478	6,546	48,024
		9000089603	US Shared Services Transactio-	200	260	35	294		
				A60	-	-	-		
				A65	(1,379)	(197)	(1,576)		
				B01	14,001	1,787	15,787		
				B02	956	123	1,079		
				B03	13,245	1,710	14,955		
				B04	1,058	133	1,191		
				B06	14,390	1,876	16,266		
				B07	3,712	471	4,183		
				B08	108	14	122		
				P15	129,637	14,050	143,686		
				P30	10,797	1,378	12,174		
				P50	22,277	2,446	24,723		
				US Shared Services Transactio- Total		209,059	23,824	232,884	
				9000089603 Total			209,059	23,824	232,884
		9000093450	Regulatory Cost Structure	100	44,876		44,876		
				110	4,184	660	4,844		
				200	3,368	532	3,900		
				400	213	34	247		
				401	208	33	241		
				410	60	9	69		
				510	164	26	190		
				B01	2,441	385	2,826		
				B03	2,769	437	3,206		
				B05	-	-	-		
				B06	5,578	880	6,459		
				B07	535	84	620		
				B09	1,549	244	1,793		
				P15	17,838	2,815	20,654		
				P30	10,398	1,641	12,039		
				P50	2,830	447	3,276		
				Regulatory Cost Structure Total		97,011	8,228	105,238	
				9000093450 Total			97,011	8,228	105,238
X07264 Total					673,228	47,829	721,058		
Grand Total					673,228	47,829	721,058		

**NIAGARA MOHAWK POWER CORPORATION**

**d/b/a National Grid**

**Case 10-E-0050**

**Attachment C10 to DAG-4**

**Sheet 1 of 1**

**Project X02771**

**For the Historical Test Year ended September 30, 2009**

Bus Unit Descr	Niagara Mohawk Power Corp
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Sum of Posted Jml \$				Rate Case Segment	
Project	Project Descr	Expense Type	Activity Descr	ELECTRIC	Grand Total
X02771	CSS Consolidation Project - Ex	200	Credit & Collections	58.09	58.09
			Miscellaneous Customer Account	2,976.83	2,976.83
		200 Total		3,034.92	3,034.92
		A60	IS Development - Customer Serv	-	-
			Operations Executive Services	-	-
		A60 Total		-	-
		A65	IS Development - Customer Serv	(0.33)	(0.33)
			Miscellaneous Customer Account	808.72	808.72
		A65 Total		808.39	808.39
		B01	IS Development - Customer Serv	15.43	15.43
			Miscellaneous Customer Account	2,056.90	2,056.90
			Operations Executive Services	5,855.70	5,855.70
		B01 Total		7,928.03	7,928.03
		B02	IS Development - Customer Serv	(0.07)	(0.07)
			Miscellaneous Customer Account	58.15	58.15
			Operations Executive Services	99.76	99.76
		B02 Total		157.84	157.84
		B03	IS Development - Customer Serv	(2.16)	(2.16)
			Miscellaneous Customer Account	998.67	998.67
			Operations Executive Services	748.19	748.19
		B03 Total		1,744.70	1,744.70
		B04	IS Development - Customer Serv	0.17	0.17
			Miscellaneous Customer Account	154.21	154.21
			Operations Executive Services	59.87	59.87
		B04 Total		214.25	214.25
		B06	IS Development - Customer Serv	2.33	2.33
			Miscellaneous Customer Account	1,083.31	1,083.31
			Operations Executive Services	2,493.89	2,493.89
		B06 Total		3,579.53	3,579.53
		B07	IS Development - Customer Serv	(0.36)	(0.36)
			Miscellaneous Customer Account	518.93	518.93
			Operations Executive Services	239.41	239.41
		B07 Total		757.98	757.98
		B08	IS Development - Customer Serv	0.11	0.11
			Miscellaneous Customer Account	(48.48)	(48.48)
			Operations Executive Services	39.92	39.92
B08 Total		(8.45)	(8.45)		
P10	IS Development - Customer Serv	-	-		
P10 Total		-	-		
P15	Miscellaneous Customer Account	66,451.37	66,451.37		
	Operations Executive Services	9,975.63	9,975.63		
P15 Total		76,427.00	76,427.00		
P30	IS Development - Customer Serv	(2.54)	(2.54)		
	Miscellaneous Customer Account	8,003.17	8,003.17		
	Operations Executive Services	528.61	528.61		
P30 Total		8,529.24	8,529.24		
P50	IS Development - Customer Serv	(0.22)	(0.22)		
	Miscellaneous Customer Account	10,559.39	10,559.39		
	Operations Executive Services	1,823.21	1,823.21		
P50 Total		12,382.38	12,382.38		
T10	Miscellaneous Customer Account	5,096.81	5,096.81		
T10 Total		5,096.81	5,096.81		
X02771 Total				120,652.62	120,652.62
Grand Total				120,652.62	120,652.62

**NIAGARA MOHAWK POWER CORPORATION**

**d/b/a National Grid**

**Case 10-E-0050**

**Attachment C11 to DAG-4**

**Sheet 1 of 1**

**Project X09465**

**For the Historical Test Year Ended September 30, 2009**

Bus Unit Descr	Niagara Mohawk Power Corp
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Sum of Posted Jrm \$				Rate Case Segment	
Project	Project Descr	Expense Type	Chrg Dept Descr	ELECTRIC	Grand Total
X09465	US T Global Transformation	110	Construction Strategy	6,433	6,433
		110 Total		6,433	6,433
		200	Asset Management	2,696	2,696
			Construction Strategy	2,623	2,623
			System Delivery	2,302	2,302
			System Delivery Construction	909	909
			Trans Line Engineering	3,545	3,545
		200 Total		12,074	12,074
		A65	Acctg Services Corp Overheads	1,014	1,014
		A65 Total		1,014	1,014
		B01	Human Resources Corp Overheads	7,621	7,621
		B01 Total		7,621	7,621
		B02	Human Resources Corp Overheads	430	430
		B02 Total		430	430
		B03	Human Resources Corp Overheads	6,047	6,047
		B03 Total		6,047	6,047
		B04	Human Resources Corp Overheads	863	863
		B04 Total		863	863
		B06	Human Resources Corp Overheads	3,023	3,023
		B06 Total		3,023	3,023
		B07	Human Resources Corp Overheads	2,236	2,236
		B07 Total		2,236	2,236
		B08	Human Resources Corp Overheads	(127)	(127)
		B08 Total		(127)	(127)
		P15	Asset Management	2,948	2,948
			Construction Strategy	1,899	1,899
			Oper Planning & Review	2,616	2,616
			System Delivery	2,468	2,468
			Trans Line Engineering	45,798	45,798
			Trans Line Services-NE	1,183	1,183
		P15 Total		56,910	56,910
		P30	Acctg Services Corp Overheads	6,667	6,667
		P30 Total		6,667	6,667
		P50	Asset Management	486	486
			Construction Strategy	315	315
			Oper Planning & Review	416	416
			System Delivery	410	410
			Trans Line Engineering	7,266	7,266
			Trans Line Services-NE	196	196
		P50 Total		9,088	9,088
X09465 Total				112,280	112,280
Grand Total				112,280	112,280

Date of Request: March 12, 2010  
Due Date: March 22, 2010

Request No. DAG-5  
NMPC Req. No. NM 228 DPS 139

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirement Panel

Request: Expense Type #400 – Other Expenses

1. Please explain and provide details, invoices, and journal entries for the historic year charge of \$2,744,341 for Activity #AG0844 – IS Development A&G, as per “Other Expense Type #400” workpapers page 164.
2. Please explain and provide details, invoices, and journal entries for the historic year charge of \$776,500 for Activity #AG0730 – Accounting Services, as per “Other Expense Type #400” workpapers page 68.
3. Workpaper #38 shows SIR costs by provider company and expense type. Please provide a more detailed breakdown of the SIR costs for each expense type and by activity and vendor.

Response:

1. Please see Attachment A to this request for copies of the journal entries to Activity AG0844, Expense Type 400. Most of the charges in this activity relate to the write off of the Global ERP System which has been removed from the test year (See Workpaper 5 to Exhibit \_\_ (RRP-2) Schedule 7). The remaining costs are expenses relating to the development of the enhanced Intranet.
2. Please see Attachment B to this request for the HSBC invoices. These charges are Payment and Controls Fees.
3. Please see Attachment C to this request for a breakdown of the SIR Cost.

Name of Respondent:  
James Molloy

Date of Reply:  
March 20, 2010

Journal Entry

Header	Lines	Totals	Errors	Approval
Unit: 00099	Journal ID: 99404	Date: 03/31/2009		
Long Description:	Nov Mar True up, Expat Bonus and March Actual for untitled Expat charges			
Ledger Group:	ADJ-EXP	<input type="checkbox"/> Auto Generate Lines		
Ledger:	Adjusting Entry: <input type="checkbox"/> Non-Adjusting Entry			
Source:	IMP	Fiscal Year: 2009		
Reference Number:		Period: 12		
SJE Type:		ADJ Date: 03/31/2009		
Journal Class:		<input type="checkbox"/> Save Journal Incomplete Status		
Transaction Code:	GENERAL			
Currency Defaults: USD / CRRNT / 1	Created: 03/31/09 3:09:27PM	User ID: ppatel		
Reversal: Do Not Generate Reversal	Posted: 03/31/09 4:22:56PM			
<input type="checkbox"/> Save	<input type="checkbox"/> Return to Search	<input type="checkbox"/> Next in List	<input type="checkbox"/> Notify	<input type="checkbox"/> Refresh
Header   Lines   Totals   Errors   Approval				

ENTERED BY: Rem DATE: 3/31/09  
POSTED BY: CA DATE: 3/31/09  
CHECK ACCOUNT: CHECK CALLS  
COPIED: PREPARE AD  
REASONABILITY: VERIFY DEBITS



Journal Entry

Page 1 of 3

New Window Help Customize Page

Header		Lines		Totals		Errors		Approval					
Unit: 00099	Journal ID: 99404	Date: 03/31/2009	*Process: Edit Journal	Process									
Template List	Search Criteria	Change Values	Inter/IntraUnit	Errors Only		Line: 110							
*Unit	Activity	Project	WQ	Exp Type	Orig Dept	Chrg Dept	Bill Pool	Segment	Account	Reg Acct	Amount	Journal Line Descr(1)	
00001	AG0740	X03085	Q	110	56300	56300	Q	00203	Q	56300	Q	17,333.01	African B
00008	AG0740		Q	110	25044	25044	Q	00203	Q	25044	Q	11,155.70	Gassage K
00009	AG0740		Q	110	25044	25044	Q	00200	Q	25044	Q	2,788.03	Gassage K
00092	AG0663		Q	110	92269	92269	Q	00203	Q	92269	Q	7,477.57	Barker L
00093	AG0663		Q	110	92269	92269	Q	00203	Q	92269	Q	7,477.57	Barker L
00099	AG0760		Q	110	96000	96000	Q	00231	Q	96000	Q	13,705.01	Bingham P
00099	AG0760		Q	110	12100	12100	Q	00382	Q	921000	Q	11,800.00	Bonar D
00099	AG0760		Q	110	92000	92000	Q	00233	Q	921000	Q	379,775.18	Brett S
00099	AG0453		Q	110	15480	15480	Q	00236	Q	921000	Q	32,300.80	Callaghan J
01459	AG0080		Q	110	25250	25250	Q		Q	921000	Q	19,783.03	Connell C
01459	AG0760		Q	110	25010	25010	Q		Q	921000	Q	7,338.03	Cook M
00099	AG0760		Q	110	25010	25010	Q	00200	Q	921000	Q	7,338.03	Cook M
00099	AG0760		Q	110	25010	25010	Q	00203	Q	921000	Q	7,338.04	Cook M
00099	AG0760		Q	110	35040	35040	Q	00231	Q	921000	Q	10,828.73	Duan M
00036	TE1000	C03437	Q	110	92110	92110	Q		Q	183000	Q	1,713.07	Desmond L
00036	TE1000		Q	110	92110	92110	Q		Q	183000	Q	2,207.95	Desmond L
00099	TE1000	C03437	Q	110	92110	92110	Q	00233	Q	966000	Q	3,514.77	Desmond L
00099	TE1000		Q	110	92110	92110	Q	00233	Q	921000	Q	27,314.99	Forth A
00099	AG0745		Q	110	63000	63000	Q	00233	Q	926000	Q	10,768.52	Handsley V
00099	AG0040		Q	110	18220	18220	Q	00236	Q	926000	Q	57,508.17	Henchley M
00099	AG0045		Q	110	18000	18000	Q	00236	Q	926000	Q	32,315.84	Hewitt L
00099	DO9000		Q	110	26050	26050	Q	00231	Q	256022	Q		

http://ngridpfinc.na.ngrid.net/psc/psfpr2/EMPLOYEE/ERP/c/PROCESS\_JOURNAL\_ENTRY\_IE.GBL

3/31/2009

Journal Entry




Page 2 of 3

00001	Q	AG0770	Q	AD4502	Q	5000033848	Q	110	Q	50000	Q	56000	Q	Q	Q	OTH	Q	256022	Q	56000	Q	13,279.30	Kinnis, L.
00002	Q	AG0760	Q	AD4504	Q	5000070726	Q	110	Q	56200	Q	56200	Q	00233	Q	OTH	Q	256022	Q	56200	Q	4,877.72	Lesimura, M.
00003	Q	AG0435	Q		Q		Q	110	Q	16,300	Q	16,300	Q	00365	Q	OTH	Q	256022	Q	56200	Q	10,719.33	Nead, C.
00004	Q	AG0500	Q		Q		Q	110	Q	10500	Q	10500	Q		Q	ECLEV	Q	256022	Q	56200	Q	15,548.30	Mc-Cormick, T.
00005	Q	AG0710	Q		Q		Q	110	Q	20710	Q	20710	Q	00231	Q	OTH	Q	256022	Q	56200	Q	17,543.34	Miler, D.
00006	Q	AG0015	Q		Q		Q	110	Q	19100	Q	19100	Q	00236	Q	OTH	Q	256022	Q	56200	Q	8,008.82	Mostyn, C.
01401	Q	AG0786	Q		Q		Q	110	Q	52433	Q	52433	Q		Q	GAS	Q	256022	Q	560000	Q	23,895.08	Nichols, W.
00009	Q	AG0800	Q		Q		Q	110	Q	17275	Q	17275	Q	00250	Q	OTH	Q	256022	Q	562000	Q	8,541.05	Paarman, A. 50%
00086	Q	AG0780	Q		Q		Q	110	Q	20100	Q	20100	Q	00251	Q	OTH	Q	256022	Q	562000	Q	91,871.43	Pedigrew, J.
00008	Q	AG0700	Q	AG0704	Q	5000076168	Q	110	Q	37000	Q	20135	Q	00231	Q	OTH	Q	256022	Q	568000	Q	13,023.42	Predman, D.
00009	Q	AG0760	Q		Q		Q	110	Q	26090	Q	26090	Q	00231	Q	OTH	Q	256022	Q	562000	Q	13,138.23	Proudman, N.
00089	Q	AG0800	Q		Q		Q	110	Q	35040	Q	35040	Q	00231	Q	OTH	Q	256022	Q	568000	Q	16,300.75	Reeves, B.
00036	Q	AG0500	Q	ED0706	Q	9000070580	Q	110	Q	62000	Q	62000	Q		Q	TRAN	Q	256022	Q	566000	Q	7,000.00	Roe, A.
00038	Q	AG0030	Q		Q		Q	110	Q	62010	Q	62010	Q	00233	Q	OTH	Q	256022	Q	566000	Q	2,953.70	Roe, L.
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00036	Q	AG0085	Q	AG0545	Q	9000083581	Q	110	Q	10400	Q	10400	Q	00101	Q	DIST	Q	256022	Q	928000	Q		Ryan, L. (NM Night)
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00089	Q	AG0847	Q		Q		Q	200	Q	17980	Q	17980	Q	00380	Q	OTH	Q	256032	Q	921000	Q	28,167.44	Shinn, C.
00089	Q	AG0770	Q		Q		Q	110	Q	13000	Q	13000	Q	00236	Q	OTH	Q	256022	Q	921000	Q	8,573.64	Stevens, A.
00089	Q	AG0795	Q		Q		Q	110	Q	14200	Q	14200	Q	00201	Q	OTH	Q	256022	Q	921000	Q	57,362.33	Turner, H.
00001	Q	AG0730	Q		Q		Q	110	Q	11900	Q	11900	Q		Q	OTH	Q	256022	Q	921000	Q	13,600.23	Vernon-Pary, J.
00089	Q	AG0730	Q		Q		Q	110	Q	11200	Q	11200	Q	00382	Q	OTH	Q	256022	Q	921000	Q	69,477.74	Wheatcroft, M.
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00001	Q	AG0760	Q		Q		Q	110	Q	10850	Q	10850	Q		Q	OTH	Q	256022	Q	921000	Q	61,744.38	Wanser, N.
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
Page 3 of 3

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01459	3	27,121.06	27,121.06	V	

 Save  Return to Search  Print  Next in List  Notify  Refresh

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Header | Lines | Totals | Errors | Approval



Date of Request: March 15, 2010  
Due Date: March 25, 2010

Request No. DAG-6  
NMPC Req. No. NM 231 DPS 142

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO:

Request: collective bargaining agreements

1. Please provide a listing of (a) each labor agreement currently in effect between the Company and its union(s); (b) the effective date and period of each agreement; and (c) any extensions that have taken place since the initial agreement was negotiated.
2. Please provide copies of all current labor agreements currently in effect, including any extensions of the initial agreement.
3. Please provide a listing of any labor issues currently being discussed and/or negotiated with the Company's unions and the status of any agreements, memorandum of understandings, etc., that will result from these discussions / negotiations.
4. Please identify any labor issues and/or agreements that have been negotiated and agreed upon between the Company and the union subsequent to the start of the historic test year – i.e. October 2008.
5. For each labor issue and/or agreement listed in response to question #4 above, please explain, provide details, and identify where in the Company's electric rate case filing, the resulting impacts from each have been reflected.

Response:

- 1(a) A. Agreement Between Niagara Mohawk Power Corporation and Local Union 97  
B. Agreement Between Niagara Mohawk Power Corporation and Local Union 97  
(Gold Book)
- 1(b) A. October 1, 2004 – March 31, 2008  
B. November 6, 2007 – September 30, 2012
- 1(c) A. Agreement extended from April 1, 2008 – March 31, 2011 and Agreement  
extended from March 31, 2011 – March 31, 2014.
2. Please see attachments 1, 2, 3 and 4.

3. Labor issues currently being discussed are:

- Transmission Line Construction – Currently negotiating changes to the existing Memorandum of Agreement that applies separate work practices to the transmission construction workforce.
- Distribution Line Construction – Negotiations are completed and implementation is in process. The Memorandum of Agreement applies separate work practices to the distribution construction workforce.
- Gas crew configuration – Negotiations are ongoing regarding a dispute over the number of employees required for certain gas work.
- Doble Testing Job Flex – Negotiations are ongoing regarding a reclassification of work. This creates more flexibility around Doble (a company that manufactures power factor test instruments) testing in anticipation of additional substation work.
- Safety – Fire Retardant Clothing. Negotiations are completed and implementation is in process. This is required to comply with a new OSHA mandate.

4. Please see attachments 5, 6 and 7.

5. To the extent that new employees were added as a result of the agreements listed in response to question # 4, their costs are reflected in the test year for the period they were employed during the test year.

Name of Respondent:  
Timothy Rosbrook

Date of Reply:  
3/26/2010

Memorandum of Agreement  
Niagara Mohawk Power Corporation  
And  
Local Union 97, IBEW  
Regarding  
Extension to Labor Agreement

Niagara Mohawk Power Corporation (the "Company") and IBEW Local Union 97 ("Local 97" or the "Union") are parties to an agreement made April 1, 2008 ("Existing Agreement") and have agreed to extend the Existing Agreement and have also agreed on other matters as hereinafter set forth. The terms of the Existing Agreement shall remain in effect for the duration of the extension except as amended below.

i. Duration of Contract

The Company and Union are entering into a three year extension of the Existing Agreement from March 31, 2011 through March 31, 2014.

ii. General Wage Increases

The following base wage increases will take effect:

Effective April 1, 2011 ----- 2.50%  
Effective April 1, 2012 ----- 2.50%  
Effective April 1, 2013 ----- 2.50%

iii. Employee Benefits

1. Employee Stock Purchase Plan (ESPP), as outlined in Attachment 1

- a. Eligibility – Regular or Part Time employee who works more than 20 hours per week.
- b. Purchase American Depository Shares (ADS) on monthly basis at 10% discounted price.
- c. Each ADS represents five ordinary shares in the Company and are listed on New York Stock Exchange.
- d. Contributions up to 20% of base pay each year.
- e. Plan design in accordance with National Grid ESPP

2. Cash Balance – Supplemental pay credits by Birth Year as outlined in Attachment 2 and temporary supplemental annuity in accordance with Attachment 3. Eligibility; employees not in the "transition group", as set forth in the Pension Plan and hired prior to July 1, 1998. Changes are effective October 1, 2009.

3. Post-retirement Medical for employees hired after ratification of this Agreement and current employees not in the "transition group".

a. Changes are effective October 1, 2009.

b. For Current employees, not in the "transition group":

Eligibility	No change
Pre – 65 plans	Active employee plans
Pre – 65 contribution	Current contribution rules from CBA
Post – 65 plan	Medicare Supplement
Post – 65 contribution	Current contribution rules from CBA

c. For New Hires on or after ratification of this Agreement:

Eligibility	Age 60 or older with 85 points or Age 61 with 10 years service
Pre – 65 plans	Active employee plans
Pre – 65 contribution	Company contributes 2.67% per year of service to a maximum of 80%
Post – 65 plan	Medicare Supplement
Post – 65 contribution	Company contributes \$4.50 per month per year of service (\$9.00 if married)

iv. Grievances. Open Grievances will be jointly reviewed no later than December 30, 2009 and any grievances that cannot be mutually resolved that have been approved by the Union to arbitration, will be scheduled to arbitrate on a "first-in, first-scheduled" basis, unless the open matter is related to an employee discharge, in which case it will be scheduled no later than December 30, 2009.

v. Printing. The Agreement will be reprinted and a joint committee will review the Agreement for the purpose of making edits, additions and deletions, including Schedule A, Appendix D and Appendix E.

vi. Annual Performance Evaluation – the form will be modified at Company discretion to allow for use of one evaluation form that is consistent with all bargaining units at National Grid and the target bonus percentage will be 3.5%.

vii. EDO Operating Model

This new operating model will provide viable improvements and efficiencies necessary to enhance customer service, reliability and cost reduction and includes job security for affected employees, which is further defined under the terms and conditions of this MOA.

Any and all issues that may arise that are not covered by this MOA will be reviewed by the joint committee with the full understanding that the Collective Bargaining Agreement will apply.



I. Employee Impact Programs (EIP).

- a. Programs are voluntary and will be offered to active employees who as of July 1, 2009 are occupying the positions in the following job series; Design Representative, Office Technician, Consumer Representative, Designer, Meter Mechanic (Lab only), Meter Shop Tester C, Lab Technician, Chief Tester and Installer, and Tree Trimmer at the time of this agreement, whose position is affected by EDO Transformation.
- b. Offers will be made at least thirty days prior to the scheduled job reduction and will be made on the basis of division seniority to affected employees in the Eastern and Western divisions and on the basis of geographic area seniority as defined by Article IV 6(b) of the Labor Agreement, in the Central division. The number of eligible employees will be determined by the number of stated reductions associated with the operating model staffing.

1. Voluntary Separation

- a. 2 weeks per year of service, capped at 52 weeks or the parties Separation Allowance benefit, whichever is better based on the individual's age and years of service;
- b. An employee who elects to separate and is eligible for a pension benefit under the terms and conditions of the Collective Bargaining Agreement, will have this benefit paid through the pension asset;
- c. Lump sum payment equal to six months of current Company contribution to medical/dental benefit;
- d. Outplacement services; 30 days from start of service;
- e. Any affected employees who are currently on "Security Clause" status will be eligible for voluntary separation;
- f. Employees electing to separate may be held by the Company up to 18 months in the event the vacancy is to be filled and there are no EITs available for the specific position, or a training need exists.

2. Voluntary Relocation Allowance.

- a. Eligibility: voluntarily accept a position that is located in a work headquarters greater than 50 miles from current. All monetary amounts are less applicable taxes and withholdings and will be paid within thirty business days following Company receipt of signed lease agreement or signed purchase sale agreement.
- b. \$5,000 rental or \$15,000 primary residence
- c. Any employee who elects to relocate to a non-primary residence and within one year from the start date of their new position and location secures a primary residence, will be eligible to receive the \$10,000 difference in benefit.
- d. Lump sum \$2,000, paid in year one and year two within thirty days of starting at the new location and then one year after, assuming the employee continues in same or other eligible location.

3. Commuter Allowance. A lump sum of \$2,000 less applicable taxes and withholdings will be paid to an employee who commutes to a new location that is located in a work headquarters greater than 50 miles from the current. This payment will be made for the first year only and within thirty days of starting at the new location. The employee will remain eligible for the voluntary relocation allowance for one year from the start date of their new position and location.
4. Any employee whose work headquarters is greater than 50 miles, and who accepted an Office Technician position posted in February/March 2009 will be eligible for the voluntary relocation and commuter allowance.

II. Employee in Transition (EIT) Process. An EIT is an employee displaced as a result of implementing the EDO operating model. Unless modified by this Agreement, the seniority provisions of the Labor Agreement will apply. This is a transition pool and includes the following general provisions. More specific provisions regarding each affected job title are included in this document.

1. Placement into available vacancies in accordance with Article IV of the Labor Agreement.
2. EIT can bid posted positions without loss of wage protection. A successful award, sustaining the employee's rate of pay, will be allowed one time only and the employee status will be plus rated, but not subject to the terms and conditions of "security clause" administration (i.e. they are "made whole").
3. Placement into progression positions to allow for progression to higher level; principles of automatic progression will apply.
4. Transcending rights in accordance with Appendix A of the Labor Agreement.
5. The Company will continue to explore job opportunities for EITs and additional training options will be provided by the Company for consideration of longer term career opportunities at National Grid.

### III. Bargaining Unit Positions

By April 1, 2010 the Company will conduct a joint review with IBEW Local 97, of EDO staffing for short term and mid term business planning. The review will include age, position and location of EDO field workforce employees and planned staffing needs for the business cycle.

### IV. Design

1. EDO Distribution Design will be centralized to Syracuse. A certain number of Design Investigator positions will be assigned to divisional locations in accordance with the terms defined by this Agreement.
2. Contractors
  - a. For the term of the Labor Agreement, consignment type contractors will be discontinued in Distribution Design prior to the displacement of employees into the EIT pool through the implementation of centralized

Design. Gas Design contracting is addressed in the side letter regarding Gas Design Representatives.

- b. The model staffing number for the EDO Design Investigator position will be "protected" at East (16), Central (17) and West (17). While contractors (MSA type) are in use in the division, 10 Design Representatives will be retained as follows; 4 in the East, 2 in Central and 4 in the West.
- c. Protected means that these jobs will not be reduced so long as EDO Design Representatives remain as EIT in the geographic area.
- d. Article IV of the Labor Agreement applies to both centralized Design and Design Investigators. The provisions of the Article will be administered for Centralized Design as follows: the number of Design Representatives being offered overtime opportunities in the divisional roles will determine the number of employees offered overtime in the centralized role, but will not exceed the FTE equivalent of MSA contractors in use, in the division, at the time.
- e. If a design contractor is in use in a work location that no longer includes Design Representatives, the geographic area will be used to determine the application of contractor overtime described in Article IV of the Labor Agreement.

### 3. Employees in Transition (EIT)

- a. Design EITs will be temporarily assigned to a Design role and will be located within their original geographic area, to support the successful implementation of centralized Design.
- b. Employees assigned to these temporary roles will be a part of the transition pool and will be subject to the EIT process.
- c. Employees assigned to a Design Representative position at the time of this Agreement will continue job progression while in the EIT process as a result of the temporary design type work they are performing.
- d. EIT Design Representatives are eligible for contractor related overtime described in Article IV.
- e. Design vacancies will be filled by placing Design EITs based on seniority, from the same geographic area. If there are no Design EITs in the same geographic area, Design EITs in the division, then by system, can volunteer by seniority to fill the vacancy. If there are no volunteers, management will determine whether or not the vacancy is to be filled.

- 4. In full resolution of System Grievance 1-S-08, Design employees who were eligible as of 8/7/06 to progress to pay level 21.5 will be made whole for the step 1 time period they were required to serve. Employees occupying Design Representative Positions at the time this agreement is signed, and who are covered by Section 3 (d) of the Memorandum of Agreement Regarding Design Representatives (Design Representative MOA), who are assigned to staff divisional Design Investigator positions or who relocate to the Centralized Design office from a work location greater than 50 miles, will progress to PG 21.5 of the MOA and will serve step 1 time period.

5. The Design Representative MOA will be amended to include the following provisions and as outlined in Attachment 4:
  - a. Provision for centralized design work.
  - b. Provision for a field investigator.
  - c. Employees may perform all functions of the Design Representative in accordance with the job specification and pay level.
  - d. Employees in EDO Design will become a separate work group from Gas Design.
  - e. New entrants to series must have 2 year degree in Electrical or Mechanical Technology. Electrical ICS courses are discontinued as a qualifying measure for new entrants to the series.
  - f. New entrants to series progress to B level only
  - g. C Level duties: services requiring 3 phase primary metering, underground networks, large circuit rebuilds, manholes and ducts, lashed cable, 3 phase UCD, large public works (underground and overhead) and relocations, complex DOT jobs and relocations.
  - h. Training for field function of the Design Investigator role will be provided by the Company and with input from Local 97, IBEW.
  - i. Concurrent with the centralization of Design, there will be an addition of 3 Right of Way Agent (ROW) A positions and 2 Office Technicians for Easement work. ROW; Watertown, Syracuse and Northeast region. Office Technician; Buffalo and Albany.
  - j. The "No - Site Visit" arbitration decision is set aside and the Company is not required to make site visits.
6. Joint Committee. The Company and Union will meet quarterly to review the implementation of the new Design model. The purpose of this meeting will be to ensure successful implementation of the model in cooperation with Local 97. The committee will meet for six quarters and then mutually determine if additional meetings are necessary.

#### V. Clerical

1. The Office Technician function in EDO Distribution Support Services will be centralized to Syracuse. A limited number of positions will remain staffed at management's discretion in the division operations. The number of positions staffed will be 8 in Central, 7 in West and 7 in the East. These divisional staffing numbers include the provision for five positions described in paragraph V(7) below.
2. Administrative Clerk A:
  - a. Pay Group 1 and covered by the Labor Agreement
  - b. New job specification is described in Attachment 5.
  - c. February 2009 posting of up to 20 positions will be completed by filling the remaining 7 positions as new hires, under the PG 1 job specification.

- d. 10 new positions at PG 1 will be posted immediately.
3. "Gold Book" job specification.  
Company will post 5 new positions under Gold Book model to staff EDO Distribution Support. This new job specification is described in Attachment 6 and will remain as part of the EDO Distribution Support organization and as part of the labor agreement that covers "Gold Book" positions.
  4. Additional positions of Pay Group 1, Gold Book or Office Technician A-C, will be posted based on the job specifications and operational need.
  5. Two Senior Office Technician positions will be posted in Syracuse upon staffing 40 new centralized clerical positions. An additional two senior Office Technician positions will be posted to correspond with the expansion of clerical staff, as determined by the Company, but corresponding to the staffing of an additional 40 positions. Any employee currently occupying the Senior Office Technician job title, who remains staffed in the organization, will retain this job title until attrition.
  6. Contractors performing Office Technician work in Electric and Gas Distribution Support will be discontinued prior to displacing any active employees as a result of centralizing EDO clerical work into Syracuse and will only be further utilized while employees are in transition (EIT concept) if there is a compelling reason as determined by the Company.
  7. The Work Coordinator role is an integral part of the management team and is not structured as a role that performs bargaining unit work.
    - a. The Company will meet quarterly to conduct a joint review with Local 97 on the implementation of the Work Coordinator role and Centralized Clerical model.
    - b. A total of Five (5) additional Office Technician positions (2 East, 1 Central, 2 West) will be retained across the three divisions while EDO clerical employees remain in the EIT pool.
    - c. Disputes regarding bargaining unit work will be reviewed and discussed with the intent of creating mutually acceptable resolutions.
    - d. The Union will hold in abeyance, its grievances on Work Coordinator.
    - e. The joint committee will mutually agree whether or not to continue to meet after six quarters. Employees in Transition (EIT) will be temporarily assigned to a divisional Clerical role within their geographic area, to support the successful implementation of centralized Clerical. Employees assigned to these temporary roles will be placed into the transition pool and will be subject to the EIT process described in Section II above.
  8. Employees in EDO Office Technicians positions will be separate from Gas Office Technicians after canvassing to staff available jobs in accordance with the Falletta/Rosbrook letter dated March 2008, unless otherwise mutually agreed.

VI. Maps and Records. The job specifications are changed to create qualifications surrounding the use and application of current GIS technologies and are outlined in Attachment 7 with the Memorandum of Agreement describing the change.

1. MOA and Job Specification as addendum to Engineering Mutual Agreement.
2. New position requires 2 Year (AAS) degree in GIS/Computer Science or two years work experience in GIS. If the candidate in question was an incumbent employee at the time of this agreement, equivalent experience will be considered.
3. Five existing contractors will be replaced with the staffing of this new position over the next two years and will continue to be replaced as the new position is staffed at the qualified level. This does not change Article IV of the Labor Agreement.
4. Files and reproduction type work from the substations group in New England will be transferred to Syracuse in the fall of 2009.

VII. Customer Order Fulfillment. Functions in part, of the Design Representative, Customer Representative, Consumer Representative and Office Technician will be reassigned in the fall of 2009 to a centralized, affiliate workforce in Massachusetts. The centralized workforce will perform new and upgraded service requests, new lighting installations, and a limited variety of other non-service customer requests to provide a single point of accountability. In addition, the work group will review and monitor miscellaneous customer requests that require EDO investigation and involvement.

1. Up to seven Consumer Representatives will be affected across the three divisions. As a result, the Consumer Representatives in the Business Services Department will be eligible to participate in the EIP and EIT programs described in Sections I and II above. Geographic protection applies to affected employees.
2. Customer Representatives. There will be no reduction in occupied positions as a result of work being reassigned to Customer Order Fulfillment.
3. The impact on Office Technicians and Design Representatives is addressed separately above.

VIII. Work Readiness. This new job specification will be staffed to ensure the field force is able to successfully start and end their shifts and enable the execution of work. The Work Readiness job duties are outlined in the job specification of Attachment 8.

1. Locations. The Work Readiness position will be staffed in the following locations; Central 9, East 6, West 4.
2. 19 positions will be posted
3. Pay level of the position is 11

IX. Regional Control. Consolidation of the three operating centers is under review. The Company and Union will cooperatively bargain the impacts of consolidation, including changes to the existing job specifications. In the event that consolidation plans change, an Article XXIII review of the job specifications will continue.

X. Labs. Rubber Goods and Standards will be consolidated to Syracuse from New England and Long Island.

1. Memorandum of Agreement and new job specification relative to the Laboratory Technician A (Dielectric), Attachment 9
2. Revised spec for Lab Tech A (Electric), Attachment 10
3. New job spec for "Materials Handler", pay group 12, Attachment 11
4. All Lab employees will be offered separation in accordance with the EIP program described in section I. A total of four positions will be reduced; 2 Standards Labs and 2 Chem Labs. The four affected employees will be placed into other Lab positions and in accordance with Articles IV and XI of the Labor Agreement.

XI. Make Taps Permanent. Licensed electricians to complete the permanent connections using connectors provided by Company, for single phase, single meter, residential service upgrades up to 200 amps with the same point of attachment. Service Representative Completes the sealing of the meter and review of the site to ensure the service meets company standards. Electric Line Mechanics will be offered an additional 7 weeks of contractor related overtime (in accordance with Article IV); three weeks prior to May 1 and four weeks starting September 1. Upon ratification, employees will be eligible for the offer period to commence after September 1.

XII. Forestry. Effective April 1, 2011 the Company will discontinue in-house forestry work and utilize a fully outsourced model for this type of work.

1. Affected employees will have the voluntary option to choose other EDO jobs as outlined in Attachment 12.
2. Affected employees are eligible for separation allowance described above in EIP.
3. Forestry employees are eligible for the provisions listed in paragraphs 2 and 3 under Section II (EIT Process).
4. Employees who opt not to separate or transition to other EDO positions will remain in their job and geographic area performing forestry duties through March 31, 2011 at which time the in-house forestry work will discontinue.
5. Divisional security clause rules will apply and placement will be made into available jobs effective April 1, 2011.
6. This event will not result in the determination by the Company that no jobs are available.

### XIII. Proficiency Checklist

The Memorandum of Agreement on the Role of Chief Line Mechanic in On-the-Job Training and Evaluation will be expanded to include the following Field Operation job series and the role of the applicable Chief position or higher level employee. Time will be assigned during the regular schedule to provide on-the-job training to other employees in

the apprentice role. A joint committee will develop a checklist of duties for the following job series:

- Electrician (Stations)
- Splicer
- Maintenance Mechanic (Stations)
- Maintenance Mechanic (UG)
- Mechanic (UG)
- Relay Tester
- Communications Tester
- Field Tester

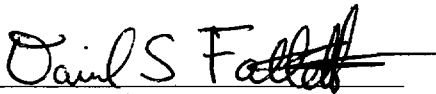
XIV. Niagara Falls

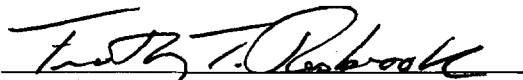
1. Combine displaced Buffalo EDO Office Technicians with Collections Service Associates to create a resource pool.
2. The EIT process will apply to all employees in this resource pool and geographic protections will apply.
3. The employees are eligible for the EIP programs.
4. Assignment of work can be within the Technical, Office and Clerical classifications and is at the discretion of management. The Universal Representative MOA applies to employees in this resource pool.
5. Virtual work model will be implemented for the Syracuse Contact Center including calls and WFM.

Signed and Agreed:

LOCAL Union 97, IBEW:

Niagara Mohawk Power Corporation:

  
David S. Falletta  
President, Business Manager  
And Financial Secretary

  
Timothy T. Rosbrook  
Director, Employee and Labor Relations  
Upstate New York

July 28, 2009

July 29, 2009

July 28, 2009

Page 10



Date of Request: March 15, 2010  
Due Date: March 25, 2010

Request No. DAG-9  
NMPC Req. No. NM 234 DPS 145

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirement Panel

Request Legal Services Expense

1. Please provide both the HY actual amount for HYE 9/20/2009 and 9/30/2008, and also the RY forecasted amounts for legal services expense; identify where those stated amounts can be found in the Company's exhibits and workpapers. If the amounts cannot be explicitly derived from the exhibits and workpapers, please provide a listing of charges by expense type, originating business units, direct and indirect charges, and activity number with activity description, along with vendor names (see the Company's response to DAG-14 (NM-144), in Case 08-G-0609 if this question cannot be responded to in the exact format asked. As an alternative, Attachment 2 of DAG-14 could be updated for historic years 2008 and 2009).

2. Please (a) provide all normalizing adjustments the company made to HY legal services expense; and (b) explain and provide a copy of the analysis the Company undertook to determine the actual HY legal services expense that needed to be normalized, in forecasting RY levels.

3. If the answer to question 2 above is, "There are no normalizing adjustments made to the HY," please explain and provide a copy of the analysis the Company undertook to determine the actual HY legal services expense was reasonable and included no non-recurring items, in forecasting the RYs.

Response:

Part 1. 1. In accordance with regulatory policy, the Company's O&M expense exhibit RRP-2 is presented by functional group, subdivided between Operation and Maintenance, with separate schedules for different cost elements (i.e. expense types). The Revenue Requirement Panel testimony describes the exhibit in further detail. Legal Services are not defined by a single expense type (cost element) in the Company's general ledger, and therefore are not presented explicitly in the Company's exhibits or workpapers. Please see attached file DAG-9 Attachment 1 (Legal Services) for requested information on legal services costs as an update to the The Company's response to DAG-14 (NM-144), in Case 08-G-0609.

Part 2. As explained above in Part 1, the Company presented O&M expenses for the Historic Year, Historic Year Normalizing Adjustments and Rate Year Adjustments by expense type, not by organization or department (i.e. "Legal Services"). For example, Historic Year Adjustments were made to various expense types to remove non-recurring New England and KeySpan integration costs. Exhibit RRP-10, Workpaper to RRP-2, Schedule 1, Workpaper 3 show how these costs by expense type (supportive of RRP-2), regardless of what department was charged.

Part 3. To comply with regulatory policy, the Company's approach to the review of Historic Year data was organized principally by expense type. For each expense type, the Company queried Historic Year (HY) data generally including information deemed relevant to the specific expense type (i.e. Company, Department, Activity, Segment, Bill Pool, Project, etc). Exhibit RRP-10, Workpaper to RRP-2, Schedule 1, Workpaper 1 – 7 is the result of this work. As described in The Company's response to Part 1.a and .b of IR DPS 138 DAG-4 on March 23, 2009, an analysis was done on all expense types by project to analyze year over year variance and scrutinize projects for purposes of normalizing the historic test year. In addition, finance representatives from lines of business and shared service groups met regularly with regulatory personnel as part of the RCS process, described in the previous cited IR DAG-4, Part 9, to review year on year variance analysis between historic test year and forecasted rate year. These individuals were provided a high-level functional profile of the HY costs and asked to review this data and to address the following:

- Identify one time costs in the HY that may not be recurring in future years
  - Review prior period costs booked in the HY
  - Identify any corrections, transfers, adjustments etc.
  - Identify any new major initiatives (not in HY) excluding NE Gas and KeySpan Costs to Achieve and Synergy Savings that would be incurred in Calendar Years 2011 through 2013
  - Provide detailed descriptions of historic year costs and the impact on rate year.
- As a result of these processes there were no one-time costs identified specific to the legal group nor a specific document showing a normalization adjustment to legal expense is not warranted.

Name of Respondent:  
James Molloy

Date of Reply:  
March 26, 2010

**Niagara Mohawk Power Corporation (Gas) d/b/a National Grid**  
**Consultants - Expense Type 100, 105, 110 Legal Services**

Business Unit	Historic Year Ending September 30, 2009			3.21%	1.80%	1.90%
	Total	Electric	Gas	Rate Year 2011	Rate Year 2012	Rate Year 2013
99 AP (see List)	267,044.58	243,738.66	23,305.92	Electric	Electric	Electric
36 AP (see List)	7,513,397.76	6,439,523.14	1,073,874.62			
99 On Line JE	56,976.41	48,537.54	8,438.87			
36 On Line JE	a 26,311.32	42,654.41	(16,343.09)			
Total	7,863,730.07	6,774,453.74	1,089,276.33	6,992,223.42	7,118,083.44	7,253,327.02
Total Book	7,863,730.42	6,774,453.95	1,089,276.47			
	(0.35)	(0.21)	(0.14)			
Total A/P Report by Vendor	8,175,217.38	7,063,230.23	1,111,987.15			
Difference	(311,486.96)	(288,776.28)	(22,710.68)			
<b>Difference Reconciled</b>						
Net Legal Accrual for Year (Online JE 01089)	\$ (169,050.00)	\$ (151,020.30)	\$ (18,029.70)			
A/C Rec data	\$ (171,618.81)	\$ (161,843.33)	\$ (9,775.48)			
Other	29,181.85	24,087.35	5,094.51			
	\$ (311,486.96)	\$ (288,776.28)	\$ (22,710.68)			

**Note**

a) Includes \$394,775 of Keyspan A/P included in Vendor Report



Outside Legal Services - Exp Type 100 Consultants and 110 Contractors  
 Historic Years Ending September 2008 and 2009 - By Originating Business, By Vendor, By Activity  
 Total Charged Through Accounts Payable System and Total Charged to Niagara Mohawk Electric & Gas  
 (Whole \$)

Originating Business Unit Desc	Orig Business Unit	Vendor	Activity	Activity Descr	Business Unit	Segment	Billing Pool	Historic Test 1 Data						
								Ending Sept. 30, 2008			Ending Sept. 30, 2009			
								Sum of Total Payables \$	Sum of Total Payables Gas	Sum of Total Electric	Sum of Total Payables \$	Sum of Total Payables Gas	Sum of Total Electric	
Niagara Mohawk Power Corp	00036	ALSTON & BIRD LLP	AG0236	AGC General Litigation	00036	DIST	00100	143,375.60	24,373.85	119,001.75	285,507.93	48,536.35	236,971.58	
			AG0245	Corporate Matters/Contracts	00036	DIST	00100	17,157.97	2,916.85	14,241.12	7,956.60	1,352.62	6,603.98	
						TRAN		169,117.70	0.00	169,117.70	2,096.00	0.00	2,096.00	
			AG0253	AGC FERC	00036	DIST					16,858.80	0.00	16,858.80	
			AG0255	Regulatory Legal Services	00036	DIST		26,586.44	0.00	26,586.44	437,233.15	0.00	437,233.15	
						00100		2,080,183.53	353,631.20	1,726,552.33	947,431.48	161,063.35	786,368.13	
						00101					289,928.00	0.00	289,928.00	
						TRAN		853,536.79	0.00	853,536.79	608,005.40	0.00	608,005.40	
		ALSTON & BIRD LLP Total							3,289,958.03	380,921.91	2,909,036.12	2,595,017.36	210,952.32	2,384,065.04
		AMDURSKY PELKY FENNELL & WALLEN PC	AG0233	Legal Compl Manfc Gas Plant N	00036	GAS		351.00	351.00	0.00				
			AG0235	General Legal Claims	00036	DIST					1,080.00	0.00	1,080.00	
		AMDURSKY PELKY FENNELL & WALLEN PC Total							351.00	351.00	0.00	1,080.00	0.00	1,080.00
		AMERICAN LEGAL SERVICES INC										700.00	0.00	700.00
		AMERICAN LEGAL SERVICES INC Total										700.00	0.00	700.00
		ANDERSON & KREIGER LLP										10,012.60	1,702.14	8,310.46
		ANDERSON & KREIGER LLP Total										10,012.60	1,702.14	8,310.46
		AT&T										207.41	35.26	172.15
		AT&T Total										207.41	35.26	172.15
		BOND SCHOENECK & KING PLLC	AG0236	AGC General Litigation	00036	DIST		5,766.51	0.00	5,766.51	17,334.85	2,946.92	14,387.93	
							00100	18,116.28	3,079.77	15,036.51				
			AG0240	SVP US General Counsel	00036	DIST		31,565.49	0.00	31,565.49	96,314.99	0.00	96,314.99	
			AG0242	AGC Labor & Employment	00036	DIST		418,593.49	71,160.89	347,432.60	428,319.36	72,814.29	355,505.07	
							00100				11,025.15	0.00	11,025.15	
											27,219.75	4,627.36	22,592.39	
		BOND SCHOENECK & KING PLLC Total							474,041.77	74,240.66	399,801.11	580,214.10	80,388.57	499,825.53
		BOWDITCH AND DEWEY LLP	AG0235	General Legal Claims	00036	DIST		5,825.09	0.00	5,825.09	504.90	0.00	504.90	
			AG0236	AGC General Litigation	00036	DIST		1,850.35	0.00	1,850.35				
							00100	229.92	39.09	190.83	8,461.42	1,438.44	7,022.98	
		BOWDITCH AND DEWEY LLP Total							7,905.36	39.09	7,866.27	8,966.32	1,438.44	7,527.88
		CLOUGH HARBOUR & ASSOCIATES LLP										3,175.21	0.00	3,175.21
		CLOUGH HARBOUR & ASSOCIATES LLP Total										3,175.21	0.00	3,175.21
		CULLEN AND DYKMAN LLP										95,981.17	95,981.17	0.00
		CULLEN AND DYKMAN LLP Total										95,981.17	95,981.17	0.00
		DAVID J MAGNARELLI										22,902.40	0.00	22,902.40
		DAVID J MAGNARELLI Total										22,902.40	0.00	22,902.40
		DRINKER BIDDLE & REATH LLP										32,292.00	5,489.64	26,802.36
		DRINKER BIDDLE & REATH LLP Total										32,292.00	5,489.64	26,802.36
		EDWARDS ANGELL PALMER & DODGE LLP										10,019.35	1,703.29	8,316.06
		EDWARDS ANGELL PALMER & DODGE LLP Total										10,019.35	1,703.29	8,316.06
		FINNEGAN HENDERSON FARABOW GARRETT &										1,008.60	171.46	837.14
		FINNEGAN HENDERSON FARABOW GARRETT & Total										1,008.60	171.46	837.14
		GREENBERG TRAURIG LLP										1,327.50	0.00	1,327.50
		GREENBERG TRAURIG LLP Total										1,327.50	0.00	1,327.50
		GREENE HERSHDORFER & SHARPE										40,201.89	0.00	40,201.89
		GREENE HERSHDORFER & SHARPE Total										40,201.89	0.00	40,201.89
		HARRIS BEACH PLLC										20,527.92	0.00	20,527.92
							00100	150,459.10	25,578.05	124,881.05	50,000.00	8,500.00	41,500.00	

Outside Legal Services - Exp Type 100 Consultants and 110 Contractors  
Historic Years Ending September 2008 and 2009 - By Originating Business, By Vendor, By Activity  
Total Charged Through Accounts Payable System and Total Charged to Niagara Mohawk Electric & Gas  
(Whole \$)

Originating Business Unit Desc	Orig Business Unit	Vendor	Activity	Activity Desc	Business Unit	Segment	Billing Pool	Historic Test 1 Data					
								Ending Sept. 30, 2008			Ending Sept. 30, 2009		
								Sum of Total Payables \$	Sum of Total Payables Gas	Sum of Total Electric	Sum of Total Payables \$	Sum of Total Payables Gas	Sum of Total Electric
		HARRIS BEACH PLLC Total						170,987.02	25,578.05	145,408.97	73,828.00	8,500.00	65,328.00
		HISCOCK & BARCLAY LLP	AG0233	Legal Compl Manfc Gas Plant N	00036	DIST					4,219.27	0.00	4,219.27
			AG0235	General Legal Claims	00036	DIST		314,746.71	0.00	314,746.71	347,921.53	0.00	347,921.53
							00100	95,269.16	16,195.76	79,073.40	2,604.90	442.83	2,162.07
								9,484.05	9,484.05	0.00	34,337.89	34,337.89	0.00
			AG0236	AGC General Litigation	00036	DIST		4,134.34	0.00	4,134.34	54,628.40	0.00	54,628.40
							00100	585,611.89	99,554.02	486,057.87	783,759.65	133,239.14	650,520.51
								8,813.08	0.00	8,813.08	8,557.39	0.00	8,557.39
			AG0245	Corporate Matters/Contracts	00036	DIST	00100	27,862.02	4,736.54	23,125.48	102,930.28	17,498.15	85,432.13
			AG0252	DGC Federal and NY Regulatory	00036	DIST	00100				2,202.00	374.34	1,827.66
			AG0254	AGC NY Regulatory	00036	DIST					14,710.70	0.00	14,710.70
			AG0255	Regulatory Legal Services	00036	DIST		360,867.39	0.00	360,867.39	610,343.65	0.00	610,343.65
							00100				42,450.30	7,216.55	35,233.75
								660.00	0.00	660.00	390.00	0.00	390.00
			AG0260	AGC Real Estate	00036	DIST	00100	8,148.54	1,385.25	6,763.29	40,818.42	0.00	40,818.42
											15,107.52	2,568.28	12,539.24
		HISCOCK & BARCLAY LLP Total						1,415,597.18	131,355.62	1,284,241.56	2,064,981.90	195,677.18	1,869,304.72
		JEANNE O'CONNELL RPR	AG0080	Regulatory Filing Activities	00036	DIST					3,674.74	0.00	3,674.74
		JEANNE O'CONNELL RPR Total									3,674.74	0.00	3,674.74
		JOHN SERTH JR PE	AG0236	AGC General Litigation	00036	DIST		610.00	0.00	610.00	125.00	0.00	125.00
		JOHN SERTH JR PE Total						610.00	0.00	610.00	125.00	0.00	125.00
		JOHN U H BLUMENSTOCK ESQ	AG0236	AGC General Litigation	00036	DIST					2,942.17	0.00	2,942.17
							00100	141,989.99	24,138.30	117,851.69	154,790.90	26,314.45	128,476.45
		JOHN U H BLUMENSTOCK ESQ Total						141,989.99	24,138.30	117,851.69	157,733.07	26,314.45	131,418.62
		MORGAN LEWIS & BOCKIUS LLP	AG0255	Regulatory Legal Services	00036	DIST	00100	170,372.00	28,963.24	141,408.76	894,293.64	152,029.92	742,263.72
		MORGAN LEWIS & BOCKIUS LLP Total						170,372.00	28,963.24	141,408.76	894,293.64	152,029.92	742,263.72
		ORRICK HERRINGTON & SUTCLIFFE LLP	AG0236	AGC General Litigation	00036	DIST		2,775.75	0.00	2,775.75	2,761.50	0.00	2,761.50
							00100	262.50	44.63	217.88	1,938.75	329.59	1,609.16
		ORRICK HERRINGTON & SUTCLIFFE LLP Total						3,038.25	44.63	2,993.63	4,700.25	329.59	4,370.66
		PRO UNLIMITED INC	AG0241	Manager of Operations	00036	DIST	00100				18,913.75	3,215.34	15,698.41
			AG0245	Corporate Matters/Contracts	00036	DIST	00100				8,302.47	1,411.42	6,891.05
		PRO UNLIMITED INC Total									27,216.22	4,626.76	22,589.46
		RICE DOLAN & KERSHAW	AG0236	AGC General Litigation	00036	DIST					608.00	0.00	608.00
		RICE DOLAN & KERSHAW Total									608.00	0.00	608.00
		ROBERT L ADAMS ESQ	AG0235	General Legal Claims	00036	DIST		46,194.59	0.00	46,194.59	57,321.97	0.00	57,321.97
								662.40	662.40	0.00	867.00	867.00	0.00
			AG0236	AGC General Litigation	00036	DIST		1,824.98	0.00	1,824.98	697.00	0.00	697.00
							00100	2,503.24	425.55	2,077.69	925.40	157.32	768.08
		ROBERT L ADAMS ESQ Total						51,185.21	1,087.95	50,097.26	59,811.37	1,024.32	58,787.05
		ROPES & GRAY LLP	AG0245	Corporate Matters/Contracts	00036	DIST	00100	4,457.50	757.78	3,699.73	11,397.70	1,937.61	9,460.09
		ROPES & GRAY LLP Total						4,457.50	757.78	3,699.73	11,397.70	1,937.61	9,460.09
		RUSSELL R JOHNSON III	AG0236	AGC General Litigation	00036	DIST	00100	48,528.61	8,249.86	40,278.75	9,704.63	1,649.79	8,054.84
		RUSSELL R JOHNSON III Total						48,528.61	8,249.86	40,278.75	9,704.63	1,649.79	8,054.84
		SEYFARTH SHAW ATTORNEYS LLP	AG0240	SVP US General Counsel	00036	DIST					1,560.09	0.00	1,560.09
		SEYFARTH SHAW ATTORNEYS LLP Total									1,560.09	0.00	1,560.09
		SOLOMON AND SOLOMON PC	AG0235	General Legal Claims	00036	DIST		261,371.00	0.00	261,371.00	177,711.06	0.00	177,711.06
		SOLOMON AND SOLOMON PC Total						261,371.00	0.00	261,371.00	177,711.06	0.00	177,711.06

Outside Legal Services - Exp Type 100 Consultants and 110 Contractors  
Historic Years Ending September 2008 and 2009 - By Originating Business, By Vendor, By Activity  
Total Charged Through Accounts Payable System and Total Charged to Niagara Mohawk Electric & Gas  
(Whole \$)

Originating Business Unit Desc	Orig Business Unit	Vendor	Activity	Activity Desc	Business Unit	Segment	Billing Pool	Historic Test 1 Data			Ending Sept. 30, 2009		
								Sum of Total	Sum of Total	Sum of Total	Sum of Total	Sum of Total	Sum of Total
								Payables \$	Payables Gas	Electric	Payables \$	Payables Gas	Electric
Niagara Mohawk Power Corp Total	00099	THE ENERGY ASSOCIATION OF NY STATE	AG0255	Regulatory Legal Services	00036	TRAN		266,155.65	0.00	266,155.65	305,896.16	0.00	305,896.16
		THE ENERGY ASSOCIATION OF NY STATE Total						266,155.65	0.00	266,155.65	305,896.16	0.00	305,896.16
		THE SUBURBAN GROUP	AG0245	Corporate Matters/Contracts	00099	OTH	00235	3,643.37	0.00	0.00			
		THE SUBURBAN GROUP Total						3,643.37	0.00	0.00			
		UPDATE LEGAL INC	AG0245	Corporate Matters/Contracts	00099	OTH	00235	2,054.00	0.00	0.00			
		UPDATE LEGAL INC Total						2,054.00	0.00	0.00			
		WEST GROUP	AG0245	Corporate Matters/Contracts	00036	DIST	00100				710.50	120.79	589.72
		WEST GROUP Total									710.50	120.79	589.72
		WILDER & LINNEBALL LLP	AG0235	General Legal Claims	00036	DIST		117,810.88	0.00	117,810.88	62,054.76	0.00	62,054.76
						GAS		44,608.39	44,608.39	0.00	37,214.33	37,214.33	0.00
		WILDER & LINNEBALL LLP Total						162,419.27	44,608.39	117,810.88	99,269.09	37,214.33	62,054.76
		STENGER & FINNERTY	AG0235	General Legal Claims	00036	DIST		1,386.50	0.00	1,386.50			
		STENGER & FINNERTY Total						1,386.50	0.00	1,386.50			
		MCCONNELL VALDES LLC	AG0236	AGC General Litigation	00036	DIST	00100	12,061.99	2,050.54	10,011.45			
		MCCONNELL VALDES LLC Total						12,061.99	2,050.54	10,011.45			
		BORDEN LADNER GERVAIS LLP	AG0245	Corporate Matters/Contracts	00036	DIST		742.31	0.00	742.31			
		BORDEN LADNER GERVAIS LLP Total						742.31	0.00	742.31			
		MARJAMA MULDOON BLASIAK & SULLIVAN LLP	AG0245	Corporate Matters/Contracts	00036	DIST	00100	3,147.74	535.12	2,612.62			
		MARJAMA MULDOON BLASIAK & SULLIVAN LLP Total						3,147.74	535.12	2,612.62			
								6,663,444.66	820,778.04	5,836,969.25	7,502,904.60	1,023,239.04	6,479,665.56
National Grid USA Service Co.	00099	ALSTON & BIRD LLP	AG0245	Corporate Matters/Contracts	00099	OTH	00236	41,397.07	3,773.16	18,422.56			
			AG0255	Regulatory Legal Services	00099	OTH	00233	84,198.97	0.00	46,467.06	115,041.19	0.00	63,844.04
							00235	6,501.60	0.00	0.00			
							00236	57,520.70	5,244.29	25,605.40	89,834.34	8,195.22	40,013.38
							00238				68,052.25	0.00	37,063.29
		ALSTON & BIRD LLP Total						189,618.34	9,017.44	90,495.01	272,927.78	8,195.22	140,920.72
		AMERICAN GAS ASSOCIATION	AG0252	DGC Federal and NY Regulatory	00099	OTH	00382				825.00	37.49	222.82
		AMERICAN GAS ASSOCIATION Total									825.00	37.49	222.82
		BOND SCHOENECK & KING PLLC	AG0242	AGC Labor & Employment	00099	OTH	00382				3,407.25	154.83	920.26
		BOND SCHOENECK & KING PLLC Total									3,407.25	154.83	920.26
		BOSTON PROPERTIES LIMITED PARTNERSHIP	AG0245	Corporate Matters/Contracts	00099	OTH	00235	865.41	0.00	0.00	594.00	0.00	0.00
			AG0256	AGC NE Regulatory	00099	OTH	00239				90.00	4.13	24.58
		BOSTON PROPERTIES LIMITED PARTNERSHIP Total						865.41	0.00	0.00	684.00	4.13	24.58
		BOWDITCH AND DEWEY LLP	AG0235	General Legal Claims	00099	OTH	00235	10,868.49	0.00	0.00	219.19	0.00	0.00
			AG0236	AGC General Litigation	00099	OTH	00230				2,477.80	0.00	0.00
							00235	1,669.40	0.00	0.00			
			AG0255	Regulatory Legal Services	00099	OTH	00235	18,700.50	0.00	0.00	7,869.25	0.00	0.00
		BOWDITCH AND DEWEY LLP Total						31,238.39	0.00	0.00	10,566.24	0.00	0.00
		CAPITAL RECORDS MANAGEMENT INC	AG0238	Information Records Management	00099	OTH	00235				970.80	0.00	0.00
			AG0245	Corporate Matters/Contracts	00099	OTH	00235				880.36	0.00	0.00
		CAPITAL RECORDS MANAGEMENT INC Total									1,851.16	0.00	0.00
		CURRY PRINTING	AG0253	AGC FERC	00099	OTH	00235				123.83	0.00	0.00
		CURRY PRINTING Total									123.83	0.00	0.00
		DAVID J GORMAN PC	AG0260	AGC Real Estate	00099	OTH	00236	36,847.54	3,348.47	16,349.11	46,019.24	4,183.97	20,428.49
		DAVID J GORMAN PC Total						36,847.54	3,348.47	16,349.11	46,019.24	4,183.97	20,428.49
		EDISON ELECTRIC INSTITUTE (EEI)	AG0493	Provide Administrative & Gener	00099	OTH	00236				12,000.00	1,095.00	5,346.36
		EDISON ELECTRIC INSTITUTE (EEI) Total									12,000.00	1,095.00	5,346.36

Outside Legal Services - Exp Type 100 Consultants and 110 Contractors  
 Historic Years Ending September 2008 and 2009 - By Originating Business, By Vendor, By Activity  
 Total Charged Through Accounts Payable System and Total Charged to Niagara Mohawk Electric & Gas  
 (Whole \$)

Originating Business Unit Desc	Orig Business Unit	Vendor	Activity	Activity Descr	Business Unit	Segment	Billing Pool	Historic Test 1 Data			Ending Sept. 30, 2009		
								Sum of Total Payables \$	Sum of Total Payables Gas	Sum of Total Electric	Sum of Total Payables \$	Sum of Total Payables Gas	Sum of Total Electric
		EDWARDS ANGELL PALMER & DODGE LLP	AG0240	SVP US General Counsel	00099	OTH	00235	4,434.53	0.00	0.00	21,290.47	0.00	0.00
			AG0245	Corporate Matters/Contracts	00099	OTH	00236	664.94	60.21	293.98	141.32	12.90	62.96
		EDWARDS ANGELL PALMER & DODGE LLP Total						5,099.47	60.21	293.98	21,431.79	12.90	62.96
		ETHICS & COMPLIANCE OFFICER ASSOCIATION	AG0493	Provide Administrative & Gener	00099	OTH	00236				4,500.00	410.63	2,004.89
		ETHICS & COMPLIANCE OFFICER ASSOCIATION Total									4,500.00	410.63	2,004.89
		FINNEGAN HENDERSON FARABOW GARRETT &	AG0245	Corporate Matters/Contracts	00099	OTH	00236	1,520.14	138.16	674.56	352.43	32.16	157.02
							00237				2,372.34	0.00	0.00
		FINNEGAN HENDERSON FARABOW GARRETT & Total						1,520.14	138.16	674.56	2,724.77	32.16	157.02
		GIBSON DUNN & CRUTCHER LLP	AG0245	Corporate Matters/Contracts	00099	OTH	00380				3,689.77	331.24	1,617.32
		GIBSON DUNN & CRUTCHER LLP Total									3,689.77	331.24	1,617.32
		GLENN E DAWSON ESQ	AG0240	SVP US General Counsel	00099	OTH	00232	16,655.99	0.00	0.00	11,971.20	0.00	0.00
							00233				3,408.22	0.00	1,865.57
							00235				1,225.26	0.00	0.00
		GLENN E DAWSON ESQ Total						16,655.99	0.00	0.00	16,604.68	0.00	1,865.57
		GOULSTON & STORRS	AG0260	AGC Real Estate	00099	OTH	00235	223,227.60	0.00	0.00	13,514.64	0.00	0.00
		GOULSTON & STORRS Total						223,227.60	0.00	0.00	13,514.64	0.00	0.00
		HISCOCK & BARCLAY LLP	AG0245	Corporate Matters/Contracts	00099	OTH	00382				752.00	34.17	203.11
			AG0255	Regulatory Legal Services	00099	OTH	00231	9,129.00	0.00	4,801.40	20,136.82	0.00	10,512.17
		HISCOCK & BARCLAY LLP Total						9,129.00	0.00	4,801.40	20,888.82	34.17	10,715.28
		INCISIVE MEDIA	AG0255	Regulatory Legal Services	00099	OTH	00380				600.00	54.09	264.10
		INCISIVE MEDIA Total									600.00	54.09	264.10
		INTERNAL REVENUE SERVICE	AG0245	Corporate Matters/Contracts	00099	OTH	00235				50,241.38	0.00	0.00
		INTERNAL REVENUE SERVICE Total									50,241.38	0.00	0.00
		IRON MOUNTAIN OFF-SITE	AG0238	Information Records Management	00099	OTH	00235				11,438.46	0.00	0.00
		IRON MOUNTAIN OFF-SITE Total									11,438.46	0.00	0.00
		IRON MOUNTAIN RECORDS MANAGEMENT	AG0238	Information Records Management	00099	OTH	00235				38,863.38	0.00	0.00
			AG0245	Corporate Matters/Contracts	00099	OTH	00235				131,857.15	0.00	0.00
		IRON MOUNTAIN RECORDS MANAGEMENT Total									170,720.53	0.00	0.00
		KELLER AND HECKMAN	AG0255	Regulatory Legal Services	00099	OTH	00231	24,779.25	0.00	13,020.21	21,280.11	0.00	11,133.27
		KELLER AND HECKMAN Total						24,779.25	0.00	13,020.21	21,280.11	0.00	11,133.27
		LANE4 MANAGEMENT GROUP	AG0240	SVP US General Counsel	00099	OTH	00382				10,518.70	477.97	2,841.00
		LANE4 MANAGEMENT GROUP Total									10,518.70	477.97	2,841.00
		LAWSON LEGAL RECRUITERS LLC	AG0245	Corporate Matters/Contracts	00099	OTH	00236				24,400.00	2,226.50	10,870.93
		LAWSON LEGAL RECRUITERS LLC Total									24,400.00	2,226.50	10,870.93
		MASSACHUSETTS DEPARTMENT OF REVENUE	AG0240	SVP US General Counsel	00099	OTH	00235				0.00	0.00	0.00
			AG0245	Corporate Matters/Contracts	00099	OTH	00235				4,958.30	0.00	0.00
		MASSACHUSETTS DEPARTMENT OF REVENUE Total									4,958.30	0.00	0.00
		MCCARTER & ENGLISH LLP	AG0242	AGC Labor & Employment	00099	OTH	00382				15,385.00	699.09	4,155.33
		MCCARTER & ENGLISH LLP Total									15,385.00	699.09	4,155.33
		MCLANE GRAF RAULERSON & MIDDLETON	AG0255	Regulatory Legal Services	00099	OTH	00237				118,905.60	0.00	0.00
			AG0256	AGC NE Regulatory	00099	OTH	00391				390.50	0.00	0.00
		MCLANE GRAF RAULERSON & MIDDLETON Total									119,296.10	0.00	0.00
		MORGAN LEWIS & BOCKIUS LLP	AG0255	Regulatory Legal Services	00099	OTH	00236				1,837.50	166.39	812.40
		MORGAN LEWIS & BOCKIUS LLP Total									1,837.50	166.39	812.40
		NOBLE & WICKERSHAM LLP	AG0255	Regulatory Legal Services	00099	OTH	00236	19,342.85	1,751.50	8,551.86	495.00	45.17	220.54
		NOBLE & WICKERSHAM LLP Total						19,342.85	1,751.50	8,551.86	495.00	45.17	220.54
		NOVA RECORDS LLC	AG0238	Information Records Management	00099	OTH	00235				2,865.45	0.00	0.00



Outside Legal Services - Exp Type 100 Consultants and 110 Contractors  
 Historic Years Ending September 2008 and 2009 - By Originating Business, By Vendor, By Activity  
 Total Charged Through Accounts Payable System and Total Charged to Niagara Mohawk Electric & Gas  
 (Whole \$)

Originating Business Unit Desc	Orig Business Unit	Vendor	Activity	Activity Descr	Business Unit	Segment	Billing Pool	Historic Test Y Data					
								Ending Sept. 30, 2008			Ending Sept. 30, 2009		
								Sum of Total Payables \$	Sum of Total Payables Gas	Sum of Total Electric	Sum of Total Payables \$	Sum of Total Payables Gas	Sum of Total Electric
		NOVA RECORDS LLC Total	AG0245	Corporate Matters/Contracts	00099	OTH	00235				8,838.55	0.00	0.00
		PRO UNLIMITED INC	AG0235	General Legal Claims	00099	OTH	00235				11,704.00	0.00	0.00
			AG0241	Manager of Operations	00099	OTH	00235				1,450.06	0.00	0.00
							00382				9,742.16	0.00	0.00
			AG0245	Corporate Matters/Contracts	00036	DIST	00100	26,069.11	4,431.75	21,637.36	25,585.84	1,162.62	6,910.48
							00101	304.20	0.00	304.20	5,854.05	995.19	4,858.86
					00099	OTH	00235				49,340.77	0.00	0.00
							00382				5,231.97	238.67	1,399.85
			AG0259	NE Siting	00099	OTH	00235				295.22	0.00	0.00
							00382				1,419.13	64.49	383.29
		PRO UNLIMITED INC Total						26,373.31	4,431.75	21,941.56	98,919.20	2,460.97	13,552.49
		PROFESSIONALS INC	AG0245	Corporate Matters/Contracts	00036	DIST	00100	69,320.68	11,784.52	57,536.16	933.00	158.61	774.39
							00101	691.20	0.00	691.20			
					00099	OTH	00235	10,668.38	0.00	0.00			
							00236	1,836.00	166.25	811.73			
		PROFESSIONALS INC Total						82,516.26	11,950.77	59,039.10	933.00	158.61	774.39
		RICE DOLAN & KERSHAW	AG0236	AGC General Litigation	00099	OTH	00235	6,616.44	0.00	0.00	8,672.90	0.00	0.00
		RICE DOLAN & KERSHAW Total						6,616.44	0.00	0.00	8,672.90	0.00	0.00
		ROPES & GRAY LLP	AG0240	SVP US General Counsel	00099	OTH	00236	37,314.50	3,404.95	16,624.73	14,314.48	1,306.20	6,377.53
		ROPES & GRAY LLP Total						37,314.50	3,404.95	16,624.73	14,314.48	1,306.20	6,377.53
		RUSSELL R JOHNSON III	AG0236	AGC General Litigation	00099	OTH	00231				195.00	0.00	101.60
							00235	1,087.91	0.00	0.00	130.20	0.00	0.00
							00236	867.16	78.98	385.61	450.61	41.12	200.76
		RUSSELL R JOHNSON III Total						1,955.07	78.98	385.61	775.81	41.12	302.36
		SAPIRE SEARCH GROUP	AG0255	Regulatory Legal Services	00099	OTH	00236				15,675.00	1,430.34	6,983.68
		SAPIRE SEARCH GROUP Total									15,675.00	1,430.34	6,983.68
		SKADDEN ARPS SLATE MEAGHER & FLOM	AG0245	Corporate Matters/Contracts	00099	OTH	00382				16,702.00	773.14	4,309.12
		SKADDEN ARPS SLATE MEAGHER & FLOM Total									16,702.00	773.14	4,309.12
		THE SUBURBAN GROUP	AG0245	Corporate Matters/Contracts	00099	OTH	00235	97,767.72	0.00	0.00	1,672.32	0.00	0.00
							00236	562.80	51.36	250.74	337.64	30.81	150.43
			AG0260	AGC Real Estate	00099	OTH	00235	760.54	0.00	0.00			
		THE SUBURBAN GROUP Total						99,091.06	51.36	250.74	2,009.96	30.81	150.43
		UPDATE LEGAL INC	AG0245	Corporate Matters/Contracts	00099	OTH	00235	99,159.45	0.00	0.00	22,869.79	0.00	0.00
							00236	2,054.00	185.99	908.11			
		UPDATE LEGAL INC Total						101,213.45	185.99	908.11	22,869.79	0.00	0.00
		YOUNG SAMUEL CHAMBERS LTD	AG0760	Operations Executive Services	00099	OTH	00354				166.51	10.77	52.60
							00382				1,242.59	57.52	320.59
		YOUNG SAMUEL CHAMBERS LTD Total									1,409.10	68.29	373.19
		THE PROVIDENCE JOURNAL COMPANY	AG0085	Provide Regulatory Support	00099	OTH	00235	64.80	0.00	0.00			
		THE PROVIDENCE JOURNAL COMPANY Total						64.80	0.00	0.00			
		SUTHERLAND ASBILL & BRENNAN LLP	AG0240	SVP US General Counsel	00099	OTH	00236	7,100.18	642.92	3,139.13			
		SUTHERLAND ASBILL & BRENNAN LLP Total						7,100.18	642.92	3,139.13			
		THE AYCO COMPANY L P	AG0245	Corporate Matters/Contracts	00099	OTH	00235	88.41	0.00	0.00			
		THE AYCO COMPANY L P Total						88.41	0.00	0.00			
		JONES DAY	AG0245	Corporate Matters/Contracts	00099	OTH	00235	680.00	0.00	0.00			
		JONES DAY Total						680.00	0.00	0.00			

Outside Legal Services - Exp Type 100 Consultants and 110 Contractors  
Historic Years Ending September 2008 and 2009 - By Originating Business, By Vendor, By Activity  
Total Charged Through Accounts Payable System and Total Charged to Niagara Mohawk Electric & Gas  
(Whole \$)

								Historic Test 1 Data		
								Ending Sept. 30, 2008		
								Ending Sept. 30, 2009		
Originating Business Unit Desc	Orig Business Unit	Vendor	Activity	Activity Descr	Business Unit	Segment	Billing Pool	Sum of Total Payables \$	Sum of Total Payables Gas	Sum of Total Payables Electric
		RICHARD C MOONEY	AG0255	Regulatory Legal Services	00099	OTH	00235	44,331.73	0.00	0.00
		RICHARD C MOONEY Total						44,331.73	0.00	0.00
		REGULATORY WATCH INC	AG0255	Regulatory Legal Services	00099	OTH	00235	216.25	0.00	0.00
		REGULATORY WATCH INC Total						216.25	0.00	0.00
		THE BRATTLE GROUP	AG0255	Regulatory Legal Services	00099	OTH	00236	36,481.73	3,328.96	16,253.71
		THE BRATTLE GROUP Total						36,481.73	3,328.96	16,253.71
		GE CORPORATE CARD SERVICES	AG0493	Provide Administrative & Gener	00099	OTH	00236	291.31	26.58	129.79
		GE CORPORATE CARD SERVICES Total						291.31	26.58	129.79
		RAINBOW MOVERS INC	AG0640	Moves & Relocations	00099	OTH	00235	598.00	0.00	0.00
		RAINBOW MOVERS INC Total						598.00	0.00	0.00
National Grid USA Service Co. Total								1,003,256.48	38,418.02	252,858.61
Narragansett Electric Company										
	00049	NOVA RECORDS LLC	AG0245	Corporate Matters/Contracts	00099	OTH	00235		144.68	0.00
		NOVA RECORDS LLC Total							144.68	0.00
		ORRICK HERRINGTON & SUTCLIFFE LLP	AG0236	AGC General Litigation	00036	DIST	00100	122.40	20.81	101.59
		ORRICK HERRINGTON & SUTCLIFFE LLP Total						122.40	20.81	101.59
		RUSSELL R JOHNSON III	AG0236	AGC General Litigation	00036	DIST			346.87	0.00
		RUSSELL R JOHNSON III Total							346.87	0.00
		SOLOMON AND SOLOMON PC	AG0235	General Legal Claims	00036	DIST		90.00	0.00	90.00
		SOLOMON AND SOLOMON PC Total						90.00	0.00	90.00
Narragansett Electric Company Total								212.40	20.81	191.59
Massachusetts Electric Company										
	00005	RUSSELL R JOHNSON III	AG0236	AGC General Litigation	00036	DIST	00100		103.77	0.00
		RUSSELL R JOHNSON III Total							226.55	38.51
		EXPONENT INC	AG0255	Regulatory Legal Services	00099	OTH	00235	2,477.50	0.00	0.00
		EXPONENT INC Total						2,477.50	0.00	0.00
Massachusetts Electric Company Total								2,477.50	0.00	0.00
National Grid USA										
	00001	INTERNAL REVENUE SERVICE	AG0245	Corporate Matters/Contracts	00099	OTH	00235		9,680.46	0.00
		INTERNAL REVENUE SERVICE Total							3,496.74	0.00
		MASSACHUSETTS DEPARTMENT OF REVENUE	AG0245	Corporate Matters/Contracts	00099	OTH	00235		13,177.20	0.00
		MASSACHUSETTS DEPARTMENT OF REVENUE Total							3,629.70	0.00
		RUSSELL R JOHNSON III	AG0236	AGC General Litigation	00036	DIST	00100		373.09	63.43
		RUSSELL R JOHNSON III Total							373.09	63.43
National Grid USA Total									17,179.99	63.43
Narragansett Gas Company										
	00048	CAPITAL RECORDS MANAGEMENT INC	AG0245	Corporate Matters/Contracts	00099	OTH	00235		1,046.21	0.00
		CAPITAL RECORDS MANAGEMENT INC Total							137.92	0.00
		IRON MOUNTAIN OFF-SITE	AG0245	Corporate Matters/Contracts	00099	OTH	00235		1,184.13	0.00
		IRON MOUNTAIN OFF-SITE Total							785.59	0.00
		IRON MOUNTAIN RECORDS MANAGEMENT	AG0238	Information Records Management	00099	OTH	00235		785.59	0.00
		IRON MOUNTAIN RECORDS MANAGEMENT Total							922.60	0.00
		IRON MOUNTAIN RECORDS MANAGEMENT	AG0245	Corporate Matters/Contracts	00099	OTH	00235		1,172.70	0.00
		IRON MOUNTAIN RECORDS MANAGEMENT Total							2,095.30	0.00
Narragansett Gas Company Total									4,065.02	0.00
New England Power Company										
	00010	ALSTON & BIRD LLP	AG0255	Regulatory Legal Services	00099	OTH	00236	353.62	32.27	157.55
		ALSTON & BIRD LLP Total						353.62	32.27	157.55
		PRO UNLIMITED INC	AG0245	Corporate Matters/Contracts	00099	OTH	00235		7,309.34	0.00
		PRO UNLIMITED INC Total							321.13	29.30

Outside Legal Services - Exp Type 100 Consultants and 110 Contractors  
Historic Years Ending September 2008 and 2009 - By Originating Business, By Vendor, By Activity  
Total Charged Through Accounts Payable System and Total Charged to Niagara Mohawk Electric & Gas  
(Whole \$)

								Historic Test \Data					
								Ending Sept. 30, 2008			Ending Sept. 30, 2009		
Originating Business Unit Desc	Orig Business Unit	Vendor	Activity	Activity Descr	Business Unit	Segment	Billing Pool	Sum of Total Payables \$	Sum of Total Payables Gas	Sum of Total Electric	Sum of Total Payables \$	Sum of Total Payables Gas	Sum of Total Electric
			AG0255	Regulatory Legal Services	00099	OTH	00235						
			PRO UNLIMITED INC Total										1,095.06
New England Power Company Total											8,725.53	29.30	143.07
KeySpan Corporate Services LLC 00431								353.62	32.27	157.55	8,725.53	29.30	143.07
											287,641.38	0.00	287,641.38
											64,094.37	64,094.37	0.00
											43,039.29	0.00	43,039.29
CULLEN AND DYKMAN Total											394,775.04	64,094.37	330,680.67
KeySpan Corporate Services LLC Total											394,775.04	64,094.37	330,680.67
Grand Total								7,669,744.66	859,249.14	6,090,176.99	8,988,043.17	1,111,987.15	7,063,230.23

Date of Request: March 16, 2010  
Due Date: March 26, 2010

Request No. AJR-7  
NMPC Req. No. NM 271 DPS 149

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Aric Rider

TO: Infrastructure and Operations Panel

Request

A. Reference IOP Testimony page 180 of 266, line 20. The Company states that it oversees the operation and maintenance of 55 occupied locations – a main office, six specialty/non-operating sites, and 48 operating sites. Please quantify the number of sites the Company plans to oversee in FY 11, FY 12, FY 13 and FY 14, identifying any location changes for each period. In addition, identify the relocated/consolidated sites and the plans for each of these assets.

B. Reference IOP Testimony page 183 of 266, lines 10-11. Please provide the actual historic levels of baseline capital expenditures for FY 06, FY 07, FY 08, FY 09 and FY 10. Identify the period of time used to develop the Company's forecast baseline capital expenditures.

C. Reference IOP Testimony page 197, lines 1-3. Provide the work papers that show how the Company is fairly assessing the Reservoir Woods lease allocation costs to all of the businesses that are run from that facility.

D. Reference IOP Testimony page 197, lines 1-3. What is the aggregated level of lease costs associated with the Reservoir Woods facility that is currently recovered from customers served by all National Grid owned companies?

E. Reference IOP Testimony page 197, lines 1-3. What functions are conducted from Niagara Mohawk facilities that benefit National Grid businesses outside of the Niagara Mohawk service territory, and how are the benefits reflected in the rate filing?

F. Reference IOP Testimony page 197, lines 13-20, and page 198, lines 1-2. Please provide the actual Fleet Service capital expenditures for FY 06, FY 07, FY 08, FY 09 and FY 10.

Form 103 Form 103

G. Reference IOP Testimony page 197, lines 13-20, and page 198 lines 1-2. Please provide the budgeted Fleet Service capital expenditures for FY 06, FY 07, FY 08, FY 09 and FY 10.

H. Reference Exhibit \_\_\_\_ (RRP-2) Schedule 45 Sheet 1 of 1, Row 14 – Facilities Rent Forecast. Please explain the \$3,496 normalization adjustment.

I. Reference Exhibit \_\_\_\_ (RRP-2) Schedule 45 Sheet 1 of 1 Rows 14, 18 & 46. Please explain the rate year increases.

Where applicable in responding to questions A through I above, provide the response in fully accessible formats without restrictions; i.e., not pdf files, but excel or whatever program was used to provide the response.

Response:

- A. The Company's Property Services group currently oversees 55 facilities. In 2011, it intends to oversee 53 facilities, and 51 facilities in 2012. The Company proposes to close its locations at Troy (two locations), Glenmont, Saratoga-Federal Street, Syracuse (Beacon North), and Tonawanda. In addition, the Company will add a small crew location in the Troy area to ensure adequate response times are maintained. Further, the Company will not renew its lease of the "E" building at the Syracuse Office Complex (SOC) and has closed and will not renew the lease of its Star Lake, NY site. Both buildings are now vacant and retirements are reflected in Exhibit \_\_\_\_ (IOP-5).
- B. The Company's baseline capital spend for facilities is as follows:
- i. FY 2006 \$2,957,542
  - ii. FY 2007 \$4,157,129
  - iii. FY 2008 \$5,159,937
  - iv. FY 2009 \$6,668,866
  - v. FY 2010 \$5,223,298 (to date of the response)

The Company utilized four years of data and applied a multiplier for FY11 through FY14 since it is expected that a lower level of baseline spend will be required due to the large construction projects that will be taking place at the SOC, North Albany and the Buffalo area. Please note these are fiscal year figures as requested whereas the figures in the testimony are calendar year.

- C. Attachment 1 (AJR-7\_Attach 1\_Reservoir Woods Sq Ft Summary With Co.xls) and Attachment 2 (AJR-7\_Attach 2\_Reservoir Woods Seating Chart.pdf) are the underlying work papers developed by Property Services for Bill Pool 603 which allocates Reservoir Woods Facilities related costs including its lease expense. Attachment 1 details the specific occupancy to allow development of Bill Pool 603. Attachment 2 depicts the allocated space by department used to populate the excel table in Attachment 1.

D. As shown in Workpaper 5 of Exhibit \_\_ (RRP-2), Schedule 8, Sheet 1, column (e) (Book 16, page 178, column (e), line 32), the estimated CY11 aggregate costs of the Reservoir Woods facility is estimated to be \$17,713,648 allocated using bill pool 603 to both operating companies and non-operating companies. As the facility has only been in service for nine months, the costs have only been explicitly included in six of the operating companies' revenue requirements filings (Massachusetts Electric, Nantucket Electric, Narragansett Electric, New England Power, EnergyNorth Gas and Niagara Mohawk electric). The remaining operating companies are implicitly recovering these costs in current rates.

E. Functions conducted from Niagara Mohawk facilities that benefit other National Grid businesses include Accounts Payable, Investment Recovery, Human Resources, aircraft transportation, credit and collections, customer service, consumer advocacy and others. Facility costs incurred in support of these functions are allocated to other companies in the form of inter-company rent charges. The Rate filing reflects facility costs to Niagara Mohawk net of any allocation out to other National Grid entities.

F. Actual Fleet Services capital expenditures for FY06 through FY10 are provided below.

	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>
Fleet NY - Co 36	\$240,375	\$192,341	\$225,736	\$162,523	\$567,604
<i>(generally consists of shop tools &amp; equipment)</i>					

G. Fleet Services capital budgets for FY06 through FY10 are provided below.

	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>
Fleet NY - Co 36	\$ 238,000	\$ 238,000	\$ 238,000	\$ 238,000	\$ 430,000
<i>(generally consists of shop tools &amp; equipment)</i>					

H. The \$3,496 normalization adjustment is the net of two adjustments: one to annualize the amount of rent expense recorded for the Reservoir Woods facility in the test year, and a second to remove rent expense related to the Sacandaga Reservoir. These represent an increase to test year rent expense of \$3,952 and a decrease of test year rent expense of \$456, respectively. The books of the Company contained only five months of rent expense for Reservoir Woods (May 2009 – September 2009), and therefore an annualizing adjustment was needed to normalize the test year. Please refer to Exhibit \_\_ (RRP-10), Schedule 8, Workpaper 6 for the calculation of the normalization entry, as well as the response to DKS-3 Part 3 which provides further support of the annual lease obligation. The Company has taken the position that as of July 2009, it is no longer obligated to pay the annual operating & maintenance expenses of the Sacandaga Reservoir, and therefore the amount of \$456 recorded in the test year was removed as a normalization adjustment.

I. Row 14 (Facilities Rent forecast) (amounts in 000s)  
Please refer to Exhibit \_\_ (RRP-2), Schedule 8, Sheets 8 & 9.

RY 2011 (\$3,306) - The decrease in rent expense in RY 2011 over the adjusted test year is due to the expiration of lease arrangements at Beacon North (\$1,153) and the SOC E Building (\$1,348) during Calendar Year 2011. The Company has decided to let these leases terminate due to Facilities consolidation initiatives.

RY 2012 (\$255) – The decrease in RY 2012 rent expense over RY 2011 rent expense represents the expiration of the Beacon North lease, as there are two months of rent expense included in RY 2011 and none in RY 2012.

RY 2013 (\$229) – The decrease in RY 2013 rent expense over RY 2012 rent expense represents the expiration of lease arrangements at Saratoga Wiebel and the SOC E Building Parking facility (\$83 and \$111, respectively). The Company has decided to let these leases terminate due to Facilities consolidation initiatives.

Row 18 (IT Rent forecast) (amounts in 000s)

Please refer to Exhibit \_\_\_ (RRP\_2), Schedule 8, Sheets 10 & 11.

RY 2011 \$1,935 – The increase in RY 2011 rent expense over the test year is due to the net effect of the winding down of existing software lease agreements and new leased software assets coming online in the Rate Year. Existing lease expirations represent a decrease in expense of (\$2,944) over the test year, the largest portion being the PeopleSoft ERP system (\$1,991). New leased software represent an increase to rent expense of \$4,894, the largest projects being the Customer Systems Agent Desktop \$688, Datacenter Rationalization \$453, IVR Phase 2 \$603, and Transformation KPIs \$432.

RY 2012 \$5,447 – The increase in RY 2012 rent expense over the RY 2011 expense represents further software projects placed into service in RY 2012, the largest being the US SAP Back office \$3,798. There is only a relatively small decrease in RY 2012 for existing project leases terminating (\$431).

RY 2013 \$4,723 – The increase in RY 2013 rent expense over the RY 2012 expense represents the net effect of the Field Force Automation (FFA) lease terminating and further software projects placed into service. FFA will be fully amortized as of February 2013, resulting in a decrease in rent expense of \$2,768. The largest projects placed into service during RY 2013 are Distribution/Outage Management System \$2,354 and the Electric Distribution Legacy Grid Mobile Expansion \$1,316. In addition, RY 2013 contains a full year of SAP Back Office lease charges versus nine months in RY 2011, an increase of \$1,454.

Row 46 (Transmission Rent forecast) (amounts in 000s)

Please refer to Exhibit \_\_\_ (RRP-2), Schedule 8, Sheets 12 & 13

RY 2011 \$1,266 – The increase in RY 2011 rent expense over the test year represents annual increases in contractual lease payments for the Volney –Marcy Transmission line.

RY 2012 \$229 – The increase in RY 2012 rent expense over the RY 2011 expense represents the annual increase in contractual lease payments for the Volney –Marcy Transmission line.

RY 2013 \$250 - The increase in RY 2013 rent expense over the RY 2012 expense represents the annual increase in contractual lease payments for the Volney –Marcy Transmission line.

Name of Respondent:

Michael E. Guerin  
James M. Molloy

Date of Reply:

March 29, 2010

**Sasold Associates, Inc. Confidential**

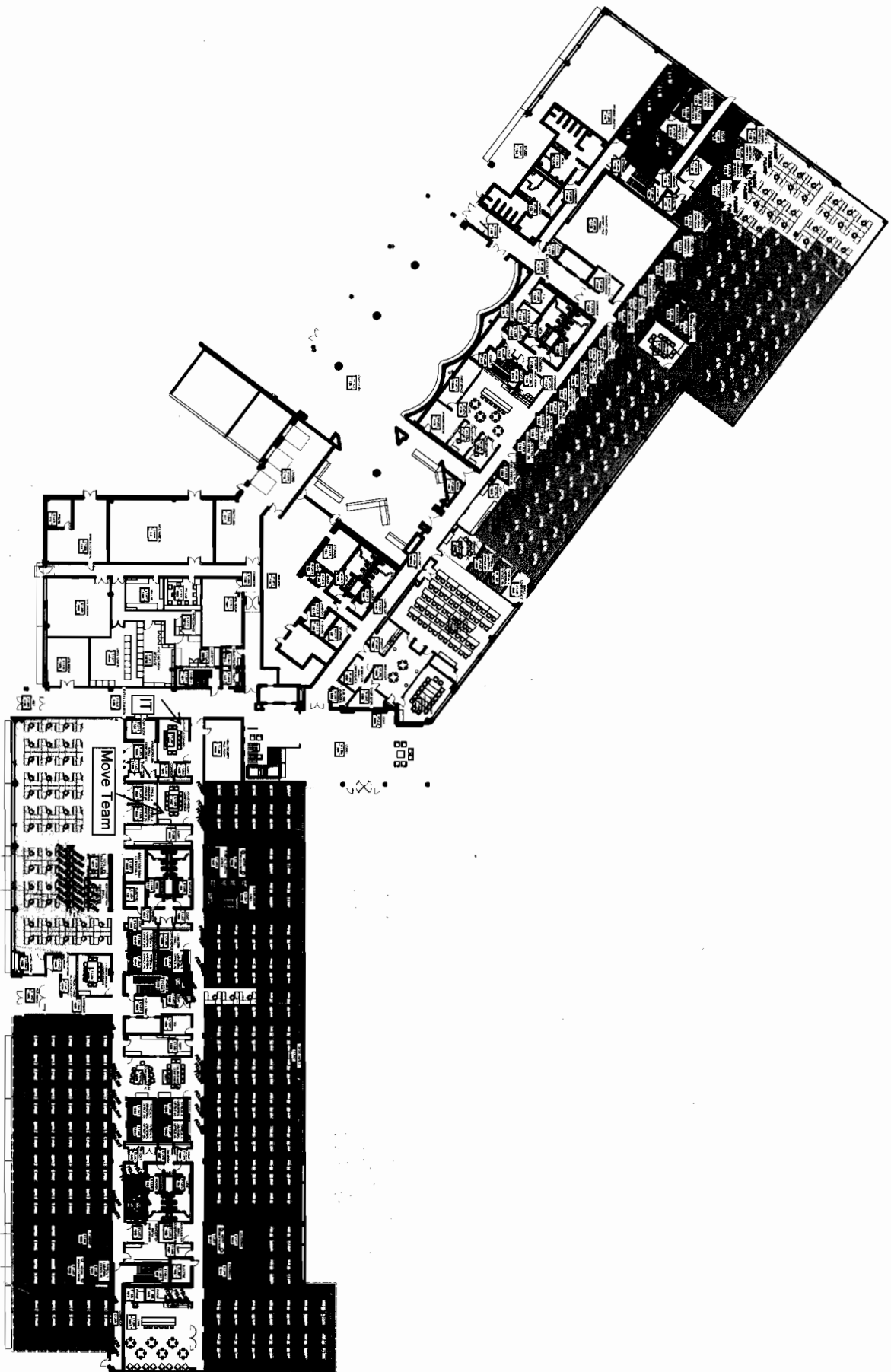


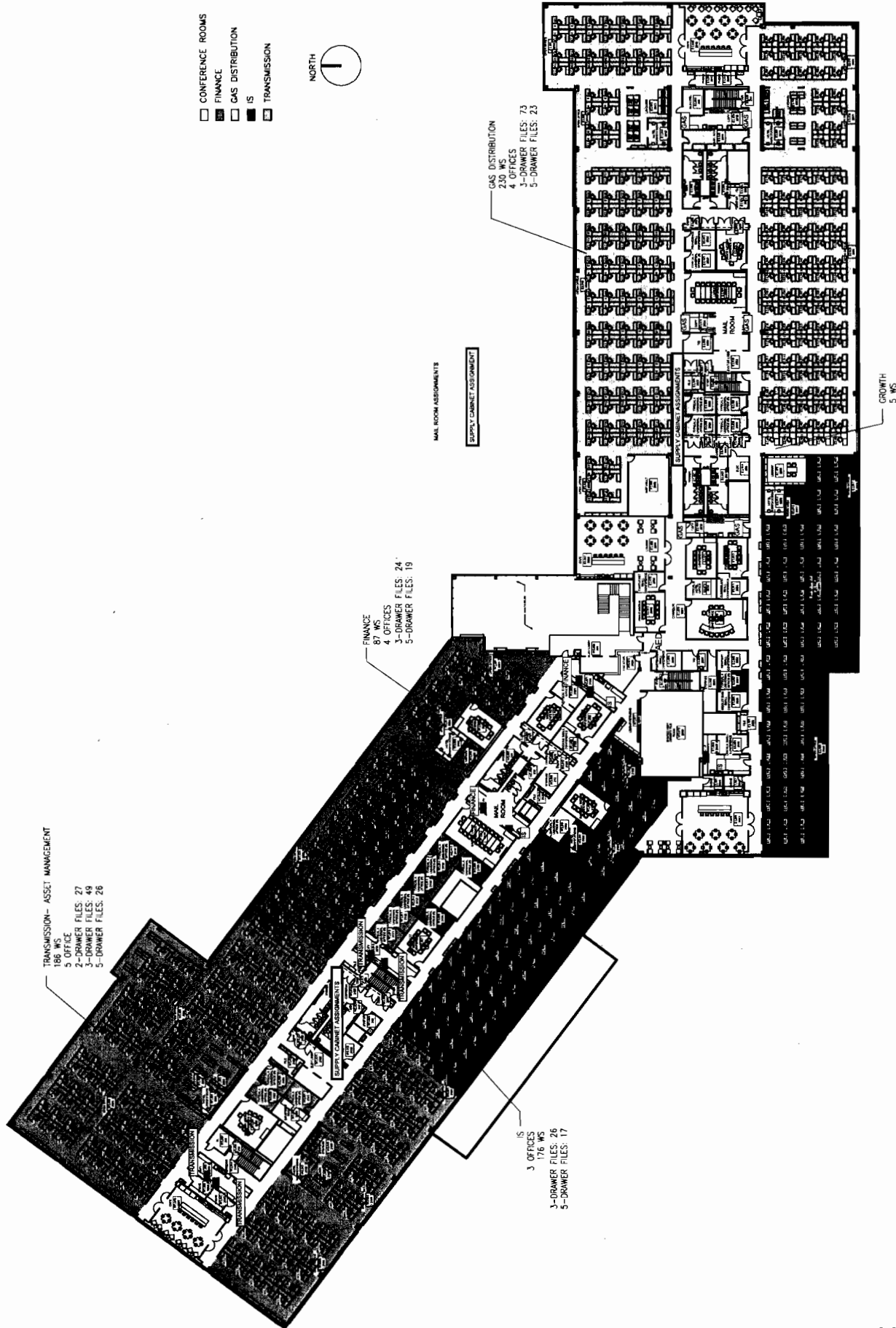
GROUP	% VALUE FROM TOTAL SALES	Segmentation methodology	100% DIST											
			DIST	GAS	TRAN	BOVE	NRSG	INTE	GEN	OTH	Total			
PHES	1.7%	PHES Segment %	1.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Supply Chain	1.5%	PHES Supply Chain %	1.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
Other PHES	0.2%	PHES Other %	0.3%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
TOTAL	34.1%	100% DIST	34.7%	1.0%	0.1%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	34.1%
BUILDING TOTALS														
TOTAL	100.0%		54.4%	28.2%	12.3%	0.8%	0.7%	0.0%	0.0%	1.0%	1.2%	100.0%		

Company totals per Billing Pool 00382 were applied to the segment totals shown above to produce company total by segment shown below:

00004	Northland Electric	0.1240%
00005	Manitowishun Electric	15.5649%
00006	ME/TECH-MA Hydro	0.1616%
00008	ME/TECH-Hydro	0.4271%
00010	New England Power	2.3057%
00029	MEET	0.0000%
00030	Midwest Transmission	0.0019%
00035	Midwest Energy Services	31.5542%
00041	Midwest Nuclear Power	0.4444%
00049	Graciele State Electric	3.4607%
00049	Marquette Gas	0.5015%
00049	Marquette Electric	0.2011%
00071	Midwest Electric	0.0000%
01461	Boston Gas Company	7.6577%
01462	Colonial Lowland Division	1.2593%
01466	EnergyNorth Company	0.8776%
01434	Kaysen Electric Services LLC	0.0000%
01435	Kaysen Energy Services LLC	5.0136%
01436	Kaysen Energy Services LLC	5.0136%
01437	Kaysen Energy Delivery NJ	0.0750%
01438	Kaysen Energy Delivery NY	5.8146%
01442	Kaysen Runnemood Services, LLC	11.3305%
01444	Kaysen Glenwood Energy Center LLC	0.0000%
01445	Kaysen Glenwood Energy Center LLC	0.0000%
01468	Kaysen Energy Supply Inc	0.0000%
01469	Kaysen Services Inc	0.1101%
01471	Service Uphill Petroleum	0.3607%
01463	Kaysen ELP Joint Venture 60%	0.0600%

[illegible]







Date of Request: March 16, 2010  
Due Date: March 26, 2010

Request No. DAG-10  
NMPC Req. No. NM 273 DPS 151

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirement Panel

Request Accounting Services Expense

1. Please provide both the HY actual amount for HYE 9/20/2009, 9/30/2008, 9/30/2007 and 9/30/2006, and also the RYs' forecasted amounts for accounting services expense and identify where those stated amounts can be found in the Company's exhibits and workpapers. If the amounts cannot be explicitly derived from the exhibits and workpapers, please provide a list of charges by expense type, originating business units, direct and indirect charges, and activity number with activity description, along with vendor names (see the Company's response to DAG-15 (NM-145), in Case 08-G-0609 if this question cannot be responded to in the exact format asked. As an alternative, a response similar to the Company response to DAG-15 could be provided and updated for historic years 2006 through 2009).

2. Please (a) provide all normalizing adjustments the company made to HY accounting services expense; and (b) explain and provide a copy of the analysis the Company undertook to determine the actual HY accounting services expense that needed to be normalized, in forecasting RY levels.

3. If the answer to question 2 above is, "There are no normalizing adjustments made to the HY," please explain and provide a copy of the analysis the Company undertook to determine the actual HY accounting services expense was reasonable and included no non-recurring items, in forecasting the RY.

Response:

1. In accordance with regulatory policy, the Company's O&M expense exhibit RRP-2 is presented by functional group, subdivided between Operation and Maintenance, with separate schedules for different cost elements (i.e. expense types). The Revenue Requirement Panel testimony describes the exhibit in further detail. Accounting Services is not defined by a single expense type (cost element) in the Company's general ledger, and therefore is not presented explicitly in the Company's exhibits or workpapers.

Please see the following attachments for requested information regarding Accounting Services costs, as an update to the Company's response to DAG-15 (NM-145) in Case 08-G-0609:

Attachment 1 – the Rate Year ended December 31, 2011 and Historical Test Year ended September 30, 2009

Attachment 2 – the twelve months ended September 30, 2008

Attachment 3 - the twelve months ended September 30, 2007

Attachment 4 - the twelve months ended September 30, 2006

Please note that due to organizational changes in the businesses, the departments reporting through the Controller have changed since Case 08-G-0609. Those departments consist of the following:

Controller	Controller	11000
	Acctg Services Corp Overheads	11999
Accounting Services	Acctg Services-NE	11200
	Acctg Services-NY	11250
	Financial Reporting-NY (Inactive 11/8/05)	11450
	Non-Income Tax	11600
	Fin Reporting Asst Controller	92015
	Financial Processing	92016
	Tax	92017
	Accounting Services	92018
	VP Financial Planning	92020
	VP & Controller NE	92168
	KeySpan Integration	92527
	KETS Backoffice	92856
	KSP Backoffice	92857
	Financial Services	92519
	Accounting	92521
	Pension Accounting	11400
	Pension Accounting	11400

2. As explained above in Part 1, the Company presented O&M expenses for the Historical Year, Historical Year Normalizing Adjustments and Rate Year Adjustments by expense type, not by organization or department (i.e. "Accounting Services"). For example, Historical Year Adjustments were made to various expense types to remove non-recurring New England and KeySpan integration costs. Exhibit RRP-10, Workpaper to RRP-2, Schedule 1, Workpaper 5 shows how these costs were removed from Expense Type 100 (supportive of RRP-2), regardless of what department was charged. Please refer to Attachment 1, Sheet 2 and Attachment 2, Sheet 1 for normalization adjustments

made to the Accounting Services analyses for the HTY and the twelve months ended September 30, 2008.

3. The Company's approach to the review of Historical Year data was to organize it principally by expense type. For each expense type, then Company queried Historical Year (HY) data generally including information deemed relevant to the specific expense type (i.e. Company, Department, Activity, Segment, Bill Pool, Project, etc). Exhibit RRP-10, Workpaper to RRP-2, Schedule 1, Workpapers 1 – 7 and Exhibit RRP-10, Workpaper to RRP-2, Schedule 2, Workpapers 1 – 8 are the result of this work. As described in the Company's response to Part 1.a and .b of IR DPS 138 DAG-4 on March 23, 2009, an analysis was done on all expense types by project to analyze year over year variance and scrutinize projects for purposes of normalizing the historical test year. In addition, finance representatives from lines of business and shared service groups met regularly with regulatory personnel as part of the RCS process, described in IR DAG-4, Part 9, to review year on year variance analysis between historical test year and forecasted rate year. These individuals were provided a high-level functional profile of the HY costs and asked to review this data and to address the following:

- Identify one time costs in the HY that may not be recurring in future years
- Review prior period costs booked in the HY
- Identify any corrections, transfers, adjustments etc.
- Identify any new major initiatives (not in HY) excluding NE Gas and KeySpan Costs to Achieve and Synergy Savings that would be incurred in Calendar Years 2011 through 2013
- Provide detailed descriptions of historic year costs and the impact on rate year.

As a result of these processes, there were no one-time costs identified specific to the Controller/Accounting Services group, aside from NEG & KeySpan Integration costs.

Name of Respondent:  
Melissa Little

Date of Reply:  
March 29, 2010

Consultants and Contractors Charged to Controller/Accounting Services

Bus Unit	Ledger Source	Inflation	1.9000%	RY 2013	1.8000%	RY 2012	3.2146%	RY 2011	HTY 9/30/09	12 mos 9/30/08	12 mos 9/30/07	12 mos 9/30/06
99	AP (see List)			337,064		330,779		324,930	314,810	185,445	477,486	164,567
36	AP (see List)			64,137		62,941		61,828	59,903	197,390	174,177	111,807
99	On Line JE			1,842,516		1,808,161		1,776,190	1,720,870	731,871	1,362,169	174,543
36	On Line JE			504,137		494,737		485,989	470,853	1,065	26,384	542,690
	Total			2,821,980		2,734,090		2,648,937	2,566,436	1,115,770	2,040,216	993,607
	Add back: Out of period adjustment									331,122		
	Add back: Presentation reclass									183,316		
	Adjusted total			2,821,980		2,734,090		2,648,937	2,566,436	1,630,208	2,040,216	993,607



Date of Request: March 16, 2010  
Due Date: March 26, 2010

Request No. DAG-11  
NMPC Req. No. NM 274 DPS 152

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirement Panel

Request Capital, Expense, Total Labor for FYE 3/09, HYE 9/09 and FYE 3/2010.

1. Using the methodology, as documented in the Company's supplemental response to I/R #PSC-276 in C. 01-M-0075 dated 4/2/07, and in a format similar to that provided in Attachment 3 of this supplemental response, please provide the updated information as it would apply to (a) Fiscal Year Ended (FYE) 3/09; (b) Historic Year Ended (HYE) 9/09; and (c) FYE 3/2010. Provide source information for the amounts provided.

Response:

Part 1a & b. Please see attached file DAG-11 Attachment 1 (Fringe Cap Rate) sheet 1 for the fringe benefit capitalization rate calculated using the methodology consistent with I/R #PSC-276 in C. 01-M-0075 dated 4/2/07 as requested. The Company is also including in attachment 1, sheet 1 the fringe benefit capitalization rate calculation methodology and result consistent with our accounting system and applied in our rate filing. The payroll data used in the calculations is provided in sheet 2 of attachment 1.

Part 1c. The calculation provided in Part 1a & b will be updated for fiscal year ending March 31, 2010 and provided to staff within five days from the year-end closing of The Company's books of record.

Name of Respondent:  
Mark Stiner

Date of Reply:  
3/26/2010

Niagara Mohawk Power Corporation  
Fringe Benefit Capitalization

	(a) Fiscal Year March 2009		(c)	(d) Historic Test Year September 2009		(e)	(f)
	NG Accounting Method	PSC 276 Method		NG Accounting Method	PSC-276 Method	NG Accounting Method (Total Non-expense)	
1 Total Payroll	332,512,359	332,512,359		327,120,416	327,120,416	327,120,416	
2 3rd Party		(1,638,404)			(914,453)		
3 Cost of Removal		(9,379,052)			(9,722,840)		
4 Other		0			(233,336)		
5 Associated		(6,896,108)			(7,603,193)		
6 Payroll Accrual							
7 Incremental Overtime	(24,643,249)			(22,382,713)			(22,382,713)
8 Less Transportation Clearing Labor charged to O&M (66%)		(8,494,618)			(8,541,388)		(8,351,798)
9 Less Stores Clearing Labor charged to O&M (19%)		(4,394,356)			(4,300,150)		(4,185,742)
10 Less: Non- Productive Time	(48,534,934)	(5,266,040)		(48,230,546)	(5,608,517)		(48,230,546)
11 NET PRODUCTIVE LABOR	259,334,175	296,443,781		256,507,158	290,196,540		243,969,618
Fringe Benefits:							
12 Thrift Plan (Expense Type B07)	6,590,523	2.54%	2.22%	6,617,118	2.58%	2.28%	2.71%
13 FAS 112 (Expense Type B02)	4,304,433	1.66%	1.45%	2,980,544	1.16%	1.03%	1.22%
14 Group Insurance (Expense Type B04)	2,236,299	0.86%	0.75%	1,712,347	0.67%	0.59%	0.70%
15 Medical Care & Prescription Plans (Expense Type B03)	25,418,181	9.80%	8.57%	29,346,650	11.44%	10.11%	12.03%
16 Pension (Expense Type B06)	43,074,304	16.61%	14.53%	45,031,069	17.56%	15.52%	18.46%
17 OPEB (Expense Type B01)	134,690,647	51.94%	45.44%	41,191,253	16.06%	14.19%	16.88%
18 TOTAL FRINGE BENEFITS	216,314,387	83.41%	72.97%	126,878,981	49.46%	43.72%	52.01%
19 Workers Compensation (Expense Type B08)	3,604,042	1.39%	1.22%	1,729,494	0.67%	0.60%	0.71%
20 Payroll Taxes (Expense Type B09)	25,459,852	9.82%	8.59%	1,061,809	0.41%	0.37%	0.44%
21 Total percentage to be applied to productive Company labor for Payroll Taxes, Fringe Benefits and OPEBs:	245,378,281	94.62%	82.77%	129,670,284	50.55%	44.68%	53.15%
22 CWIP	68,051,631	73,830,928		69,901,227	69,901,227		69,901,227
23 Time Not Worked		12,619,083			13,143,393		
24 Cost of Removal	8,507,906			8,879,686			8,879,686
25 3rd Party							833,056
26 Associated Company							7,344,464
27 Incremental Overtime					5,396,752		
28 Capital, Associated Company and Billable Projects	76,559,537	86,450,011		78,780,914	88,441,373		86,958,434
29 OPEB/Pension Rates	68.55%	59.97%		33.61%	29.71%		35.34%
30 OPEB/Pension Capitalized	52,479,016	51,840,460		26,481,418	26,277,434		30,732,343
31 Other Benefits Rates	26.07%	22.81%		16.94%	14.97%		17.81%
32 Other Benefits Capitalized	19,960,521	19,717,644		13,344,151	13,241,362		15,486,218
33 Capital percent	29.52%	29.16%		30.71%	30.48%		35.64%

Column Notes

Col's a,b,d, e : Calculate the rate of fringe benefits to be capitalized exclusive of Associated Company and 3rd Party billings.

Col f : Calculates a rate of fringe benefits capitalized and fringe benefits applied to Associated Company and 3rd Party billings.  
Also, this is the revised rate as indicated in The Company's response to RAV-20 Supplemental Part C on March 16, 2010.

Date of Request: April 22, 2010  
Due Date: April 26, 2010

Request No. DAG-11 SUPP  
NMPC Req. No. NM 274 DPS 152

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirement Panel

Request Capital, Expense, Total Labor for FYE 3/09, HYE 9/09 and FYE 3/2010.

1. Using the methodology, as documented in the Company's supplemental response to I/R #PSC-276 in C. 01-M-0075 dated 4/2/07, and in a format similar to that provided in Attachment 3 of this supplemental response, please provide the updated information as it would apply to (a) Fiscal Year Ended (FYE) 3/09; (b) Historic Year Ended (HYE) 9/09; and (c) FYE 3/2010. Provide source information for the amounts provided.

Response:

Part 1c. Please see attached file DAG-11 Supp Attachment 1 (Fringe Cap Rate) sheet 1 for the fringe benefit capitalization rate calculated using the methodology consistent with I/R #PSC-276 in C. 01-M-0075 dated 4/2/07 as requested. The Company is also including in attachment 1, sheet 1 the fringe benefit capitalization rate calculation methodology and result consistent with our accounting system and applied in our rate filing. The payroll data used in the calculations is provided in sheet 2 of attachment 1.

Name of Respondent:  
Mark Stiner

Date of Reply:  
4/30/2010

**NIAGARA MOHAWK POWER CORPORATION**  
**NON-PRODUCTIVE TIME, FRINGE BENEFITS and OPEB RATES CALC**

	(a)	(b)	(c)
	Fiscal Year March 2010		
	NG Accounting Method	PSC-276 Method	NG Accounting Method (Total Non-expense)
1 Total Payroll	321,626,555	321,626,555	321,626,555
2 3rd Party		(2,988,802)	
3 Cost of Removal		(10,405,427)	
4 Other		0	
5 Associated		(7,940,601)	
6 Payroll Accrual			
7 Incremental Overtime	(18,718,713)		(18,718,713)
8 Less Transportation Clearing Labor charged to O&M (66%)		(8,482,718)	(8,318,097)
9 Less Stores Clearing Labor charged to O&M (19%)		(4,229,309)	(4,121,842)
10 Less: Non- Productive Time	(48,320,889)	(6,009,526)	(48,320,889)
<b>11 NET PRODUCTIVE LABOR</b>	<b>254,586,954</b>	<b>281,570,172</b>	<b>242,147,015</b>
Fringe Benefits:			
12 Thrift Plan (Expense Type B07)	6,498,553	2.55%	2.31%
13 FAS 112 (Expense Type B02)	2,583,822	1.01%	0.92%
14 Group Insurance (Expense Type B04)	1,296,618	0.51%	0.46%
15 Medical Care & Prescription Plans (Expense Type B03)	31,180,307	12.25%	11.07%
16 Pension (Expense Type B06)	34,022,655	13.36%	12.08%
17 OPEB (Expense Type B01)	48,913,093	19.21%	17.37%
<b>18 TOTAL FRINGE BENEFITS</b>	<b>124,495,048</b>	<b>48.90%</b>	<b>44.21%</b>
19 Workers Compensation (Expense Type B08)	4,017,726	1.58%	1.43%
20 Payroll Taxes (Expense Type B09)	1,682,341	0.66%	0.60%
<b>21 Total percentage to be applied to productive Company labor for Payroll Taxes, Fringe Benefits and OPEBs:</b>	<b>130,195,116</b>	<b>51.14%</b>	<b>46.24%</b>
			<b>53.77%</b>
22 CWIP	74,078,909	74,078,909	74,078,909
23 Time Not Worked		14,054,381	
24 Cost of Removal	9,509,212		9,509,212
25 3rd Party			2,213,576
26 Associated Company			7,704,151
27 Incremental Overtime		5,571,507	
<b>28 Capital, Associated Company and Billable Projects</b>	<b>83,588,120</b>	<b>93,704,797</b>	<b>93,505,848</b>
29 OPEB/Pension Rates	32.58%	29.45%	34.25%
30 OPEB/Pension Capitalized	27,230,159	27,600,500	32,025,906
31 Other Benefits Rates	18.56%	16.78%	19.52%
32 Other Benefits Capitalized	15,516,591	15,727,623	18,249,356
<b>33 Capital percent</b>	<b>32.83%</b>	<b>33.28%</b>	<b>38.62%</b>

**Notes**

Col's a,b: Calculate the rate of fringe benefits to be capitalized exclusive of Associated Company and 3rd Party billings.

Col c : Calculates a rate of fringe benefits capitalized and fringe benefits applied to Associated Company and 3rd Party billings.

Date of Request: March 16, 2010  
Due Date: March 26, 2010

Request No. AAE-17  
NMPC Req. No. NM 276 DPS 154

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Allison Esposito

TO: Infrastructure and Operations Panel

Request

1. Please explain the Regional Delivery Ventures (RDV) competitive procurement event process. As part of this explanation, please answer the following questions:
  - A. In what ways is this similar to or different from a competitive bidding process?
  - B. How many companies participated in this event?
  - C. What factors, other than cost, were considered when choosing NEPA?
  - D. Was NEPA the least expensive option? If not, please list (1) each company that was less expensive than NEPA and (2) NMPC's reasons for not selecting them.
2. Please provide the cost/benefit analysis that shows that the use of the RDV, rather than a traditional competitive bidding process or the process used for the Distribution Alliance Contracts, is beneficial to customers. Please ensure that this analysis includes the gain sharing component of the RDV.
3. Please explain why the gain sharing mechanism included in the RDV was not included as an incentive to reduce costs in the Distribution Alliance Contracts.
4. How will the Company account for NEPA's share of any gain share payments? Will these payments be capitalized as part of the infrastructure investment or expensed as incurred? Fully explain your accounting rationale.
5. As the gain share mechanism rewards NEPA for costs incurred below targets, how does the Company ensure that NEPA is actually cutting costs to achieve these "savings" rather than overestimating their budgeted expenses?
6. Has NEPA been awarded any gain shares thus far – either through the completion of a project or through core team annual cost reviews? Please continue to update this response throughout the course of the rate case proceedings.
7. Please provide the NEPA RDV contract.

Response:

1.

- A. A competitive procurement process was followed to select the Regional Delivery Ventures (RDVs). Consistent with competitive bidding processes, the Company evaluated bidder qualifications per the Pre-Qualification Questionnaire provided in Attachment 1 of NM 322 DPS 194 JJA-12. Additionally, an assessment of pricing data was completed under the direction of the Company's Procurement department and included the evaluation of pricing comparison sheets for fee, equipment, labor rates, unit rates, core team, and typical projects. The unit rates are used in the development of the project target costs.

The Procurement Event was conducted in three stages leading to the selection of the optimal partners to form the Regional Delivery Ventures (RDV):

- Bid Stage 1 - The first stage of the assessment was a desktop assessment of the bid submittals.
  - Bid Stage 2 – The second stage of the assessment process included site visits to verify the findings of the desktop assessment.
  - Bid Stage 3 – In the third stage, the Company conducted workshops to assess the relative performance of potential RDV partners to work together with the Company in a collaborative environment.
- B. Expressions of Interest were received from thirty individual companies to the Company's February 29, 2008 Request for Information (RFI). Six groups of companies participated in the Company's July 1, 2008 Request for Proposal (RFP). Northeast Power Alliance (NEPA) was the successful bidder for the Upstate New York RDV.
- C. In addition to bidder qualifications and pricing, the selection process included an assessment of bidders' performance and experience in the following areas:
- Safety, Environment and Quality
  - Commercial
  - Continuous Improvement
  - Resource Assurance, Program Management and Resource Planning, Construction, Engineering and Design, Leadership and People
  - Cultural Fit (collaboration, relationships, objectives)
- D. NEPA was evaluated as the least expensive option for the New York RDV award.

2. As described in the testimony of the Infrastructure and Operations Panel at pp. 152-155, the collaborative RDV model has been used to deliver value over the traditional project-by-project bidding process, including improved contract oversight, scalability, and delivery efficiencies necessary to deliver the capital investment plan. For example, the employment of a single long-term service provider in a geographic region reduces demobilization/mobilization costs, provides resource continuity, and allows for the optimization of specialty equipment.

During the competitive procurement event, a total cost analysis was performed to evaluate the cost to deliver the 5-year capital program for the New York region based on the competitive bid pricing as summarized in Attachment 1 (AAE-17\_Attach 1\_TSS Savings Summary).

- Actual costs for 8 completed projects were scaled, based on the proportion of the work they represent, to the anticipated 5-year NY capital plan investment. The projects were completed using internal and external resources, depending on project.
- To model costs to deliver this same project work volume under the new arrangement, the unit and project risk costs bid for the 8 projects were multiplied by the work volumes derived from the actual cost analysis. Additional elements included in the bid, such as core team and fee, were incrementally added to develop a total cost model comparison.
- Pain/gain share was not reflected in this analysis

The analysis derived an estimate of savings of 13% from use of the RDV selected bid. The Company determined it appropriate to reduce these estimated savings by 50% as part of its review of the RDV approach to account for the limited sample of projects reviewed, and potential risks not reflected in the project sample. The resulting estimate of 6.5% savings was applied to the contractor element of the five-year capital plan, and totals \$45 million as described in response to IR NM 154 MI-62 MM-62. The Company has proposed a tracker of CAPEX costs. If savings from the RDV exceed the 6.5% level, such savings would be reflected in actual capital costs and the benefit will flow directly to customers through the annual reconciliation of the CAPEX tracker.

3. Due to the unique and complex nature of each transmission project, an integrated design-build approach was pursued. By incentivizing the designer and constructor to work more closely together through the gain share mechanism described in data request IR NM 156 MI-64 MM-64, improvements can be jointly pursued in design quality, project risk management, and delivery efficiencies to reduce overall project costs. Work best suited to this incentive mechanism, such as the Transmission workload, reflect such characteristics as sufficient and complex workload to support increased associated overhead and management tasks (e.g., determination and auditing of an accurate target cost), isolatable risk elements, financially and commercial mature supply partners, and visibility of workload.

In contrast to transmission projects, distribution projects have more standard designs, a high proportion of construction costs to total project costs, and repeatable work methods matched to consistent types of work. To optimize the biggest value driver – construction costs -the arrangement is structured on a more predictable fixed-price unit rate agreement under which the contractor absorbs risks associated with delivery to scope, schedule, budget, and standards. As the distribution construction work has a different value driver and does not sufficiently possess the typical transmission project characteristics described above, no gain share mechanism has been provided for Distribution. Another consideration is that any potential benefit from gain share for distribution projects may be outweighed by the incremental overhead costs for administration.

Both contracts allow for pricing review in subsequent years.

4. IR NM 156 MI-64 MM-64 and NM 328 DPS 200 JJA-18 describe how gain share payments are calculated. Any gain share realized will be charged to the same accounts (in the same percentages of total costs) that incurred charges during project construction. These accounts include capital, cost of removal and capital related expense. The accounting rationale behind this approach is to ensure that any gain share is charged to the specific assets that were constructed at a reduced cost compared to the negotiated target cost.

5. The Work Proposals are developed and agreed jointly by NEPA and Company project team. Each Work Proposal includes the project target cost, which is built in part from the competitively bid unit rates. In addition, as described in data IR NM 328 DPS 200 JJA-8, the Work Proposal and associated project target cost are reviewed as part of the Work Proposal Submission Process, and a Commercial review is undertaken. Finally, the Company project manager and, subsequently, the RDV Governance Board are also required to agree to the entire Work Proposal.

Per the Management Audit action plan for Recommendation VIII-4, the Company will employ professional estimators to validate the RDVs' substation and transmission line project target costs as described in TGP 32 on Project Cost Estimating in Attachment 2 (AAE-17\_Attach 2\_TGP 32). In summary, the procedure calls for the RDVs' target prices to be compared to estimates independently prepared by the Company's professional estimators. Differences between the project estimates and target costs that exceed allowable tolerances must be reconciled between the RDV and the Company's estimators. If the differences cannot be reconciled, Niagara Mohawk may reject the difference. The process will be fully implemented, including completion of the US Cost estimating application, in FY2011.

6. No gain share has been awarded to date. The Total Core Team work authorization will reach final completion on March 31, 2010. However, contractual terms allow for final reconciliation to be completed within four months after the end of each fiscal year.



7. In accordance with Section 216.1 (a) of the Public Service Commission's ("Commission") regulations (16 NYCRR §216.1(a)), the Company filed with the Commission a copy of the Regional Delivery Venture Agreement between National Grid and Northeast Power Alliance LLC ("NEPA") on April 28, 2009. A redacted version is provided in Attachment 3 (AAE-17\_Attach 3\_RDVA) and a complete version will be filed separately.

Name of Respondent:  
Annemarie Loftus

Date of Reply:  
April 7, 2010

Date of Request: March 18, 2010  
Due Date: March 29, 2010

Request No. CVB-9  
NMPC Req. No. NM 290 DPS 162

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Christian Bonvin

TO: Infrastructure and Operations Panel

Request

1. Please provide the number of meters purchased under the Meter Blanket (installs & purchases) for each of the past five years and the projected number of meters to be purchased per year for FY11 through FY15.
2. Please explain why the Company is forecasting an increase in its Meter Blanket (installs & purchases) compared to actual historic spending.
3. Does the Company's forecast include the purchasing of any smart meters?
4. Please explain the increase in the outdoor lighting blanket budget compared to actual historic spending.
5. Are repairs to deficiencies found on outdoor lighting during the inspection process included under the outdoor lighting blanket? If not, where are those forecasted cost captured?
6. Please provide the number of meters purchased under the Distribution Transformer blanket for each of the past five years and the projected number of units to be purchased for FY11 through FY15.
7. Please explain why the Company is forecasting an increase in its transformer blanket, including any efforts to reduce system losses. Additionally, please provide cost comparisons between higher efficiency transformers and models purchased in recent years.

Response:

1. Meters purchased under blanket projects:

- FY2006 -- 9,485
- FY2007 -- 12,482
- FY2008 -- 12,148
- FY2009 -- 14,223
- FY2010 -- 8,447 (invoiced through 3/26/2010)

The Company does not currently project the number of meter units for the 5-year plan. Budgeting of the meter purchase blanket is done on a trended basis including a factor for both volume and commodity/inflationary changes over the prior fiscal year's forecast at the time the budget is being built. Factors applied to the FY2010 meter purchase blanket during the FY11-FY15 build were as follows:

- FY2011 -- Volume Increase 0% / Commodity/Inflationary Inc 6%
- FY2012 -- Volume 1.0% / Commodity/Infl 9.8%
- FY2013 -- Volume 2.0% / Commodity/Infl 6%
- FY2014 -- Volume 1.5% / Commodity/Infl 5.3%
- FY2015 -- Volume 1.5% / Commodity/Infl 6.8%

See Attachment 1 (CVB-9\_Attach 1\_Meter and Transformer) for the calculations.

2. Please refer to Attachment 1 for the calculations that were used to develop the FY11 to FY15 meter and transformer blankets for installation and purchases. The increase budgeted for FY2011 was based on the FY2010 forecast at the time of the budget build process. The factors mentioned in the response to question 1 of this request were applied to the prior year forecasts. The volume factors were based on an overall expected trend of the short term economy being flat and longer term economic growth in the 1-2% range as historically experienced. Lastly, installation factors are based on expected wage increases of the work force.

The forecasts for these blankets are reviewed at divisional work planning meetings and are adjusted depending on how actual and expected costs are experienced throughout the year. While trends in these blankets would more than likely follow economic conditions, they are not directly proportionate to sales/load figures. The mix of meters purchased, size of the customers serviced, replacement requirements and other factors all play a role in the actual spending within the meter blanket projects. Volume factors are reviewed annually during the spending plan development cycle.

3. The current capital plan does not include any forecast for the purchase of smart meters. The Company filed a separate, comprehensive Smart Grid filing in January 2010.

4. Similar to the meter blankets mentioned in our response to question 1, budgeting of the outdoor lighting blanket is done on a trended basis including a factor for both volume and commodity/inflationary changes over the prior fiscal year's forecast at the time the budget is being built. Factors applied to the FY2010 outdoor lighting blanket during the FY11-FY15 build were as follows:

- FY2011 – Volume Increase 0% / Commodity/Inflationary Inc 4.1%
- FY2012 – Volume 0% / Commodity/Infl 5.6%
- FY2013 – Volume 0% / Commodity/Infl 4.1%
- FY2014 – Volume 0% / Commodity/Infl 3.8%
- FY2015 – Volume 0% / Commodity/Infl 4.4%

See Attachment 1 (CVB-9\_Attach 1\_Meter and Transformer) for the calculation. This does not include the Mercury Vapor Conversion project work which is being performed under project C26839.

5. Capital repairs to street lights which result from an inspection either under the Elevated Voltage (annual) or I&M program (5-year cycle) would be captured under the divisional outdoor lighting blanket project which also include other types of work such as luminaire replacement.
6. (Note: Christian Bonvin confirmed via e-mail on March 19, 2010 that the word 'meters' was a typographical error and the question actually refers to transformers)

Transformers purchased under blanket projects:

- FY2006 – 14,156
- FY2007 – 13,314
- FY2008 – 12,006
- FY2009 – 10,303
- FY2010 – 11,622 (invoiced through 3/26/2010)

We do not currently project the number of transformer units for the 5-year plan. Budgeting of the transformer purchase blanket is done on a trended basis including a factor for both volume and commodity/inflationary changes over the prior fiscal year's forecast at the time the budget is being built. Factors applied to the FY2010 transformer purchase blanket during the FY11-FY15 build were as follows:

- FY2011 – Volume Increase 0% / Commodity/Inflationary Inc 12%
- FY2012 -- Volume 1.5% / Commodity/Infl 9.8%
- FY2013 -- Volume 2.5% / Commodity/Infl 6.0%
- FY2014 – Volume 1.0% / Commodity/Infl 5.3%
- FY2015 -- Volume 1.0% / Commodity/Infl 6.8%

See Attachment 1 (CVB-9\_Attach 1\_Meter and Transformer) for the calculations.

7. The increase budgeted for FY2011 was based on the FY2010 forecast at the time of the budget build process. The factors mentioned in the response to question 6

of this data request were applied to the prior year forecasts. The volume factors were based on an expectation of the short term economy/load being flat and longer term economic growth in the 1-2% range as historically experienced.

The estimated cost increase for higher efficiency transformers versus those recently purchased is approximately 13%.

Name of Respondent:

Glen DiConza

Date of Reply:

03/30/2010

**Niagara Mohawk Meter and Transformer Blanket Budget Calculation**

CVB-9  
Attachment 1

Meters		FY11 CAPITAL BUDGET		FY12 CAPITAL BUDGET		FY13 CAPITAL BUDGET		FY14 CAPITAL BUDGET		FY15 CAPITAL BUDGET	
		Vol	Infl	Vol	Infl	Vol	Infl	Vol	Infl	Vol	Infl
Meters - Dist	740,000										
INSTALL NE (Eastern Division)		0.0%	3.1%	1.0%	3.3%	2.0%	3.1%	1.5%	3.0%	1.5%	3.1%
Meters - Dist	650,000										
INSTALL NC (Central Division)		0.0%	3.1%	1.0%	3.3%	2.0%	3.1%	1.5%	3.0%	1.5%	3.1%
Meters - Dist	695,000										
INSTALL NW (Western Division)		0.0%	3.1%	1.0%	3.3%	2.0%	3.1%	1.5%	3.0%	1.5%	3.1%
Meters - Dist	4,700,000										
PURCH		0.0%	6.0%	1.0%	9.8%	2.0%	6.0%	1.5%	5.3%	1.5%	6.8%
Meters - Dist	6,785,000										
TOTAL		0.0%	5.1%	1.0%	7.9%	2.0%	5.2%	1.5%	4.6%	1.5%	5.8%

Transformers		FY11 CAPITAL BUDGET		FY12 CAPITAL BUDGET		FY13 CAPITAL BUDGET		FY14 CAPITAL BUDGET		FY15 CAPITAL BUDGET	
		Vol	Infl	Vol	Infl	Vol	Infl	Vol	Infl	Vol	Infl
Transformer - Dist	23,900,000										
PURCH		0.0%	12.0%	1.5%	9.8%	2.5%	6.0%	1.0%	5.3%	1.0%	6.8%

Purchase blanket estimated 75% materials 25% labor (Cap OH, Stores Handling, etc)

Street Lighting		FY11 CAPITAL BUDGET		FY12 CAPITAL BUDGET		FY13 CAPITAL BUDGET		FY14 CAPITAL BUDGET		FY15 CAPITAL BUDGET	
		Vol	Infl	Vol	Infl	Vol	Infl	Vol	Infl	Vol	Infl
Outdoor Lighting	1,800,000										
NE (Eastern Division)		0.0%	4.1%	0.0%	5.6%	0.0%	4.1%	0.0%	3.8%	0.0%	4.4%
Outdoor Lighting	2,800,000										
NC (Central Division)		0.0%	4.1%	0.0%	5.6%	0.0%	4.1%	0.0%	3.8%	0.0%	4.4%
Outdoor Lighting	3,250,000										
NW (Western Division)		0.0%	4.1%	0.0%	5.6%	0.0%	4.1%	0.0%	3.8%	0.0%	4.4%
	7,850,000										

Date of Request: March 18, 2010  
Due Date: March 29, 2010

Request No. DAG-12  
NMPC Req. No. NM 292 DPS 164

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirement Panel

Request Exhibit (RRP-2), Schedules 12-17 Other Costs and Credits

The RRP testimony at page 23 references Exhibit \_\_ RRP-2, Schedules 11-17 as "Other Costs and Credits" and includes the following:

Schedule 12 – Exp Type #A40 – Construction Reimbursement  
Schedule 13 – Exp Type #A41 – Company Contributions / Credits to Jobs  
Schedule 14 – Exp Type #A42 – Bill Interface Expense Type  
Schedule 15 – Exp Type #A50 – Capital Overheads  
Schedule 16 – Exp Type #A60 – Supervision and Administration  
Schedule 17 – Exp Type #A65 – Service Company Operating Costs

1. For each of the above expense types, please provide a detailed explanation of what the expense cost is supposed to encompass and represent, how the cost is calculated, and on what basis does the charge come through to Niagara Mohawk (Co 36).
2. For the expense types where no normalizing adjustments were made to the historic test year, please explain and provide the analysis the Company undertook to determine that the actual historic test year amounts were reasonable and needed no adjustments, in forecasting the rate years.
3. For the expense types where normalizing adjustments were made to the historic test year, please explain and provide the analysis the Company undertook to determine the actual historic test year amounts with these adjustments, was a reasonable level, in forecasting the rate years.

Response:

**Part 1 –**

**Schedule 12 – Exp Type #A40 – Construction Reimbursement**

Expense Type A40 represents money received as an advance from customers, businesses, and others for construction activities on third party assets. These

construction activities generally are for work performed on customer owned equipment or on company owned equipment that require a customer contribution.

The amounts billed to the respective parties are based on the cost of services and materials to be provided to each individual job.

When payment is received, the amount is credited back to the general ledger as Expense Type A40 to offset the anticipated costs of performing the work.

#### **Schedule 13 – Exp Type #A41 – Company Contributions / Credits to Jobs**

Expense Type A41 represents situations where Niagara Mohawk Power Corporation is responsible for a proportion of the costs of a job that is billed to a third party. For the same types of services described above under Expense Type A40, a complete job occasionally has shared financial responsibility for the cost between the customer and the Company.

The amount that is calculated is based on the services and materials provided to each individual job and a determination is made as to the percentage and share of financial responsibility attributable to the third party and to the Company respectively.

At the time of billing, a customer share percentage is entered based on the arrangement with the customer. An automated process within the billing application uses this percentage to appropriately credit the invoice for the Company's portion and will send a credit back to the general ledger as Expense Type A41, resulting in a partial offset to the costs of performing the work.

#### **Schedule 14 – Exp Type #A42 – Bill Interface Expense Type**

Expense Type A42 represents amounts billed to customers, businesses, and others for construction activities provided on third party assets, that are additional to advance payments (see A40 above). These construction activities generally are for work performed on customer owned equipment or on company owned equipment that requires a customer contribution.

The amounts that are billed to the respective parties are calculated based on the total amount incurred by the Company in providing the services and materials less any A40 payment received in advance from the customer.

When payment is billed, the amount is credited back to the general ledger as Expense Type A42 to offset the costs of performing the work.



#### **Schedule 15 – Exp Type #A50 – Capital Overheads**

Expense Type A50 represents the allocated cost of capital supervision and administrative expense associated with the construction of assets.

Capital supervision and administrative expense generally includes charges from field operation supervisors, district engineers, field operations management, and accounting services where they are working to support the capital construction program but cannot charge a specific project. The costs are collected in a pool to be distributed over the current period's capital spending (charges to 107 CWIP) using a standard percentage. The percentage rates used are calculated monthly by Plant Accounting based on the amount accumulated in the pools and the estimated monthly capital spends.

The charge is applied during month end accounting close processing and is charged directly to capital work orders.

#### **Schedule 16 – Exp Type #A60 – Supervision and Administration**

Expense Type A60 represents the allocated cost of Supervision and Administration which 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 only one exception. On Niagara Mohawk, third party work is charged at a PSC stated rate of 16.14% applied to all charges excluding payments received.

The charge is applied during month end accounting close process.

#### **Schedule 17 – Exp Type #A65 – Service Company Operating Costs**

Expense Type A65 represents the allocated cost of Supervision and Administration which is to recover Service Company only supervision and administrative charges supporting Service Company employees. This covers functions such as Accounting, Finance, Human Resources, Information Technology, Facilities, Legal, etc. for Service Company only.

The cost is collected in a clearing account on Service Company. The account is cleared using a percentage rate applied to payroll of the Service Company (regular

pay and overtime base pay for monthly and weekly employees) billed to associated companies or third parties. The rate is developed monthly by reviewing the total current month charges, plus any unallocated charges from the prior month are divided by the current month's productive payroll to calculate an estimated rate.

The charge is applied during month end accounting close process.

### **Parts 2 & 3-**

As described in the Company's response to Part 1.a and .b of IR DPS 138 DAG-4 on March 23, 2009, an analysis was performed on all expense types by project to analyze year over year variance and scrutinize projects for purposes of normalizing the historic test year. In addition, finance representatives from lines of business and shared service groups met regularly with regulatory personnel as part of the RCS process, described in the response to IR DAG-4, Part 9, to review year on year variance analysis between historic test year and forecast rate year. These individuals were provided a profile of the HY costs and asked to review this data and to address the following:

- Identify one time costs in the HY that may not be recurring in future years
- Review prior period costs booked in the HY
- Identify any corrections, transfers, adjustments etc.
- Identify any new major initiatives (not in HY) excluding NE Gas and KeySpan Costs to Achieve and Synergy Savings that would be incurred in Calendar Years 2011 through 2013
- Provide detailed descriptions of historic year costs and impact on rate year.

Name of Respondent:  
Brian Langh

Date of Reply:  
March 30, 2010

Date of Request: March 18, 2010  
Due Date: March 29, 2010

Request No. DAG-13 *SLPP*  
NMPC Req. No. NM 293 DPS 165

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirement Panel

Request Consultants Expense

1. For each of the following, provide a copy of all historic test year invoices with supporting documentation for the total historic test year costs incurred and charged to Niagara Mohawk (Company #36) either directly or indirectly. The supporting documentation should include the actual accounting applied so that verification of costs incurred can be reconciled with the historic test year workpapers provided in Exhibit \_\_ (RRP-10).

- (a) Harris Beach
- (b) Morgan Lewis & Bockius
- (c) The Energy Association of NY State
- (d) Huron Consulting Services
- (e) Equaterra Inc
- (f) Accenture
- (g) Icon Nicholson LLC
- (h) Tata America International Corporation
- (i) Davidson & O'Mara PC

2. For (a) – (i) listed in question #1 above, please provide a copy of the contract and purchase order the Company has with the vendor that supports and identifies the work being performed.

3. There is a listing on workpaper pages #35-36 for consultants expense in Exhibit \_\_ (RRP-10) of journal id charges from business unit 00431 to Niagara Mohawk (Co. 36) that total \$5,067,472. Based on workpapers provided by the Company, for the previous historic year ending 9/30/08, comparable journal id charges from business unit 431 to Niagara Mohawk was \$2,349,006.

- (a) Please reconcile and provide a detailed explanation of the significant increase of \$2,718,466 between the historic year periods for business unit 431 charges coming to Niagara Mohawk.
- (b) Based on workpapers #35-36, for each charge listed of \$100,000 or more, please provide (i) a copy of the invoice(s) related to the charge and, if not provided on the invoice, a description and explanation of the work that was done and represented by the charge; (ii) the associated accounting that shows the allocation of the total invoice cost among the various

business units; (iii) the bill pool and explanation that supports the allocation used; (iv) and a copy of the purchase order supporting the vendor(s) invoice.

(c) Based on workpapers #35-36, for each charge listed of \$100,000 or more, please provide a copy of the analysis that was done by the Company to conclude that the historic year charges incurred would be recurring in the rate years, and that the charges are not non-recurring in nature.

4. Workpaper page #7 for consultants expense in Exhibit \_\_ (RRP-10) shows a listing of charges by originating company, by project, and by regulatory account that have been normalized in the historic test year to "remove one time costs related to the KeySpan Integration, WU 10310." The total of the electric expense normalizing adjustments for expense type #100 are \$368,144. Please explicitly identify in the supporting workpapers on pages 12-48, the charges that make up the historic test year normalizing adjustments.

5. (a) For overall consultants expense, please explain and provide a copy of the analysis the Company undertook to determine that no additional normalizing adjustments to the historic test year were required, beyond the amounts provided on workpaper #7 and supported by the charges identified in question #4 above.

(b) Show how the analysis determines the remaining historic test year costs are reasonable and includes no non-recurring items, in that the normalized historic test year as presented by the Company is the basis in forecasting the rate years.

Response:

1. Please refer to attachments DAG-13 Attachment 1 and DAG-13 Attachment 1A.

2. Please refer to attachment DAG-13 Attachment 2.

3.

(a) As indicated in the workpapers, these charges originated from KeySpan Service Co. (Co. 431). Full service charging from KeySpan Service Co. to Niagara Mohawk did not begin until April 1, 2008. Prior to that date KeySpan Service Co. charges to Niagara Mohawk were de minimis. Therefore, the year ending September 30, 2008 includes only six months of these charges from KeySpan Service Co. while the historic test year ending September 30, 2009 contains twelve months of charges. This accounts for the approximate 115% from \$2,349,006 in 2008 to \$5,067,472 in 2009.

(b) Please refer to attachments DAG-13 Attachment 4 and DAG-13 Attachment 5.

(c) To comply with regulatory policy, the Company's approach to the review of Historic Year data was organized principally by expense type. For each expense type, the Company queried Historic Year (HY) data generally including information deemed relevant to the specific expense type (i.e. Company, Department, Activity, Segment, Bill Pool, Project, etc). Exhibit RRP-10, Workpaper to RRP-2, Schedule 4, Workpaper 2 – 5 is the result of this work. As described in the Company's response to Part 1.a and .b of IR DPS 138 DAG-4 on March 23, 2009, an analysis was done on all expense types by

project to analyze year over year variance and to scrutinize projects for purposes of normalizing the historic test year. In addition, finance representatives from lines of business and shared service groups met regularly with regulatory personnel as part of the RCS process, described in the previous cited IR DAG-4, Part 9, to review year on year variance analysis between historic test year and forecasted rate year. These individuals were provided a high-level functional profile of the HY costs and asked to review this data and to address the following:

- Identify one time costs in the HY that may not be recurring in future years
  - Review prior period costs booked in the HY
  - Identify any corrections, transfers, adjustments etc.
  - Identify any new major initiatives (not in HY) excluding NE Gas and KeySpan Costs to Achieve and Synergy Savings that would be incurred in Calendar Years 2011 through 2013
  - Provide detailed descriptions of historic year costs and the impact on rate year.
- As a result of these processes, there were no normalization adjustments to these KeySpan Service Co. charges identified, nor is there a specific document showing that a normalization adjustment was not warranted.

4. Please refer to attachment DAG-13 Attachment 3.

5. (a) and (b) The Company's approach to the review of Historical Year data was to organize it principally by expense type. For each expense type, the Company queried Historical Year (HY) data generally including information deemed relevant to the specific expense type (i.e. Company, Department, Activity, Segment, Bill Pool, Project, etc). Exhibit RRP- 10, Workpaper to RRP-2, Schedule 1, Workpapers 1 – 7 and Exhibit RRP-10, Workpaper to RRP-2, Schedule 2, Workpapers 1 – 8 are the result of this work. As described in the Company's response to Part 1.a and .b of IR DPS 138 DAG-4 on March 23, 2009, an analysis was done on all expense types by project to analyze year over year variance and scrutinize projects for purposes of normalizing the historical test year. In addition, finance representatives from lines of business and shared service groups met regularly with regulatory personnel as part of the RCS process, described in IR DAG-4, Part 9, to review year on year variance analysis between historical test year and forecasted rate year. These individuals were provided a high-level functional profile of the HY costs and asked to review this data and to address the following:

- Identify one time costs in the HY that may not be recurring in future years
- Review prior period costs booked in the HY
- Identify any corrections, transfers, adjustments etc.
- Identify any new major initiatives (not in HY) excluding NE Gas and KeySpan Costs to Achieve and Synergy Savings that would be incurred in Calendar Years 2011 through 2013
- Provide detailed descriptions of historic year costs and the impact on rate year.

Name of Respondent:

Date of Reply:

Donald Albers, James Molloy & John O Shaughnessy

April 30, 2010

Date of Request: March 18, 2010  
Due Date: March 29, 2010

Request No. DAG-13  
NMPC Req. No. NM 293 DPS 165

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirement Panel

Request Consultants Expense

1. For each of the following, provide a copy of all historic test year invoices with supporting documentation for the total historic test year costs incurred and charged to Niagara Mohawk (Company #36) either directly or indirectly. The supporting documentation should include the actual accounting applied so that verification of costs incurred can be reconciled with the historic test year workpapers provided in Exhibit \_\_ (RRP-10).

- (a) Harris Beach
- (b) Morgan Lewis & Bockius
- (c) The Energy Association of NY State
- (d) Huron Consulting Services
- (e) Equaterra Inc
- (f) Accenture
- (g) Icon Nicholson LLC
- (h) Tata America International Corporation
- (i) Davidson & O'Mara PC

2. For (a) – (i) listed in question #1 above, please provide a copy of the contract and purchase order the Company has with the vendor that supports and identifies the work being performed.

3. There is a listing on workpaper pages #35-36 for consultants expense in Exhibit \_\_ (RRP-10) of journal id charges from business unit 00431 to Niagara Mohawk (Co. 36) that total \$5,067,472. Based on workpapers provided by the Company, for the previous historic year ending 9/30/08, comparable journal id charges from business unit 431 to Niagara Mohawk was \$2,349,006.

(a) Please reconcile and provide a detailed explanation of the significant increase of \$2,718,466 between the historic year periods for business unit 431 charges coming to Niagara Mohawk.

(b) Based on workpapers #35-36, for each charge listed of \$100,000 or more, please provide (i) a copy of the invoice(s) related to the charge and, if not provided on the invoice, a description and explanation of the work that was done and represented by the charge; (ii) the associated accounting that shows the allocation of the total invoice cost among the various business units; (iii) the bill pool and explanation that supports the allocation used; (iv) and a copy of the purchase order supporting the vendor(s) invoice.

(c) Based on workpapers #35-36, for each charge listed of \$100,000 or more, please provide a copy of the analysis that was done by the Company to conclude that the historic year charges incurred would be recurring in the rate years, and that the charges are not non-recurring in nature.

4. Workpaper page #7 for consultants expense in Exhibit \_\_ (RRP-10) shows a listing of charges by originating company, by project, and by regulatory account that have been normalized in the historic test year to "remove one time costs related to the KeySpan Integration, WU 10310." The total of the electric expense normalizing adjustments for expense type #100 are \$368,144. Please explicitly identify in the supporting workpapers on pages 12-48, the charges that make up the historic test year normalizing adjustments.

5. (a) For overall consultants expense, please explain and provide a copy of the analysis the Company undertook to determine that no additional normalizing adjustments to the historic test year were required, beyond the amounts provided on workpaper #7 and supported by the charges identified in question #4 above.

(b) Show how the analysis determines the remaining historic test year costs are reasonable and includes no non-recurring items, in that the normalized historic test year as presented by the Company is the basis in forecasting the rate years.

Response:

1. Please refer to attachments DAG-13 Attachment 1 and DAG-13 Attachment 1A.

2. Please refer to attachment DAG-13 Attachment 2.

3.

(a) The Company is finalizing the response to this subpart and will submit under separate cover.

(b) Please refer to attachments DAG-13 Attachment 4 and DAG-13 Attachment 5.

(c) The Company is finalizing the response to this subpart and will submit under separate cover.

4. Please refer to attachment DAG-13 Attachment 3.

5. (a) and (b) The Company's approach to the review of Historical Year data was to organize it principally by expense type. For each expense type, then Company queried Historical Year (HY) data generally including information deemed relevant to the specific expense type (i.e. Company, Department, Activity, Segment, Bill Pool, Project,

etc). Exhibit RRP- 10, Workpaper to RRP-2, Schedule 1, Workpapers 1 – 7 and Exhibit RRP-10, Workpaper to RRP-2, Schedule 2, Workpapers 1 – 8 are the result of this work. As described in the Company's response to Part 1.a and .b of IR DPS 138 DAG-4 on March 23, 2009, an analysis was done on all expense types by project to analyze year over year variance and scrutinize projects for purposes of normalizing the historical test year. In addition, finance representatives from lines of business and shared service groups met regularly with regulatory personnel as part of the RCS process, described in IR DAG-4, Part 9, to review year on year variance analysis between historical test year and forecasted rate year. These individuals were provided a high-level functional profile of the HY costs and asked to review this data and to address the following:

- Identify one time costs in the HY that may not be recurring in future years
- Review prior period costs booked in the HY
- Identify any corrections, transfers, adjustments etc.
- Identify any new major initiatives (not in HY) excluding NE Gas and KeySpan Costs to Achieve and Synergy Savings that would be incurred in Calendar Years 2011 through 2013
- Provide detailed descriptions of historic year costs and the impact on rate year.

Name of Respondent:

Donald Albers, James Molloy & John O Shaughnessy

Date of Reply:

April 27, 2010



DAC-13 - NMPC Consultants Expense Part 1

Business Unit	Fiscal Yr	Period	Expense Type	Voucher #	Activity	Activity Descr	Vendor	Invoice No	Purchase Order	Total Payables \$	Allocation	Co. 36 Allocation	Invoices	Comment
<b>HARRIS BEACH</b>														
00006	2009	7:100	AG0256	00473864	AG0256	AGC General Litigation	HARRIS BEACH P/LC	1747731		\$2,915.00	100.00%		Completed	
00006	2009	8:100	AG0256	00484741	AG0256	AGC General Litigation	HARRIS BEACH P/LC	1754679		\$1,080.00	100.00%		Completed	
00006	2009	9:100	AG0256	00484743	AG0256	AGC General Litigation	HARRIS BEACH P/LC	1754679		\$315.00	100.00%		Completed	
00006	2009	10:100	AG0256	00497159	AG0256	AGC General Litigation	HARRIS BEACH P/LC	1752797		\$2,700.00	100.00%		Completed	
00006	2009	11:100	AG0256	00507789	AG0256	AGC General Litigation	HARRIS BEACH P/LC	1757797		\$4,953.00	100.00%		Completed	
00006	2010	1:100	AG0256	00538108	AG0256	AGC General Litigation	HARRIS BEACH P/LC	1779184		\$1,022.50	100.00%		Completed	
00006	2010	2:100	AG0256	00548108	AG0256	AGC General Litigation	HARRIS BEACH P/LC	1779184		\$1,022.50	100.00%		Completed	
00006	2010	3:100	AG0256	00548108	AG0256	AGC General Litigation	HARRIS BEACH P/LC	1779184		\$1,022.50	100.00%		Completed	
00006	2010	4:100	AG0256	00548108	AG0256	AGC General Litigation	HARRIS BEACH P/LC	1779184		\$1,022.50	100.00%		Completed	
00006	2010	5:100	AG0256	00548108	AG0256	AGC General Litigation	HARRIS BEACH P/LC	1779184		\$1,022.50	100.00%		Completed	
										\$2,025.00	100.00%		Completed	
										\$23,828.00	Total per allocation			
										\$23,828.00	Total per RRP-10			
											Variance			
											\$0.00			
<b>MORGAN LEWIS &amp; BOCKLIUS</b>														
00006	2009	7:100	AG0256	00472534	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2074381		\$10,343.00	83.00%		Completed	
00006	2009	8:100	AG0256	00482765	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2085407		\$4,313.25	83.00%		Completed	
00006	2009	9:100	AG0256	00486767	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2085407		\$2,780.02	83.00%		Completed	
00006	2009	10:100	AG0256	00506298	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2100841		\$1,580.00	83.00%		Completed	
00006	2009	11:100	AG0256	00506300	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2100841		\$10,962.00	83.00%		Completed	
00006	2009	12:100	AG0256	00506303	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2100841		\$2,982.00	83.00%		Completed	
00006	2009	1:100	AG0256	00506301	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$14,648.00	83.00%		Completed	
00006	2009	2:100	AG0256	00506302	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$1,580.00	83.00%		Completed	
00006	2009	3:100	AG0256	00506303	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$1,580.00	83.00%		Completed	
00006	2009	4:100	AG0256	00506307	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2009	5:100	AG0256	00506301	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2009	6:100	AG0256	00506302	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2009	7:100	AG0256	00506303	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2009	8:100	AG0256	00506307	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2009	9:100	AG0256	00506301	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2009	10:100	AG0256	00506302	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2009	11:100	AG0256	00506303	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2009	12:100	AG0256	00506307	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2010	1:100	AG0256	00506301	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2010	2:100	AG0256	00506302	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2010	3:100	AG0256	00506303	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2010	4:100	AG0256	00506307	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2010	5:100	AG0256	00506301	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2010	6:100	AG0256	00506302	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2010	7:100	AG0256	00506303	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2010	8:100	AG0256	00506307	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2010	9:100	AG0256	00506301	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2010	10:100	AG0256	00506302	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2010	11:100	AG0256	00506303	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
00006	2010	12:100	AG0256	00506307	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2119692		\$4,313.25	83.00%		Completed	
										\$84,293.54	Total per allocation			
										\$84,293.54	Total per RRP-10			
											Variance			
											\$0.00			
<b>THE ENERGY ASSOCIATION OF NY STATE</b>														
00006	2010	1:100	AG0256	00511763	AG0256	Regulatory Legal Services	MORGAN LEWIS & BOCKLIUS	2141738		\$1,832.00	44.18%		Completed	
										\$511.81	Total per allocation			
										\$511.81	Total per RRP-10			
											Variance			
											\$0.00			
<b>THE ENERGY ASSOCIATION OF NY STATE</b>														
00006	2010	7:100	AG0256	00473031	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1747731		\$2,503.03	100.00%		Completed	
00006	2010	8:100	AG0256	00484741	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1754679		\$2,038.22	100.00%		Completed	
00006	2010	9:100	AG0256	00484743	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1754679		\$2,754.86	100.00%		Completed	
00006	2010	10:100	AG0256	00497159	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1752797		\$1,986.67	100.00%		Completed	
00006	2010	11:100	AG0256	00507789	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1757797		\$2,281.50	100.00%		Completed	
00006	2010	12:100	AG0256	00538108	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1779184		\$2,084.25	100.00%		Completed	
00006	2010	1:100	AG0256	00548108	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1779184		\$2,084.25	100.00%		Completed	
00006	2010	2:100	AG0256	00548108	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1779184		\$2,084.25	100.00%		Completed	
00006	2010	3:100	AG0256	00548108	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1779184		\$2,084.25	100.00%		Completed	
00006	2010	4:100	AG0256	00548108	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1779184		\$2,084.25	100.00%		Completed	
00006	2010	5:100	AG0256	00548108	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1779184		\$2,084.25	100.00%		Completed	
00006	2010	6:100	AG0256	00548108	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1779184		\$2,084.25	100.00%		Completed	
00006	2010	7:100	AG0256	00548108	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1779184		\$2,084.25	100.00%		Completed	
00006	2010	8:100	AG0256	00548108	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1779184		\$2,084.25	100.00%		Completed	
00006	2010	9:100	AG0256	00548108	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1779184		\$2,084.25	100.00%		Completed	
00006	2010	10:100	AG0256	00548108	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1779184		\$2,084.25	100.00%		Completed	
00006	2010	11:100	AG0256	00548108	AG0256	Regulatory Legal Services	THE ENERGY ASSOCIATION OF NY STATE	1779184		\$2,084.25	100.00%		Completed	

Business Unit	Fiscal Yr.	Period	Expense Type	Voucher #	Activity	Activity Descr	Vendor	Invoice No	Purchase Order	Total Payable \$	Allocation	Co. 36 Allocation	Invoice#	Comment
00036	2009	12 100		00511887	AG0760	Regulatory Legal Services	THE ENERGY ASSOCIATE TOCJAN09			\$25,281	100.00%	\$25,280.88		Completed
00036	2010	1 100		00511215	AG0255	Regulatory Legal Services	THE ENERGY ASSOCIATE TOCJAN09			\$24,267	100.00%	\$24,267.40		Completed
00036	2010	3 100		00530780	AG0255	Regulatory Legal Services	THE ENERGY ASSOCIATE TOCJAN09			\$24,479	100.00%	\$24,478.94		Completed
00036	2010	6 100		00530305	AG0255	Regulatory Legal Services	THE ENERGY ASSOCIATE TOCJAN09			\$32,032	100.00%	\$32,031.76		Completed
00036	2010	6 100		00530304	AG0255	Regulatory Legal Services	THE ENERGY ASSOCIATE TOCJAN09			\$30,468	100.00%	\$30,469.11		Completed
00036	2010	8 100		00530308	AG0255	Regulatory Legal Services	THE ENERGY ASSOCIATE TOCJAN09			\$27,960	100.00%	\$27,959.75		Completed
00036	2010	6 100		00530307	AG0255	Regulatory Legal Services	THE ENERGY ASSOCIATE TOCJAN09			\$17,435	100.00%	\$17,389.89		Completed
										\$303,886.16	Total per RRP-10	\$303,886.00		
											Variance	\$0.16		
00036	2009	7 100		00478623	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$3,780	100.00%	\$3,779.83		Completed
00036	2009	8 100		00481432	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$6,876	100.00%	\$6,876.16		Completed
00036	2009	9 100		00481444	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$8,627	100.00%	\$8,626.70		Completed
00036	2009	10 100		00481456	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$5,477	100.00%	\$5,477.59		Completed
00036	2009	11 100		00508870	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$3,046	100.00%	\$3,045.91		Completed
00036	2009	12 100		00511360	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$3,046	100.00%	\$3,046.30		Completed
00036	2010	1 100		00511881	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$3,448	100.00%	\$3,448.75		Completed
00036	2010	3 100		00520205	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$8,550	100.00%	\$8,550.08		Completed
00036	2010	4 100		00520246	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$4,885	100.00%	\$4,885.32		Completed
00036	2010	4 100		00520658	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$9,518	100.00%	\$9,518.00		Completed
00036	2010	4 100		00520658	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$6,918	100.00%	\$6,918.17		Completed
00036	2010	5 100		00520658	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$6,790	100.00%	\$6,790.33		Completed
00036	2010	6 100		00520658	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$4,786	100.00%	\$4,786.32		Completed
00036	2010	6 100		00520658	AG0760	Operations Executive Services	THE ENERGY ASSOCIATE TOCJAN09			\$4,786	100.00%	\$4,786.32		Completed
										\$85,287.29	Total per allocation	\$85,287.29		
											Variance	\$0.29		
00036	2010	6 100		00511330	TO0000	Supplation Trans Misc. Sys	THE ENERGY ASSOCIATE TOCJAN09			\$16,517	100.00%	\$16,516.50		Completed
										\$16,517.00	Total per allocation	\$16,517.00		
											Variance	(\$0.50)		
HURON CONSULTING SERVICES														
00036	2009	7 100		00477620	AG0745	Financial Executive Services	HURON CONSULTING SERVICES			\$20,287	100.00%	\$20,286.04		Completed
00036	2009	9 100		00481435	AG0745	Financial Executive Services	HURON CONSULTING SERVICES			\$20,286	100.00%	\$20,286.22		Completed
00036	2009	9 100		00481435	AG0745	Financial Executive Services	HURON CONSULTING SERVICES			\$45,057	100.00%	\$45,057.71		Completed
00036	2009	10 100		00520658	AG0745	Financial Executive Services	HURON CONSULTING SERVICES			\$987	100.00%	\$987.00		Completed
00036	2010	1 100		00520658	AG0745	Financial Executive Services	HURON CONSULTING SERVICES			\$289,277.37	Total per allocation	\$289,277.87		Completed
											Variance	\$0.50		
EQUATERRA INC.														
00099	2009	9 100		00555445	AG0463	Provide Administrative & General	EQUATERRA INC	10003292		\$88,549	25.80%	\$22,872.43		Completed
00099	2009	9 100		00555445	AG0463	Provide Administrative & General	EQUATERRA INC	10003291		\$87,367	25.80%	\$22,173.29		Completed
00099	2009	9 100		00555445	AG0463	Provide Administrative & General	EQUATERRA INC	10003291		\$105,675	25.80%	\$27,265.12		Completed
00099	2009	9 100		00555445	AG0463	Provide Administrative & General	EQUATERRA INC	10003291		\$176,455	25.80%	\$45,537.72		Completed
00099	2009	9 100		00555445	AG0463	Provide Administrative & General	EQUATERRA INC	10003291		\$114,086	25.80%	\$29,663.09		Completed
00099	2009	10 100		00573326	AG0463	Provide Administrative & General	EQUATERRA INC	10003291		\$108,325	25.80%	\$27,825.27		Completed
00099	2009	10 100		00573326	AG0463	Provide Administrative & General	EQUATERRA INC	10003291		\$108,325	25.80%	\$27,825.27		Completed
00099	2009	10 100		00573326	AG0463	Provide Administrative & General	EQUATERRA INC	10003291		\$108,325	25.80%	\$27,825.27		Completed
00099	2010	1 100		00573326	AG0463	Provide Administrative & General	EQUATERRA INC	10003291		\$81,771	27.01%	\$16,884.16		Completed
00099	2010	1 100		00573326	AG0463	Provide Administrative & General	EQUATERRA INC	10003291		\$98,549	27.01%	\$26,887.93		Completed
00099	2010	1 100		00573326	AG0463	Provide Administrative & General	EQUATERRA INC	10003291		\$25,164	27.01%	\$6,866.06		Completed
00099	2010	1 100		00573326	AG0463	Provide Administrative & General	EQUATERRA INC	10003291		\$95,164	27.01%	\$15,860.10		Completed
										\$947,120.71	Total per allocation	\$247,344.91		
											Variance	\$247,339.00		
												\$8.91		
ACCENTURE														
00099	2009	7 100		00527834	DO0600	Misc Ops Supp and Admin	ACCENTURE LLP	1000215182		\$1,951,788.00	43.77%	\$727,338.97		Completed

Business Unit	Fiscal Yr	Period	Expense Type	Voucher Id	Activity	Activity Descr	Vendor	Invoice No	Purchase Order	Total Payables \$	Allocation	Co. 36 Allocation	Invoice	Comment
0009	2009	11 100	00000000	00000000	00000000	Misc Ops Supp and Admin	ACCENTURE LLP	1000201379	0000000000	\$1,286,184.00	43.77%	\$558,194.77	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ACCENTURE LLP	1000201379	0000000000	\$1,286,184.00	43.77%	\$558,194.77	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ACCENTURE LLP	1000201379	0000000000	\$1,286,184.00	43.77%	\$558,194.77	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ACCENTURE LLP	1000201379	0000000000	\$1,286,184.00	43.77%	\$558,194.77	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ACCENTURE LLP	1000201379	0000000000	\$1,286,184.00	43.77%	\$558,194.77	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ACCENTURE LLP	1000201379	0000000000	\$1,286,184.00	43.77%	\$558,194.77	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ACCENTURE LLP	1000201379	0000000000	\$1,286,184.00	43.77%	\$558,194.77	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ACCENTURE LLP	1000201379	0000000000	\$1,286,184.00	43.77%	\$558,194.77	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ACCENTURE LLP	1000201379	0000000000	\$1,286,184.00	43.77%	\$558,194.77	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ACCENTURE LLP	1000201379	0000000000	\$1,286,184.00	43.77%	\$558,194.77	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ACCENTURE LLP	1000201379	0000000000	\$1,286,184.00	43.77%	\$558,194.77	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ACCENTURE LLP	1000201379	0000000000	\$1,286,184.00	43.77%	\$558,194.77	Completed	
Total per RRP-10												\$5,091,027.00		
Variance												\$138.91		
0009	2010	11 100	00000000	00000000	00000000	Misc Ops Supp and Admin	ICON NICHOLSON LLC	0019000001	0000100099	\$135,941.88	43.76%	\$135,941.88	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ICON NICHOLSON LLC	0019000001	0000100099	\$135,941.88	43.76%	\$135,941.88	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ICON NICHOLSON LLC	0019000001	0000100099	\$135,941.88	43.76%	\$135,941.88	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ICON NICHOLSON LLC	0019000001	0000100099	\$135,941.88	43.76%	\$135,941.88	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ICON NICHOLSON LLC	0019000001	0000100099	\$135,941.88	43.76%	\$135,941.88	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ICON NICHOLSON LLC	0019000001	0000100099	\$135,941.88	43.76%	\$135,941.88	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ICON NICHOLSON LLC	0019000001	0000100099	\$135,941.88	43.76%	\$135,941.88	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ICON NICHOLSON LLC	0019000001	0000100099	\$135,941.88	43.76%	\$135,941.88	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ICON NICHOLSON LLC	0019000001	0000100099	\$135,941.88	43.76%	\$135,941.88	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ICON NICHOLSON LLC	0019000001	0000100099	\$135,941.88	43.76%	\$135,941.88	Completed	
				00000000	00000000	Misc Ops Supp and Admin	ICON NICHOLSON LLC	0019000001	0000100099	\$135,941.88	43.76%	\$135,941.88	Completed	
				Total per RRP-10										
Variance												(\$0.94)		
0009	2010	11 100	00000000	00000000	00000000	Misc Ops Supp and Admin	TATA AMERICA INTERNATIONAL CORPORATION	0000000000	0000000000	\$29,408.74	43.76%	\$29,408.74	Completed	
				00000000	00000000	Misc Ops Supp and Admin	TATA AMERICA INTERNATIONAL CORPORATION	0000000000	0000000000	\$29,408.74	43.76%	\$29,408.74	Completed	
				00000000	00000000	Misc Ops Supp and Admin	TATA AMERICA INTERNATIONAL CORPORATION	0000000000	0000000000	\$29,408.74	43.76%	\$29,408.74	Completed	
				00000000	00000000	Misc Ops Supp and Admin	TATA AMERICA INTERNATIONAL CORPORATION	0000000000	0000000000	\$29,408.74	43.76%	\$29,408.74	Completed	
				00000000	00000000	Misc Ops Supp and Admin	TATA AMERICA INTERNATIONAL CORPORATION	0000000000	0000000000	\$29,408.74	43.76%	\$29,408.74	Completed	
				00000000	00000000	Misc Ops Supp and Admin	TATA AMERICA INTERNATIONAL CORPORATION	0000000000	0000000000	\$29,408.74	43.76%	\$29,408.74	Completed	
				00000000	00000000	Misc Ops Supp and Admin	TATA AMERICA INTERNATIONAL CORPORATION	0000000000	0000000000	\$29,408.74	43.76%	\$29,408.74	Completed	
				00000000	00000000	Misc Ops Supp and Admin	TATA AMERICA INTERNATIONAL CORPORATION	0000000000	0000000000	\$29,408.74	43.76%	\$29,408.74	Completed	
				00000000	00000000	Misc Ops Supp and Admin	TATA AMERICA INTERNATIONAL CORPORATION	0000000000	0000000000	\$29,408.74	43.76%	\$29,408.74	Completed	
				00000000	00000000	Misc Ops Supp and Admin	TATA AMERICA INTERNATIONAL CORPORATION	0000000000	0000000000	\$29,408.74	43.76%	\$29,408.74	Completed	
				00000000	00000000	Misc Ops Supp and Admin	TATA AMERICA INTERNATIONAL CORPORATION	0000000000	0000000000	\$29,408.74	43.76%	\$29,408.74	Completed	
				Total per RRP-10										
Variance												\$0.14		
0009	2010	11 100	00000000	00000000	00000000	Misc Ops Supp and Admin	DAVIDSON & O'MARA	0000000000	0000000000	\$9,300.00	83.00%	\$9,300.00	Completed	
				00000000	00000000	Misc Ops Supp and Admin	DAVIDSON & O'MARA	0000000000	0000000000	\$9,300.00	83.00%	\$9,300.00	Completed	
				00000000	00000000	Misc Ops Supp and Admin	DAVIDSON & O'MARA	0000000000	0000000000	\$9,300.00	83.00%	\$9,300.00	Completed	
				00000000	00000000	Misc Ops Supp and Admin	DAVIDSON & O'MARA	0000000000	0000000000	\$9,300.00	83.00%	\$9,300.00	Completed	
				00000000	00000000	Misc Ops Supp and Admin	DAVIDSON & O'MARA	0000000000	0000000000	\$9,300.00	83.00%	\$9,300.00	Completed	
				00000000	00000000	Misc Ops Supp and Admin	DAVIDSON & O'MARA	0000000000	0000000000	\$9,300.00	83.00%	\$9,300.00	Completed	
				00000000	00000000	Misc Ops Supp and Admin	DAVIDSON & O'MARA	0000000000	0000000000	\$9,300.00	83.00%	\$9,300.00	Completed	
				00000000	00000000	Misc Ops Supp and Admin	DAVIDSON & O'MARA	0000000000	0000000000	\$9,300.00	83.00%	\$9,300.00	Completed	
				00000000	00000000	Misc Ops Supp and Admin	DAVIDSON & O'MARA	0000000000	0000000000	\$9,300.00	83.00%	\$9,300.00	Completed	
				00000000	00000000	Misc Ops Supp and Admin	DAVIDSON & O'MARA	0000000000	0000000000	\$9,300.00	83.00%	\$9,300.00	Completed	
				00000000	00000000	Misc Ops Supp and Admin	DAVIDSON & O'MARA	0000000000	0000000000	\$9,300.00	83.00%	\$9,300.00	Completed	
				Total per RRP-10										
Variance												\$0.00		

Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
Tel: 202.739.3000  
Fax: 202.739.3001  
www.morganlewis.com

**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

**John D. McGrane**  
202-739-5621  
jmcgrane@morganlewis.com

December 1, 2008

Mr. Ronald T. Gerwatowski  
Deputy General Counsel  
National Grid  
201 Jones Road 5th Floor  
Waltham, MA 02451

Re: Global Transformation Accounting

Dear Mr. Gerwatowski:

Morgan, Lewis & Bockius LLP appreciates the opportunity to provide legal services to National Grid USA in connection with the Company's Global Transformation Project, specifically in connection with regulatory and other issues involved in service company cost allocations within the United States and between the United States and the United Kingdom. In accordance with Firm policy, the purpose of this letter is to set forth our understanding as to the terms upon which we have been retained.

**MUTUAL RESPONSIBILITIES**

We will provide the legal services that, in our professional judgment, are appropriate for this matter and in accordance with applicable legal and ethical standards. You agree that appropriate representatives of National Grid USA and its affiliates will be reasonably available to confer with us upon request, will provide us with such documents and information as you may possess relating to the matter, will disclose all facts and circumstances of which you are aware that may bear upon our handling of the matter, will promptly pay our fees in accordance with the terms of this letter, and will otherwise assist our efforts as we reasonably request.

**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

### **SCOPE OF REPRESENTATION**

We are confident that our services in this matter will prove beneficial and we hope that you will seek our assistance with other matters in the future. However, our present agreement to provide legal services to National Grid USA is limited to the matter, described above, for which you have engaged us. As you are aware, we are a large law firm, and we represent many other companies and individuals. It is possible that some of our present or future clients will have disputes or other dealings with National Grid USA during the time that we are representing National Grid USA. Accordingly, as a condition of our undertaking this matter for you, you agree that this Firm may continue to represent, or may undertake in the future to represent, existing or new clients in any matter, including litigation, that is not substantially related to our work for National Grid USA, even if the interests of such clients in those other matters are directly adverse to National Grid USA. Where ethically permissible to do so, we agree to notify you of each such representation as it arises. We agree, however, that your prospective consent to conflicting representations shall not apply in any instance where, as the result of our representation of National Grid USA, we have obtained sensitive, proprietary or other confidential information of a non-public nature that, if known to another client of ours, could be used to the material disadvantage of National Grid USA in a matter in which we represent, or in the future are asked to undertake representation of, that client.

In particular, but without limiting the prior paragraph, we have advised you of, and you agree that we may continue in, the following representations involving matters unrelated to our present representation of National Grid USA:

- Pinnacle West Capital Corporation/Transwest Express Project
- Freeport McMoRan Copper & Gold Inc./Vanadium Corporation Superfund Site and Newtown Creek Superfund site
- Cargill Power Markets/FERC Complaint re HVDC Line
- Globe Specialty Metals/Retail Contracts
- Long Island Power Authority
- Better PLC/Technology transactions

### **DETERMINATION OF FEE**

Our fees are determined, in accordance with applicable ethical rules, by considering a number of factors, including the amount of time that our lawyers, legal assistants and staff devote to the matter, the experience and expertise of the professionals who perform the services, the complexity, novelty and difficulty of the questions involved, the magnitude of the matter, any time limitations or other special demands presented, and the results obtained.

You agree that our fee will be based upon the time which we devote to the matter, in accordance with hourly rates assigned to the particular lawyers and legal assistants performing the work. Our current rates, through calendar year 2008, and our 2009 rates (reflecting a [REDACTED] as discussed below) are attached. We do not anticipate an increase in rates in 2009,

**Morgan Lewis**  
COUNSELORS AT LAW

other than moving associate attorneys to the next class tier to reflect their increased experience. We have also agreed to provide National Grid USA with a [REDACTED] on our 2009 standard rates for this matter, effective for time billed after January 1, 2009. We will also provide an [REDACTED] for any fees in excess of the first [REDACTED] of fees charged to National Grid on all matters in the twelve month period beginning October 1, 2008. We agree that our rates will not change without receiving your prior written approval.

In addition to our fees, we will bill you for any expenditures which we make or expenses we incur for you or on your behalf. These may include computer-based legal research costs, the costs of reproducing documents, long distance telephone charges, parking and travel costs, expenses which we incur while we are away from our office on your business; fees which accountants or consultants retained on your behalf charge us, and other similar expenditures. Where such expenditures are significant in amount, we may ask you to make payment directly to the provider of goods or services.

#### **RESPONSIBLE ATTORNEY**

I will be the partner responsible for this representation. I will match the lawyers providing services with the services required; check periodically with lawyers working on particular matters concerning their progress, the existence of problems, and whether any further assistance is required; monitor the extent of research (if any) required and billing rates of the lawyer(s) performing such research; ensure that client time requirements are adhered to; and review bills for any needed adjustments relating to value received by the client.

I currently anticipate that George Billinson, of Counsel, Bill Baker, a Senior Counsel, and Michael Griffen, one of my partners, will also be working on this matter, as will one or more associate attorneys, as needed.

If at any time you have questions regarding statements for our services or the management of your matter, you should feel free to contact me at 202-739-5621 (office), 703-969-6723 (cell) or 703-356-6245 (home), or by email at [jmcgrane@morganlewis.com](mailto:jmcgrane@morganlewis.com).

#### **STATEMENTS**

We will send you statements for services rendered and for expenditures which we have made for you on a monthly basis pursuant to your electronic billing procedures. The amounts set forth in the statements are due within thirty days after the statement is mailed. If you have any questions about any statement, please call me promptly to discuss it.

If your account becomes delinquent, we have established collection procedures which may include stopping all legal services of a non-emergency nature and, where consistent with our ethical obligations, withdrawing from this representation. We also reserve the right to ask you for reasonable security for past due balances and work required in the near future. As a condition of our undertaking this representation, you agree to provide such security to us upon request.

**Morgan Lewis**  
COUNSELORS AT LAW

In fairness to the majority of our clients who pay our statements promptly, we have established late payment charges designed to charge to the late payors the costs of carrying their overdue accounts. We reserve the right, to the extent permitted by law, to add a late payment charge of [REDACTED] per month to your past due account. These late charges will accrue from the due date of the bill until the date it is paid.

#### **ARBITRATION OF FEE DISPUTES**

We seldom have disagreements with our clients concerning our fees, but some occasionally do occur. It is our desire to resolve any such disagreement through amicable discussion; unfortunately, such disputes cannot always be resolved in that way. Our experience is that in such instances it is in the best interest of both the client and our Firm that the dispute be resolved through binding arbitration rather than by legal action and the courts. To that end, you and we agree that any dispute under this representation agreement that cannot be resolved in a reasonable time through discussions between us shall be submitted to binding arbitration before the American Arbitration Association pursuant to its rules. It is agreed that the site of such arbitrations shall be New York. Any arbitration award will be final, binding and enforceable in New York. You acknowledge that this agreement is entered into after we have advised you of your right to have this agreement reviewed by independent counsel and allowed you sufficient time to avail yourself of that right.

#### **TERMINATION**

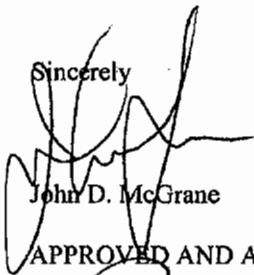
We anticipate a long and mutually satisfactory relationship. However, you have the right to terminate our engagement at any time by giving us written notice of termination. We also have the right, subject to our responsibilities under applicable ethical rules, to terminate our engagement by giving you written notice if you fail to cooperate with us or to pay our bills when due or if we determine that continuing to represent you would be unethical, impractical or improper. If our relationship is terminated by either of us, you will remain obligated to pay us in full for our past services and for costs and expenses in accordance with the terms of this letter.

This agreement will apply to any additional matters we agree to undertake upon your behalf unless we enter into an express written agreement reflecting an alternate arrangement.

Please review this letter carefully, and raise and discuss with me any questions which you may have. If this letter accurately reflects your understanding of our attorney-client relationship, please indicate your approval and acceptance by dating and signing the enclosed duplicate of the letter and returning it to me. Your signature indicates your authority to act on behalf of National Grid USA.

**Morgan Lewis**  
COUNSELORS AT LAW

Sincerely

  
John D. McGrane

APPROVED AND ACCEPTED

By: 

Title: Deputy General Counsel

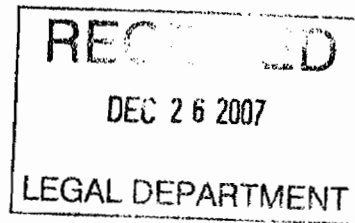
Date: 1-1-09

Enclosure

DB1/62420837.1



Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
Tel: 202.739.3000  
Fax: 202.739.3001  
www.morganlewis.com



Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 2 to DAG-13  
Page 11 of 595  
Final Version  
**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

**John D. McGrane**  
202-739-5621  
jmcgrane@morganlewis.com

December 18, 2007

Colin Owyang, Esq.  
National Grid USA  
25 Research Drive  
Westborough, MA 01582

Re: FERC Audit, Niagara Mohawk Power Corporation

Dear Mr. Owyang:

Morgan, Lewis & Bockius LLP appreciates the opportunity to provide legal services to National Grid USA in connection with an audit being conducted by the Federal Energy Regulatory Commission of Niagara Mohawk Power Corporation, Docket No. PA-08-7-000. The audit is to evaluate Niagara Mohawk's compliance with the certain notice, filing and records retention requirements of the Federal Power Act and FERC's regulations thereunder. In accordance with Firm policy, the purpose of this letter is to set forth our understanding as to the terms upon which we have been retained.

#### **MUTUAL RESPONSIBILITIES**

We will provide the legal services that, in our professional judgment, are appropriate for this matter and in accordance with applicable legal and ethical standards. You agree that appropriate representatives of National Grid USA and Niagara Mohawk will be reasonably available to confer with us upon request, will provide us with such documents and information as you may possess relating to the matter, will disclose all facts and circumstances of which you are aware that may bear upon our handling of the matter, will promptly pay our fees in accordance with the terms of this letter, and will otherwise assist our efforts as we reasonably request.

#### **SCOPE OF REPRESENTATION**

We are confident that our services in this matter will prove beneficial and we hope that you will seek our assistance with other matters in the future. However, our present agreement to provide legal services to National Grid USA is limited to the matter, described above, for which you have

engaged us. As you are aware, we are a large law firm, and we represent many other companies and individuals. It is possible that some of our present or future clients will have disputes or other dealings with National Grid USA during the time that we are representing National Grid USA. Accordingly, as a condition of our undertaking this matter for you, you agree that this Firm may continue to represent, or may undertake in the future to represent, existing or new clients in any matter, including litigation, that is not substantially related to our work for National Grid USA, even if the interests of such clients in those other matters are directly adverse to National Grid USA. Where ethically permissible to do so, we agree to notify you of each such representation as it arises. We agree, however, that your prospective consent to conflicting representations shall not apply in any instance where, as the result of our representation of National Grid USA, we have obtained sensitive, proprietary or other confidential information of a non-public nature that, if known to another client of ours, could be used to the material disadvantage of National Grid USA in a matter in which we represent, or in the future are asked to undertake representation of, that client.

In particular, but without limiting the prior paragraph, we have advised you of, and you agree that we may continue in, the following representations involving matters unrelated to our present representation of National Grid USA:

- Pinnacle West Capital Corporation/Transwest Express Project
- Freeport McMoRan Copper & Gold Inc./Vanadium Corporation Superfund Site and Newtown Creek Superfund site.

#### **DETERMINATION OF FEE**

Our fees are determined, in accordance with applicable ethical rules, by considering a number of factors, including the amount of time that our lawyers, legal assistants and staff devote to the matter, the experience and expertise of the professionals who perform the services, the complexity, novelty and difficulty of the questions involved, the magnitude of the matter, any time limitations or other special demands presented, and the results obtained.

You agree that our fee will be based upon the time which we devote to the matter, in accordance with hourly rates assigned to the particular lawyers and legal assistants performing the work. Our current rates, through calendar year 2008, are attached.

In addition to our fees, we will bill you for any expenditures which we make or expenses we incur for you or on your behalf. These may include computer-based legal research costs, the costs of reproducing documents, long distance telephone charges, parking and travel costs, expenses which we incur while we are away from our office on your business; fees which accountants or consultants retained on your behalf charge us, and other similar expenditures. Where such expenditures are significant in amount, we may ask you to make payment directly to the provider of goods or services.

### **RESPONSIBLE ATTORNEY**

I will be the partner responsible for this representation. I will match the lawyers providing services with the services required; check periodically with lawyers working on particular matters concerning their progress, the existence of problems, and whether any further assistance is required; monitor the extent of research (if any) required and billing rates of the lawyer(s) performing such research; ensure that client time requirements are adhered to; and review bills for any needed adjustments relating to value received by the client.

I currently anticipate that George Billinson, of Counsel, will also be working on this matter, as will one or more associate attorneys, as needed. Mr. Billinson is a former senior attorney with FERC's Office of Enforcement and has experience with recent document retention audits.

If at any time you have questions regarding statements for our services or the management of your matter, you should feel free to contact me at 202-739-5621 (office), 703-969-6723 (cell) or 703-356-6245 (home), or by email at [jmcgrane@morganlewis.com](mailto:jmcgrane@morganlewis.com).

### **STATEMENTS**

We will send you statements for services rendered and for expenditures which we have made for you on a monthly basis. The amounts set forth in the statements are due within thirty days after the statement is mailed. If you have any questions about any statement, please call me promptly to discuss it.

If your account becomes delinquent, we have established collection procedures which may include stopping all legal services of a non-emergency nature and, where consistent with our ethical obligations, withdrawing from this representation. We also reserve the right to ask you for reasonable security for past due balances and work required in the near future. As a condition of our undertaking this representation, you agree to provide such security to us upon request.

In fairness to the majority of our clients who pay our statements promptly, we have established late payment charges designed to charge to the late payors the costs of carrying their overdue accounts. We reserve the right, to the extent permitted by law, to add a late payment charge of [REDACTED] per month to your past due account. These late charges will accrue from the due date of the bill until the date it is paid.

### **ARBITRATION OF FEE DISPUTES**

We seldom have disagreements with our clients concerning our fees, but some occasionally do occur. It is our desire to resolve any such disagreement through amicable discussion; unfortunately, such disputes cannot always be resolved in that way. Our experience is that in such instances it is in the best interest of both the client and our Firm that the dispute be resolved through binding arbitration rather than by legal action and the courts. To that end, you and we agree that any dispute under this representation agreement that cannot be resolved in a

reasonable time through discussions between us shall be submitted to binding arbitration before the American Arbitration Association pursuant to its rules. It is agreed that the site of such arbitrations shall be New York. Any arbitration award will be final, binding and enforceable in New York. You acknowledge that this agreement is entered into after we have advised you of your right to have this agreement reviewed by independent counsel and allowed you sufficient time to avail yourself of that right.

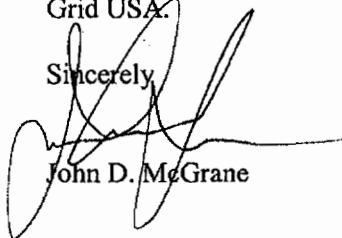
#### **TERMINATION**

We anticipate a long and mutually satisfactory relationship. However, you have the right to terminate our engagement at any time by giving us written notice of termination. We also have the right, subject to our responsibilities under applicable ethical rules, to terminate our engagement by giving you written notice if you fail to cooperate with us or to pay our bills when due or if we determine that continuing to represent you would be unethical, impractical or improper. If our relationship is terminated by either of us, you will remain obligated to pay us in full for our past services and for costs and expenses in accordance with the terms of this letter.

This agreement will apply to any additional matters we agree to undertake upon your behalf unless we enter into an express written agreement reflecting an alternate arrangement.

Please review this letter carefully, and raise and discuss with me any questions which you may have. If this letter accurately reflects your understanding of our attorney-client relationship, please indicate your approval and acceptance by dating and signing the enclosed duplicate of the letter and returning it to me. Your signature indicates your authority to act on behalf of National Grid USA.

Sincerely,



John D. McGrane

APPROVED AND ACCEPTED

By: 

Title: Assistant General Counsel

Date: Dec. 26, 2007

Enclosure

**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
Tel: 202.739.3000  
Fax: 202.739.3001  
www.morganlewis.com

**John D. McGrane**  
202-739-5621  
jmcgrane@morganlewis.com

November 26, 2008

Mr. Ronald T. Gerwatowski  
Deputy General Counsel  
National Grid  
201 Jones Road 5th Floor  
Waltham, MA 02451

Re: FERC Financial Audit, Docket No. FA09-10

Dear Mr. Gerwatowski:

Morgan, Lewis & Bockius LLP appreciates the opportunity to provide legal services to National Grid USA in connection with an audit being conducted by the Federal Energy Regulatory Commission of National Grid USA, including its service companies and other affiliates in the National Grid holding company system, FERC Docket No. FA09-10. The audit will evaluate the Companies' compliance with the Commission's cross subsidization restrictions on affiliate transactions; accounting, recordkeeping, and reporting requirements; preservation of records requirements for holding companies and service companies; Uniform System of Accounts for centralized service companies; and compliance with the conditions upon which merger authorizations were granted in Docket No. EC06-125-000.

**MUTUAL RESPONSIBILITIES**

We will provide the legal services that, in our professional judgment, are appropriate for this matter and in accordance with applicable legal and ethical standards. You agree that appropriate representatives of National Grid USA and its affiliates will be reasonably available to confer with us upon request, will provide us with such documents and information as you may possess relating to the matter, will disclose all facts and circumstances of which you are aware that may

bear upon our handling of the matter, will promptly pay our fees in accordance with the terms of this letter, and will otherwise assist our efforts as we reasonably request.

#### **SCOPE OF REPRESENTATION**

We are confident that our services in this matter will prove beneficial and we hope that you will seek our assistance with other matters in the future. However, our present agreement to provide legal services to National Grid USA is limited to the matter, described above, for which you have engaged us. As you are aware, we are a large law firm, and we represent many other companies and individuals. It is possible that some of our present or future clients will have disputes or other dealings with National Grid USA during the time that we are representing National Grid USA. Accordingly, as a condition of our undertaking this matter for you, you agree that this Firm may continue to represent, or may undertake in the future to represent, existing or new clients in any matter, including litigation, that is not substantially related to our work for National Grid USA, even if the interests of such clients in those other matters are directly adverse to National Grid USA. Where ethically permissible to do so, we agree to notify you of each such representation as it arises. We agree, however, that your prospective consent to conflicting representations shall not apply in any instance where, as the result of our representation of National Grid USA, we have obtained sensitive, proprietary or other confidential information of a non-public nature that, if known to another client of ours, could be used to the material disadvantage of National Grid USA in a matter in which we represent, or in the future are asked to undertake representation of, that client.

In particular, but without limiting the prior paragraph, we have advised you of, and you agree that we may continue in, the following representations involving matters unrelated to our present representation of National Grid USA:

- Pinnacle West Capital Corporation/Transwest Express Project
- Freeport McMoRan Copper & Gold Inc./Vanadium Corporation Superfund Site and Newtown Creek Superfund site
- Cargill Power Markets/FERC Complaint re HVDC Line
- Globe Specialty Metals/Retail Contracts
- Long Island Power Authority
- Better PLC/Technology transactions

#### **DETERMINATION OF FEE**

Our fees are determined, in accordance with applicable ethical rules, by considering a number of factors, including the amount of time that our lawyers, legal assistants and staff devote to the matter, the experience and expertise of the professionals who perform the services, the complexity, novelty and difficulty of the questions involved, the magnitude of the matter, any time limitations or other special demands presented, and the results obtained.

You agree that our fee will be based upon the time which we devote to the matter, in accordance with hourly rates assigned to the particular lawyers and legal assistants performing the work.

**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

Our current rates, through calendar year 2008, and our 2009 rates (reflecting a five percent (5%) discount as discussed below) are attached. We do not anticipate an increase in rates in 2009, other than moving associate attorneys to the next class tier to reflect their increased experience. We have also agreed to provide National Grid USA with a [REDACTED] on our 2009 standard rates for this matter, effective for time billed after January 1, 2009. We will also provide an [REDACTED] for any fees in excess of the first [REDACTED] of fees charged to National Grid on all matters in the twelve month period beginning October 1, 2008. We agree that our rates will not change without receiving your prior written approval.

In addition to our fees, we will bill you for any expenditures which we make or expenses we incur for you or on your behalf. These may include computer-based legal research costs, the costs of reproducing documents, long distance telephone charges, parking and travel costs, expenses which we incur while we are away from our office on your business; fees which accountants or consultants retained on your behalf charge us, and other similar expenditures. Where such expenditures are significant in amount, we may ask you to make payment directly to the provider of goods or services.

#### **RESPONSIBLE ATTORNEY**

I will be the partner responsible for this representation. I will match the lawyers providing services with the services required; check periodically with lawyers working on particular matters concerning their progress, the existence of problems, and whether any further assistance is required; monitor the extent of research (if any) required and billing rates of the lawyer(s) performing such research; ensure that client time requirements are adhered to; and review bills for any needed adjustments relating to value received by the client.

I currently anticipate that George Billinson, an of Counsel, and Michael Griffen, one of my partners, will also be working on this matter, as will one or more associate attorneys, as needed. Mr. Billinson is a former senior attorney with FERC's Office of Enforcement and has experience with FERC audits, and Mr. Griffen has experience with FERC holding company requirements.

If at any time you have questions regarding statements for our services or the management of your matter, you should feel free to contact me at 202-739-5621 (office), 703-969-6723 (cell) or 703-356-6245 (home), or by email at [jmcgrane@morganlewis.com](mailto:jmcgrane@morganlewis.com).

#### **STATEMENTS**

We will send you statements for services rendered and for expenditures which we have made for you on a monthly basis pursuant to your electronic billing procedures. The amounts set forth in the statements are due within thirty days after the statement is mailed. If you have any questions about any statement, please call me promptly to discuss it.

If your account becomes delinquent, we have established collection procedures which may include stopping all legal services of a non-emergency nature and, where consistent with our ethical obligations, withdrawing from this representation. We also reserve the right to ask you

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for reasonable security for past due balances and work required in the near future. As a condition of our undertaking this representation, you agree to provide such security to us upon request.

In fairness to the majority of our clients who pay our statements promptly, we have established late payment charges designed to charge to the late payors the costs of carrying their overdue accounts. We reserve the right, to the extent permitted by law, to add a late payment charge of [REDACTED] per month to your past due account. These late charges will accrue from the due date of the bill until the date it is paid.

#### **ARBITRATION OF FEE DISPUTES**

We seldom have disagreements with our clients concerning our fees, but some occasionally do occur. It is our desire to resolve any such disagreement through amicable discussion; unfortunately, such disputes cannot always be resolved in that way. Our experience is that in such instances it is in the best interest of both the client and our Firm that the dispute be resolved through binding arbitration rather than by legal action and the courts. To that end, you and we agree that any dispute under this representation agreement that cannot be resolved in a

reasonable time through discussions between us shall be submitted to binding arbitration before the American Arbitration Association pursuant to its rules. It is agreed that the site of such arbitrations shall be New York. Any arbitration award will be final, binding and enforceable in New York. You acknowledge that this agreement is entered into after we have advised you of your right to have this agreement reviewed by independent counsel and allowed you sufficient time to avail yourself of that right.

#### **TERMINATION**

We anticipate a long and mutually satisfactory relationship. However, you have the right to terminate our engagement at any time by giving us written notice of termination. We also have the right, subject to our responsibilities under applicable ethical rules, to terminate our engagement by giving you written notice if you fail to cooperate with us or to pay our bills when due or if we determine that continuing to represent you would be unethical, impractical or improper. If our relationship is terminated by either of us, you will remain obligated to pay us in full for our past services and for costs and expenses in accordance with the terms of this letter.

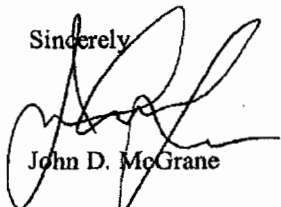
This agreement will apply to any additional matters we agree to undertake upon your behalf unless we enter into an express written agreement reflecting an alternate arrangement.

Please review this letter carefully, and raise and discuss with me any questions which you may have. If this letter accurately reflects your understanding of our attorney-client relationship, please indicate your approval and acceptance by dating and signing the enclosed duplicate of the letter and returning it to me. Your signature indicates your authority to act on behalf of National Grid USA.



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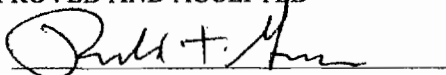
Sincerely,



John D. McGrane

APPROVED AND ACCEPTED

By:



Title:

Deputy General Counsel

Date:

1-1-09

Enclosure

DB1/62420806.1

Morgan, Lewis & Bockius LLP  
1111 Pennsylvania Avenue, NW  
Washington, DC 20004  
Tel: 202.739.3000  
Fax: 202.739.3001  
www.morganlewis.com

**Morgan Lewis**  
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**John D. McGrane**  
202-739-5621  
jmcgrane@morganlewis.com

November 26, 2008

Mr. Ronald T. Gerwatowski  
Deputy General Counsel  
National Grid  
201 Jones Road 5th Floor  
Waltham, MA 02451

Re: FERC Gas Matter

Dear Mr. Gerwatowski:

Morgan, Lewis & Bockius LLP appreciates the opportunity to provide legal services to National Grid USA in connection with certain areas of potential non-compliance by National Grid's local gas distribution company affiliates with natural gas transportation requirements of the Federal Energy Regulatory Commission. In accordance with Firm policy, the purpose of this letter is to set forth our understanding as to the terms upon which we have been retained.

**MUTUAL RESPONSIBILITIES**

We will provide the legal services that, in our professional judgment, are appropriate for this matter and in accordance with applicable legal and ethical standards. You agree that appropriate representatives of National Grid USA and its affiliates will be reasonably available to confer with us upon request, will provide us with such documents and information as you may possess relating to the matter, will disclose all facts and circumstances of which you are aware that may bear upon our handling of the matter, will promptly pay our fees in accordance with the terms of this letter, and will otherwise assist our efforts as we reasonably request.

**SCOPE OF REPRESENTATION**

We are confident that our services in this matter will prove beneficial and we hope that you will seek our assistance with other matters in the future. However, our present agreement to provide legal services to National Grid USA is limited to the matter, described above, for which you have

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engaged us. As you are aware, we are a large law firm, and we represent many other companies and individuals. It is possible that some of our present or future clients will have disputes or other dealings with National Grid USA during the time that we are representing National Grid USA. Accordingly, as a condition of our undertaking this matter for you, you agree that this Firm may continue to represent, or may undertake in the future to represent, existing or new clients in any matter, including litigation, that is not substantially related to our work for National Grid USA, even if the interests of such clients in those other matters are directly adverse to National Grid USA. Where ethically permissible to do so, we agree to notify you of each such representation as it arises. We agree, however, that your prospective consent to conflicting representations shall not apply in any instance where, as the result of our representation of National Grid USA, we have obtained sensitive, proprietary or other confidential information of a non-public nature that, if known to another client of ours, could be used to the material disadvantage of National Grid USA in a matter in which we represent, or in the future are asked to undertake representation of, that client.

In particular, but without limiting the prior paragraph, we have advised you of, and you agree that we may continue in, the following representations involving matters unrelated to our present representation of National Grid USA:

- Pinnacle West Capital Corporation/Transwest Express Project
- Freeport McMoRan Copper & Gold Inc./Vanadium Corporation  
Superfund Site and Newtown Creek Superfund site
- Cargill Power Markets/FERC Complaint re HVDC Line
- Globe Specialty Metals/Retail Contracts
- Long Island Power Authority
- Better PLC/Technology transactions

**DETERMINATION OF FEE**

Our fees are determined, in accordance with applicable ethical rules, by considering a number of factors, including the amount of time that our lawyers, legal assistants and staff devote to the matter, the experience and expertise of the professionals who perform the services, the complexity, novelty and difficulty of the questions involved, the magnitude of the matter, any time limitations or other special demands presented, and the results obtained.

You agree that our fee will be based upon the time which we devote to the matter, in accordance with hourly rates assigned to the particular lawyers and legal assistants performing the work. Our current rates, through calendar year 2008, and our 2009 rates [REDACTED] (as discussed below) are attached. We do not anticipate an increase in rates in 2009, other than moving associate attorneys to the next class tier to reflect their increased experience. We have also agreed to provide National Grid USA with a [REDACTED] on our 2009 standard rates for this matter, effective for time billed after January 1, 2009. We will also

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provide an [REDACTED] for any fees in excess of the first [REDACTED] of fees charged to National Grid on all matters in the twelve month period beginning October 1, 2008. We agree that our rates will not change without receiving your prior written approval.

In addition to our fees, we will bill you for any expenditures which we make or expenses we incur for you or on your behalf. These may include computer-based legal research costs, the costs of reproducing documents, long distance telephone charges, parking and travel costs, expenses which we incur while we are away from our office on your business; fees which accountants or consultants retained on your behalf charge us, and other similar expenditures. Where such expenditures are significant in amount, we may ask you to make payment directly to the provider of goods or services.

#### **RESPONSIBLE ATTORNEY**

I will be the partner responsible for this representation. I will match the lawyers providing services with the services required; check periodically with lawyers working on particular matters concerning their progress, the existence of problems, and whether any further assistance is required; monitor the extent of research (if any) required and billing rates of the lawyer(s) performing such research; ensure that client time requirements are adhered to; and review bills for any needed adjustments relating to value received by the client.

I currently anticipate that George Billinson, of Counsel, and Mark Haskell, one of my partners will also be working on this matter, as will one or more associate attorneys, as needed. Mr. Billinson is a former senior attorney with FERC's Office of Enforcement and both he and Mr. Haskell have experience with FERC enforcement matters involving issues similar to those at issue in this matter.

If at any time you have questions regarding statements for our services or the management of your matter, you should feel free to contact me at 202-739-5621 (office), 703-969-6723 (cell) or 703-356-6245 (home), or by email at [jmcgrane@morganlewis.com](mailto:jmcgrane@morganlewis.com).

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**Morgan Lewis**  
C O U N S E L O R S   A T   L A W

In fairness to the majority of our clients who pay our statements promptly, we have established late payment charges designed to charge to the late payors the costs of carrying their overdue accounts. We reserve the right, to the extent permitted by law, to add a late payment charge of [REDACTED] per month to your past due account. These late charges will accrue from the due date of the bill until the date it is paid.

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We seldom have disagreements with our clients concerning our fees, but some occasionally do occur. It is our desire to resolve any such disagreement through amicable discussion; unfortunately, such disputes cannot always be resolved in that way. Our experience is that in such instances it is in the best interest of both the client and our Firm that the dispute be resolved through binding arbitration rather than by legal action and the courts. To that end, you and we agree that any dispute under this representation agreement that cannot be resolved in a

reasonable time through discussions between us shall be submitted to binding arbitration before the American Arbitration Association pursuant to its rules. It is agreed that the site of such arbitrations shall be New York. Any arbitration award will be final, binding and enforceable in New York. You acknowledge that this agreement is entered into after we have advised you of your right to have this agreement reviewed by independent counsel and allowed you sufficient time to avail yourself of that right.

#### **TERMINATION**

We anticipate a long and mutually satisfactory relationship. However, you have the right to terminate our engagement at any time by giving us written notice of termination. We also have the right, subject to our responsibilities under applicable ethical rules, to terminate our engagement by giving you written notice if you fail to cooperate with us or to pay our bills when due or if we determine that continuing to represent you would be unethical, impractical or improper. If our relationship is terminated by either of us, you will remain obligated to pay us in full for our past services and for costs and expenses in accordance with the terms of this letter.

This agreement will apply to any additional matters we agree to undertake upon your behalf unless we enter into an express written agreement reflecting an alternate arrangement.

Please review this letter carefully, and raise and discuss with me any questions which you may have. If this letter accurately reflects your understanding of our attorney-client relationship, please indicate your approval and acceptance by dating and signing the enclosed duplicate of the letter and returning it to me. Your signature indicates your authority to act on behalf of National Grid USA.

**Morgan Lewis**  
COUNSELORS AT LAW

Sincerely

  
John D. McGrane

APPROVED AND ACCEPTED

By: 

Title: Deputy General Counsel

Date: 1-1-09

Enclosure

DBI/62420858.1

# Legal eXchange Invoice fromMorgan Lewis & Bockius LLP

**Invoice Number:** 2119332  
**Invoice Date:** 01/28/2009  
**Description:** FERC FINANCIAL AUDIT FERC Financial Audit  
**Matter Number:** 051477  
**Matter Name:** FERC Audit  
**Customer Pay Name:**  
**Customer Pay Number:**  
**Firm Tax ID:** 230891050  
**Firm Address:** 1701 Market Street  
Philadelphia, PA 19103-2921

## Fees:

Date	Timekeeper	LI #	Code	Hours	Rate	Orig. Amt	To Pay	Description
12/01/2008	GeorgeBillinson	45514109				\$825.00	\$825.00	Telephone conference with D. Gallaburda, W. Richer, and J. McGrane re PUHCA audit (1.50).
12/01/2008	JohnMcGrane	45511376				\$973.00	\$973.00	Conference call regarding FERC audit; review talking points on [REDACTED].
12/02/2008	GeorgeBillinson	45514112				\$825.00	\$825.00	Review materials in preparation for conference calls re FERC PUHCA audit.
12/02/2008	JohnMcGrane	45511381				\$278.00	\$278.00	E-mails with D. Galaburda regarding call with staff, talking points.
12/03/2008	GeorgeBillinson	45514117				\$605.00	\$605.00	Telephone conference with T. Gerarden (OE Staff) re [REDACTED] (.60); draft email to client to same (.20); discuss same with M. Haskell and M. Griffen (.30).
12/03/2008	GeorgeBillinson	45514120				\$1,870.00	\$1,870.00	Review revised draft talking points for telephone conference with FERC Audit Staff and draft [REDACTED] for records hold (.40); telephone conference with D. Galaburda, W. Richer, and M. Griffen re potential issues (.80); discuss same with M. Griffen (0.40); review document from D. Galaburda re [REDACTED] (.30); PUHCA Audit conference call in preparation for initial call with Audit Staff (1.30); follow-up call with D. Galaburda re hold issue (.20).
12/04/2008	JohnMcGrane	45511398				\$556.00	\$556.00	E-mails regarding hold (0.4); review material from earlier audit (0.4).
12/04/2008	GeorgeBillinson	45514128				\$1,100.00	\$1,100.00	Review and comment on draft outline for initial discussion with Audit Staff (.30); telephone conference with D. Galaburda re same (.30); attention to [REDACTED] (.60); review additional materials re [REDACTED] (.80).
12/04/2008	AnanSokker Hunt	45514469				\$1,058.00	\$1,058.00	Research, obtain, and review [REDACTED] [REDACTED] [REDACTED] [REDACTED] and assemble onto CD for M. Griffen's review.
12/05/2008	GeorgeBillinson	45514129				\$660.00	\$660.00	Telephone conference with D. Galaburda re preparations for initial conference call with FERC Audit Staff (.30); review and comment on draft outline for same (.20); attention to [REDACTED] (.70).
12/05/2008	JohnMcGrane	45511411				\$764.50	\$764.50	Review organizational chart and other materials (0.7); e-mail with D. Galaburda regarding call with FERC (0.4).
12/08/2008	JohnMcGrane	45562218				\$695.00	\$695.00	Conference call with FERC staff regarding audit.

12/08/2008	GeorgeBillinson	45587284	██████████	\$1,760.00	\$1,760.00	Prepare for initial conference call with Audit Staff (.70); initial conference call with Audit Staff (.70); review and comment on draft outline for ██████████ telephone conference with Audit Staff (.50); telephone conference with D. Galaburda, M. Guttikonda re same (.50) review FERC files for National Grid Form 65 and discuss same with L. McAllister (.80).
12/09/2008	GeorgeBillinson	45587288	██████████	\$1,100.00	\$1,100.00	Review and comment on revised draft outline for telephone conference with Audit Staff re ██████████ (.30); telephone conference with Audit Staff re same (.50); follow-up telephone conference with D. Galaburda, M. Guttikonda, B. Richer, and B. Needleman re same (.50); work on email to Audit Staff confirming agreement re ██████████ (.70).
12/10/2008	JohnMcGrane	45562235	██████████	\$347.50	\$347.50	Conference call regarding issues, hold, etc.
12/10/2008	GeorgeBillinson	45587295	██████████	\$385.00	\$385.00	Conference call with Audit Team (0.50); telephone conference with D. Galaburda re draft email to Audit Staff (.20).
12/12/2008	GeorgeBillinson	45587307	██████████	\$1,210.00	\$1,210.00	Review Audit Staff's First set of data requests (.60); telephone conference with D. Galaburda, M. Gotakinda, and B. Richer re same (1.30); attention to issues re ██████████ (.30).
12/12/2008	JohnMcGrane	45562253	██████████	\$834.00	\$834.00	Review data requests (0.5); telephone conference with Baker regarding same (0.5), office conference with G. Billinson; e-mail to B. Rider regarding response to DRS (0.2).
12/12/2008	WilliamBaker, Jr.	45692171	██████████	\$792.00	\$792.00	Begin review and analysis of FERC audit letter request; review of files.
12/14/2008	WilliamBaker, Jr.	45692180	██████████	\$1,122.00	\$1,122.00	Completion of review of FERC audit letter request and list of items in email for discussion and change.
12/15/2008	JohnMcGrane	45664356	██████████	\$278.00	\$278.00	E-mails regarding data requests (0.4).
12/15/2008	DanielSkees	45587560	██████████	\$282.00	\$282.00	Conference with G. Billinson regarding data request responses and organizational approach to production (0.2 hours); review template of audit responses and circulate to group (1.0 hours).
12/15/2008	GeorgeBillinson	45666703	██████████	\$660.00	\$660.00	Work on PUHCA audit data responses (1.0) Conference with D. Skees re data request responses and production of responsive documents (.20).
12/16/2008	JohnMcGrane	45664366	██████████	\$1,320.50	\$1,320.50	Review data requests, issues (0.5); e-mails regarding same (1.4).
12/16/2008	DanielSkees	45609756	██████████	\$822.50	\$822.50	Review and organize all materials received from National grid to date, including exhibits and narrative responses (3.0 hours); conference with G. Billinson and B. Richard regarding organization of production.
12/16/2008	GeorgeBillinson	45666711	██████████	\$1,265.00	\$1,265.00	Discuss preparations for responses to Audit Staff's first set of data requests with D. Skees and review materials re same.
12/17/2008	GeorgeBillinson	45666713	██████████	\$605.00	\$605.00	Regular audit telephone conference (.90); conference with D. Skees re production (.2).
12/17/2008	JohnMcGrane	45664376	██████████	\$1,320.50	\$1,320.50	Weekly conference call regarding PUHCA audit (0.8); office conference with G. Billinson regarding issues regarding same (0.4); review prep materials for call with Staff (0.4); review petition for waiver regarding affiliate transactions (0.3).
12/17/2008	DanielSkees	45620478	██████████	\$399.50	\$399.50	Attend conference call with G. Billinson, J. McGrane and National Grid personnel to discuss audit (0.9 hours); review and organize documents received to date (0.6 hours); conference with G. Billinson regarding production (0.2 hours).
12/18/2008	GeorgeBillinson	45666718	██████████	\$1,375.00	\$1,375.00	Prepare for call with FERC Audit Staff (.70);



Redacted  
telephone conference with D. Galaburda, M. Gotakinda, B. Richer, and D. Skees in preparation for same (1.30); telephone conference with FERC Audit Staff (.70); follow-up call with D. Galaburda (.30); review and revise summary of agreements with FERC Audit Staff (.50).

12/18/2008	DanielSkees	45635120	██████████	\$1,386.50	\$1,386.50	Attend conference call to discuss meeting topics before call with FERC (0.5 hours); attend conference call with FERC Audit staff and discuss call with G. Billinson (1.0 hours); summarize in e-mail all discussions with FERC audit staff (0.5 hours); review, organize, and catalogue all information and attachments received to date (3.90 hours).
12/18/2008	JohnMcGrane	45664389	██████████	\$347.50	\$347.50	Office conference with G. Billinson regarding interpretation of data requests (0.3); e-mail regarding same (0.2).
12/19/2008	GeorgeBillinson	45666724	██████████	\$990.00	\$990.00	Work on responses to Audit Staff's first data requests and discuss same with D. Skees.
12/19/2008	DanielSkees	45645153	██████████	\$893.00	\$893.00	Review, organize, and categorize documents received from National Grid in preparation for audit; (2.0 hours); prepare grid of all materials and information received to date (0.8 hours); conference call with National grid to discuss production (1.0 hours).
12/22/2008	DanielSkees	45666930	██████████	\$1,128.00	\$1,128.00	Review and catalogue documents received from National Grid for audit responses; correspond with National Grid regarding documents and to set up conference call.
12/23/2008	DanielSkees	45691088	██████████	\$1,903.50	\$1,903.50	Review and organize additional documents received from National Grid (3.0 hours); conference call with W. Richer to discuss status of audit response (0.5 hours); prepare matrix of response documents to date in preparation for conference call (1.0 hours); conference call with D. Galaburda, J. McGrane, and G. Billinson to discuss ██████████ (1.0 hours); update matrix to include all notes and determinations from conference call (1.0 hours); review and proofread all documents for January 2, 2009 production (1.0 hours); prepare zip file with all documents for January 2, 2009 production (0.6 hours).
12/23/2008	JohnMcGrane	45690127	██████████	\$1,042.50	\$1,042.50	Conference call regarding draft filing (0.5); review data responses (1.0).
12/23/2008	GeorgeBillinson	45690988	██████████	\$1,760.00	\$1,760.00	Prepare for telephone conference re responses to Audit Staff's first data requests (0.70); telephone conference with D. Galaburda, J. McGrane, and D. Skees re responses to Audit Staff's first data requests (1.0); discuss same with D. Skees (1.70).
12/27/2008	DanielSkees	45691093	██████████	\$282.00	\$282.00	Respond to e-mails from W. Richer and other National Grid personnel regarding status of production and summarizing discussions and decisions from the previous Tuesday conference call.
12/28/2008	DanielSkees	45691094	██████████	\$47.00	\$47.00	E-mail with G. Billinson about issues raised in National Grid e-mails over the holidays.
12/29/2008	GeorgeBillinson	45737931	██████████	\$3,685.00	\$3,685.00	Work on audit data responses (6.40); telephone conference with M. Wheatcroft and D. Skees regarding same (.30).
12/29/2008	JohnMcGrane	45735942	██████████	\$486.50	\$486.50	E-mails regarding production on January 2 (0.4); telephone conferences with D. Galaburda et al regarding same (0.3).
12/29/2008	DanielSkees	45703631	██████████	\$893.00	\$893.00	Review, catalogue, and organize new documents received from National Grid for audit responses (1.2 hours); conference with G. Billinson regarding open questions from

National Grid regarding responses (0.5 hours); set up and hold conference call with M. Wheatcroft to discuss receiving approval for January 2 production (0.5 hours); conference with G. Billinson regarding additional production steps including Index for submissions (0.3 hours); respond to e-mails from National Grid (0.3 hours); update matrix of response documents and send to National Grid attorneys (1.0 hours).

12/30/2008 DanielSkees 45715351

\$23.50

\$23.50

Review and respond to National Grid e-mails regarding audit response.

12/30/2008 GeorgeBillinson 45737937

\$1,980.00

\$1,980.00

Work on audit data responses (3.30); draft transmittal letter regarding same (.30).

12/31/2008 DanielSkees 45724310

\$846.00

\$846.00

Revise transmittal letter (0.3 hours); conference with G. Billinson regarding production of first response to PUHCA audit and revisions to transmittal letter (0.6 hours); conference with D. Galaburda regarding production (0.1 hours); circulate transmittal letter to the group and review responses (0.1 hours); review documents for production, proofread, and insert changes (2.5 hours).

12/31/2008 GeorgeBillinson 45737947

\$1,100.00

\$1,100.00

Work on audit data responses (1.60); review and revise draft transmittal letter regarding same (.40).

#### Expenses:

Date	Timekeeper	LI #	Code	Hours	Rate	Orig. Amt	To Pay	Description
12/03/2008	GeorgeBillinson	56260911	E105			\$1.03	\$1.03	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
12/04/2008	GeorgeBillinson	56266201	E105			\$1.80	\$1.80	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
12/16/2008	WilliamBaker, Jr.	56404459	E106			\$66.96	\$66.96	Lexis Charges
12/16/2008	DanielSkees	56315590	E105			\$0.65	\$0.65	Domestic Long Distance 15083892311 WESTBORO Ma ssachusetts
12/19/2008	DanielSkees	56339262	E105			\$0.46	\$0.46	Domestic Long Distance 16173042302 BOSTON Ma ssachusetts

#### Billing Summary:

	Orig. Amt	Adjustment	To Pay
Fees:	\$44,882.00	\$0.00	\$44,882.00
Expenses:	\$70.90	\$0.00	\$70.90
<b>Totals:</b>	<b>\$44,952.90</b>	<b>\$0.00</b>	<b>\$44,952.90</b>

# Legal eXchange Invoice fromMorgan Lewis & Bockius LLP

**Invoice Number:** 2141740  
**Invoice Date:** 03/19/2009  
**Description:** FERC FINANCIAL AUDIT FERC Financial Audit  
**Matter Number:** 051477  
**Matter Name:** FERC Audit  
**Customer Pay Name:**  
**Customer Pay Number:**  
**Firm Tax ID:** 230891050  
**Firm Address:** 1701 Market Street  
Philadelphia, PA 19103-2921

## Fees:

Date	Timekeeper	LI #	Code	Hours	Rate	Orig. Amt	To Pay	Description
02/01/2009	GeorgeBillinson	46089547				\$1,050.00	\$1,050.00	Review documents from Client for responsiveness to data requests; review materials re [REDACTED].
02/02/2009	WilliamBaker, Jr.	46040585				\$375.00	\$375.00	Issues re [REDACTED]; discussion re same.
02/02/2009	DanielSkees	46032709				\$1,258.75	\$1,258.75	Review e-mail correspondence and additional attachments for responsiveness for final response to data request and update responses (2.0 hours); prepare for and attend conference call with G. Billinson, J. McGrane, and National Grid personnel to discuss remaining issues (2.5 hours); conference with G. Billinson regarding draft presentation for audit staff (0.5 hours).
02/02/2009	GeorgeBillinson	46089551				\$1,312.50	\$1,312.50	Telephone conference with J. McGrane and B. Baker re [REDACTED] (.30); telephone conference with D. Galaburda, M. Guttikonda, B. Richer, J. McGrane, and D. Skees re open issues (1.0); follow-up discussions and telephone conferences with D. Galaburda re same (.70); discussions with D. Skees re site visit presentation. (.50).
02/02/2009	JohnMcGrane	46086334				\$2,376.00	\$2,376.00	Review data responses and SEC audit materials regarding [REDACTED] (1.8); office conferences regarding same (1.1); e-mails with D. Galaburda regarding action items for steering committee call (0.2); conference call regarding [REDACTED] (0.5).
02/03/2009	GeorgeBillinson	46089555				\$1,470.00	\$1,470.00	Review and comment on draft outline of initial presentation to FERC audit staff during site visit and discuss same with J. McGrane and D. Skees (0.80); work on answers to data requests. (2.0).
02/03/2009	JohnMcGrane	46086340				\$1,848.00	\$1,848.00	Conference call with D. Galaburda, B. Needleman, and M. Noble regarding [REDACTED] (0.5); e-mails with M. Guttikonda regarding PUCHA 2005 regs (0.3); review draft responses with G. Billinson (1.5) and revise draft site visit agenda (0.5).
02/03/2009	DanielSkees	46040206				\$1,711.90	\$1,711.90	Draft outline of initial presentation to FERC audit staff during site visit, conference with G. Billinson regarding revisions and revise outline and circulate to National Grid (2.0 hours); review new documents for National Grid response to data request and conference with G. Billinson, J. McGrane and National Grid

02/04/2009	JohnMcGrane	46086352	██████████	\$990.00	\$990.00	personnel regarding response and circulate response to National Grid (4.8 hours); Conference call with steering committee (0.7); review final responses; office conferences with G. Billinson and D. Skees regarding same (0.8).
02/04/2009	DanielSkees	46047502	██████████	\$1,460.15	\$1,460.15	Review comments from M. Wheatcroft on proposed submission and update Bates numbers to account for all changes to submission (0.5 hours); prepare for and attend conference call with G. Billinson and J. McGrane with National Grid audit steering committee to discuss next steps in audit (1.0 hours); prepare and finalize all documents and responses for submission to Audit Staff (2.6 hours); arrange delivery and hand-deliver response to Audit Staff (1.0 hours); review e-mails regarding next projects from D. Galaburda (0.4 hours); conference with G. Billinson regarding audit (0.3 hours).
02/04/2009	GeorgeBillinson	46089559	██████████	\$892.50	\$892.50	Weekly audit call (.70); telephone conferences with D. Skees re same and re final production in response to Audit Staff's data requests (.60); discussion with D. Skees re same and re next steps. (.40).
02/05/2009	GeorgeBillinson	46089561	██████████	\$630.00	\$630.00	Telephone conference with D. Galaburda, et al. re audit (1.0); discuss same with J. McGrane (.20).
02/05/2009	DanielSkees	46056569	██████████	\$453.15	\$453.15	Send duplicate copies of latest filing to National Grid personnel (0.3 hours); prepare for and attend conference call with National Grid and G. Billinson to discuss preparations for audit site visit (1.5 hours).
02/05/2009	JohnMcGrane	46086362	██████████	\$198.00	\$198.00	E-mails regarding legal memo ██████████
02/06/2009	GeorgeBillinson	46089565	██████████	\$787.50	\$787.50	Telephone conference with D. Galaburda and D. Skees in preparation for call with FERC Audit Staff (.20); telephone conference with R. Strother (Audit Staff), D. Galaburda, and B. Richer re same (.30); telephone conference with D. Galaburda re same (.20); follow-up discussion with D. Skees re same (.50); review and respond to email re site visit issues (.30).
02/06/2009	DanielSkees	46066988	██████████	\$201.40	\$201.40	Conference with G. Billinson and National Grid personnel regarding call with FERC Audit Staff to discuss the location of the audit and follow-up e-mail.
02/09/2009	DanielSkees	46089891	██████████	\$679.73	\$679.72	Conference with G. Billinson regarding supplemental response (0.5 hours); prepare and draft supplemental submission for ██████████ and circulate to National Grid personnel (0.4 hours); prepare supplemental affidavit and correspond with W. Richer regarding execution (0.2 hours); conference with G. Billinson regarding revisions to outline for site visit kick off presentation (0.1 hours); revise presentation outline (1.5 hours).
02/09/2009	GeorgeBillinson	46148816	██████████	\$735.00	\$735.00	Work on supplemental response to ██████████ and discuss same with J. McGrane and M. Haskell (.80); discuss potential Massachusetts audit with J. McGrane and D. Skees (.20); discuss site visit plans with D. Skees (.40).
02/10/2009	JohnMcGrane	46147240	██████████	\$1,716.00	\$1,716.00	Review draft supplemental response (0.3); office conference with G. Billinson and D. Skees regarding same (0.3); e-mails regarding launch effort; review materials (1.0); e-mail regarding DPU authority in AG DRs (0.2); review AG requests (0.3); telephone

02/10/2009	DanielSkees	46110769		\$805.60	\$805.60	conference with D. Galaburda regarding same (0.5). Attorney/Client and Work Product Privileged Material Revised draft outline of initial site visit presentation after conference with G. Billinson regarding revisions (0.5 hours); review Massachusetts AG's requests and conference with J. McGrane and G. Billinson regarding responses (0.4 hours); prepare for and attend conference call with G. Billinson, J. McGrane and National Grid personnel to discuss action items (1.5 hours); revise (0.5 hours); correspond with National Grid personnel (0.3 hours).
02/10/2009	GeorgeBillinson	46148824		\$945.00	\$945.00	Review data request from Massachusetts Attorney General and discuss same with J. McGrane (.40); telephone conference with D. Galaburda, M. Guttikonda, and B. Richer re same (.90); review and comment on site visit outline (.20); review and comment on revised site visit kickoff schedule (.30).
02/11/2009	GeorgeBillinson	46148828		\$787.50	\$787.50	Weekly Audit Team conference call (.70); attention to submitting (0.50); discuss call with D. Skees and J. McGrane (.30).
02/11/2009	JohnMcGrane	46147248		\$792.00	\$792.00	Steering committee call (0.6); review materials regarding launch, etc. (0.6).
02/11/2009	DanielSkees	46121346		\$855.95	\$855.95	Attend conference call with J. McGrane, G. Billinson, and National Grid steering committee (0.9 hours); prepare and finalize submission of (1.5 hours); call FERC Audit Staff to arrange delivery of response and hand-deliver response to Audit Staff (1.0 hours).
02/12/2009	JohnMcGrane	46147261		\$396.00	\$396.00	Review materials from B. Richer regarding site visit.
02/12/2009	DanielSkees	46149034		\$125.88	\$125.88	Review new e-mail correspondence from National Grid related to FERC and Massachusetts audits (0.3 hours); conference with D. Galaburda regarding revising presentations for site visit (0.2 hours).
02/13/2009	DanielSkees	46149037		\$125.88	\$125.88	Participate in conference call with National Grid personnel to discuss
02/13/2009	JohnMcGrane	46147270		\$462.00	\$462.00	Conference call with B. Richer, et al regarding (0.5); and vehicle fleet (0.5); e-mails with B. Richer regarding same (0.2).
02/16/2009	GeorgeBillinson	46233006		\$630.00	\$630.00	Review and comment on revised draft slides for audit kickoff meeting.
02/16/2009	DanielSkees	46149040		\$704.90	\$704.90	Review comments on presentations for site visit kick off and revise presentations accordingly (2.0 hours); draft e-mail summary of outstanding issues related to presentations for G. Billinson (0.3 hours); correspond with G. Billinson regarding next steps in dealing with presentations and what additional revisions will be necessary (0.3 hours); draft e-mail to D. Galaburda at National Grid regarding changes to presentations (0.2 hours).
02/17/2009	GeorgeBillinson	46233007		\$787.50	\$787.50	Review revised draft slides for audit kickoff meeting and discuss same with D. Skees (1.1); telephone conference with D. Galaburda re same (.30); review agenda for weekly conference call (.10).
02/17/2009	JohnMcGrane	46230352		\$660.00	\$660.00	Review agenda, slides for site visit.
02/17/2009	DanielSkees	46172898		\$1,661.55	\$1,661.55	Conference with G. Billinson regarding presentations revised at the request of National Grid for site visit and leave message for D. Galaburda (0.5 hours); draft new

presentation based on outline used during previous steering group conference call incorporating existing slides (2.0 hours); conference with D. Galaburda regarding presentations (0.2 hours); conference with G. Billinson regarding next steps in revision of presentation (0.3 hours); revise presentation to include all suggested revisions and add new substantive materials and circulate to D. Galaburda (3.6 hours).

02/18/2009	DanielSkees	46189914	██████████	\$453.15	\$453.15	Review materials and prepare for steering group conference call (0.4 hours); participate in steering group conference call with G. Billinson and conference with G. Billinson afterwards regarding next steps (1.1 hours); review additional materials received from National Grid (0.3 hours).
02/18/2009	GeorgeBillinson	46233014	██████████	\$735.00	\$735.00	Regular weekly Steering Committee call (1.0); discuss revised slides with J. McGrane (.40).
02/18/2009	JohnMcGrane	46230360	██████████	\$1,584.00	\$1,584.00	Conference call with steering committee (1.0); e-mails regarding ██████████ (0.4); e-mails regarding petition or waiver of ██████████; review petition; office conferences with G. Billinson (1.0).
02/19/2009	DanielSkees	46198250	██████████	\$276.93	\$276.92	Review petition for waiver of affiliate transaction requirements and cross-reference with FERC Data Request questions to determine ██████████ (0.6 hours); conference with G. Billinson regarding petition for waiver (0.2 hours); conference with D. Galaburda and send responses to 403 and 404 to him (0.2 hours); respond to National grid's request for copies of certain final responses (0.1 hours).
02/19/2009	GeorgeBillinson	46233022	██████████	\$420.00	\$420.00	Review request for waiver of ██████████ and discuss same with D. Skees (.80).
02/20/2009	JohnMcGrane	46230382	██████████	\$1,386.00	\$1,386.00	Review 2d DRs (0.6); office conference with G. Billinson, telephone conference with D. Galaburda regarding same (1.0); e-mails with B. Richer regarding same (0.5).
02/20/2009	DanielSkees	46208326	██████████	\$528.68	\$528.68	Review new set of data requests from FERC (0.4 hours); prepare for conference call with National Grid personnel (0.2 hours); attend conference call with G. Billinson and National Grid personnel to discuss ██████████ (1.5 hours).
02/20/2009	GeorgeBillinson	46233028	██████████	\$1,575.00	\$1,575.00	Telephone conference with D. Galaburda and J. McGrane in preparation for conference call regarding waiver request (.30); review materials in preparation for same (1.10) review Audit Staff's second set of data requests and discuss same with J. McGrane (.30); telephone conference with D. Galaburda regarding same (.30); telephone conference with P. Flynn, D. Galaburda, et al regarding waiver request (1.0).
02/22/2009	GeorgeBillinson	46233030	██████████	\$577.50	\$577.50	Telephone conference with J. McGrane regarding audit preparation (.30); telephone conference with D. Galaburda regarding same (.80).
02/23/2009	JohnMcGrane	46288537	██████████	\$1,980.00	\$1,980.00	Conference call regarding 2d set of FERC DRs (1.0); office conference with G. Billinson regarding same (0.5); review site visit issues (0.5); e-mails regarding ██████████ (1.0).
02/23/2009	DanielSkees	46233233	██████████	\$1,283.93	\$1,283.92	██████████ (1.0 hours); prepare for conference call with

National Grid by reviewing new correspondence and conferencing with G. Billinson (0.5 hours); attend conference call with G. Billinson, John McGrane, and National Grid personnel (1.3 hours); pull National Grid/KeySpan merger orders and conference with G. Billinson regarding orders (0.4 hours); review list of topics of interest for site visit and create list of response to date for each topics and send list to G. Billinson for review (1.4 hours); conference with W. Baker regarding [REDACTED] after

02/23/2009 GeorgeBillinson 46291601

[REDACTED] \$2,205.00 \$2,205.00

discussing it with G. Billinson (0.5 hours). Prepare for telephone conference re Second Set of Data Requests (.40); discuss same with D. Skees (.20) telephone conference with D. Galaburda, B. Richer, et al re same (1.0); discuss same with J. McGrane and D. Skees (.80); draft timetable for preparation for site visit and discuss same with J. McGrane and D. Skees (.60); conference call with D. Galaburda, et al re [REDACTED] (.30); multiple telephone conferences with D. Galaburda re above (.90).

02/24/2009 GeorgeBillinson 46291604

[REDACTED] \$2,257.50 \$2,257.50

Numerous telephone conferences with D. Galaburda re preparation for site visit, audit responses, etc. (.90); discuss B. Richer's questions for Audit Staff with J. McGrane (.40); telephone conference with B. Richer re same (.40); telephone conference with R. Strothers (FERC Audit Staff) and B. Richer re same (.30); work on proposed timeline for preparation for site visit (.70); review and revise agenda for weekly audit conference call and discuss same with D. Skees (.70); discussions with D. Skees re data responses (.90).

02/24/2009 JohnMcGrane 46288551

[REDACTED] \$2,310.00 \$2,310.00

E-mails with D. Galaburda and D. Skees regarding IS issues; walver (1.5); office conferences with G. Billinson regarding same (1.0); review data requests (1.0).

02/24/2009 DanielSkees 46255262

[REDACTED] \$1,158.05 \$1,158.05

Conference with D. Galaburda regarding drafting of agenda and other steps to prepare for meeting (0.4 hours); assemble responses for interviewees appointed as point persons for various FERC topics of interest during site visit and send files to interviewees (1.5 hours); conference with J. McGrane and G. Billinson regarding possible clarifications for second data request (0.4 hours); review [REDACTED] and pull instructions and past filings (0.7 hours); conference with G. Billinson regarding [REDACTED] requirements (0.3 hours); prepare agenda for steering committee conference call and review and revise (1.1 hours); review and respond to e-mail correspondence from National Grid personnel (0.2 hours).

02/25/2009 GeorgeBillinson 46291606

[REDACTED] \$735.00 \$735.00

Weekly Audit Steering Committee call (1.0); telephone conferences with D. Galaburda re same and re scheduling of site visit prep (.40).

02/25/2009 JohnMcGrane 46288557

[REDACTED] \$2,442.00 \$2,442.00

Conference call with steering committee (0.8); review materials regarding site visit (0.9); e-mails regarding IS issues (1.2); review service agreements (0.8).

02/25/2009 DanielSkees 46263099

[REDACTED] \$654.55 \$654.55

Review correspondence from National Grid regarding second data request and prepare for conference call (0.6 hours); attend conference call with J. McGrane, G. Billinson, and National Grid steering group to discuss current projects

In audit (1.3 hours); prepare and send old responses to National Grid personnel working on new responses (0.4 hours); conference with G. Billinson regarding next steps in project (0.3 hours).

02/26/2009	JohnMcGrane	46288564		\$2,442.00	\$2,442.00	Conference call regarding (1.2); review materials; draft responses (1.5); e-mails regarding same; schedule for prep. sessions (1.0).
02/26/2009	GeorgeBillinson	46291611		\$262.50	\$262.50	Telephone conferences with D. Galaburda re site visit prep., data responses, etc.
02/26/2009	DanielSkees	46270590		\$226.58	\$226.58	Review correspondence from National Grid regarding follow-up clarifications for (0.4 hours); pull National Grid organization chart and conference with J. McGrane about particular affiliate/subsidiary in organization (0.1 hours); conference with G. Billinson about correspondence with National Grid and next steps in production (0.4 hours).
02/27/2009	GeorgeBillinson	46291613		\$892.50	\$892.50	Review and comment on (0.40); telephone conference with D. Galaburda, M. Guttikonda, B. Richer, and D. Skees re responses to data requests, site visit prep, etc. (1.0); follow-up telephone conference with D. Galaburda re same (.30).
02/27/2009	DanielSkees	46291956		\$730.08	\$730.08	Prepare for conference call with National Grid personnel to discuss response preparations (0.1 hours); attend conference call with G. Billinson, J. McGrane, and National Grid personnel to discuss status of responses and conference with G. Billinson afterwards to discuss next steps (1.7 hours); review responses received from National Grid and begin reformatting (0.4 hours); draft short summary of audit for National Grid executives and send to G. Billinson for review (0.7 hours).
02/27/2009	JohnMcGrane	46288572		\$2,310.00	\$2,310.00	Multiple e-mails regarding DRs materials and office conferences regarding same (2.5) review materials (1.0).

#### Expenses:

Date	Timekeeper	LI #	Code	Hours	Rate	Orig. Amt	To Pay	Description
02/03/2009	DanielSkees	56555819	E107	1.00	\$38.53	\$38.53	\$38.53	Overnight Courier Service SEE LABEL, SEE LABEL WALTHAM MA 02451 Tracking#: 982574637769
02/03/2009	DanielSkees	56555820	E107	1.00	\$30.64	\$30.64	\$30.64	Overnight Courier Service SEE LABEL, SEE LABEL WALTHAM MA 02451 Tracking#: 982574637758
02/03/2009	DanielSkees	56493518	E105			\$0.29	\$0.29	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
02/04/2009	DanielSkees	56510957	E110	1.00	\$10.00	\$10.00	\$10.00	Taxi - Daniel Skees Taxi to Federal Energy Regulatory Commission
02/05/2009	DanielSkees	56555821	E107	1.00	\$15.00	\$15.00	\$15.00	Overnight Courier Service SEE LABEL, SEE LABEL WALTHAM MA 02451 Tracking#: 982574638710
02/05/2009		56502846	E101			\$37.20	\$37.20	Duplicating Usage 372 Copies
02/06/2009	DanielSkees	56507123	E105			\$1.87	\$1.87	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
02/09/2009	DanielSkees	56511958	E105			\$0.26	\$0.26	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
02/10/2009	DanielSkees	56518231	E105			\$0.29	\$0.29	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
02/10/2009	DanielSkees	56518230	E105			\$0.26	\$0.26	Domestic Long Distance 15083892311 WESTBORO Ma ssachusetts
02/11/2009	DanielSkees	56583426	E107	1.00	\$5.17	\$5.17	\$5.17	Overnight Courier Service SEE LABEL, SEE LABEL WALTHAM MA 02451 Tracking#: 982574640250
02/11/2009	DanielSkees	56587398	E110	1.00	\$10.00	\$10.00	\$10.00	Taxi - Daniel Skees Taxi to Federal Energy Reg Commission



02/19/2009	BryanClark	46198161	██████████	\$387.00	\$387.00	Draft language for G. Billinson re: ██████████ ██████████
02/20/2009	JohnMcGrane	46230381	██████████	\$396.00	\$396.00	Review e-mails regarding IR transactions (0.3); office conference with G. Billinson regarding same and status (0.3). ██████████
02/20/2009	GeorgeBillinson	46233025	██████████	\$892.50	\$892.50	Work on draft report of investigation.
02/22/2009	GeorgeBillinson	46233031	██████████	\$4,042.50	\$4,042.50	Work on draft report of investigation.
02/23/2009	JohnMcGrane	46288538	██████████	\$330.00	\$330.00	E-mails regarding ██████████ issues.
02/23/2009	MarkHaskell	46290659	██████████	\$1,425.00	\$1,425.00	Work on revised draft report.
02/24/2009	MarkHaskell	46290663	██████████	\$2,280.00	\$2,280.00	Revise draft report.
02/24/2009	JohnMcGrane	46288547	██████████	\$792.00	\$792.00	E-mail regarding ██████████ issues (1.0); office conference with G. Billinson regarding same (0.2).
02/25/2009	MarkHaskell	46290667	██████████	\$1,311.00	\$1,311.00	Revise draft report.
02/25/2009	GeorgeBillinson	46291607	██████████	\$787.50	\$787.50	Prepare for telephone conference with A. Chacko re status of investigation, open issues, etc. (.90); telephone conference with A. Chacko, et al re same (6.0).
02/25/2009	JohnMcGrane	46288554	██████████	\$660.00	\$660.00	Conference call with A. Chacko regarding status (0.6); office conference with G. Billinson (0.4).
02/26/2009	GeorgeBillinson	46291609	██████████	\$262.50	\$262.50	Telephone conference with T. Gerarden (OE Staff) re status of investigation, report, etc. (.40); draft email to Client re same (.10).

#### Expenses:

Date Timekeeper LI # Code Hours Rate Orig. Amt To Pay Description

No Records Found.

#### Billing Summary:

	Orig. Amt	Adjustment	To Pay
Fees:	\$44,335.00	\$0.00	\$44,335.00
Expenses:	\$0.00	\$0.00	\$0.00
<b>Totals:</b>	<b>\$44,335.00</b>	<b>\$0.00</b>	<b>\$44,335.00</b>

# Legal eXchange Invoice from Morgan Lewis & Bockius LLP

<b>Invoice Number:</b>	2119331
<b>Invoice Date:</b>	01/28/2009
<b>Description:</b>	GLOBAL TRANSFORMATION ALLOCATION Global Transformation Allocation
<b>Matter Number:</b>	051477
<b>Matter Name:</b>	FERC Audit
<b>Customer Pay Name:</b>	
<b>Customer Pay Number:</b>	
<b>Firm Tax ID:</b>	230891050
<b>Firm Address:</b>	1701 Market Street Philadelphia, PA 19103-2921

## Fees:

Date	Timekeeper	LI #	Code	Hours	Rate	Orig. Amt	To Pay	Description
11/21/2008	GeorgeBillInson	45377902	A106			\$165.00	\$165.00	Telephone conference with C. Owyang and R. Gerwatowski re [REDACTED]
12/01/2008	WilliamBaker, Jr.	45705616				\$990.00	\$990.00	Review of SEC audit manual and results of prior SEC audits.
12/03/2008	WilliamBaker, Jr.	45692127				\$1,188.00	\$1,188.00	Research re [REDACTED]; review of manuals and policies.
12/04/2008	JohnMcGrane	45511400	A106			\$695.00	\$695.00	Global - review materials regarding [REDACTED]
12/04/2008	GeorgeBillInson	45514124	A106			\$1,045.00	\$1,045.00	Review memos from T. Schwennesen re [REDACTED] (.70); prepare for telephone conference re [REDACTED] (1.2).
12/04/2008	WilliamBaker, Jr.	45692133				\$1,320.00	\$1,320.00	Research in [REDACTED]; review of annual reports.
12/05/2008	JohnMcGrane	45511412	A106			\$1,807.00	\$1,807.00	Conference call with National Grid regarding issues (1.0); review materials (1.6).
12/05/2008	GeorgeBillInson	45514131	A106			\$1,925.00	\$1,925.00	Telephone conference with R. Gerwatowski, et al re [REDACTED] (.70); discuss same with J. McGrane and W. Baker (.40); discuss research project re [REDACTED] FERC Form 60 with L. McAllister (.40); review documents re [REDACTED] (2.00).
12/05/2008	LeviMcAllister	45492903	A102			\$211.50	\$211.50	Begin researching, for G. BillInson, FERC Form 60 filings [REDACTED]
12/05/2008	WilliamBaker, Jr.	45692140				\$1,452.00	\$1,452.00	Preparation for and participation in conference call re [REDACTED]; research re [REDACTED]; review of certain SEC audit materials; review of regulatory approvals chart.
12/06/2008	WilliamBaker, Jr.	45692144				\$1,320.00	\$1,320.00	Review of notes to holding company Form 60 re [REDACTED]; review of [REDACTED]
12/06/2008	JohnMcGrane	45511417	A106			\$417.00	\$417.00	Review SAP materials and forward to Baker.
12/07/2008	GeorgeBillInson	45587283				\$1,100.00	\$1,100.00	Review [REDACTED] from R. Gerwatowski.
12/07/2008	WilliamBaker, Jr.	45692145				\$1,848.00	\$1,848.00	Research in holding company Form 60 re [REDACTED]; review of depreciation charges; review of service agreements.
12/08/2008	LeviMcAllister	45492913	A102			\$728.50	\$728.50	Research FERC Form 60 [REDACTED]

Date	Name	Case Number	Amount 1	Amount 2	Description
12/08/2008	GeorgeBillinson	45587286	\$1,100.00	\$1,100.00	Review FERC filings re [REDACTED]
12/09/2008	LeviMcAllister	45563584	\$1,034.00	\$1,034.00	Participate in conference call with G. Billinson, J. McGrane, and B. Baker regarding research re [REDACTED]
12/09/2008	WilliamBaker, Jr.	45692151	\$1,188.00	\$1,188.00	Review of SAP materials; begin draft of outline of questions; continue review of Form 60s.
12/09/2008	JohnMcGrane	45562230	\$1,112.00	\$1,112.00	Review materials from FERC (1.3); office conferences with G. Billinson and Baker regarding issues (.3).
12/09/2008	GeorgeBillinson	45587287	\$1,210.00	\$1,210.00	Review FERC filings re [REDACTED] and discuss same with L. McAllister (1.70); telephone conference with J. McGrane, B. Baker, and L. McAllister re same (.50).
12/10/2008	JohnMcGrane	45562236	\$417.00	\$417.00	Review issues and questions for Grid (0.4); office conference with G. Billinson; telephone conference with Baker, regarding same (0.3).
12/10/2008	GeorgeBillinson	45587293	\$770.00	\$770.00	Review FERC filings re [REDACTED] and discuss same with L. McAllister (0.70); work on list of information needed from Client (.70).
12/10/2008	LeviMcAllister	45563588	\$188.00	\$188.00	Review [REDACTED] report from 2008.
12/10/2008	WilliamBaker, Jr.	45692160	\$1,914.00	\$1,914.00	Continue review of Form 60; review of chart and memo re regulatory filing; preparation of draft of lists of issues for discussion with client on [REDACTED]; calls re same.
12/11/2008	WilliamBaker, Jr.	45692165	\$1,518.00	\$1,518.00	Continue work on Form 60s and [REDACTED]; review of work plan and outline.
12/12/2008	JohnMcGrane	45562254	\$1,251.00	\$1,251.00	Conference call regarding [REDACTED] (1.0); e-mails with Baker regarding same (0.5); review [REDACTED] (0.3).
12/12/2008	WilliamBaker, Jr.	45692172	\$2,574.00	\$2,574.00	Review and analysis of [REDACTED]; review of [REDACTED]; review of powerpoint materials re [REDACTED]; preparation for and participation in conference call re [REDACTED] and list of issues.
12/13/2008	WilliamBaker, Jr.	45692177	\$858.00	\$858.00	Research and email concerning [REDACTED]
12/14/2008	WilliamBaker, Jr.	45692179	\$990.00	\$990.00	List of issues and discussion points on [REDACTED] and email re same.
12/15/2008	WilliamBaker, Jr.	45692181	\$858.00	\$858.00	Research re [REDACTED]
12/15/2008	JohnMcGrane	45664354	\$347.50	\$347.50	E-mails with Baker regarding issues (0.5).
12/16/2008	LeviMcAllister	45588482	\$1,363.00	\$1,363.00	Research [REDACTED] (5.4); prepare summary for J. McGrane, B. Baker, and G. Billinson regarding research (0.4).
12/16/2008	WilliamBaker, Jr.	45692190	\$2,772.00	\$2,772.00	Research re state and federal proceedings and [REDACTED]; review of SEC orders and filings; review of manuals; review of documents.
12/16/2008	JohnMcGrane	45664362	\$903.50	\$903.50	E-mails regarding research (1.3).
12/17/2008	JohnMcGrane	45664379	\$278.00	\$278.00	E-mails from Baker and McAllister regarding research on other holding companies (0.4).
12/17/2008	LeviMcAllister	45620536	\$1,504.00	\$1,504.00	Conference with J. McGrane, G. Billinson, and B. Baker regarding conference call with client (0.40); Conference call with R. Gerwatowski, G. Billinson, J. McGrane, and B. Baker regarding status of research (0.30); research [REDACTED] (5.0);

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Redacted  
prepare materials for G. Billinson and J. McGrane (0.30)  
Attorney/Client and Work Product  
Continue research re [REDACTED]

12/17/2008 WilliamBaker, Jr. 45692194

[REDACTED] \$3,234.00 \$3,234.00

[REDACTED]  
[REDACTED]; lists of issues and alternatives.

12/18/2008 JohnMcGrane 45664382

[REDACTED] \$1,320.50 \$1,320.50

Office conference with G. Billinson, Baker, McAllister regarding research on [REDACTED] (1.4); conference call with R. Gerwatowski regarding same (0.5).

12/18/2008 LeviMcAllister 45691407

[REDACTED] \$1,339.50 \$1,339.50

Follow-up research for B. Baker (1.5); Research FERC orders regarding [REDACTED] (4.2).

12/18/2008 WilliamBaker, Jr. 45692200

[REDACTED] \$2,508.00 \$2,508.00

Research relating to [REDACTED]; preparation for and participation in conference calls to review [REDACTED].

12/19/2008 WilliamBaker, Jr. 45692202

[REDACTED] \$198.00 \$198.00

List of issues and approaches; email re same.

12/19/2008 JohnMcGrane 45664393

[REDACTED] \$139.00 \$139.00

E-mails regarding research on [REDACTED] (0.2).

12/19/2008 GeorgeBillinson 45666726

[REDACTED] \$385.00 \$385.00

Discuss [REDACTED] with L. McAllister.

12/19/2008 LeviMcAllister 45691409

[REDACTED] \$728.50 \$728.50

Review National Grid's [REDACTED]

12/22/2008 LeviMcAllister 45691410

[REDACTED] \$822.50 \$822.50

Review [REDACTED]

12/22/2008 WilliamBaker, Jr. 45692213

[REDACTED] \$1,650.00 \$1,650.00

Research re [REDACTED]; review of state proceedings; review of exhibits.

12/27/2008 LeviMcAllister 45691415

[REDACTED] \$1,245.50 \$1,245.50

Research [REDACTED] (0.4); prepare outline for memorandum (3.6); research [REDACTED] are discussed (1.3).

12/29/2008 LeviMcAllister 45691416

[REDACTED] \$2,796.50 \$2,796.50

Research relationship between [REDACTED] (4.1); research the [REDACTED] (3.9); draft memorandum outline, edit, and revise accordingly for presentation to J. McGrane, B. Baker, and G. Billinson (3.9).

12/29/2008 JohnMcGrane 45735941

[REDACTED] \$695.00 \$695.00

Review draft outline regarding [REDACTED] (0.8); telephone conference with Baker regarding same (0.2).

12/30/2008 WilliamBaker, Jr. 45705626

[REDACTED] \$1,980.00 \$1,980.00

Research for memo outline; review of memo outline; conference call to discuss issues and approaches.

12/30/2008 GeorgeBillinson 45737939

[REDACTED] \$385.00 \$385.00

Discussions with L. McAllister regarding draft memo regarding [REDACTED].

12/30/2008 LeviMcAllister 45724426

[REDACTED] \$376.00 \$376.00

Finalize outline for memorandum requested by National Grid

12/30/2008 JohnMcGrane 45735950

[REDACTED] \$834.00 \$834.00

Review [REDACTED] (1.0); office conference with G. Billinson regarding same (0.2).

12/31/2008 WilliamBaker, Jr. 45715765

[REDACTED] \$594.00 \$594.00

Review of materials re [REDACTED] and notes re same for memo; research SEC orders.

12/31/2008 LeviMcAllister 45724428

[REDACTED] \$1,903.50 \$1,903.50

Draft memorandum regarding [REDACTED]

**Expenses:**

Date	Timekeeper	LI #	Code	Hours	Rate	Orig. Amt	To Pay	Description
12/09/2008	LeviMcAllister	56355662	E106			\$17.18	\$17.18	Lexis Charges
12/22/2008	LeviMcAllister	56361493	E106			\$25.88	\$25.88	Lexis Charges
12/27/2008	LeviMcAllister	56361494	E106			\$14.22	\$14.22	Lexis Charges
12/29/2008	LeviMcAllister	56375865	E106			\$108.29	\$108.29	Lexis Charges

**Billing Summary:**

	Orig. Amt	Adjustment	To Pay
Fees:	\$63,496.50	\$0.00	\$63,496.50
Expenses:	\$165.57	\$0.00	\$165.57
<b>Totals:</b>	<b>\$63,662.07</b>	<b>\$0.00</b>	<b>\$63,662.07</b>

# Legal eXchange Invoice fromMorgan Lewis & Bockius LLP

<b>Invoice Number:</b>	2151262
<b>Invoice Date:</b>	04/07/2009
<b>Description:</b>	FERC FINANCIAL AUDIT FERC Financial Audit
<b>Matter Number:</b>	051477
<b>Matter Name:</b>	FERC Audit
<b>Customer Pay Name:</b>	
<b>Customer Pay Number:</b>	
<b>Firm Tax ID:</b>	230891050
<b>Firm Address:</b>	1701 Market Street Philadelphia, PA 19103-2921

## Fees:

Date	Timekeeper	LI #	Code	Hours	Rate	Orig. Amt	To Pay	Description
03/01/2009	DanielSkees	46291959				\$600.00	\$600.00	Review draft responses, reformat them, and file them electronically to prepare for submission (0.6 hours); draft Index of responses for response to second data request (1.9 hours).
03/02/2009	JohnMcGrane	46377584				\$1,187.50	\$1,187.50	Multiple emails with NG re data responses and documents (0.9); review slidepack for site visit (1.0).
03/02/2009	GeorgeBillinson	46380721				\$1,890.00	\$1,890.00	Telephone conferences with D. Galaburda re site visit preparation, data responses, etc. (.50); discuss same with J. McGrane and D. Skees (.60); review site visit plan (.30); review and comment on kickoff slides (.40); draft agenda for site visit prep (.80); review and revise audit history memo for T.King (.40); work on draft data responses (.60).
03/02/2009	DanielSkees	46322675				\$1,440.00	\$1,440.00	Review responses for second data request, proofread, re-format, and organize for submission (3.5 hours); conference with G. Billinson throughout the day regarding ongoing projects to prepare second data response (0.5 hours); review and respond to correspondence from National Grid personnel regarding data responses (0.5 hours); review comments on presentations and revise presentation (1.5 hours).
03/03/2009	DanielSkees	46335552				\$1,224.00	\$1,224.00	Review, re-format, and proofread new responses from National Grid received overnight (1.0 hours); prepare for and attend conference call with G. Billinson and National Grid personnel regarding status of various responses (1.5 hours); review responses, proofread, and discuss with M. Huntington for additional review (1.1 hours); prepare for and attend conference call with G. Billinson and FERC audit staff to discuss responses (0.6 hours); revise presentation and send to group (0.5 hours); review new responses, proofread, and organize for submission and send group e-mail regarding status of outstanding responses (0.4 hours).
03/03/2009	MaryannHuntington	46377617				\$1,450.00	\$1,450.00	Conf. call re: FERC data requests, status of responses; review and provide comments on data request.
03/03/2009	JohnMcGrane	46377589				\$750.00	\$750.00	Emails re data responses, site visit.
03/03/2009	GeorgeBillinson	46380723				\$3,307.50	\$3,307.50	Telephone conferences with D. Galaburda

re site visit preparation, data responses, etc. (.60); telephone conference with D. Galaburda, M. Guttikonda, B. Richer, and D. Skees re same (1.40); telephone conference with Audit Staff re same (.50); review site visit plan (.30); prepare draft agenda for site visit prep (.80); work on draft data responses (1.90); discuss above with J. McGrane and D. Skees (.80).

03/04/2009	GeorgeBillinson	46380726		\$2,467.50	\$2,467.50	Telephone conferences with D. Galaburda re site visit preparation, data responses, etc. (.50); Weekly Audit Steering Committee Call (.70); Telephone conference with D. Galaburda, M. Guttikonda, B. Richer, and D. Skees re data requests (.70); telephone conference with Audit Staff re Data Request No. 130 (.20); discuss same with A. Chacko and J. McGrane (.50); discuss [REDACTED] with J. McGrane and L. Griggs (.40); work on finalizing and producing data responses (1.70).
03/04/2009	LindaGriggs	46376672		\$142.00	\$142.00	Telephone call with J. McGrane regarding FERC investigation.
03/04/2009	DanielSkees	46342012		\$2,688.00	\$2,688.00	Prepare for and attend conference call with G. Billinson, J. McGrane, and audit committee steering group (1.5 hours); review responses to second data request, conference with M. Huntington regarding revisions and corrections, revise, re-format, and organize the responses for production throughout the day and correspond with National Grid personnel regarding revisions (7.1 hours); conference with G. Billinson and National Grid personnel regarding remaining problems and needed revisions to responses (1.2 hours); revise index of responses to match current production (1.4 hours).
03/04/2009	LindaGriggs	46376673		\$142.00	\$142.00	Telephone call with J. McGrane regarding [REDACTED].
03/04/2009	MaryannHuntington	46377620		\$2,450.00	\$2,450.00	Review draft data responses and provide comments; steering committee conf. call re: data requests, site visits, Mass AG's data requests, etc.
03/04/2009	JohnMcGrane	46377595		\$2,937.50	\$2,937.50	Conference call - Steering Committee (1.0); review data responses and office conferences with Billinson, Huntington, re same (2.1); review, compliance materials re production, privilege and teleconference with A. Chacko re same (1.2); conference call with G. Williams re [REDACTED] (.4).
03/05/2009	GeorgeBillinson	46380729		\$2,415.00	\$2,415.00	Review and comment on draft data responses (1.20); work on production of same (1.00); telephone conference with D. Galaburda, et al. re open issues (0.70); telephone conference with R. Strother (Audit Staff) re data responses (.20); work on draft audit prep memo for L. Crutchfield (1.50).
03/05/2009	JohnMcGrane	46377597		\$2,125.00	\$2,125.00	Work on revisions to DRs, including compliance program, etc. (1.5); multiple emails re: same (1.2); conference call re: same (0.7).
03/05/2009	LeviMcAllister	46357882		\$473.00	\$473.00	Collaborate with J.D. Skees on finalizing production to FERC in connection to Data Request Set #2 (1.3); deliver to FERC the materials in response to data requests (.9).

03/05/2009	DanielSkees	46348722	██████████	\$2,280.00	\$2,280.00	Review, proofread, and re-format responses to Data Request No. 2 correspond and call National Grid personnel to correct problems with responses, arrange printing and organization of responses for production and arrange delivery to FERC (8.5 hours); conference with G. Billinson regarding next steps (0.2 hours); prepare CD of all responses to date and arrange duplication (0.8 hours).
03/06/2009	JohnMcGrane	46377610	██████████	\$1,875.00	\$1,875.00	Multiple emails with D. Galaburda, et al. re: Mass AG DRs (1.4); final review of responses (0.6); review site visit preparation with Billinson, several office conferences re: same (1.0).
03/06/2009	GeorgeBillinson	46380730	██████████	\$3,990.00	\$3,990.00	Work on draft audit prep memo for L. Crutchfield (2.50); work on preparations for prep session (4.4); telephone conferences with D. Galaburda and M. Guttikonda re same and re Massachusetts Attorney General's data requests (.70).
03/06/2009	SimonLaw	46357465	██████████	\$110.00	\$110.00	Prepare 5x copies of production DVD per D. Skees.
03/06/2009	DanielSkees	46357531	██████████	\$1,824.00	\$1,824.00	Conference with G. Billinson regarding preparations for visit to National Grid (0.5 hours); conference with G. Billinson and D. Galaburda regarding preparations (0.3 hours); identify responses relevant to all personnel who will be prepared and send the responses to them electronically for review (3.5 hours); pull and review relevant paperwork and orders in preparation for visit; conference with G. Billinson regarding next steps (0.5 hours); prepare and organize hard copies of responses for shipment to National Grid (2.8 hours).
03/08/2009	JohnMcGrane	46377613	██████████	\$562.50	\$562.50	Office conference with G. Billinson re: audit preparation (0.4); review materials, DRs (0.5).
03/08/2009	DanielSkees	46403737	██████████	\$432.00	\$432.00	Prepare CD-ROM versions of all responses relevant to various audit interviewees.
03/08/2009	GeorgeBillinson	46437412	██████████	\$1,995.00	\$1,995.00	Prepare for site visit prep meetings in Brooklyn.
03/09/2009	JohnMcGrane	46456278	██████████	\$4,687.50	\$4,687.50	Review materials for audit preparation (0.5); audit preparation session in Brooklyn (7.0).
03/09/2009	LeviMcAllister	46460191	██████████	\$107.50	\$107.50	Conduct research for J.D. Skees and G. Billinson regarding ██████████
03/09/2009	DanielSkees	46403738	██████████	\$2,040.00	\$2,040.00	Review audit preparation materials while travelling to Brooklyn (0.5 hours); attend preparation sessions to prepare for audit site visit (8.0 hours).
03/09/2009	GeorgeBillinson	46437414	██████████	\$4,462.50	\$4,462.50	Prepare for site visit prep meetings (.50); site visit prep meetings in Brooklyn (8.0).
03/10/2009	GeorgeBillinson	46437417	██████████	\$4,147.50	\$4,147.50	Site visit prep meetings in Brooklyn (5.30); attention to responses to Massachusetts Attorney General's data requests (.70); work on revised draft site visit plan and circulate to team (.6); attention to site visit preparations (.7); attention to responses to Audit Staff's Second data requests (.6).
03/10/2009	JohnMcGrane	46456283	██████████	\$1,375.00	\$1,375.00	Review data responses, issues (1.5); office conference with M. Huntington re: same (0.3); emails re: same (0.4).
03/10/2009	AnanSokker Hunt	46459352	██████████	\$512.50	\$512.50	Review, revise and bates labels for service agreements; and conferences with M.



03/10/2009	MaryannHuntington	46436368	[REDACTED]	\$2,350.00	\$2,350.00	Review data responses and AG's request re: service agreements and MAA's; download and filing information for production.
03/10/2009	LeviMcAllister	46460194	[REDACTED]	\$365.50	\$365.50	Research for G. Billinson SEC orders addressing [REDACTED]
03/10/2009	DanielSkees	46403740	[REDACTED]	\$2,784.00	\$2,784.00	Attend preparation sessions to prepare for audit site visit and work with National Grid personnel (5.5 hours); correspond with personnel to prepare Massachusetts GA oversight question responses (1.0 hours); review draft responses, conference with National Grid personnel, and prepare responses to Massachusetts AG (5.1 hours).
03/11/2009	DanielSkees	46410987	[REDACTED]	\$2,928.00	\$2,928.00	Prepare Massachusetts Attorney General responses (4.5 hours); attend steering group conference call with J. McGrane and George Billinson (1.0 hours); continue preparation work regarding Mass AG requests and arrange final production and delivery (2.7 hours); review, organize, and revise second set of responses to FERC Data Request No. 2 (2.0 hours); attend conference call with G. Billinson and National Grid working group (1.0 hours); continue preparing and drafting responses to FERC data requests (1.0 hours).
03/11/2009	GeorgeBillinson	46437420	[REDACTED]	\$2,467.50	\$2,467.50	Weekly Audit Steering Committee call (1.0); attention to production of responses to Massachusetts Attorney General's data requests (2.0); work on preparations for site visit, data responses, etc. (.30); nightly conference call re site visit (.70); review and comment on draft data responses (.70).
03/11/2009	JohnMcGrane	46456290	[REDACTED]	\$2,500.00	\$2,500.00	Steering Committee conference call (0.7); work on Mass AG responses; office conferences with D. Skees, G. Billinson re: same (1.8); review Issues for FERC site visit, multiple emails re: same (1.5).
03/11/2009	LeviMcAllister	46460200	[REDACTED]	\$1,032.00	\$1,032.00	Research SEC filings and orders for [REDACTED] conference with J.D. Skees regarding response to [REDACTED] of the FERC audit.
03/11/2009	MatthewVerga	46425173	[REDACTED]	\$106.00	\$106.00	Locate and review National Grid comments on NOPR.
03/12/2009	GeorgeBillinson	46437423	[REDACTED]	\$3,622.50	\$3,622.50	Attention to data responses (2.20); nightly conference call re site visit (.70); attention to site visit preparations (4.0).
03/12/2009	JohnMcGrane	46456299	[REDACTED]	\$1,125.00	\$1,125.00	Multiple emails re: production and site visit (0.4); office conferences with D. Skees, G. Billinson re: same (0.4); review data responses (0.8); review SEC order re: [REDACTED] (0.2).
03/12/2009	MaryannHuntington	46436373	[REDACTED]	\$1,050.00	\$1,050.00	Review data responses and provide comments on same; discuss w/ J. McGrane.
03/12/2009	DanielSkees	46437515	[REDACTED]	\$2,136.00	\$2,136.00	Review new responses to FERC Data Request No.2, revise data responses, finish index of responses, draft transmittal letter, conference with National Grid personnel regarding submission of data responses and appropriate changes (6.5 hours) arrange submission of data

						Page 68 of 293 responses to Audit Staff and finalize submissions (0.5 hours); conference with G. Billinson and J. McGrane regarding data responses to Audit Staff (0.6 hours); conference with G. Billinson and National Grid personnel for 5:30 call (0.8 hours); work on follow-up assignments from call, including send list of outstanding audit reports to S. Partridge at National Grid (0.5 hours).
03/12/2009	LeviMcAllister	46460204		\$215.00	\$215.00	Deliver materials to FERC for production in connection with audit.
03/13/2009	JohnMcGrane	46456302		\$1,750.00	\$1,750.00	Preparation for site visit, review materials (1.0); office conferences with G. Billinson re: same (0.3); conference call with Galaburda, et al. (1.0); multiple emails re: site visit materials (0.5).
03/13/2009	DanielSkees	46437518		\$1,128.00	\$1,128.00	Conference with G. Billinson regarding next steps in preparing for audit site visit (0.5 hours); research and review (2.0 hours); assemble relevant material for site visit (0.3 hours); send responsive data responses from March 12 submission to appropriate interviewees (0.5 hours); send March 12 submission to M. Campbell for record-keeping purposes (0.1 hours); send Massachusetts AG submission to A. Rabinowitz at National Grid for her review and draft e-mail explaining to her how to access materials (0.4 hours); attend conference call with G. Billinson and National Grid personnel regarding site visit preparation (0.5 hours); conference with G. Billinson regarding site visit preparations and assemble site visit data request materials (0.2 hours); arrange for reproduction and mailing of March 12 filing to National Grid for reference during site visit (0.2 hours).
03/13/2009	GeorgeBillinson	46437431		\$1,470.00	\$1,470.00	Attention to site visit preparations (2.0); nightly conference call re site visit (.80).
03/15/2009	JohnMcGrane	46528939		\$1,250.00	\$1,250.00	Review materials in preparation for Brooklyn site visit by staff (1.0); meetings with G. Billinson and D. Skees re: same, issues, schedules (1.0).
03/15/2009	DanielSkees	46459282		\$120.00	\$120.00	Review audit materials and conference with J. McGrane and G. Billinson regarding upcoming site visit.
03/15/2009	GeorgeBillinson	46531882		\$1,312.50	\$1,312.50	Prepare for Audit Staff site visit.
03/16/2009	DanielSkees	46459283		\$2,712.00	\$2,712.00	Conference with J. McGrane, G. Billinson, and National Grid personnel prior to meeting FERC Audit Staff (0.3 hours); attend site visit interviews and presentations, take notes regarding presentations, questions asked, and responses offered, and compose list of site visit data requests (8.5 hours); participate in conference call with National Grid personnel to review status of audit site visit (0.5 hours); review, proofread, revise, and organize follow-up clarifications regarding Data Request No. 1 (2.0 hours).
03/16/2009	GeorgeBillinson	46531884		\$4,725.00	\$4,725.00	In Brooklyn, attend Audit Staff site visit.
03/16/2009	JohnMcGrane	46528945		\$5,000.00	\$5,000.00	Participate in FERC staff site visit in Brooklyn, NY; daily status call re: same.
03/17/2009	GeorgeBillinson	46531888		\$4,515.00	\$4,515.00	In Brooklyn, attend Audit Staff site visit (8.5); review and comment on R.

03/17/2009	JohnMcGrane	46528954	██████████	\$937.50	\$937.50	Conference call re: site visit by FERC staff (0.7); review of steering committee minutes; email re: information
03/17/2009	DanielSkees	46459284	██████████	\$2,736.00	\$2,736.00	Attend site visit interviews with FERC Audit Staff and take notes regarding presentations, questions asked, and responses given and conference with G. Billinson and National Grid personnel during breaks in interviews (9.4 hours); attend and participate in 5:30 prepare motion conference call with National Grid personnel (0.5 hours); review responses to follow-up questions, revise and circulate to group (1.0 hours); compose and revise list of audit site visit data requests and circulate to the group (0.5 hours).
03/18/2009	DanielSkees	46509243	██████████	\$2,520.00	\$2,520.00	Conference with National Grid personnel and attend audit interview sessions, taking notes of questions asked and responses offered as well as site visit data requests (9.5 hours); attend conference call and wrap-up session with National Grid personnel (0.5 hours); review notes and update formal list of site visit data requests (0.5 hours).
03/18/2009	GeorgeBillinson	46531891	██████████	\$4,882.50	\$4,882.50	In Brooklyn, attend Audit Staff site visit.
03/18/2009	JohnMcGrane	46528964	██████████	\$500.00	\$500.00	Multiple emails re: site visit data requests; presentations.
03/19/2009	GeorgeBillinson	46531893	██████████	\$4,095.00	\$4,095.00	In Brooklyn, attend Audit Staff site visit.
03/19/2009	DanielSkees	46509244	██████████	\$2,040.00	\$2,040.00	Attend interview sessions with FERC audit staff and National Grid personnel and conference with National Grid personnel about audit issues (8.0 hours); attend conference call and wrap-up sessions with National Grid personnel (0.5 hours).
03/19/2009	JohnMcGrane	46528972	██████████	\$687.50	\$687.50	Conference call re: site visit (0.5); review site visit draft responses (0.6).
03/20/2009	GeorgeBillinson	46531895	██████████	\$682.50	\$682.50	In Brooklyn, attend Audit Staff site visit (1.0); follow-up re same (.30).
03/20/2009	JohnMcGrane	46528977	██████████	\$1,062.50	\$1,062.50	Site visit close conference call (0.8); emails with A. Chacko re: FERC filing of service agreements (0.1); review draft responses to Mass AG ██████████ (0.8).
03/20/2009	DanielSkees	46509245	██████████	\$480.00	\$480.00	Attend wrap-up session with National Grid personnel (1.0 hours); review and revise second group of Massachusetts AG responses and send to group for review (1.0 hours).
03/23/2009	JohnMcGrane	46583543	██████████	\$500.00	\$500.00	Emails re: site visit DRs.
03/23/2009	GeorgeBillinson	46613438	██████████	\$315.00	\$315.00	Attention to responses to Massachusetts Attorney General Data Requests and next steps.
03/23/2009	DanielSkees	46532217	██████████	\$384.00	\$384.00	Review and send to National Grid personnel the list of remaining unanswered site visit data requests (0.5 hours); conference with G. Billinson regarding next steps for audit (0.4 hours); correspond with National Grid personnel regarding Massachusetts Attorney General oversight questions (0.7 hours).
03/24/2009	JohnMcGrane	46583555	██████████	\$500.00	\$500.00	Emails re: DRs (0.6); review agenda for steering committee (0.2).
03/24/2009	DanielSkees	46555187	██████████	\$1,176.00	\$1,176.00	Review and revise agenda for conference call including major topics of interest and discussion during site visit and send revisions to M. Guttikonda (1.5 hours); prepare Massachusetts Attorney General submission by corresponding with National Grid personnel about remaining changes,

drafting transmittal letter, creating index of responses, and setting up arrangements for production in Boston (1.0 hours); research to determine [REDACTED] and [REDACTED]

[REDACTED] (2.0 hours); conference with G. Billinson regarding Massachusetts Attorney General production and other outstanding issues (0.2 hours); correspond with National grid personnel about research (0.2 hours).

03/24/2009	GeorgeBillinson	46613439	[REDACTED]	\$472.50	\$472.50	Attention to open audit issues.
03/25/2009	GeorgeBillinson	46613444	[REDACTED]	\$630.00	\$630.00	Weekly Audit Steering Committee conference call (.40); discussions with D. Skees re follow-up issues, Massachusetts Attorney General data production, etc. (.80).
03/25/2009	DanielSkees	46555193	[REDACTED]	\$840.00	\$840.00	Review correspondence with National Grid and prepare for weekly conference call with audit steering committee (0.4 hours); attend conference call with audit steering committee and G. Billinson and conference with G. Billinson following call (1.1 hours); finish research and draft response to site visit data requests regarding [REDACTED] (1.1 hours); review corresponded from W. Richer regarding draft responses, respond to questions and draft revised responses after conferencing with G. Billinson regarding approach (0.9 hours).
03/26/2009	JohnMcGrane	46583563	[REDACTED]	\$187.50	\$187.50	Emails re: MA AG data requests (0.1); review responses to site visit DRs (0.2).
03/29/2009	JohnMcGrane	46640504	[REDACTED]	\$187.50	\$187.50	Review status of data responses.
03/30/2009	DanielSkees	46613722	[REDACTED]	\$504.00	\$504.00	Review and respond to voicemail message from D. Galaburda regarding status of site visit follow-up responses (0.1 hours); review draft responses to site visit questions, revise, re-format, and organize for production (1.9 hours); e-mail D. Galaburda regarding status of outstanding items (0.1 hours).
03/31/2009	JohnMcGrane	46640522	[REDACTED]	\$1,000.00	\$1,000.00	Conference call with D. Galaburda, M. Noble, et al. re: Audit Committee materials (0.7); office conference with G. Billinson, D. Skees re: same, data responses (0.3); review agenda for steering committee meeting and issues (0.6).
03/31/2009	GeorgeBillinson	46642570	[REDACTED]	\$315.00	\$315.00	Discuss Audit Committee meeting issue with J. McGrane (.30); attention to site visit data requests (.30).
03/31/2009	DanielSkees	46642751	[REDACTED]	\$384.00	\$384.00	Prepare for and attend conference call with National Grid UK audit staff to discuss meeting minutes (1.0 hours); review and respond to correspondence from National Grid regarding site visit data requests (0.3 hours); conference with G. Billinson regarding preparation of responses to site visit data requests (0.3 hours).

**Expenses:**

Date	Timekeeper	LI #	Code	Hours	Rate	Orig. Amt	To Pay	Description
01/05/2009	GeorgeBillinson	56707568	E105	[REDACTED]	[REDACTED]	\$1.97	\$1.97	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts

01/06/2009		56707569	E105			\$1.85	\$1.85	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
01/07/2009	GeorgeBillinson	56707561	E105			\$0.29	\$0.29	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
01/08/2009	GeorgeBillinson	56707562	E105			\$0.48	\$0.48	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
01/12/2009	GeorgeBillinson	56707572	E105			\$1.61	\$1.61	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
01/12/2009	GeorgeBillinson	56707571	E105			\$1.51	\$1.51	Domestic Long Distance 15083892311 WESTBORO Ma ssachusetts
01/12/2009	GeorgeBillinson	56707570	E105			\$0.34	\$0.34	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
01/13/2009	GeorgeBillinson	56707564	E105			\$0.43	\$0.43	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
01/13/2009	GeorgeBillinson	56707563	E105			\$0.26	\$0.26	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
01/16/2009	JohnMcGrane	56707575	E105			\$1.10	\$1.10	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
01/16/2009	JohnMcGrane	56707576	E105			\$2.30	\$2.30	Domestic Long Distance 17027707000 LAS VEGAS N vada
01/16/2009	GeorgeBillinson	56720728	E124	1.00	\$13.99	\$13.99	\$13.99	Other - George D. Billinson Internet service and long distance phone charge
01/16/2009	JohnMcGrane	56707573	E105			\$1.20	\$1.20	Domestic Long Distance 17027707000 LAS VEGAS N vada
01/16/2009	LeviMcAllister	56707574	E105			\$2.04	\$2.04	Domestic Long Distance 17027707000 LAS VEGAS N vada
01/22/2009	GeorgeBillinson	56707577	E105			\$1.49	\$1.49	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
01/22/2009	GeorgeBillinson	56707578	E105			\$3.82	\$3.82	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
01/29/2009	JohnMcGrane	56707579	E105			\$0.53	\$0.53	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
02/02/2009	GeorgeBillinson	56707565	E105			\$1.99	\$1.99	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
02/02/2009		56707580	E105			\$0.60	\$0.60	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
02/03/2009	GeorgeBillinson	56707581	E105			\$0.89	\$0.89	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
02/03/2009	GeorgeBillinson	56707582	E105			\$0.34	\$0.34	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
02/03/2009	JohnMcGrane	56707584	E105			\$3.20	\$3.20	International Calls 442070819473 Un Kingdom Un Kingdom
02/06/2009	GeorgeBillinson	56707583	E105			\$1.44	\$1.44	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
03/02/2009	GeorgeBillinson	56604320	E105			\$3.22	\$3.22	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
03/02/2009	JohnMcGrane	56654778	E110	1.00	\$441.00	\$441.00	\$441.00	Air Shuttle
03/02/2009	DanielSkees	56665024	E107	1.00	\$6.15	\$6.15	\$6.15	Overnight Courier Service SEE LABEL, SEE LABEL BROOKLYN NY 11201 Tracking#: 982574645561
03/02/2009	GeorgeBillinson	56654777	E110	1.00	\$441.00	\$441.00	\$441.00	Air Shuttle
03/03/2009	GeorgeBillinson	56612401	E105			\$0.41	\$0.41	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
03/03/2009	DanielSkees	56612400	E105			\$1.73	\$1.73	Domestic Long Distance 17819071855 WALTHAM Ma ssachusetts
03/03/2009	GeorgeBillinson	56612399	E105			\$2.11	\$2.11	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
03/04/2009	GeorgeBillinson	56616590	E105			\$0.94	\$0.94	Domestic Long Distance 17819071855 WALTHAM Ma ssachusetts
03/04/2009	JohnMcGrane	56616591	E105			\$2.54	\$2.54	Domestic Long Distance 15165455246 HICKSVILLE w York
03/04/2009	GeorgeBillinson	56616592	E105			\$0.31	\$0.31	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
03/04/2009	MaryannHuntington	56616593	E101			\$9.90	\$9.90	Duplicating Usage 99 Copies
03/05/2009	DanielSkees	56622137	E105			\$0.36	\$0.36	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
03/05/2009	GeorgeBillinson	56622138	E105			\$0.77	\$0.77	Domestic Long Distance 17819071847

Page 72 of 293									
WALTHAM Ma ssachusetts									
03/05/2009	DanielSkees	56622139	E101			\$3.30	\$3.30	Duplication Usage - 33 Copies	COSTS
03/05/2009	LeviMcAllister	56622140	E101			\$15.80	\$15.80	Duplication Usage - 33 Copies	DATA
RESPONSE Pricing Information									
03/05/2009	DanielSkees	56622136	E105			\$1.27	\$1.27	Domestic Long Distance	17819071855
WALTHAM Ma ssachusetts									
03/06/2009	GeorgeBillinson	56627236	E105			\$0.89	\$0.89	Domestic Long Distance	17819071855
WALTHAM Ma ssachusetts									
03/06/2009	DanielSkees	56634627	E105			\$1.01	\$1.01	Domestic Long Distance	17819071847
WALTHAM Ma ssachusetts									
03/06/2009	DanielSkees	56697863	E107			\$86.61	\$86.61	Overnight Courier Service SEE LABEL, SEE LABEL BROOKLYN NY 11201	
Tracking#: 982574647314									
03/06/2009	DanielSkees	56697864	E107			\$86.61	\$86.61	Overnight Courier Service SEE LABEL, SEE LABEL BROOKLYN NY 11201	
Tracking#: 982574647303									
03/06/2009	GeorgeBillinson	56627234	E105			\$5.16	\$5.16	Domestic Long Distance	17819071847
WALTHAM Ma ssachusetts									
03/06/2009	GeorgeBillinson	56627235	E105			\$0.58	\$0.58	Domestic Long Distance	17819071847
WALTHAM Ma ssachusetts									
03/06/2009	DanielSkees	56697862	E107			\$66.11	\$66.11	Overnight Courier Service SEE LABEL, SEE LABEL BROOKLYN NY 11201	
Tracking#: 982574647325									
03/09/2009	JohnMcGrane	56664272	E110	1.00	\$20.00	\$20.00	\$20.00	Parking - John D. McGrane Travel to Brooklyn, NY for Audit Preparation	
03/09/2009	JohnMcGrane	56664270	E110	1.00	\$25.00	\$25.00	\$25.00	Taxi - John D. McGrane Travel to Brooklyn, NY for Audit Preparation	
03/09/2009	JohnMcGrane	56664271	E110	1.00	\$25.00	\$25.00	\$25.00	Taxi - John D. McGrane Travel to Brooklyn, NY for Audit Preparation	
03/09/2009	GeorgeBillinson	56709054	E110	1.00	\$276.56	\$276.56	\$276.56	Hotel - George D. Billinson reimbursement for travel to/from New York for meeting w/client (March 9-10, 2009)	
03/09/2009	GeorgeBillinson	56709055	E110	1.00	\$40.00	\$40.00	\$40.00	Parking - George D. Billinson reimbursement for travel to/from New York for meeting w/client (March 9-10, 2009)	
03/09/2009	DanielSkees	56650368	E110	1.00	\$276.56	\$276.56	\$276.56	Hotel - Daniel Skees Trip to National Grid	
03/10/2009	DanielSkees	56656966	E105			\$0.53	\$0.53	Domestic Long Distance	16173711300
BOSTON Ma ssachusetts									
03/10/2009	LeviMcAllister	56680790	E106			\$13.62	\$13.62	Lexis Charges	
03/10/2009	DanielSkees	56656965	E105			\$4.27	\$4.27	Domestic Long Distance	17742625763
WORCESTER M ssachusetts									
03/11/2009	DanielSkees	56697865	E107			\$13.95	\$13.95	Overnight Courier Service SEE LABEL, SEE LABEL WALTHAM MA 02451	
Tracking#: 982574648722									
03/11/2009	DanielSkees	56697866	E107	1.00	\$6.74	\$6.74	\$6.74	Overnight Courier Service J. DANIEL SKEES, MORGAN LEWIS & BOCKIUS LLP	
WASHINGTON DC 20004 Tracking#: 796419779270									
03/11/2009		56656967	E105			\$0.46	\$0.46	Domestic Long Distance	17819071847
WALTHAM Ma ssachusetts									
03/11/2009	GeorgeBillinson	56656968	E105			\$1.34	\$1.34	Domestic Long Distance	17819071847
WALTHAM Ma ssachusetts									
03/11/2009	DanielSkees	56656969	E105			\$0.26	\$0.26	Domestic Long Distance	17819071855
WALTHAM Ma ssachusetts									
03/11/2009	LeviMcAllister	56680791	E106			\$148.16	\$148.16	Lexis Charges	
03/11/2009	DanielSkees	56656970	E105			\$0.79	\$0.79	Domestic Long Distance	17819071855
WALTHAM Ma ssachusetts									
03/12/2009		56656974	E105			\$2.21	\$2.21	Domestic Long Distance	17819071847
WALTHAM Ma ssachusetts									
03/12/2009	DanielSkees	56656975	E105			\$0.31	\$0.31	Domestic Long Distance	15083892311
WESTBORO Ma ssachusetts									
03/12/2009	DanielSkees	56656976	E105			\$2.93	\$2.93	Domestic Long Distance	17184032479
BKLYN NYC N w York									
03/12/2009	GeorgeBillinson	56686460	E110	1.00	\$441.00	\$441.00	\$441.00	Air Shuttle	

03/12/2009	JohnMcGrane	56686461	E110	1.00	\$441.00	\$441.00	\$441.00	Air Shuttle
03/12/2009	DanielSkees	56656972	E105			\$0.53	\$0.53	Domestic Long Distance 17819071855 WALTHAM Ma ssachusetts
03/12/2009	GeorgeBillinson	56656973	E105			\$0.82	\$0.82	Domestic Long Distance 17819071855 WALTHAM Ma ssachusetts
03/12/2009	DanielSkees	56656971	E105			\$3.94	\$3.94	Domestic Long Distance 15083892311 WESTBORO Ma ssachusetts
03/13/2009		56662598	E105			\$0.31	\$0.31	Domestic Long Distance 17819071855 WALTHAM Ma ssachusetts
03/13/2009	DanielSkees	56662592	E105			\$0.29	\$0.29	Domestic Long Distance 17819071855 WALTHAM Ma ssachusetts
03/13/2009	DanielSkees	56662593	E105			\$0.70	\$0.70	Domestic Long Distance 17819071855 WALTHAM Ma ssachusetts
03/13/2009	GeorgeBillinson	56662594	E105			\$0.72	\$0.72	Domestic Long Distance 17819071855 WALTHAM Ma ssachusetts
03/13/2009	GeorgeBillinson	56662595	E105			\$0.34	\$0.34	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
03/13/2009	DanielSkees	56662596	E105			\$0.79	\$0.79	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
03/13/2009	GeorgeBillinson	56662597	E105			\$0.29	\$0.29	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts
03/13/2009		56662591	E105			\$2.11	\$2.11	Domestic Long Distance 14017847156 PROVIDENCE ode Island
03/15/2009	DanielSkees	56720730	E110	1.00	\$1,447.60	\$1,447.60	\$1,447.60	Hotel - Daniel Skees Trip to National Grid- NY
03/15/2009	JohnMcGrane	56695416	E110	1.00	\$25.00	\$25.00	\$25.00	Taxi - John D. McGrane Travel to Brooklyn, NY for Audit Preparation 03/15-16/09
03/16/2009	JohnMcGrane	56695415	E110	1.00	\$276.56	\$276.56	\$276.56	Hotel - John D. McGrane Travel to Brooklyn, NY for Audit Preparation 03/15-16/09
03/16/2009	JohnMcGrane	56695419	E110	1.00	\$30.00	\$30.00	\$30.00	Taxi - John D. McGrane Travel to Brooklyn, NY for Audit Preparation 03/15-16/09
03/16/2009	JohnMcGrane	56695420	E110	1.00	\$30.00	\$30.00	\$30.00	Parking - John D. McGrane Travel to Brooklyn, NY for Audit Preparation 03/15-16/09
03/17/2009	LeviMcAllister	56702214	E106			\$5.17	\$5.17	Lexls Charges
03/24/2009	DanielSkees	56710746	E105			\$0.43	\$0.43	Domestic Long Distance 17819071855 WALTHAM Ma ssachusetts
03/30/2009	DanielSkees	56732918	E105			\$0.36	\$0.36	Domestic Long Distance 17819071847 WALTHAM Ma ssachusetts

**Billing Summary:**

	Orig. Amt	Adjustment	To Pay
Fees:	\$132,773.00	\$0.00	\$132,773.00
Expenses:	\$4,788.07	\$0.00	\$4,788.07
<b>Totals:</b>	<b>\$137,561.07</b>	<b>\$0.00</b>	<b>\$137,561.07</b>

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# Niagara Mohawk

A National Grid Company



Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 2 to DAG-13  
Page 584 of 595  
Public Version

William F. Edwards  
President and Chief Operating Officer

May 1, 2002

John F. O'Mara, Esq.  
Davidson & O'Mara, P.C.  
243 Lake Street  
Elmira, New York 14901-3192

Re: Consulting Agreement

Dear Mr. O'Mara:

This letter will confirm the terms and conditions under which consulting services will be provided by you to Niagara Mohawk, National Grid and its affiliates ("National Grid").

## SCOPE

The consulting services shall include, but not be limited to, providing strategic advice, participating in internal discussions, attending meetings with public officials, reviewing public filings or news releases, and performing such other strategic and public relations related services as requested by National Grid from time to time.

I will be the primary individual responsible for this matter on behalf of National Grid. From time to time, I also may designate other individuals to request services from you.

## FEE

Your fee for the services will be \$15,000 per month.

## EXPENSES AND DISBURSEMENTS

In the course of your work, it may be necessary for you to incur certain costs or expenses. National Grid will reimburse you for such costs and expenses actually incurred and reasonably necessary for completing the assigned matter, so long as the charges for costs and expenses are competitive with sources of the same products or services. Specifically, National Grid will reimburse you for actually incurred and reasonably necessary charges in accordance with the following guidelines:

- (1) Your monthly fee will include all overhead and internal charges associated with your service with the exception of items specifically noted below. Unless otherwise agreed in advance, National Grid will not pay for additional overhead or normal costs outside of the monthly fee. In no event will National Grid pay for a markup on disbursements.
- (2) National Grid will not reimburse for secretarial or clerical fees. Such costs are considered overhead.

300 Erie Boulevard West  
Syracuse, NY 13202-4250  
315.428.6982 Fax: 315.428.3406



- (3) All travel, hotel accommodations and related expenses incurred shall be kept reasonable in relation to their availability and geographic location and must be supported by written documentation.
- (4) National Grid will reimburse for long distance telephone service and postage.
- (5) All charges and disbursements are subject to audit by National Grid.

**BILLING:**

Invoices should be submitted to the attention of Ms. Roberta Januszka, and any questions regarding invoicing should be directed to her at (315) 428-6489.

**TERMINATION:**

Either party has the right to terminate this agreement by written notice at any time.

**PREVIOUS ENGAGEMENT WITH DAVIDSON & O'MARA, P.C.:**

This agreement supersedes all other agreements with Davidson & O'Mara, P.C.

If this agreement is acceptable to you, please sign this letter and return it to me. I look forward to working with you on this matter.

Sincerely, \*

*William F. Edwards*  
William F. Edwards  
President

Accepted and Agreed:

*John F. Moran*  
\_\_\_\_\_  
Date: *5/9/02*

300 Erie Boulevard West  
Syracuse, NY 13202 4250  
315.428.5982 Fax: 315.428.3406

# Niagara Mohawk Holdings, Inc.

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 2 to DAG-13  
Page 586 of 595  
Public Version

Gary J. Lavina  
Senior Vice President and  
Chief Legal Officer

May 9, 2001

Phone: 315.428.6947  
Fax: 315.428.5740  
e-mail: lavineg@nimo.com

John F. O'Mara, Esq.  
Davidson & O'Mara, P.C.  
243 Lake Street  
Elmira, New York 14901-3192

Re: Lobbying Agreement

Dear Mr. O'Mara:

This letter will confirm the terms and conditions under which lobbying services will be provided by you to Niagara Mohawk Holdings, Inc.

## SCOPE:

Representation of Niagara Mohawk Holdings, Inc. in regard to the Niagara Mohawk/National Grid Merger Application [PSC-01-M-0075] and related matters.

## SPECIFIC DUTIES:

Lobbying services provided shall include but not be limited to:

- (a) Participation in strategy discussions relating to the Niagara Mohawk-National Grid Merger and related matters;
- (b) Assistance in communicating to the Executive Chamber, the Department of Public Service, the Public Service Commission and other agencies concerning the Merger Petition filed on behalf of Niagara Mohawk and National Grid and related issues and proceedings;
- (c) Advocacy of Niagara Mohawk Holdings Inc.'s views to the Executive Chamber, the Department of Public Service, the Public Service Commission and other agencies;
- (d) Attendance at meetings with attorneys and other representatives of entities involved with the negotiation of the Niagara Mohawk-National Grid Merger Application and related matters;

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300 Erie Boulevard West, Syracuse, New York 13202-4250 • www.nimo.com

John F. O'Mara, Esq.  
Davidson & O'Mara, P.C.  
May 10, 2001

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 2 to DAG-13  
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- (e) Presentation of reports advising of current status and analysis of future action on the pending Merger Petition; and
- (f) Provision of copies of reports submitted to New York Temporary State Commission on Lobbying.

**FEES:**

Your rate is fixed at [REDACTED] per hour, plus reimbursement for expenses and disbursements.

**EXPENSES AND DISBURSEMENTS:**

Niagara Mohawk Holdings, Inc. will reimburse you for such costs and expenses actually incurred and reasonably necessary for completing the assigned matter, so long as the charges for costs and expenses are competitive with other sources of the same products or services. Specifically, Niagara Mohawk Holdings, Inc. will reimburse you for actually incurred and reasonably necessary charges in accordance with the following guidelines:

1. Your professional fees will include all overhead and internal charges associated with your services with the exception of items specifically noted below. Unless otherwise agreed in advance, Niagara Mohawk Holdings, Inc. will not pay for additional overhead or normal costs outside of the billing rates. In no event will Niagara Mohawk Holdings, Inc. pay for a markup on disbursements.
2. Niagara Mohawk Holdings, Inc. will not reimburse for secretarial or clerical fees. Such costs are considered overhead.
3. All travel, hotel accommodations and related expenses incurred shall be kept reasonable in relation to their availability and geographic location.
4. Niagara Mohawk Holdings, Inc. will reimburse for long distance telephone service and postage. You are expected to use good judgment in the use of telecopiers and overnight express mail services.
5. All charges and disbursements are subject to audit by Niagara Mohawk Holdings, Inc. and Niagara Mohawk Holdings, Inc. reserves the right to refuse to pay any amount for which proper documentation cannot be presented or for which charges, not justified to our satisfaction, are made in excess of actual expenses incurred by you.

John F. O'Mara, Esq.  
Davidson & O'Mara, P.C.  
May 10, 2001

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 2 to DAG-13  
Page 588 of 595  
Public Version

**BILLING:**

You are expected to strictly adhere to Niagara Mohawk Holdings Inc.'s Billing Policies as shown in Appendix A. Your invoice format should be in accordance with Appendix B — Outside Counsel Billing Procedures. Each item on the invoice must refer to a Niagara Mohawk Holdings, Inc. matter number. Charges for lobbying services that have not been issued a Niagara Mohawk Holdings, Inc. matter number in advance will not be approved for payment. We expect that you will maintain back-up documentation for all expenses for our review as may be necessary.

Invoices should be submitted to the attention of Ms. Rita Carlucci, and any questions regarding invoicing should be directed to her at (315) 428-5006.

**AVOIDING CONFLICTS:**

Avoidance of conflicts of interest and protection of the attorney-client privilege are priority considerations for Niagara Mohawk Holdings, Inc. Consultants representing Niagara Mohawk Holdings, Inc. are expected to have established policies and procedures to ascertain the existence or potential for conflicts which will assure adherence to these priorities. Niagara Mohawk Holdings, Inc. expects all conflicts and potential conflicts to be brought to our attention for appropriate consideration and resolution. We understand that you represent Telergy, Inc. and that in the event of a conflict you will have the right to terminate this Engagement and represent Telergy Inc.'s interests.

**COMPLIANCE WITH NEW YORK STATE'S LOBBYING ACT:**

You agree to comply with the requirements set forth in the Lobbying Act. You further agree to provide Niagara Mohawk Holdings, Inc. with a copy of your Lobbyist Statement of Registration and Bi-Monthly and Semi-Annual Lobbyist Reports if such disclosure are required in connection with the work performed in this engagement. You also agree to provide a draft copy of the Bi-Monthly and Semi-Annual Lobbyist Reports to Niagara Mohawk Holdings Inc. at least ten (10) days before such reports are due so to facilitate Niagara Mohawk Holdings Inc.'s preparation of its own lobbying disclosure reports.

**COMPLIANCE WITH PUBLIC OFFICERS LAW:**

You have represented to Niagara Mohawk Holdings, Inc. that this engagement is not precluded by the Public Officers Law. You have further indicated that to ensure continued compliance with the Public Officers Law that you will seek guidance from the state Ethics Commission as developments in the engagement warrant.

John F. O'Mara, Esq.  
Davidson & O'Mara, P.C.  
May 10, 2001

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 2 to DAG-13  
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**TERMINATION:**

Niagara Mohawk Holdings, Inc. has the right to terminate your engagement by written notice at any time. You have the right to terminate this engagement, subject to an obligation to give Niagara Mohawk Holdings, Inc. reasonable notice to permit it to obtain alternative representation and subject to applicable ethical provisions.

**PREVIOUS ENGAGEMENT WITH DAVIDSON & O'MARA, P.C. :**

The previous engagement with Davidson & O'Mara, P.C. for legal services remains in effect.

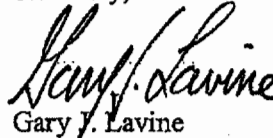
**DISPUTES:**

The laws of the State of New York shall govern the interpretation of this agreement, including all rules or codes of ethics which apply to the provision of services.

Please review this agreement carefully and, if you have any questions concerning the conditions, contact me. If this agreement is acceptable to you, please acknowledge that you desire to represent Niagara Mohawk Holdings, Inc. on the terms and conditions set forth in this letter by signing and returning to me the enclosed copy.

We look forward to working with you on this matter.

Sincerely,

  
Gary J. Lavine

Accepted and Agreed:

\_\_\_\_\_

Date: \_\_\_\_\_

SYLIB01\125539\1

DAVIDSON & O'MARA, P.C.

ATTORNEYS AT LAW  
243 LAKE STREET  
ELMIRA, NEW YORK 14901-3192  
(607) 733-4635  
FAX (607) 732-1033

M. BATES DAVIDSON (1924-1984)

\*ALSO ADMITTED IN PENNSYLVANIA

JOHN F. O'MARA  
RANSOM P. REYNOLDS, JR.  
WEEDEEN A. WETMORE  
JOSEPH G. FAZZARY  
THOMAS F. O'MARA  
DONALD S. THOMSON  
PAMELA DOYLE GEE  
JASON L. COOK\*

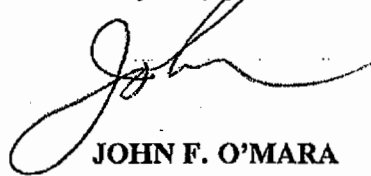
September 25, 2000

Gary J. Lavine  
Senior Vice President and Chief Legal Officer  
Niagara Mohawk Holdings Inc.  
300 Erie Boulevard  
Syracuse, New York 13202

Dear Gary:

I am returning to you herein an executed copy of our agreement. I look forward to continuing to work with you on this matter.

Very truly yours,



JOHN F. O'MARA

JFO/cr  
Enclosure



Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 2 to DAG-13  
Page 591 of 595  
Public Version

Gary J. Lavine  
Senior Vice President and  
Chief Legal Officer

Phone: 315.428.6947  
Fax: 315.428.5740  
e-mail: lavineg@nimo.com

September 19, 2000

John F. O'Mara, Esq.  
Davidson & O'Mara  
243 Lake Street  
Elmira NY 14901-3192

Re: Niagara Mohawk -Grid USA  
Transaction

Dear Mr. O'Mara:

This letter will confirm the terms and conditions under which legal services will be provided by your firm to Niagara Mohawk Holdings, Inc. with respect to the captioned matter.

**SCOPE**

Representation of and counsel to Niagara Mohawk in state and federal regulatory proceedings.

**SPECIFIC DUTIES**

The legal services shall include but not be limited to:

- (a) Participation in strategy discussions with Company personnel;
- (b) Preparation of memoranda outlining your view of appropriate strategies to be employed;
- (c) Attendance at meetings with attorneys, public officials, and other representatives of entities involved in meetings/negotiations with the Company;
- (d) Participation in public presentations made on behalf of the Company;
- (e) Coordination with other outside counsel engaged to represent the Company in pertinent legal actions or proceedings;
- (f) Liaison with in-house counsel on all matters in which you are involved;
- (g) Review of and comment on pleadings, motion papers and legal memoranda prepared by other outside counsel.

John F. O'Mara, Esq.  
September 19, 2000  
Page 2

### **EXPECTATIONS REGARDING PERFORMANCE**

Gary J. Lavine is the in-house counsel responsible for this matter. We expect that you will keep Mr. Lavine informed regarding developments as they occur and provide sufficient notice to enable an in-house Niagara Mohawk attorney to attend meetings, discovery proceedings, conferences, hearings and other proceedings as we deem appropriate.

We expect you to provide copies of all pleadings, motions and other papers prepared by you for review by Mr. Lavine before filing.

We expect you to obtain approval, in advance, from Mr. Lavine for the selection and terms of employment of experts, consultants and other technical or professional assistance. We expect you to prepare and execute appropriate consulting agreements and confidentiality agreements with such approved experts and consultants.

There may be times when you will need to obtain information from Niagara Mohawk, e.g., documents or information from past or current employees. All requests for access to documents, employees, or other information should be made to Mr. Lavine or as otherwise directed by him.

### **FEES**

Your fees will be based upon the reasonable value of your services as determined in accordance with the Code of Professional Responsibility. Your rate is fixed at \$25,000 per month payable during the last business week of each month.

### **OTHER CHARGES**

In the course of your representation, it may be necessary for you to incur certain costs or expenses. Niagara Mohawk will reimburse you for such costs and expenses actually incurred and reasonably necessary for completing the assigned matter, so long as the charges for costs and expenses are competitive with other sources of the same products or services. Specifically, Niagara Mohawk will reimburse you for actually incurred and reasonably necessary charges in accordance with the following:

1. Your professional fees will include all overhead and internal charges associated with your practice with the exception of items noted specifically below. Unless otherwise agreed in advance, Niagara Mohawk will not pay for additional overhead or normal costs outside of the billing rates. In no event will Niagara Mohawk pay for a markup on disbursements.
2. Niagara Mohawk will reimburse actual costs for all photocopying provided, however, that such costs are competitive with other sources of copying and are prudently incurred. Niagara Mohawk expects that you will take reasonable steps to avoid excessive photocopying charges. Where practical



John F. O'Mara, Esq.  
September 19, 2000  
Page 3

and economical, alternative arrangements, such as outside copy services, should be utilized for large volume copying.

3. Niagara Mohawk will not reimburse for secretarial or clerical fees. Such costs are considered overhead.
4. Niagara Mohawk expects you, while traveling on Niagara Mohawk business, to eat adequately and lodge comfortably, but not extravagantly. All travel, hotel accommodations, and related expenses incurred shall be kept reasonable in relation to their availability and geographic location. Niagara Mohawk will not reimburse for first class air travel or chartering of aircraft unless the expense can be justified and the prior approval by the responsible contact attorney is obtained.
5. Disbursements for overtime, such as meal money and secretarial time, will be reimbursed only if required by the nature of Niagara Mohawk's work. While Niagara Mohawk does not wish to interfere with your prioritization of the work day, Niagara Mohawk does not expect to be billed for overtime charges that can be avoided.
6. One of the factors Niagara Mohawk takes into account in its outside counsel selection process is the firms' recognized expertise in a given field of law. Niagara Mohawk, therefore, does not expect to be billed for subscriptions to legal periodicals or the purchase of legal treatises, or attendance at seminars or conventions, unless requested by Niagara Mohawk.
7. Lexis and Westlaw use charges are reimbursable if used in connection with pre-approved legal research. Niagara Mohawk will not reimburse any Lexis or Westlaw terminal lease charges.
8. There shall be no standard minimum charges for any services performed such as telephone calls, file review, etc. Only the actual time expended shall be charged.
9. Niagara Mohawk will reimburse for long distance telephone service and postage. You are expected to use good judgment in the use of telecopiers and overnight express mail services.
10. All charges and disbursements are subject to audit by Niagara Mohawk, and Niagara Mohawk reserves the right to refuse to pay any amount for which proper documentation cannot be presented or for which charges, not justified to our satisfaction, are made in excess of actual expenses incurred by you.

John F. O'Mara, Esq.  
September 19, 2000  
Page 4

11. Niagara Mohawk will reimburse you for normal court costs, but will not be responsible for sanctions or penalties imposed by a court due to your conduct.

#### **AVOIDING CONFLICTS**

Avoidance of conflicts-of-interest and protection of the attorney-client privilege are priority considerations to Niagara Mohawk in referring work to outside counsel. Firms representing Niagara Mohawk are expected to have established policies and procedures to ascertain the existence or potential for conflicts which will assure adherence to these priorities. Niagara Mohawk expects all conflicts and potential conflicts to be brought to our attention prior to retention of outside counsel. We understand that you represent Telergy, Inc. and its subsidiary corporations and that in the event of a conflict you will have the right to terminate this engagement and represent their interests.

#### **COMPLIANCE WITH PUBLIC OFFICERS LAW**

You have represented to Niagara Mohawk Holdings, Inc. that this engagement is not precluded by the Public Officers Law. You have further indicated that to ensure continued compliance with the Public Officers Law that you will seek guidance from the state Ethics Commission if developments in the engagement warrant.

#### **TERMINATION**

Niagara Mohawk has the right to terminate your engagement by written notice at any time. You have the right to terminate this engagement, subject to an obligation to give Niagara Mohawk reasonable notice to permit it to obtain alternative representation and subject to applicable ethical provisions. You will be expected to provide reasonable assistance in effecting a transfer of responsibilities to the new firm, including the expeditious transfer of files.

#### **DISPUTES**

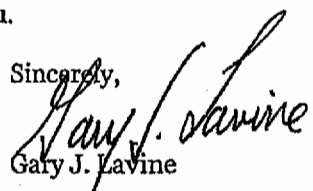
The laws of the State of New York shall govern the interpretation of this agreement, including all rules or codes of ethics which apply to the provision of services.

If this agreement is acceptable to you, please acknowledge that you desire to represent Niagara Mohawk on the terms and conditions set forth in this letter by signing and returning to me the enclosed copy.

John F. O'Mara, Esq.  
September 19, 2000  
Page 5

We look forward to working with you.

Sincerely,

  
Gary J. Lavine

Accepted and Agreed:

  
Date: 9/25/00

**DAVIDSON & O'MARA, P.C.**

ATTORNEYS AT LAW  
243 LAKE STREET  
ELMIRA, NY 14901

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 1a to DAG-13  
Page 285 of 293  
Redacted  
Attorney/Client and Work Product  
Privileged Material  
and Pricing Information  
September 30, 2008

Niagara Mohawk  
300 Erie Boulevard West  
Syracuse, New York 13202-4250

Employer Identification #16-1094178

JFO:cr

2008

September

Consulting Services for September 2008

\$ 10,000 00

ATTORNEYS AT LAW  
243 LAKE STREET  
ELMIRA, NY 14901

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 1a to DAG-13  
Page 286 of 293  
Redacted  
Attorney/Client and Work Product  
Privileged and Confidential, 2008  
and Pricing Information

Niagara Mohawk  
300 Erie Boulevard West  
Syracuse, New York 13202-4250

JFO:cr

2008 October	Consulting Services for October 2008	\$ 10,000	00
-----------------	--------------------------------------	-----------	----

DAVIDSON & O'MARA, P.C.

ATTORNEYS AT LAW  
243 LAKE STREET  
ELMIRA, NY 14901

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 1a to DAG-13  
Page 287 of 293  
Redacted  
Attorney/Client and Work Product  
Privileged Material  
and Pricing Information  
November 28, 2008

Niagara Mohawk

300 Eric Boulevard West

Syracuse, New York 13202-4250

Employer Identification #16-1094178

JFO:cr

2008

November

Consulting Services for November 2008

\$ 10,000 00

**DAVIDSON & O'MARA, P.C.**

ATTORNEYS AT LAW  
243 LAKE STREET  
ELMIRA, NY 14901

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 1a to DAG-13  
Page 288 of 293  
Redacted  
Attorney/Client and Work Product  
Privileged Material  
and Pricing Information  
December 31, 2008

Niagara Mohawk  
300 Erie Boulevard West  
Syracuse, New York 13202-4250

Employer Identification #16-1094178

JFO:cr

2008

December

Consulting Services for December 2008

\$ 10,000 00

DAVIDSON & O'MARA, P.C.

ATTORNEYS AT LAW  
243 LAKE STREET  
ELMIRA, NY 14901

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 1a to DAG-13  
Page 289 of 293  
Redacted  
Attorney/Client and Work Product  
Privileged Material  
and Pricing Information  
January 30, 2009

Niagara Mohawk

300 Erie Boulevard West

Syracuse, New York 13202-4250

Employer Identification #16-1094178

JFO:cr

2009

January

Consulting Services for January 2009

\$ 10,000 00



**DAVIDSON & O'MARA, P.C.**

ATTORNEYS AT LAW  
243 LAKE STREET  
ELMIRA, NY 14901

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 1a to DAG-13  
Page 290 of 293  
Redacted  
Attorney/Client and Work Product  
Privileged Material  
and Pricing Information  
February 27, 2009

Niagara Mohawk

300 Erie Boulevard West

Syracuse, New York 13202-4250

Employer Identification #16-1094178

JFO:cr

2009

February

Consulting Services for February 2009

\$ 10,000 00

**DAVIDSON & O'MARA, P.C.**

ATTORNEYS AT LAW  
243 LAKE STREET  
ELMIRA, NY 14901

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 1a to DAG-13  
Page 291 of 293  
Redacted  
Attorney/Client and Work Product  
Privileged Material  
and Pricing Information  
March 31, 2009

Niagara Mohawk

300 Erie Boulevard West

Syracuse, New York 13202-4250

Employer Identification #16-1094178

JFO:cr

2009

March

Consulting Services for March 2009

\$ 10,000 00

**DAVIDSON & O'MARA, P.C.**

ATTORNEYS AT LAW  
243 LAKE STREET  
ELMIRA, NY 14901

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 1a to DAG-13  
Page 292 of 293  
Redacted  
Attorney/Client and Work Product  
Privileged Material  
and Pricing Information  
April 30, 2009

Niagara Mohawk  
300 Erie Boulevard West  
Syracuse, New York 13202-4250

Employer Identification #16-1094178

JFO:cr

2009  
April

Consulting Services for April 2009

\$ 10,000 00

**DAVIDSON & O'MARA, P.C.**

ATTORNEYS AT LAW  
243 LAKE STREET  
ELMIRA, NY 14901

Niagara Mohawk Power Corporation  
d/b/a National Grid  
Case 10-E-0050  
Attachment 1a to DAG-13  
Page 293 of 293  
Redacted  
Attorney/Client and Work Product  
Privileged Material  
and Pricing Information  
May 29, 2009

Niagara Mohawk  
300 Erie Boulevard West  
Syracuse, New York 13202-4250

Employer Identification #16-1094178

JFO:cr

2009  
May

Consulting Services for May, 2009

\$ 10,000 00

NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Consultants Expense by Provider Company  
Integration costs - by Regulatory Acct, Activity, Journal ID, Journal Description and Vendor

Provider Co	Regulatory Acct	Activity	Jrnl Id	Jrnl Descr	Vendor	ELECTRIC X05684	GAS X05684	Grand Total
Niagara Mohawk Power Corp	905000	AG0992	AP0021355	Accounts Payable	CR Fletcher Associates Inc.	22,267.5		22,267.5 Book 14, p. 19
	909000	AG0025	7032 RC 1	Nimo Reclasse- July 2008		1,537,794.4	298,321.0	1,537,794.4 Book 14, p. 33
	923000	AG0470	AP0021281	Accounts Payable	CR Fletcher Associates Inc.	7,500.0		7,500.0
			AP00239614	Accounts Payable	CR Fletcher Associates Inc.	44,370.0		44,370.0 Book 14, p. 19
			B36D000001	Bus Unit 36 Elec - Dist. Gas	CR Fletcher Associates Inc.	(8,817.9)	8,817.9	(0.0)
Niagara Mohawk Power Corp Total	930110		7032 RC 1	Nimo Reclasse- July 2008		(1,239,473.4)	(298,321.0)	(1,537,794.4) Book 14, p. 33
						65,319.6	8,817.9	74,137.5
	903000	AG0990	99616	CFS adjustment TA & CTA		2,030.2	364.3	2,394.5 Book 14, p. 35
			SEC2030001	Elec Dist - Keyspan & NGrid	CR Fletcher Associates Inc.	3,610.8		3,610.8 Book 14, p. 28
			SEC2390001	Reg Co - KSpan - NGrid w/Gas	CR Fletcher Associates Inc.	22,846.5	4,061.0	26,907.5 Book 14, p. 28
905000	AG0992		AP00200790	Accounts Payable	CR Fletcher Associates Inc.	15,690.0		15,690.0 Book 14, p. 22
			B36D000001	Bus Unit 36 Elec - Dist. Gas	CR Fletcher Associates Inc.	(2,667.3)	2,667.3	0.0
			99618	Fran La Riviere GTT Exp. Non Me		(1,239,518.4)	(298,321.0)	(1,537,839.4) Book 14, p. 35
	AG0025		SEC2000001	Gas Dist - KS NE NY		591,744.4		591,744.4 Book 14, p. 37
			SEC2360001	Utility Operating Co NE & NY	99089-Monthly consulting accrual	311,312.7	63,759.5	375,072.2 Book 14, p. 37
923000	AG0493			Service Adjustments	99617-Enst & Young, LLP Reclasse to Property			
				Enst & Young LLP		117,270.4	20,673.0	137,943.3 Book 14, p. 27
			SEC3820001	All Co O&M Based - KS NE NY	GVA Advants			
	AG0730		SEC3520001	Human Resources NE	Hewitt Associates LLC	629.5	128.9	758.5 Book 14, p. 27
			SEC3540001	Human Resources KS NE NY	Hewitt Associates LLC	6,389.6	1,308.7	7,698.3 Book 14, p. 27
90760								
AG0831	AG0760		SEC2360001	Utility Operating Co NE & NY	99617-Reclasse Enst & Young	155,057.9	31,757.8	186,815.6 project code and KS integration project code. On Book 14, the net total is zero.
			SEC3800001	All Company NE & NY O&M Based	Sutherland Ashill & Brennan LLP	159,545.6	32,471.4	191,016.9 Book 14, p. 27
					WPRO LTD			
					Zenar Technologies			
						(448,802.5)	450,615.1	1,812.6
921000						2,046.2	501.3	2,547.5
923000	921000		KSA0014424	Associated Company Billing		1,066.3		1,066.3
			KSA0014988	Associated Company Billing		12,226.5	2,998.1	15,224.6
			KSA0017027	Associated Company Billing		15,339.0	3,499.4	18,838.4 Book 14, p. 35
						(368,143.9)	462,932.4	94,788.5
Total								

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*Druck*

**accenture**

Accenture LLP  
161 N. Clark St.  
Chicago, IL 60601  
USA  
Tel: 312-693-0161

Niagara Mohawk Power Corporation  
dba National Grid  
#1348144 Case 10-E-0050  
DAG-13 Attachment 4  
Page 1 of 40  
Public Version

05/22/2009

INVOICE 1000260899  
Purchase Order Number: PO347385 554 501

NATIONAL GRID  
25 Research Dr - High Rise bldg  
WESTBOROUGH, MA 01582  
USA

Customer ID: 10003018

For services rendered in connection with Customer Experience Phase III

	Tax Rate	
April and May Invoice	USD	543,340.00
Total Amount	USD	543,340.00

Please remit EFT payments to:  
Accenture LLP  
JP Morgan Chase Bank N.A.  
Account Number: 5311314  
ABA Number: 071000013

*NET 15*

Please remit by payment due date: 06/21/2009

Material Delivered: Strategic Consulting

Invoice Reference: 1000260899  
Amount: US Dollar 543,340.00

Federal Tax Identification Number: 720542904

Please remit checks to:  
Accenture LLP  
P.O. Box 70629  
Chicago, IL 60673-0629  
Qualifier: Invoice 1000260899





Accenture LLP  
161 N. Clark St.  
Chicago, IL 60601  
USA  
Tel: 312-693-0161

P.O. # 558155  
6/24/09  
Receipt # 773529  
Date 6/25/09  
1358004

06/08/2009

INVOICE 1000263811  
Purchase Order Number: PO547385

NATIONAL GRID  
25 Research Dr - High Rise bldg  
WESTBOROUGH, MA 01582  
USA

Customer ID: 10003018

For services rendered in connection with Customer Experience Phase III

	Tax Rate		
June Fees & Expenses		USD	271,660.00

Total Amount

USD	271,660.00
-----	------------

Please remit EFT payments to:  
Accenture LLP  
JP Morgan Chase Bank N.A.  
Account Number: 5311314  
ABA Number: 071000013

Please remit by payment due date: 07/08/2009

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Material Delivered: Strategic Consulting

Invoice Reference: 1000263811  
Amount: US Dollar 271,660.00

Federal Tax Identification Number: 720542904

Please remit checks to:  
Accenture LLP  
P.O. Box 70629  
Chicago, IL 60673-0629  
Qualifier: Invoice 1000263811





with



Niagara Mohawk Power Corporation  
dba National Grid  
Case 10-E-0050  
DAG-13 Attachment 4  
Page 3 of 40  
Public Version

500# 1221151  
Accenture LLP  
161 N. Clark St.  
Chicago, IL 60601  
USA  
Tel: 312-693-0161

PO#520154

10/10/2008

INVOICE 1000221465

National Grid  
One Metrotech Center  
BROOKLYN, NY 11201  
USA

Customer ID: 10003018

Customer Experience Phase II Interim Support

	Tax Rate	
Fees & Expenses	USD	269,000.00
Total Amount	USD	269,000.00

Please remit EFT payments to:  
Accenture LLP  
JP Morgan Chase Bank N.A.  
Account Number: 5311314  
ABA Number: 071000013

Please remit by payment due date: 10/31/2008

Material Delivered: Strategic Consulting

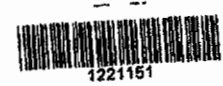
Invoice Reference: 1000221465  
Amount: US Dollar 269,000.00

Federal Tax Identification Number: 720542904

Please remit checks to:  
Accenture LLP  
P.O. Box 70629  
Chicago, IL 60673-0629  
Qualifier: Invoice 1000221465

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K02946  
NG20  
CT406

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m. tol

accenture

C# 454867

09/01/2008

National Grid  
One Metrotech Center  
BROOKLYN, NY 11201  
USA

Customer Experience Phase II Interim Support

Fees & Expenses

Niagara Mohawk Power Corporation  
dba National Grid  
Case 10-E-0050  
Page 4 of 40  
Public Version  
550-# 10-2-11  
Accenture LLP  
161 N. Clark St.  
Chicago, IL 60601  
USA  
Tel: 312-693-0161

INVOICE 1000214818

Customer ID: 10003018

POT# 520145

Tax Rate		
0%	USD	268,000.00

Total Amount

USD	268,000.00
-----	------------

Please remit EFT payments to:  
Accenture LLP  
JP Morgan Chase Bank N.A.  
Account Number: 5311314  
ABA Number: 071000013

Please remit by payment due date: 09/01/2008

Invoice Reference: 1000214818  
Amount: US Dollar 268,000.00

Federal Tax Identification Number: 720542904

Please remit checks to:  
Accenture LLP  
P.O. Box 70629  
Chicago, IL 60673-0629  
Qualifier: Invoice 1000214818

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K02946  
NG20  
CT 406

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accenture

Niagara Mohawk Power Corporation  
dba National Grid  
Case 10-E-0050  
DAG-13 Attachment 4  
Page 5 of 40  
Public Version

Accenture LLP  
161 N. Clark St.  
Chicago, IL 60601  
USA  
Tel: 312-693-0161

1721145  
P# 520152  
SCD#

09/01/2008

INVOICE 1000214822

National Grid  
One Metrotech Center  
BROOKLYN, NY 11201  
USA

Customer ID: 10003018

C# 454867

Customer Experience Phase II Interim Support

	Tax Rate		
Fees & Expenses	0%	USD	268,000.00
Total Amount		USD	268,000.00

Please remit EFT payments to:  
Accenture LLP  
JP Morgan Chase Bank N.A.  
Account Number: 5311314  
ABA Number: 071000013

Please remit by payment due date: 09/01/2008

Invoice Reference: 1000214822  
Amount: US Dollar 268,000.00

Federal Tax Identification Number: 720542904

Please remit checks to:  
Accenture LLP  
P.O. Box 70629  
Chicago, IL 60673-0629  
Qualifier: Invoice 1000214822

NIO  
K02946  
NG20  
CT 406

ACCTS.PAY '08NOV 4am11:57

1/1



**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0626-26

(To be filled out by Requesting Department):

WIRE DUE DATE June 26, 2009

DOLLAR AMOUNT \$ 1,325,279.06

REQUESTING DEPT PHONE

**WIRE INSTRUCTIONS: (Per Invoice)**

CREDIT TO- NAME CULLEN & DYKMAN LLP (VENDOR NUMBER 0044000)

BANK NAME JP MORGAN CHASE

ABA ROUTING 021000021

ACCOUNT NUMBER 530931915

DESCRIPTION / INSTRUCTIONS CHASUS33

Supporting Documentation / Invoices must be attached:

INVOICE # 20090823 AMOUNT \$ 1,325,279.06

INVOICE # AMOUNT

INVOICE # AMOUNT

INVOICE # AMOUNT

Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

Signature & Date

Signature & Date

Accounts Payable Approval:

Signature & Date

MELISSA SPENCER

Batch Number

June 24, 2009

Date Received in AP

Treasury Approval:

Funds Wired on

Date

by

Signature



**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0729-08

(To be filled out by Requesting Department):

WIRE DUE DATE July 29, 2009

DOLLAR AMOUNT \$ 145,000.00

REQUESTING DEPT PHONE

**WIRE INSTRUCTIONS: (Per Invoice)**

CREDIT TO- NAME CULLEN & DYKMAN LLP (VENDOR NUMBER 0044000)

BANK NAME JP MORGAN CHASE

ABA ROUTING 021000021

ACCOUNT NUMBER 530931915

DESCRIPTION / INSTRUCTIONS

Supporting Documentation / Invoices must be attached:

INVOICE # 200907T AMOUNT \$ 145,000.00

INVOICE # AMOUNT

INVOICE # AMOUNT

INVOICE # AMOUNT

Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

Signature & Date

Signature & Date

Accounts Payable Approval:

Signature & Date

MELISSA SPENCER  
Batch Number

July 27, 2009  
Date Received in AP

Treasury Approval:

Funds Wired on \_\_\_\_\_ by \_\_\_\_\_  
Date Signature



**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0626-26

(To be filled out by Requesting Department):

WIRE DUE DATE June 26, 2009

DOLLAR AMOUNT \$ 1,325,279.06

REQUESTING DEPT PHONE

**WIRE INSTRUCTIONS: (Per Invoice)**

CREDIT TO- NAME CULLEN & DYKMAN LLP (VENDOR NUMBER 0044000)

BANK NAME JP MORGAN CHASE

ABA ROUTING 021000021

ACCOUNT NUMBER 530931915

DESCRIPTION / INSTRUCTIONS CHASUS33

Supporting Documentation / Invoices must be attached:

INVOICE # 20090623 AMOUNT \$ 1,325,279.06

INVOICE # AMOUNT

INVOICE # AMOUNT

INVOICE # AMOUNT

Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

Signature & Date

Signature & Date

Accounts Payable Approval:

Signature & Date

MELISSA SPENCER  
Batch Number

June 24, 2009  
Date Received In AP

Treasury Approval:

Funds Wired on

Date

by

Signature



**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0511-19S

(To be filled out by Requesting Department):

WIRE DUE DATE May 11, 2009

DOLLAR AMOUNT \$ 425,000.00 CONTACT

REQUESTING DEPT PHONE

**WIRE INSTRUCTIONS: (Per Invoice)**

CREDIT TO- NAME DELOITTE TAX LLP (VENDOR NUMBER 201353)

BANK NAME CITIBANK

ABA ROUTING 031100209

ACCOUNT NUMBER 38740725

DESCRIPTION / INSTRUCTIONS

**Supporting Documentation / Invoices must be attached:**

INVOICE #	8000946084	AMOUNT	\$	325,000.00
INVOICE #	80009466080	AMOUNT	\$	100,000.00
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		

Accounting Information Below (or) Shown on Individual Invoices attached \_\_\_\_\_

COMPANY	PROJECT NUMBER	TASK	EXP TYPE	EXP ORG
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Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

\_\_\_\_\_  
Signature & Date

\_\_\_\_\_  
Signature & Date

**Accounts Payable Approval:**

<u>Signature &amp; Date</u>	<u>MELISSA SPENCER</u>	<u>May 8, 2009</u>
	Batch Number	Date Received in AP

**Treasury Approval:**

Funds Wired on \_\_\_\_\_ Date \_\_\_\_\_ by \_\_\_\_\_ Signature \_\_\_\_\_



**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0324-28

(To be filled out by Requesting Department):

WIRE DUE DATE March 24, 2009

DOLLAR AMOUNT \$ 2,274,626.51 CONTACT

REQUESTING DEPT PHONE

**WIRE INSTRUCTIONS: (Per Invoice)**

CREDIT TO- NAME DELOITTE TAX LLP (VENDOR NUMBER 201353)

BANK NAME CITIBANK

ABA ROUTING 031100209

ACCOUNT NUMBER 38740725

1306156

**DESCRIPTION / INSTRUCTIONS**

**Supporting Documentation / Invoices must be attached:**

INVOICE #	71023330	AMOUNT	\$	780,000.00	✓
INVOICE #	71023325	AMOUNT	\$	400,000.00	✓
INVOICE #	8000910536	AMOUNT	\$	750,000.00	✓
INVOICE #	8000887276	AMOUNT	\$	344,626.51	✓
INVOICE #		AMOUNT			
INVOICE #		AMOUNT			

**Accounting Information Below (or) Shown on Individual Invoices attached**

COMPANY	PROJECT NUMBER	TASK	EXP TYPE	EXP ORG
---------	----------------	------	----------	---------

Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

Signature & Date

Signature & Date

**Accounts Payable Approval:**

Signature & Date 3-23-09

SANDRA INNISS  
Batch Number

March 23, 2009  
Date Received in AP

**Treasury Approval:**

Funds Wired on

Date

by

Signature





**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0325-175

(To be filled out by Requesting Department):

WIRE DUE DATE March 25, 2009

DOLLAR AMOUNT \$ 338,337.00 CONTACT

REQUESTING DEPT PHONE

WIRE INSTRUCTIONS: (Per Invoice)

CREDIT TO- NAME / DELOITTE TAX LLP (VENDOR NUMBER 201353)

BANK NAME / CITIBANK

ABA ROUTING / 031100209

ACCOUNT NUMBER / 38740725

DESCRIPTION / INSTRUCTIONS

Supporting Documentation / Invoices must be attached:

INVOICE #	8000919691	AMOUNT	\$	16,000.00
INVOICE #	8000919688	AMOUNT	\$	300,000.00
INVOICE #	8000919690	AMOUNT	\$	22,337.00
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		

Accounting Information Below (or) Shown on Individual Invoices attached \_\_\_\_\_

COMPANY	PROJECT NUMBER	TASK	EXP TYPE	EXP ORG
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Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

Signature & Date

Signature & Date

Accounts Payable Approval:

Signature & Date

SANDRA INNISS  
Batch Number

March 24, 2009  
Date Received in AP

Treasury Approval:

Funds Wired on

Date

by

Signature



**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 1002-08

(To be filled out by Requesting Department):

WIRE DUE DATE October 2, 2009

DOLLAR AMOUNT \$ 213,457.90 CONTACT

REQUESTING DEPT PHONE

**WIRE INSTRUCTIONS: (Per Invoice)**

CREDIT TO- NAME DELOITTE TAX LLP (VENDOR NUMBER 201353)

BANK NAME CITIBANK

ABA ROUTING 031100209

ACCOUNT NUMBER 38740725

DESCRIPTION / INSTRUCTIONS

Supporting Documentation / Invoices must be attached:

INVOICE #	8001039519	AMOUNT	\$	195,353.00
INVOICE #	8001039467	AMOUNT	\$	18,104.90
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		


Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

Signature & Date

Signature & Date

Accounts Payable Approval:

  
Signature & Date

MELISSA SPENC  
Batch Number

September 29, 2009  
Date Received in AP

Treasury Approval:

Funds Wired on \_\_\_\_\_  
Date

by \_\_\_\_\_  
Signature



**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0911-37

(To be filled out by Requesting Department):

WIRE DUE DATE September 11, 2009

DOLLAR AMOUNT \$ 147,464.66 CONTACT

REQUESTING DEPT PHONE

**WIRE INSTRUCTIONS: (Per Invoice)**

CREDIT TO- NAME DELOITTE TAX LLP (VENDOR NUMBER 201363)

BANK NAME CITIBANK

ABA ROUTING 031100209

ACCOUNT NUMBER 38740725

DESCRIPTION / INSTRUCTIONS

**Supporting Documentation / Invoices must be attached:**

INVOICE #	8001023078	AMOUNT	\$	147,464.66
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		

Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

Signature & Date

Signature & Date

**Accounts Payable Approval:**

Signature & Date 9/10

MELISSA SPENC  
Batch Number

September 10, 2009  
Date Received in AP

**Treasury Approval:**

Funds Wired on \_\_\_\_\_ by \_\_\_\_\_  
Date Signature



**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0608-03  
\*\*\*\*\*

(To be filled out by Requesting Department):

WIRE DUE DATE June 8, 2009  
DOLLAR AMOUNT \$ 185,757.80 CONTACT  
REQUESTING DEPT PHONE

**WIRE INSTRUCTIONS: (Per Invoice)**

CREDIT TO- NAME DELOITTE TAX LLP (VENDOR NUMBER 201353)

BANK NAME CITIBANK

ABA ROUTING 031100209

ACCOUNT NUMBER 38740725

DESCRIPTION / INSTRUCTIONS

**Supporting Documentation / Invoices must be attached:**

INVOICE #	8000868172	AMOUNT	\$	28,897.00
INVOICE #	8000887277	AMOUNT	\$	<u>141,187.80</u>
INVOICE #	8000868178	AMOUNT	\$	15,673.00
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		
INVOICE #		AMOUNT		

Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

\_\_\_\_\_  
Signature & Date

\_\_\_\_\_  
Signature & Date

\*\*\*\*\*  
**Accounts Payable Approval:**

\_\_\_\_\_  
Signature & Date

\_\_\_\_\_  
Batch Number

June 5, 2009  
Date Received in AP

\*\*\*\*\*  
**Treasury Approval:**

Funds Wired on \_\_\_\_\_ by \_\_\_\_\_  
Date Signature



**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0511-19S

(To be filled out by Requesting Department):

WIRE DUE DATE May 11, 2009

DOLLAR AMOUNT \$ 425,000.00 CONTACT

REQUESTING DEPT PHONE

WIRE INSTRUCTIONS: (Per Invoice)

CREDIT TO- NAME DELOITTE TAX LLP (VENDOR NUMBER 201353)

BANK NAME CITIBANK

ABA ROUTING 031100209

ACCOUNT NUMBER 38740725

DESCRIPTION / INSTRUCTIONS

Supporting Documentation / Invoices must be attached:

INVOICE # 8000946084 AMOUNT \$ 325,000.00

INVOICE # 80009466080 AMOUNT \$ 100,000.00

INVOICE # AMOUNT

INVOICE # AMOUNT

INVOICE # AMOUNT

INVOICE # AMOUNT

Accounting Information Below (or) Shown on Individual Invoices attached

COMPANY PROJECT NUMBER TASK EXP TYPE EXP ORG

Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

Signature & Date

Signature & Date

Accounts Payable Approval:

*[Signature]* 5/11/09  
Signature & Date

MELISSA SPENCER  
Batch Number

May 8, 2009  
Date Received in AP

Treasury Approval:

Funds Wired on \_\_\_\_\_ Date by \_\_\_\_\_ Signature



**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0311-23  
\*\*\*\*\*

(To be filled out by Requesting Department):

WIRE DUE DATE March 11, 2009  
DOLLAR AMOUNT \$ 757,405.09 CONTACT  
REQUESTING DEPT PHONE

WIRE INSTRUCTIONS: (Per Invoice)

CREDIT TO- NAME DELOITTE TAX LLP (VENDOR NUMBER 201353)  
BANK NAME CITIBANK  
ABA ROUTING 031100209  
ACCOUNT NUMBER 38740725

1297931

DESCRIPTION / INSTRUCTIONS

Supporting Documentation / Invoices must be attached:

INVOICE #	8000880146	AMOUNT	\$	750,000.00	✓
INVOICE #	8000885222	AMOUNT	\$	7,405.09	✓
INVOICE #		AMOUNT			
INVOICE #		AMOUNT			
INVOICE #		AMOUNT			
INVOICE #		AMOUNT			

Accounting Information Below (or) Shown on Individual Invoices attached \_\_\_\_\_

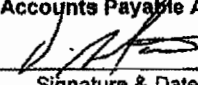
COMPANY	PROJECT NUMBER	TASK	EXP TYPE	EXP ORG
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Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

Signature & Date	Signature & Date
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\*\*\*\*\*  
Accounts Payable Approval:

 Signature & Date	3-10-09 Batch Number	SANDRA INNISS Date Received in AP	March 10, 2009
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\*\*\*\*\*  
Treasury Approval:

Funds Wired on	Date	by	Signature
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**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0324-28

(To be filled out by Requesting Department):

WIRE DUE DATE March 24, 2009

DOLLAR AMOUNT \$ 2,274,626.51 CONTACT

REQUESTING DEPT PHONE

WIRE INSTRUCTIONS: (Per Invoice)

CREDIT TO- NAME DELOITTE TAX LLP (VENDOR NUMBER 201353)

BANK NAME CITIBANK

ABA ROUTING 031100209

ACCOUNT NUMBER 38740725

DESCRIPTION / INSTRUCTIONS

Supporting Documentation / Invoices must be attached:

INVOICE #	71023330	AMOUNT	\$	780,000.00	✓
INVOICE #	71023325	AMOUNT	\$	400,000.00	✓
INVOICE #	8000910636	AMOUNT	\$	750,000.00	✓
INVOICE #	8000887276	AMOUNT	\$	344,626.51	✓
INVOICE #		AMOUNT			
INVOICE #		AMOUNT			

Accounting Information Below (or) Shown on Individual Invoices attached

COMPANY	PROJECT NUMBER	TASK	EXP TYPE	EXP ORG
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Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

Signature & Date

Signature & Date

Accounts Payable Approval:

Signature & Date

3-23-09

SANDRA INNISS  
Batch Number

March 23, 2009  
Date Received in AP

Treasury Approval:

Funds Wired on

Date

by

Signature



**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0324-28  
\*\*\*\*\*

(To be filled out by Requesting Department):

WIRE DUE DATE March 24, 2009  
DOLLAR AMOUNT \$ 2,274,626.51 CONTACT  
REQUESTING DEPT PHONE

WIRE INSTRUCTIONS: (Per Invoice)

CREDIT TO- NAME DELOITTE TAX LLP (VENDOR NUMBER 201353)  
BANK NAME CITIBANK  
ABA ROUTING 031100209  
ACCOUNT NUMBER 38740725

1306152

DESCRIPTION / INSTRUCTIONS

Supporting Documentation / Invoices must be attached:

INVOICE #	71023330	AMOUNT	\$	780,000.00	✓
INVOICE #	71023325	AMOUNT	\$	400,000.00	✓
INVOICE #	8000910536	AMOUNT	\$	750,000.00	✓
INVOICE #	8000887276	AMOUNT	\$	344,626.51	✓
INVOICE #		AMOUNT			
INVOICE #		AMOUNT			

Accounting Information Below (or) Shown on Individual Invoices attached \_\_\_\_\_

COMPANY	PROJECT NUMBER	TASK	EXP TYPE	EXP ORG
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Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

\_\_\_\_\_  
Signature & Date

\_\_\_\_\_  
Signature & Date

\*\*\*\*\*  
Accounts Payable Approval:

\_\_\_\_\_  
Signature & Date

3-23-09 SANDRA INNISS Batch Number March 23, 2009 Date Received In AP

\*\*\*\*\*  
Treasury Approval:

Funds Wired on \_\_\_\_\_ by \_\_\_\_\_  
Date





**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0324-28

(To be filled out by Requesting Department):

WIRE DUE DATE March 24, 2009

DOLLAR AMOUNT \$ 2,274,626.51 CONTACT

REQUESTING DEPT PHONE

WIRE INSTRUCTIONS: (Per Invoice)

CREDIT TO- NAME DELOITTE TAX LLP (VENDOR NUMBER 201353)

BANK NAME CITIBANK

ABA ROUTING 031100209

ACCOUNT NUMBER 38740725

1306154

DESCRIPTION / INSTRUCTIONS

Supporting Documentation / Invoices must be attached:

INVOICE #	71023330	AMOUNT	\$	780,000.00	✓
INVOICE #	71023325	AMOUNT	\$	400,000.00	✓
INVOICE #	8000910536	AMOUNT	\$	750,000.00	✓
INVOICE #	8000887276	AMOUNT	\$	344,626.51	✓
INVOICE #		AMOUNT			
INVOICE #		AMOUNT			

Accounting Information Below (or) Shown on individual Invoices attached

COMPANY	PROJECT NUMBER	TASK	EXP TYPE	EXP ORG
---------	----------------	------	----------	---------

Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

Signature & Date

Signature & Date

Accounts Payable Approval:

Signature & Date

3-23-09

SANDRA INNIS  
Batch Number

March 23, 2009  
Date Received in AP

Treasury Approval:

Funds Wired on

Date

by

Signature



# KeySpan Check Request Form

DATE 1/9/09 INVOICE # 8172 1267360  
CHECK AMOUNT \$151,873.01 DATE CHECK REQUIRED 1/10/09  
PAYABLE TO DeSola Group, Inc. TAX ID#  
477 Madison Avenue CORPORATION (Y/N)  
New York, NY 10022 SUPPLIER #

Strategic Positioning and Brand Development; Services rendered for the month of December 2008

## REASON FOR CHECK

REQUESTED BY (Print) J. Gioia EMPLOYEE # 8446  
REQUESTED BY (Signature) *J. Gioia* DEPARTMENT LIPA & Gen  
PHONE # 718-403-2763

## ACCOUNTING INFORMATION: (Requestor must supply this accounting)

Project	Task	Expenditure type	Expenditure Organization	Amount
K02701	NG20	406	N10	\$151,873.01

APPROVED BY	EMPLOYEE#	SIGNATURE
J. CAROSELLI	11737	<i>J. Caroselli</i>

## LOCATION OF SERVICE (Requestor Circle One)

NYC

Nassau Glen Cove  
Suffolk Long Beach

MA

NH

Other  
State

## NON PURCHASE ORDER CATEGORY (Requestor Check One):

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Advertising                      | <input type="checkbox"/> Inspection / Insurance      | <input type="checkbox"/> R & D Initiative   |
| <input type="checkbox"/> Awards / Gifts                   | <input type="checkbox"/> Legal Professional Services | <input type="checkbox"/> 'Satisfaction Program' Reimbursement                                     |
| <input type="checkbox"/> Bank / Escrow / Rating Agencies  | <input type="checkbox"/> Legal / Settlement / Claim  | <input type="checkbox"/> Subscription   |
| <input type="checkbox"/> Catering                         | <input type="checkbox"/> Marketer Bill               | <input type="checkbox"/> Summons / DMV / Tolls  |
| <input type="checkbox"/> Charitable / Sponsorship         | <input type="checkbox"/> Parking                     | <input type="checkbox"/> Tax Payment / Assessments  |
| <input type="checkbox"/> Dues / Fees                      | <input type="checkbox"/> Payments on behalf of LIPA  | <input type="checkbox"/> Training Course / Registrations / Seminar                                |
| <input type="checkbox"/> Freight / Fed Ex / UPS / Postage | <input type="checkbox"/> Permits                     | <input type="checkbox"/> Utility Bill or Adjustment   |
| <input type="checkbox"/> Government / Municipality        | <input type="checkbox"/> Police / Marshals           | <input checked="" type="checkbox"/> Other - Exception must be pre-approved<br>by Accounts Payable |
| <input type="checkbox"/> HR / Medical / Workmen Comp      | <input type="checkbox"/> Rebate Program              |   |
| <input type="checkbox"/> Incentive Program                | <input type="checkbox"/> Refund / Adjust / Reimburse |   |

DELIVER CHECK TO PAYEE - OR -

OTHER - SPECIAL HANDLING INSTRUCTIONS

RETURN TO

DEPT

LOCATION

PHONE

## RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Com



ACCOUNTS PAYABLE APPROVAL

*[Signature]*

DATE

01/15/09

# KeySpan Check Request Form

DATE 11/19/08 INVOICE # 8151  
 CHECK AMOUNT \$151,262.48 DATE CHECK REQUIRED 11/20/08  
 PAYABLE TO DeSola Group TAX ID#  
 477 Madison Avenue CORPORATION (Y/N)  
 New York, NY 10022 SUPPLIER #

## REASON FOR CHECK

Strategic Positioning & Brand Development 2008  
 Oct.

REQUESTED BY (Print) Josephine M. Gioia EMPLOYEE # 8446  
 DEPARTMENT LIPA & Gen  
 REQUESTED BY (Signature) *Josephine M. Gioia* PHONE # 7184032763

## ACCOUNTING INFORMATION: (Requestor must supply this accounting)

Project	Task	Expenditure type	Expenditure Organization	Amount
K02701	NG20	406	N10	\$151,262.46

APPROVED BY	EMPLOYEE#	SIGNATURE
John A. Consoletti	11737	<i>John A. Consoletti</i>

## LOCATION OF SERVICE (Requestor Circle One)

NYC MA NH Other State  
 Nassau Glen Cove  
 Suffolk Long Beach

## NON PURCHASE ORDER CATEGORY (Requestor Check One):

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Advertising                      | <input type="checkbox"/> Inspection / Insurance      | <input type="checkbox"/> R & D Initiative  |
| <input type="checkbox"/> Awards / Gifts                   | <input type="checkbox"/> Legal Professional Services | <input type="checkbox"/> 'Satisfaction Program' Reimbursement                                  |
| <input type="checkbox"/> Bank / Escrow / Rating Agencies  | <input type="checkbox"/> Legal / Settlement / Claim  | <input type="checkbox"/> Subscription  |
| <input type="checkbox"/> Catering                         | <input type="checkbox"/> Marketer Bill               | <input type="checkbox"/> Summons / DMV / Tolls   |
| <input type="checkbox"/> Charitable / Sponsorship         | <input type="checkbox"/> Parking                     | <input type="checkbox"/> Tax Payment / Assessments   |
| <input type="checkbox"/> Dues / Fees                      | <input type="checkbox"/> Payments on behalf of LIPA  | <input type="checkbox"/> Training Course / Registrations / Seminar                             |
| <input type="checkbox"/> Freight / Fed Ex / UPS / Postage | <input type="checkbox"/> Permits                     | <input type="checkbox"/> Utility Bill or Adjustment  |
| <input type="checkbox"/> Government / Municipality        | <input type="checkbox"/> Police / Marshals           | <input checked="" type="checkbox"/> Other - Exception must be pre-approved by Accounts Payable |
| <input type="checkbox"/> HR / Medical / Workmen Comp      | <input type="checkbox"/> Rebate Program              |  |
| <input type="checkbox"/> Incentive Program                | <input type="checkbox"/> Refund / Adjust / Reimburse |  |

## DELIVER CHECK TO PAYEE - OR -

## OTHER - SPECIAL HANDLING INSTRUCTIONS

## RETURN TO

DEPT LOCATION PHONE

## RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
								\$

## ACCOUNTS PAYABLE APPROVAL

DATE 11/24/08

# KeySpan Check Request Form

Niagara Mohawk Power Corporation  
dba National Grid  
Case 10-E-0050  
DAG-13/A/B/C/D/E/F/G/H/I/J/K/L/M/N/O/P/Q/R/S/T/U/V/W/X/Y/Z  
Page 22 of 40  
Public Version

DATE November 11, 2008

INVOICE #

8131

CHECK AMOUNT \$151,031.31

DATE CHECK REQUIRED November 18, 2008

PAYABLE TO DeSola Group, Inc.

TAX ID#

477 Madison Avenue

CORPORATION (Y/N)

New York, NY 10022

SUPPLIER #

1506650

REASON FOR CHECK

Strategic Positioning and Brand Development - September 2008

REQUESTED BY (Print)

Joseph E. Smoluch

EMPLOYEE #

08802

REQUESTED BY (Signature)

*Joseph E. Smoluch*

DEPARTMENT

Finance

PHONE #

X-2827

ACCOUNTING INFORMATION: (Requestor must supply this accounting)

Project	Task	Expenditure type	Expenditure Organization	Amount
K02701	NG20	406	N10	\$151,031.31
APPROVED BY				
J. Caroselli		EMPLOYEE#		SIGNATURE
				<i>J. Caroselli</i>

LOCATION OF SERVICE  
(Requestor Circle One)

NYC

Nassau Glen Cove  
Suffolk Long Beach

MA

NH

Other  
State

ACCTS.PAY '09NOV12am10:50

NON PURCHASE ORDER CATEGORY (Requestor Check One):

☐ Advertising  
☐ Awards / Gifts  
☐ Bank / Escrow / Rating Agencies  
☐ Catering  
☐ Charitable / Sponsorship  
☐ Dues / Fees  
☐ Freight / Fed Ex / UPS / Postage  
☐ Government / Municipality  
☐ HR / Medical / Workmen Comp  
☐ Incentive Program

☐ Inspection / Insurance  
☐ Legal Professional Services  
☐ Legal / Settlement / Claim  
☐ Marketer Bill  
☐ Parking  
☐ Payments on behalf of LIPA  
☐ Permits  
☐ Police / Marshals  
☐ Rebate Program  
☐ Refund / Adjust / Reimburse

☐ R & D Initiative  
☐ 'Satisfaction Program' Reimbursement  
☐ Subscription  
☐ Summons / DMV / Tolls  
☐ Tax Payment / Assessments  
☐ Training Course / Registrations / Seminar  
☐ Utility Bill or Adjustment  
☒ Other - Exception must be pre-approved  
by Accounts Payable

DELIVER CHECK TO PAYEE - OR -

OTHER - SPECIAL HANDLING INSTRUCTIONS

RETURN TO

DEPT

LOCATION

PHONE

RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount

ACCOUNTS PAYABLE APPROVAL

*[Signature]*

DATE 11/12/08



1227A55

# KeySpan Check Request Form

SEP 1267359

DATE 1/9/09 INVOICE # 8162  
 CHECK AMOUNT \$150,375.27 DATE CHECK REQUIRED 1/10/09  
 PAYABLE TO DeSola Group, Inc. TAX ID#  
 477 Madison Avenue CORPORATION (Y/N)  
 New York, NY 10022 SUPPLIER #

REASON FOR CHECK NATIONAL GRID: STRATEGIC POSITIONING AND BRAND DEVELOPMENT  
 Services rendered for the month of November 2008

REQUESTED BY (Print) J. Gloia EMPLOYEE # 8446  
 REQUESTED BY (Signature) [Signature] DEPARTMENT LIPA & Gen  
 PHONE # 718-403-2763

## ACCOUNTING INFORMATION: (Requestor must supply this accounting)

Project	Task	Expenditure type	Expenditure Organization	Amount
K02701	NG20	406	N10	\$150,375.27

APPROVED BY	EMPLOYEE#	SIGNATURE
John Caroselli	11737	[Signature]

LOCATION OF SERVICE (Requestor Circle One) NYC MA NH Other State  
 Nassau Glen Cove  
 Suffolk Long Beach

## NON PURCHASE ORDER CATEGORY (Requestor Check One):

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Advertising                      | <input type="checkbox"/> Inspection / Insurance      | <input type="checkbox"/> R & D Initiative  |
| <input type="checkbox"/> Awards / Gifts                   | <input type="checkbox"/> Legal Professional Services | <input type="checkbox"/> 'Satisfaction Program' Reimbursement                                  |
| <input type="checkbox"/> Bank / Escrow / Rating Agencies  | <input type="checkbox"/> Legal / Settlement / Claim  | <input type="checkbox"/> Subscription  |
| <input type="checkbox"/> Catering                         | <input type="checkbox"/> Marketer Bill               | <input type="checkbox"/> Summons / DMV / Tolls   |
| <input type="checkbox"/> Charitable / Sponsorship         | <input type="checkbox"/> Parking                     | <input type="checkbox"/> Tax Payment / Assessments   |
| <input type="checkbox"/> Dues / Fees                      | <input type="checkbox"/> Payments on behalf of LIPA  | <input type="checkbox"/> Training Course / Registrations / Seminar                             |
| <input type="checkbox"/> Freight / Fed Ex / UPS / Postage | <input type="checkbox"/> Permits                     | <input type="checkbox"/> Utility Bill or Adjustment  |
| <input type="checkbox"/> Government / Municipality        | <input type="checkbox"/> Police / Marshals           | <input checked="" type="checkbox"/> Other - Exception must be pre-approved by Accounts Payable |
| <input type="checkbox"/> HR / Medical / Workmen Comp      | <input type="checkbox"/> Rebate Program              |  |
| <input type="checkbox"/> Incentive Program                | <input type="checkbox"/> Refund / Adjust / Reimburse |  |

DELIVER CHECK TO PAYEE - OR - ACCTS.PAY '09JAN15am11:12  
 OTHER - SPECIAL HANDLING INSTRUCTIONS RETURN TO  
 DEPT LOCATION PHONE

## RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
								\$

ACCOUNTS PAYABLE APPROVAL

[Signature]

DATE 01/15/09

NationalGrid Check Request Form

#137772

DATE 7/27/2009 INVOICE # US 0130093538  
CHECK AMOUNT \$269,719.00 DATE CHECK REQUIRED 7/31/09  
PAYABLE TO Ernst & Young TAX ID# 34-6565596  
P.O. Box 91251 CORPORATION (Y/N) Y  
Chicago, IL 60693 SUPPLIER # 0006879

REASON FOR CHECK For Organizational Design + Cost + Markets

REQUESTED BY (Print) [Redacted] EMPLOYEE # 07927  
REQUESTED BY (Signature) Gail Narano DEPARTMENT SALES & MKT  
PHONE # 718-403-7744

ACCOUNTING INFORMATION: (Requestor must supply this accounting)

Project	Task	Expenditure type	Expenditure Organization	Amount
K03000	002031	406	128KCC	\$269,719.00

APPROVED BY	EMPLOYEE#	SIGNATURE
Fred J Surrey	03352	<u>[Signature]</u>
William Bollbach	07179	<u>[Signature]</u>

LOCATION OF SERVICE (Requestor Circle One) NYC MA NH Other State  
Nassau Glen Cove  
Suffolk Long Beach

NON PURCHASE ORDER CATEGORY (Requestor Check One):

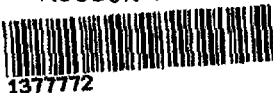
- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Advertising                          | <input type="checkbox"/> Inspection / Insurance      | <input type="checkbox"/> R & D Initiative   |
| <input type="checkbox"/> Awards / Gifts                       | <input type="checkbox"/> Legal Professional Services | <input type="checkbox"/> 'Satisfaction Program' Reimbursement                       |
| <input type="checkbox"/> Bank / Escrow / Rating Agencies      | <input type="checkbox"/> Legal / Settlement / Claim  | <input type="checkbox"/> Subscription   |
| <input type="checkbox"/> Catering                             | <input type="checkbox"/> Marketer Bill               | <input type="checkbox"/> Summons / DMV / Tolls                                      |
| <input type="checkbox"/> Charitable / Sponsorship             | <input type="checkbox"/> Parking                     | <input type="checkbox"/> Tax Payment / Assessments                                  |
| <input type="checkbox"/> Dues / Fees                          | <input type="checkbox"/> Payments on behalf of LIPA  | <input type="checkbox"/> Training Course / Registrations / Seminar                  |
| <input type="checkbox"/> Freight / Fed Ex / UPS / Postage     | <input type="checkbox"/> Permits                     | <input type="checkbox"/> Utility Bill or Adjustment                                 |
| <input checked="" type="checkbox"/> Government / Municipality | <input type="checkbox"/> Police / Marshals           | <input type="checkbox"/> Other - Exception must be pre-approved by Accounts Payable |
| <input type="checkbox"/> HR / Medical / Workmen Comp          | <input type="checkbox"/> Rebate Program              |   |
| <input type="checkbox"/> Incentive Program                    | <input type="checkbox"/> Refund / Adjust / Reimburse |   |

DELIVER CHECK TO PAYEE - OR -  
OTHER - SPECIAL HANDLING INSTRUCTIONS RETURN TO  
DEPT LOCATION PHONE

RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
								\$

ACCOUNTS PAYABLE APPROVAL [Signature] DATE 8/4/09



**KEYSPAN ENERGY ACH / WIRE TRANSFER AUTHORIZATION FORM**

WIRE # 0908-10

(To be filled out by Requesting Department):

WIRE DUE DATE September 8, 2009

DOLLAR AMOUNT \$ 275,091.00 CONTACT

REQUESTING DEPT PHONE

**WIRE INSTRUCTIONS: (Per Invoice)**

CREDIT TO- NAME ERNST & YOUNG LLP (VENDOR NUMBER 0006879)

BANK NAME WACHOVIA BANK, N.A.

ABA ROUTING # 031201467

ACCOUNT NUMBER 2000032587266

DESCRIPTION / INSTRUCTIONS SWIFT CODE: PNBPU33

**Supporting Documentation / Invoices must be attached:**

INVOICE #	US0130111146	AMOUNT	\$	5,800.00
INVOICE #	US0130111166	AMOUNT	\$	39,721.00
INVOICE #	US0130111039	AMOUNT	\$	229,570.00
INVOICE #		AMOUNT		

Requesting Dept must obtain one Officer Signature if total amount is greater than \$500,000.00

Officer Authorization:

Signature & Date

Signature & Date

**Accounts Payable Approval:**

Signature & Date

MELISSA SPENCER  
Batch Number

September 4, 2009  
Date Received in AP

**Treasury Approval:**

Funds Wired on \_\_\_\_\_ by \_\_\_\_\_  
Date Signature



### KeySpan Check Request Form

DATE December 12, 2008 INVOICE # US0123840398  
CHECK AMOUNT \$224,476 DATE CHECK REQUIRED  
PAYABLE TO Ernst & Young TAX ID# 34-6565596  
Bank of America - Chic 91251 CORPORATION (Y/N)  
PO Box 91251 SUPPLIER #  
Chicago, IL 60693

REASON FOR CHECK Billing for professional services rendered from Sep.29-Oct.31, 2008 for Balance Sheet and Cash Flow Reporting and Forecasting Support.

REQUESTED BY (Print) Doug Meyer EMPLOYEE # 16888  
REQUESTED BY (Signature) *Doug Meyer* DEPARTMENT Corp. Budget  
PHONE # 718-403-2782

ACCOUNTING INFORMATION: (Requestor must supply this accounting)

Project	Task	Expenditure type	Expenditure Organization	Amount
				\$
APPROVED BY		EMPLOYEE#	SIGNATURE	
Andrew Sloey		08426	<i>[Signature]</i>	

LOCATION OF SERVICE (Requestor Circle One) NYC MA NH Other State  
Nassau Glen Cove  
Suffolk Long Beach

#### NON PURCHASE ORDER CATEGORY (Requestor Check One):

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Advertising                      | <input type="checkbox"/> Inspection / Insurance      | <input type="checkbox"/> R & D Initiative   |
| <input type="checkbox"/> Awards / Gifts                   | <input type="checkbox"/> Legal Professional Services | <input type="checkbox"/> 'Satisfaction Program' Reimbursement                       |
| <input type="checkbox"/> Bank / Escrow / Rating Agencies  | <input type="checkbox"/> Legal / Settlement / Claim  | <input type="checkbox"/> Subscription   |
| <input type="checkbox"/> Catering                         | <input type="checkbox"/> Marketer Bill               | <input type="checkbox"/> Summons / DMV / Tolls                                      |
| <input type="checkbox"/> Charitable / Sponsorship         | <input type="checkbox"/> Parking                     | <input type="checkbox"/> Tax Payment / Assessments                                  |
| <input type="checkbox"/> Dues / Fees                      | <input type="checkbox"/> Payments on behalf of LIPA  | <input type="checkbox"/> Training Course / Registrations / Seminar                  |
| <input type="checkbox"/> Freight / Fed Ex / UPS / Postage | <input type="checkbox"/> Permits                     | <input type="checkbox"/> Utility Bill or Adjustment                                 |
| <input type="checkbox"/> Government / Municipality        | <input type="checkbox"/> Police / Marshals           | <input type="checkbox"/> Other - Exception must be pre-approved by Accounts Payable |
| <input type="checkbox"/> HR / Medical / Workmen Comp      | <input type="checkbox"/> Rebate Program              | <input checked="" type="checkbox"/> Consulting                                      |
| <input type="checkbox"/> Incentive Program                | <input type="checkbox"/> Refund / Adjust / Reimburse |   |

DELIVER CHECK TO PAYEE ☒ - OR - RETURN TO ACCTS.PAY 08DEC15PM 3:11  
OTHER - SPECIAL HANDLING INSTRUCTIONS  
DEPT LOCATION PHONE

RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
31	N13	00NG41	406	9210K	K02915	N13	31	\$224,476



1251240

APPROVAL

*[Signature]*

DATE 12/15/08



## NationalGrid Check Request Form

DATE 7/27/09 INVOICE # US0130093544  
 CHECK AMOUNT \$198,499.00 DATE CHECK REQUIRED 7/31/09  
 PAYABLE TO ERNST + YOUNG TAX ID# 34-6565596  
P.O. Box 91251 CORPORATION (Y/N) Y  
Chicago, IL 60693 SUPPLIER # 0006879

REASON FOR CHECK FOR ORGANIZATIONAL DESIGN - US TRANS + EDO

REQUESTED BY (Print) William Bollbach EMPLOYEE # 07921  
 REQUESTED BY (Signature) \_\_\_\_\_ DEPARTMENT SVP-HR  
 PHONE # \_\_\_\_\_

ACCOUNTING INFORMATION: (Requestor must supply this accounting) 07

Project	Task	Expenditure type	Expenditure Organization	Amount
<u>K03000</u>	<u>002031</u>	<u>406</u>	<u>128KCC</u>	<u>\$198,499.00</u>

APPROVED BY	EMPLOYEE#	SIGNATURE
<u>Fred J Surrey</u>	<u>03352</u>	<u>Fred J Surrey</u>

LOCATION OF SERVICE  
(Requestor Circle One)

NYC

Nassau Glen Cove  
Suffolk Long Beach

MA

NH

Other  
State \_\_\_\_\_

NON PURCHASE ORDER CATEGORY (Requestor Check One):

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Advertising                          | <input type="checkbox"/> Inspection / Insurance      | <input type="checkbox"/> R & D Initiative   |
| <input type="checkbox"/> Awards / Gifts                       | <input type="checkbox"/> Legal Professional Services | <input type="checkbox"/> 'Satisfaction Program' Reimbursement                       |
| <input type="checkbox"/> Bank / Escrow / Rating Agencies      | <input type="checkbox"/> Legal / Settlement / Claim  | <input type="checkbox"/> Subscription   |
| <input type="checkbox"/> Catering                             | <input type="checkbox"/> Marketer Bill               | <input type="checkbox"/> Summons / DMV / Tolls                                      |
| <input type="checkbox"/> Charitable / Sponsorship             | <input type="checkbox"/> Parking                     | <input type="checkbox"/> Tax Payment / Assessments                                  |
| <input type="checkbox"/> Dues / Fees                          | <input type="checkbox"/> Payments on behalf of LIPA  | <input type="checkbox"/> Training Course / Registrations / Seminar                  |
| <input type="checkbox"/> Freight / Fed Ex / UPS / Postage     | <input type="checkbox"/> Permits                     | <input type="checkbox"/> Utility Bill or Adjustment                                 |
| <input checked="" type="checkbox"/> Government / Municipality | <input type="checkbox"/> Police / Marshals           | <input type="checkbox"/> Other - Exception must be pre-approved by Accounts Payable |
| <input type="checkbox"/> HR / Medical / Workmen Comp          | <input type="checkbox"/> Rebate Program              |   |
| <input type="checkbox"/> Incentive Program                    | <input type="checkbox"/> Refund / Adjust / Reimburse |   |

DELIVER CHECK TO PAYEE \_\_\_\_\_ - OR -

OTHER - SPECIAL HANDLING INSTRUCTIONS

RETURN TO

DEPT \_\_\_\_\_

LOCATION \_\_\_\_\_

PHONE \_\_\_\_\_

RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable.

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
								\$

ACCOUNTS PAYABLE APPROVAL \_\_\_\_\_

DATE 7/28/09



1374728

# KeySpan Check Request Form

DATE January 9, 2009 INVOICE # US0123868007  
CHECK AMOUNT \$186,142 DATE CHECK REQUIRED  
PAYABLE TO Ernst & Young TAX ID# 34-6565596  
Bank of America- Chic 91251 CORPORATION (Y/N)  
PO Box 91251 SUPPLIER #  
Chicago, IL 60693

REASON FOR CHECK "Billing for professional services rendered from November 24 2008 through December 19 2008 for Balance Sheet and Cash Flow Reporting and Forecasting Support (Phase2) as per our Statement of Work dated November 24, 2008"

REQUESTED BY (Print) Doug Meyer EMPLOYEE # 16888  
DEPARTMENT Corp. Budget  
REQUESTED BY (Signature) PHONE # 718-403-2782

APPROVED BY	EMPLOYEE#	SIGNATURE
Andrew Slooy	08426	x.

LOCATION OF SERVICE (Requestor Circle One) NYC MA NH Other State  
Nassau Glen Cove  
Suffolk Long Beach

## NON PURCHASE ORDER CATEGORY (Requestor Check One):

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Advertising                      | <input type="checkbox"/> Inspection / Insurance      | <input type="checkbox"/> R & D Initiative   |
| <input type="checkbox"/> Awards / Gifts                   | <input type="checkbox"/> Legal Professional Services | <input type="checkbox"/> 'Satisfaction Program' Reimbursement                       |
| <input type="checkbox"/> Bank / Escrow/ Rating Agencies   | <input type="checkbox"/> Legal / Settlement / Claim  | <input type="checkbox"/> Subscription   |
| <input type="checkbox"/> Catering                         | <input type="checkbox"/> Marketer Bill               | <input type="checkbox"/> Summons / DMV / Tolls                                      |
| <input type="checkbox"/> Charitable / Sponsorship         | <input type="checkbox"/> Parking                     | <input type="checkbox"/> Tax Payment / Assessments                                  |
| <input type="checkbox"/> Dues / Fees                      | <input type="checkbox"/> Payments on behalf of LIPA  | <input type="checkbox"/> Training Course / Registrations/ Seminar                   |
| <input type="checkbox"/> Freight / Fed Ex / UPS / Postage | <input type="checkbox"/> Permits                     | <input type="checkbox"/> Utility Bill or Adjustment                                 |
| <input type="checkbox"/> Government / Municipality        | <input type="checkbox"/> Police / Marshals           | <input type="checkbox"/> Other - Exception must be pre-approved by Accounts Payable |
| <input type="checkbox"/> HR / Medical / Workmen Comp      | <input type="checkbox"/> Rebate Program              | <input checked="" type="checkbox"/> Consulting                                      |
| <input type="checkbox"/> Incentive Program                | <input type="checkbox"/> Refund / Adjust / Reimburse |   |

DELIVER CHECK TO PAYEE x - OR -  
OTHER - SPECIAL HANDLING INSTRUCTIONS RETURN TO  
DEPT LOCATION PHONE

RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
31	N13	00NG41	406	9210K	K02915	N13	31	\$186,142

ACCOUNTS PAYABLE APPROVAL DATE 01/20/09



# KeySpan Check Request Form

Niagara Mohawk Power Corporation  
dba National Grid  
Case 10-E-0050  
DAG-13 Attachment 4  
Page 29 of 80  
Public Version

DATE October 27, 2008 INVOICE # US0123793198  
CHECK AMOUNT \$ 157,274.00 DATE CHECK REQUIRED ASAP  
PAYABLE TO Ernst & Young TAX ID# 34-6565596  
Bank of America - Chic. 91251 CORPORATION (Y/N) \_\_\_\_\_  
PO Box 91251 SUPPLIER # \_\_\_\_\_  
Chicago, IL 60693

REASON FOR CHECK E&Y Balance Sheet and Cash Flow Reporting & Forecasting Support

REQUESTED BY (Print) Doug Meyer EMPLOYEE # 16888  
REQUESTED BY (Signature) Doug Meyer DEPARTMENT Corp. Budget  
PHONE # 718-403-2782

APPROVED BY	EMPLOYEE#	SIGNATURE
Andrew Sloey	06426	<i>[Signature]</i>

LOCATION OF SERVICE (Requestor Circle One) NYC MA NH Other State \_\_\_\_\_  
Nassau Glen Cove  
Suffolk Long Beach

## NON PURCHASE ORDER CATEGORY (Requestor Check One):

<input type="checkbox"/> Advertising	<input type="checkbox"/> Inspection / Insurance	<input type="checkbox"/> R & D Initiative
<input type="checkbox"/> Awards / Gifts	<input type="checkbox"/> Legal Professional Services	<input type="checkbox"/> 'Satisfaction Program' Reimbursement
<input type="checkbox"/> Bank / Escrow / Rating Agencies	<input type="checkbox"/> Legal / Settlement / Claim	<input type="checkbox"/> Subscription
<input type="checkbox"/> Catering	<input type="checkbox"/> Marketer Bill	<input type="checkbox"/> Summons / DMV / Tolls
<input type="checkbox"/> Charitable / Sponsorship	<input type="checkbox"/> Parking	<input type="checkbox"/> Tax Payment / Assessments
<input type="checkbox"/> Dues / Fees	<input type="checkbox"/> Payments on behalf of LIPA	<input type="checkbox"/> Training Course / Registrations / Seminar
<input type="checkbox"/> Freight / Fed Ex / UPS / Postage	<input type="checkbox"/> Permits	<input type="checkbox"/> Utility Bill or Adjustment
<input type="checkbox"/> Government / Municipality	<input type="checkbox"/> Police / Marshals	<input type="checkbox"/> Other - Exception must be pre-approved by Accounts Payable
<input type="checkbox"/> HR / Medical / Workmen-Comp	<input type="checkbox"/> Rebate Program	<input type="checkbox"/> Consulting
<input type="checkbox"/> Incentive Program	<input type="checkbox"/> Refund / Adjust / Reimburse	<input checked="" type="checkbox"/> Consulting

DELIVER CHECK TO PAYEE ☒ - OR -  
OTHER - SPECIAL HANDLING INSTRUCTIONS \_\_\_\_\_ RETURN TO \_\_\_\_\_  
DEPT \_\_\_\_\_ LOCATION \_\_\_\_\_ PHONE \_\_\_\_\_



LE APPROVAL \_\_\_\_\_ DATE \_\_\_\_\_

INFORMATION: (Requestor must supply this accounting)

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
31	N13	00NG41	406	9210K	K02915	N13	31	\$ 157,274.00

*W. J. J. J.*

10/28/08

# KeySpan Check Request Form

DATE December 17, 2008 INVOICE # US0123850367  
CHECK AMOUNT \$142,700 DATE CHECK REQUIRED  
PAYABLE TO Ernst & Young TAX ID# 34-6565596  
Bank of America- Chlc 91251 CORPORATION (Y/N)  
PO Box 91251 SUPPLIER #  
Chicago, IL 60693

REASON FOR CHECK "Billing for professional services rendered from November 3 -21, 2008 for Balance Sheet & Cash Flow Reporting and Forecasting Support as per our Statement of Work dated November 6, 2008." E&Y 12/11/08

REQUESTED BY (Print) Doug Meyer EMPLOYEE # 16888  
DEPARTMENT Corp. Budget  
REQUESTED BY (Signature) PHONE # 718-403-2782

APPROVED BY	EMPLOYEE#	SIGNATURE
Andrew Slooy	06426	x. (see attached invoice)

LOCATION OF SERVICE (Requestor Circle One) NYC MA NH Other State  
Nassau Glen Cove  
Suffolk Long Beach

## NON PURCHASE ORDER CATEGORY (Requestor Check One):

☐ Advertising ☐ Inspection / Insurance ☐ R & D Initiative  
☐ Awards / Gifts ☐ Legal / Professional Services ☐ 'Satisfaction Program' Reimbursement  
☐ Bank / Escrow / Rating Agencies ☐ Legal / Settlement / Claim ☐ Subscription  
☐ Catering ☐ Marketer Bill ☐ Summons / DMV / Tolls  
☐ Charitable / Sponsorship ☐ Parking ☐ Tax Payment / Assessments  
☐ Dues / Fees ☐ Payments on behalf of LIPA ☐ Training Course / Registrations / Seminar  
☐ Freight / Fed Ex / UPS / Postage ☐ Permits ☐ Utility Bill or Adjustment  
☐ Government / Municipality ☐ Police / Marshals ☐ Other - Exception must be pre-approved  
☐ HR / Medical / Workmen Comp ☐ Rebate Program ☐ by Accounts Payable  
☐ Incentive Program ☐ Refund / Adjust / Reimburse ☒ Consulting

DELIVER CHECK TO PAYEE ☒ - OR -  
OTHER - SPECIAL HANDLING INSTRUCTIONS RETURN TO  
DEPT LOCATION PHONE

RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
31	N13	00NG41	406	9210K	K02815	N13	31	\$142,700

ACCOUNTS PAYABLE APPROVAL DATE 12/20/08



# KeySpan Check Request Form

DATE February 10, 2009 INVOICE # US0130000791  
CHECK AMOUNT \$125,533 DATE CHECK REQUIRED  
PAYABLE TO Ernst & Young TAX ID# 34-6565596  
Bank of America- Chlc 91251 CORPORATION (Y/N)  
PO Box 91251 SUPPLIER #  
Chicago, IL 60693

## REASON FOR CHECK

Engagement Number: 14228021

Billing for professional services rendered from December 22, 2008 through January 30, 2009 for Balance Sheet and Cash Flow Reporting and Forecasting Support (Phase 2) as per our Statement of Work dated November 24, 2008.

REQUESTED BY (Print) Doug Meyer EMPLOYEE # 16888  
DEPARTMENT Corp. Budget  
REQUESTED BY (Signature) PHONE # 718-403-2782

APPROVED BY	EMPLOYEE#	SIGNATURE
Bill Edwards	100027301	x. William F. Edwards

## LOCATION OF SERVICE (Requestor Circle One)

NYC

Nassau Glen Cove  
Suffolk Long Beach

MA

NH

Other  
State

## NON PURCHASE ORDER CATEGORY (Requestor Check One):

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Advertising                      | <input type="checkbox"/> Inspection / Insurance      | <input type="checkbox"/> R & D Initiative                          |
| <input type="checkbox"/> Awards / Gifts                   | <input type="checkbox"/> Legal Professional Services | <input type="checkbox"/> 'Satisfaction Program' Reimbursement      |
| <input type="checkbox"/> Bank / Escrow / Rating Agencies  | <input type="checkbox"/> Legal / Settlement / Claim  | <input type="checkbox"/> Superfund / OSHA / 2503-32                |
| <input type="checkbox"/> Catering                         | <input type="checkbox"/> Marketer Bill               | <input type="checkbox"/> Summons / DMV / Tolls                     |
| <input type="checkbox"/> Charitable / Sponsorship         | <input type="checkbox"/> Parking                     | <input type="checkbox"/> Tax Payment / Assessments                 |
| <input type="checkbox"/> Dues / Fees                      | <input type="checkbox"/> Payments on behalf of LIPA  | <input type="checkbox"/> Training Course / Registrations / Seminar |
| <input type="checkbox"/> Freight / Fed Ex / UPS / Postage | <input type="checkbox"/> Permits                     | <input type="checkbox"/> Utility Bill or Adjustment                |
| <input type="checkbox"/> Government / Municipality        | <input type="checkbox"/> Police / Marshals           | <input type="checkbox"/> Other - Exception must be pre-approved    |
| <input type="checkbox"/> HR / Medical / Workmen Comp      | <input type="checkbox"/> Rebate Program              | <input type="checkbox"/> by Accounts Payable                       |
| <input type="checkbox"/> Incentive Program                | <input type="checkbox"/> Refund / Adjust / Reimburse | <input checked="" type="checkbox"/> Consulting                     |

DELIVER CHECK TO PAYEE ☒ - OR -

OTHER - SPECIAL HANDLING INSTRUCTIONS

RETURN TO

Req. Company	Req. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
31	N13	00NG20	406	9230K	K02932	N13	31	\$125,533

ACCOUNTS PAYABLE APPROVAL  
DEPT

LOCATION

DATE 03/25/09  
PHONE

RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable



NationalGrid Check Request Form

#1355765

DATE 6/18/09 INVOICE # US 01300 781000  
 CHECK AMOUNT \$100,000.00 DATE CHECK REQUIRED 6/24/09  
 PAYABLE TO Ernst & Young TAX ID# 34-656 5596  
P.O. Box 91251 CORPORATION (YIN) Y  
Chicago, IL 60693 SUPPLIER # 0006879

REASON FOR CHECK US Customer + Markets organizational design

REQUESTED BY (Print) William Bollbach EMPLOYEE # 07921  
 REQUESTED BY (Signature) [Signature] DEPARTMENT SVP-HR  
 PHONE # \_\_\_\_\_

ACCOUNTING INFORMATION: (Requestor must supply this accounting)

Project	Task	Expenditure type	Expenditure Organization	Amount
K03000	002031	406	128KCC	\$100,000.00

APPROVED BY	EMPLOYEE#	SIGNATURE
FRED J SURREY	03352	<u>[Signature]</u>

LOCATION OF SERVICE (Requestor Circle One) NYC MA NH Other State \_\_\_\_\_  
 Nassau Glen Cove  
 Suffolk Long Beach

NON PURCHASE ORDER CATEGORY (Requestor Check One):

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Advertising                          | <input type="checkbox"/> Inspection / Insurance      | <input type="checkbox"/> R & D Initiative   |
| <input type="checkbox"/> Awards / Gifts                       | <input type="checkbox"/> Legal Professional Services | <input type="checkbox"/> 'Satisfaction Program' Reimbursement                       |
| <input type="checkbox"/> Bank / Escrow / Rating Agencies      | <input type="checkbox"/> Legal / Settlement / Claim  | <input type="checkbox"/> Subscription   |
| <input type="checkbox"/> Catering                             | <input type="checkbox"/> Marketer Bill               | <input type="checkbox"/> Summons / DMV / Tolls                                      |
| <input type="checkbox"/> Charitable / Sponsorship             | <input type="checkbox"/> Parking                     | <input type="checkbox"/> Tax Payment / Assessments                                  |
| <input type="checkbox"/> Dues / Fees                          | <input type="checkbox"/> Payments on behalf of LIPA  | <input type="checkbox"/> Training Course / Registrations / Seminar                  |
| <input type="checkbox"/> Freight / Fed Ex / UPS / Postage     | <input type="checkbox"/> Permits                     | <input type="checkbox"/> Utility Bill or Adjustment                                 |
| <input checked="" type="checkbox"/> Government / Municipality | <input type="checkbox"/> Police / Marshals           | <input type="checkbox"/> Other - Exception must be pre-approved by Accounts Payable |
| <input type="checkbox"/> HR / Medical / Workmen Comp          | <input type="checkbox"/> Rebate Program              |   |
| <input type="checkbox"/> Incentive Program                    | <input type="checkbox"/> Refund / Adjust / Reimburse |   |

DELIVER CHECK TO PAYEE \_\_\_\_\_ - OR -  
 OTHER - SPECIAL HANDLING INSTRUCTIONS \_\_\_\_\_ RETURN TO \_\_\_\_\_  
 DEPT \_\_\_\_\_ LOCATION \_\_\_\_\_ PHONE \_\_\_\_\_

RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable.

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
								\$

ACCOUNTS PAYABLE APPROVAL [Signature] DATE 6/22/09



Sq # 1296388

# Invoice

**Sold To:**

NATIONAL GRID  
 ACCOUNTS PAYABLE  
 ONE METROTECH CENTER  
 BROOKLYN NY 11201

Invoice No.: 93978457  
Invoice Date: 08 Sep 2008  
Customer No.: 165669  
Order No.: 70353543  
Delivery No.:  
P.O. Date:  
Customer P.O. No.: 498623

**Ship To:**

NATIONAL GRID  
ACCOUNTS PAYABLE  
ONE METROTECH CENTER  
BROOKLYN NY 11201

**Your Contact Person: Customer Service**  
**Telephone No.: 800-672-2222**

**Fax No.: 800-967-0398**

PAGE 1 - 3

Date Shipped	Shipped via	Bill of lading No.	Terms of Shipment	Terms of Payment			
08 Sep 2008			FOB DEST/PPD/A	NET 30 DAYS			
Item	Qty	UM	Mat No.	Description	% Batch Qty	Unit Price	Net Price
EFTA							
10		EA	10095066	CAP,V-GD,W/RATCHET,STD,WHT,NATIONAL GRID sim to 475358 white v-gard cap, except to have NATIONAL GRID logo BL 21996 on front and American Flag BL 30345 on the left side and blue National Grid stripe that goes 3/4 the way around the helmet.			66,518.40
20		EA	10095063				11,116.80

ACCTG.PAY 0349R 6pm 6156



Over  $\rightarrow$   
2/6 @

MAR-30-2009 11:54

KEYSPAN

Niagara Mohawk Power Corporation  
 dba National Grid  
 Case 10-E-00002  
 DAG-13 Attachment 4  
 Page 34 of 40  
 Public Version

Mine Safety Appliances Company  
 PO Box 426  
 Pittsburgh, PA 15230-0426  
 D-U-N-S 00-432-1885  
 FEI 28-0868780

TO - Dominic Bryan.  
 516 545 4715  
 From Steve Byler

Corrected Invoice BATCH-REB09MAR2009  
 VOUCHER-1296354

**Sold To**  
**11201**  
 NATIONAL GRID  
 ACCOUNTS PAYABLE  
 ONE METROTECH CENTER  
 BROOKLYN NY 11201

Invoice No.: 94199221 \*  
 Invoice Date: 19 Mar 2009  
 Customer No.: 165689  
 Order No.: 70359976  
 Delivery No.:  
 P.O. Date:

Customer P.O. No.: 486270

Ship To:  
 NATIONAL GRID  
 ACCOUNTS PAYABLE  
 ONE METROTECH CENTER  
 BROOKLYN NY 11201

Your Contact Person: Customer Service  
 Telephone No.: 800-672-2222

Fax No.: 800-967-0398

PAGE 1 - 3

Date Shipped	Shipped via	Bill of lading No.	Terms of Shipment	Terms of Payment			
			FOB DEST/PPD/A	NET 30 DAYS			
Item	Qty	UM	Mat No.	Description	%	Unit Price	Net Price
EFTA					Batch Qty		
APPLIES TO INVOICE 93978455							
MSA 70353541							
10		EA	10095068	CAP,V-GD,W/RATCHET,STD,WHT,NATIONAL GRID			87,204.00





# KeySpan Check Request Form

DATE 1/13/09 INVOICE # 4291  
CHECK AMOUNT \$125,000.00 DATE CHECK REQUIRED Upon Receipt  
PAYABLE TO M.J. Bradley & Associates, LLC TAX ID# 28-2840513  
47 Junction Square Drive CORPORATION (Y/N) Y  
Concord, MA 01742 SUPPLIER #

REASON FOR CHECK Advocacy activities associated w/ Clean Energy Group's legislative initiative, including funding for full-time legislative assistance & technical/policy analysis & communication issues for Jan-Dec 2009.

REQUESTED BY (Print) Margaret A. Alfelda EMPLOYEE # 100045930  
REQUESTED BY (Signature) *Margaret A. Alfelda* DEPARTMENT 042  
PHONE # 202-783-7959

## ACCOUNTING INFORMATION: (Requestor must supply this accounting)

Project	Task	Expenditure type	Expenditure Organization	Amount
K00208	2031	406	155	\$125,000.00
APPROVED BY		EMPLOYEE#	SIGNATURE	
Richard A. Carter		16786	<i>[Signature]</i>	

LOCATION OF SERVICE (Requestor Circle One) NYC MA NH Other State DC  
Nassau Glen Cove  
Suffolk Long Beach

## NON PURCHASE ORDER CATEGORY (Requestor Check One):

Advertising ☐ Inspection / Insurance ☐ R & D Initiatives ☐  
Awards / Gifts ☐ Legal Professional Services ☒ Satisfaction Program/ Reimbursement ☐  
Bank / Escrow/ Rating Agencies ☐ Legal / Settlement / Claim ☐ Subscription ☐  
Catering ☐ Marketing Btl ☐ Summons / DMV / Tolls ☐  
Charitable / Sponsorship ☐ Parking ☐ Tax Payment / Assessments ☐  
Dues / Fees ☐ Payments on behalf of LPA ☐ Training Course / Registrations/ Seminar ☐  
Freight / Fed Ex / UPS / Postage ☐ Permits ☐ Utility Btl or Adjustment ☐  
Government / Municipality ☐ Police / Marshals ☐ Other - Exception must be pre-approved by Accounts Payable ☐  
HR / Medical / Workmen Comp ☐ Robote Program ☐  
Incentive Program ☐ Refund / Adjust / Reimburse ☐

DELIVER CHECK TO PAYEE - OR - RETURN TO Rick Carter, VP, Fed. Govt. Relations,  
OTHER - SPECIAL HANDLING INSTRUCTIONS 633 Pennsylvania Ave, NW, 6th Floor,  
Washington, DC 20004  
DEPT Federal Affairs LOCATION Washington, DC PHONE 202-783-7959

## RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
								\$



ROVAL *[Signature]* DATE 01/21/09

# KeySpan Check Request Form

DATE 12/3 8/13/08 INVOICE # 3112  
CHECK AMOUNT \$100,000.00 DATE CHECK REQUIRED NEXT RUN  
PAYABLE TO M.J. Bradley & Associates TAX ID# 04-3245712  
47 Junction Square Drive CORPORATION (Y/N) Y  
Concord, MA 01742 SUPPLIER # 42844

CEG Integrated Strategy - 2008

REASON FOR CHECK

REQUESTED BY (Print) Robert McMaster EMPLOYEE # (temp)  
REQUESTED BY (Signature) [Signature] DEPARTMENT External Affairs  
PHONE # 718-403-3316

ACCOUNTING INFORMATION: (Requestor must supply this accounting)

Project	Task	Expenditure type	Expenditure Organization	Amount
K00208	2031	406	155	\$100,000.00

APPROVED BY	EMPLOYEE#	SIGNATURE
David Manning EVP, U.S. External Affairs	08343	<u>[Signature]</u>

LOCATION OF SERVICE  
(Requestor Circle One)

National

NYC

Nassau Glen Cove  
Suffolk Long Beach

MA

NH

Other  
State

NON PURCHASE ORDER CATEGORY (Requestor Check One):

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Advertising                      | <input type="checkbox"/> Inspection / Insurance      | <input type="checkbox"/> R & D Initiative   |
| <input type="checkbox"/> Awards / Gifts                   | <input type="checkbox"/> Legal Professional Services | <input type="checkbox"/> Satisfaction Program / Reimbursement                                     |
| <input type="checkbox"/> Bank / Escrow / Rating Agencies  | <input type="checkbox"/> Legal / Settlement / Claim  | <input type="checkbox"/> Subscription   |
| <input type="checkbox"/> Catering                         | <input type="checkbox"/> Marketer Bill               | <input type="checkbox"/> Summons / DMV / Tolls  |
| <input type="checkbox"/> Charitable / Sponsorship         | <input type="checkbox"/> Parking                     | <input type="checkbox"/> Tax Payment / Assessments  |
| <input type="checkbox"/> Dues / Fees                      | <input type="checkbox"/> Payments on behalf of LIPA  | <input type="checkbox"/> Training Course / Registrations / Seminar                                |
| <input type="checkbox"/> Freight / Fed Ex / UPS / Postage | <input type="checkbox"/> Permits                     | <input type="checkbox"/> Utility Bill or Adjustment   |
| <input type="checkbox"/> Government / Municipality        | <input type="checkbox"/> Police / Marshals           | <input checked="" type="checkbox"/> Other - Exception must be pre-approved<br>by Accounts Payable |
| <input type="checkbox"/> HR / Medical / Workmen Comp      | <input type="checkbox"/> Rebate Program              | EVENT PLANNING SERVICES   |
| <input type="checkbox"/> Incentive Program                | <input type="checkbox"/> Refund / Adjust / Reimburse |   |

DELIVER CHECK TO PAYEE OR

OTHER - SPECIAL HANDLING INSTRUCTIONS

RETURN TO

ACCTS.PAY 08DEC5PM1205

DEPT

LOCATION

PHONE

RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
								\$

ACCOUNTS PAYABLE APPROVAL

[Signature]

DATE

12/05/08

## KeySpan Check Request Form

DATE March 23, 2009 INVOICE # \_\_\_\_\_  
CHECK AMOUNT \$171,139.83 DATE CHECK REQUIRED May 1, 2009  
PAYABLE TO Moody's Analytics TAX ID# \_\_\_\_\_  
405 Howard Street CORPORATION (Y/N) \_\_\_\_\_  
San Francisco, CA 94105 SUPPLIER # 852223  
Attention: SuLee Smith

REASON FOR CHECK CreditEdge, RiskCalc and Redistribution fees (for 05/01/09 to 04/30/10)

REQUESTED BY (Print) Eboni Troupe EMPLOYEE # 16423  
REQUESTED BY (Signature) Eboni Troupe DEPARTMENT Treasury  
PHONE # 516-545-3122

APPROVED BY	EMPLOYEE#	SIGNATURE
Alexander Zhukovsky	99050	<i>Alexander Zhukovsky</i>
Lorraine M. Lynch	09803	<i>Lorraine M. Lynch</i>

LOCATION OF SERVICE (Requestor Circle One) NYC MA NH Other State  
Nassau Glen Cove 10073  
Suffolk Long Beach

### NON PURCHASE ORDER CATEGORY (Requestor Check One):

<input type="checkbox"/> Advertising	<input type="checkbox"/> Inspection / Insurance	<input type="checkbox"/> R & D Initiative
<input type="checkbox"/> Awards / Gifts	<input type="checkbox"/> Legal Professional Services	<input type="checkbox"/> 'Satisfaction Program' Reimbursement
<input type="checkbox"/> Bank / Escrow / Rating Agencies	<input type="checkbox"/> Legal / Settlement / Claim	<input checked="" type="checkbox"/> Subscription
<input type="checkbox"/> Catering	<input type="checkbox"/> Marketer Bill	<input type="checkbox"/> Summons / DMV / Tolls
<input type="checkbox"/> Charitable / Sponsorship	<input type="checkbox"/> Parking	<input type="checkbox"/> Tax Payment / Assessments
<input type="checkbox"/> Dues / Fees	<input type="checkbox"/> Payments on behalf of LIPA	<input type="checkbox"/> Training Course / Registrations / Seminar
<input type="checkbox"/> Freight / Fed Ex / UPS / Postage	<input type="checkbox"/> Permits	<input type="checkbox"/> Utility Bill or Adjustment
<input type="checkbox"/> Government / Municipality	<input type="checkbox"/> Police / Marshals	<input type="checkbox"/> Other - Exception must be pre-approved by Accounts Payable
<input type="checkbox"/> HR / Medical / Workmen Comp	<input type="checkbox"/> Rebate Program	
<input type="checkbox"/> Incentive Program	<input type="checkbox"/> Refund / Adjust / Reimburse	

DELIVER CHECK TO PAYEE Yes - OR -  
OTHER - SPECIAL HANDLING INSTRUCTIONS RETURN TO  
DEPT \_\_\_\_\_ LOCATION \_\_\_\_\_ PHONE \_\_\_\_\_

### ACCOUNTING INFORMATION: (Requestor must supply this accounting)

Rec. Company	Rec. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
	033	002004	310		K00101			\$171,139.83



1314286

APPROVAL [Signature] DATE 04/08/09

Tax ID#: 04-3715193

**Praxis**  
RESEARCH PARTNERS

Praxis Research Partners, LLC

PO Box 586  
Monroe, CT 06468

(203)445-0166

DATE

06/08/2009

INVOICE #

3362

TERMS

Due on receipt

P.O. # 5623P7

## BILL TO

National Grid  
1 Metro Tech Center  
Brooklyn, NY 11201

Contract # 551191

Activity	Amount
• First 50% of the Conversion/Energy Services Tracking (Total project price = \$250,000)	125,000.00
<p>OK to pay J. Ewert 6/29/2009.</p> <p>169 KCC-K04138-002647</p> <p><i>[Signature]</i></p> <p>07-28-09A10:45 RCVD</p>	
<b>TOTAL</b>	<b>\$125,000.00</b>

Thank you.



1374467

# NationalGrid Check Request Form

DATE 3/9/09 INVOICE # STA11574-0209  
CHECK AMOUNT \$201,062.69 DATE CHECK REQUIRED 3/11/09  
PAYABLE TO TOWERS PERRIN TAX ID# 23-1159360  
P.O. Box 8500 S-6110 CORPORATION (Y/N) Y  
Philadelphia, PA 19178-6110 SUPPLIER # 4564

REASON FOR CHECK Consulting Services Related to 2009 Medical + Dental Scope of Work  
REQUESTED BY (Print) MAUREEN HENPHY EMPLOYEE # 05126  
DEPARTMENT HR-EXEC  
REQUESTED BY (Signature) \_\_\_\_\_ PHONE # \_\_\_\_\_

## ACCOUNTING INFORMATION: (Requestor must supply this accounting)

Project	Task	Expenditure type	Expenditure Organization	Amount
K00076	002975	406	045 KCC	\$201,062.69

APPROVED BY	EMPLOYEE#	SIGNATURE
FRED J SURREY	03352	<i>[Signature]</i>

LOCATION OF SERVICE (Requestor Circle One) NYC MA NH Other State  
Nassau Glen Cove  
Suffolk Long Beach

## NON PURCHASE ORDER CATEGORY (Requestor Check One):

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Advertising                          | <input type="checkbox"/> Inspection / Insurance      | <input type="checkbox"/> R & D Initiative   |
| <input type="checkbox"/> Awards / Gifts                       | <input type="checkbox"/> Legal Professional Services | <input type="checkbox"/> 'Satisfaction Program' Reimbursement                       |
| <input type="checkbox"/> Bank / Escrow / Rating Agencies      | <input type="checkbox"/> Legal / Settlement / Claim  | <input type="checkbox"/> Subscription   |
| <input type="checkbox"/> Catering                             | <input type="checkbox"/> Marketer Bill               | <input type="checkbox"/> Summons / DMV / Tolls                                      |
| <input type="checkbox"/> Charitable / Sponsorship             | <input type="checkbox"/> Parking                     | <input type="checkbox"/> Tax Payment / Assessments                                  |
| <input type="checkbox"/> Dues / Fees                          | <input type="checkbox"/> Payments on behalf of LIPA  | <input type="checkbox"/> Training Course / Registrations / Seminar                  |
| <input type="checkbox"/> Freight / Fed Ex / UPS / Postage     | <input type="checkbox"/> Permits                     | <input type="checkbox"/> Utility Bill or Adjustment                                 |
| <input checked="" type="checkbox"/> Government / Municipality | <input type="checkbox"/> Police / Marshals           | <input type="checkbox"/> Other - Exception must be pre-approved by Accounts Payable |
| <input type="checkbox"/> HR / Medical / Workmen Comp          | <input type="checkbox"/> Rebate Program              |   |
| <input type="checkbox"/> Incentive Program                    | <input type="checkbox"/> Refund / Adjust / Reimburse |   |

DELIVER CHECK TO PAYEE \_\_\_\_\_ - OR -  
OTHER - SPECIAL HANDLING INSTRUCTIONS \_\_\_\_\_ RETURN TO \_\_\_\_\_  
DEPT \_\_\_\_\_ LOCATION \_\_\_\_\_ PHONE \_\_\_\_\_

## RESTRICTED USE: Only supply 8-segment accounting if 4-segment project information is unavailable

Req. Company	Req. Cost Center	Activity	Cost Type	GL Acct	Project	Prov. Cost Center	Prov. Company	Amount
								\$



BLE APPROVAL *[Signature]* DATE 03/09/09

**UTILITIES**  
International Inc.

161 N. Clark Street, Suite 3400  
Chicago, Illinois 60601

Telephone: 312.580.6200  
Facsimile: 312.536.6212

<http://www.utlinc.com>

Niagara Mohawk Power Corporation  
dba National Grid  
Case 10-E-0050  
DAG-13 Attachment 4  
Page 40 of 40  
Public Version

## INVOICE

To: National Grid  
Accounts Payable  
Department K  
300 Erie Blvd West  
Syracuse, NY 13202

Date: August 31, 2009

Invoice: NGGPOC908

RE: Consulting Services for August 2009  
Proof of Concept  
PO #: 562419  
Tax ID #: 36-3940239

Professional Fees

Less:

Less:

Professional Fees Due

\*Travel Expenses Due

Amount Due to Utilities International, Inc.

**\$128,609.26**

Terms: 2% 10, Net 30

\*Travel expenses incurred on August 30th and 31st will be invoice in September

Date of Request: March 18, 2010  
Due Date: March 29, 2010

Request No. RAV-60  
NMPC Req. No. NM 295 DPS 167

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirement Panel

Request

Regarding Exhibit RRP-5, Summary, please provide the following information:

A. Fully explain why a rate year federal income tax deduction was not taken for "dividends paid on certain preferred stock of public utilities." Include the actual federal income tax deduction for this item for each of the past three fiscal years, split between electric and gas. If rate year deductions should have been forecasted, provide the amount, along with the supporting calculation and explanation as to how the amount was derived.

B. Fully explain why rate year federal income tax credits were not taken for each of the following items:

a. Federal tax paid on fuels

b. Empowerment zone and renewal community employment credit. Include the actual federal income tax credits for each of the past three fiscal years, split between electric and gas. If rate year tax credits should have been forecasted for any or all of the above potential tax credits, provide the amounts, along with supporting calculations and explanations as to how the amounts were derived.

C. 1. Fully explain the \$375,000 DFIT reversal for "V-M Book Gain Amortization." Include supporting information / calculations on how and when the ADFIT was initially set-up and explain how you arrived at the reversal amortization duration (i.e., number of years).

2. Fully explain how the V-M book gain itself (i.e., not the taxes on the gain, but the book gain) was initially accounted for and the ratemaking that was / is being afforded the V-M book gain. Include in your explanation supporting Commission Orders that discuss the ratemaking for the book gain.

3. Fully explain how the amortization of the V-M book gain itself is reflected in the rate year forecasts. If it is not reflected, explain why not and also address the apparent mismatch of requiring ratepayers to pay the taxes on the gain, but not receive credit for the gain.

D. Fully explain and provide supporting calculations for the \$29,837,143 tax depreciation adjustment in the "Deferrable basis" column of Exhibit RRP-5, Summary (in the supporting Excel spreadsheets, this amount is hardwired).

E. 1. Provide the supporting workpapers and calculations for the \$10,000,000 rate year "flow thru effect" adjustment on line 12 of tab "ADIT Calculation" of "ADIT and M's for 9-09 to 2013.xls." Include an explanation of what this adjustment represents and why it is necessary.

2. Provide the actual "flow thru effect" adjustment for each of the past 3 fiscal years or calendars years, whichever is easier to identify. Break out the amounts between electric, gas, and total. Include supporting tax return workpapers to show how the amounts were derived.

F. Fully explain the theory / rationale behind the calculation of "Federal DIT

Change on Depreciation" on line 13 of tab "ADIT Calculation" of "ADIT and M's for 9-09 to 2013.xls" and how it ties in to the aforementioned "flow thru effect" adjustment on line 12.

G. Provide the "tax depreciation per power tax reports" for 9-09 through 2011 for both federal and NYS tax purposes.

H. Provide actuals for 9-08 to 8-09 in the same format as lines 8 – 13 of tab

"ADIT Calculation" of "ADIT and M's for 9-09 to 2013.xls.").

Response:

A. The history of the last 3 fiscal years' deductions for dividends paid on certain preferred stock of public utilities is as follows:

	<u>Deduction</u>	<u>Tax Benefit</u>	<u>Electric</u>	<u>Gas</u>
Fiscal year ended 3/31/07	423,878	148,357	128,077	20,280
Fiscal year ended 3/31/08	423,954	148,384	128,100	20,284
Fiscal year ended 3/31/09	424,199	148,470	128,174	20,296

Since the dividends paid out on preferred stock remain consistent, a good estimate of the tax benefit for the future would be \$128,100 for Electric and \$20,300 for gas. A deduction was not taken on the rate year federal income tax calculation for this item in order to remain consistent with the treatment of the item in the Merger Joint Proposal.

B. a. Federal Tax Paid on Fuels

The history of the last 3 years' credits for federal tax paid on fuels is as follows:

Fiscal year ended 3/31/07	60,832
Fiscal year ended 3/31/08	54,516
Fiscal year ended 3/31/09	60,113

This item is allocated 100% to the electric business. For federal tax return purposes, the Company is allowed either the credit on fuels tax or the deduction. Assuming the amount remains fairly consistent, year on year, a rate calculation would be as follows:



Disallowance of tax deduction for federal fuels tax	\$61,000
Permanent Tax Impact of disallowance	21,350
Fuels Tax Credit	(61,000)
Net Tax Benefit	(39,650)

b. Empowerment Zone and Renewal Community Zone Credits

The history of the last 3 years' credits for these payroll credits is as follows:

	<u>Empowerment</u>	<u>Renewal</u>	<u>Electric</u>	<u>Gas</u>
Fiscal year ended 3/31/07	39,000	3,000	22,410	4,590
Fiscal year ended 3/31/08	142,539	10,000	126,607	25,932
Fiscal year ended 3/31/09	88,899	446,233	444,160	90,972

The Renewal Community Employment Credit is a credit that expired for wages paid after December 31, 2009, so the item will not be included in the rate year federal income tax calculations. For the Empowerment Zone Employment Credit, an appropriate method would be an average of the prior three years actual results. Similar to the fuel tax credit, the wage expense would have to be reduced by the credit taken. The calculation is as follows:

Disallowance of tax deduction for wages	\$90,146
Permanent Tax Impact of disallowance	31,551
Empowerment Zone Credit	(90,146)
Net Tax Benefit	(58,595)

C. To be provided by May 14, 2010.

D. The Company's estimate for flowthru on depreciation for the rate case years was \$10,000,000. In the tax expense exhibits, the combination of the net FIT expense for book depreciation and net FIT expense for tax depreciation should approximate that \$10,000,000 amount. The book and tax depreciation schedule M amounts are calculated elsewhere in the exhibits. The "Deferrable Basis" amount is a number calculated to numerically make the net flowthru amount equal the \$10,000,000.

E. 1. The depreciation related flowthru adjustment used was intended to be the best estimate we had based on the last finalized fiscal year, which at the time was the fiscal year ended March 31, 2008. However, a more representative amount for fiscal 2008 would have been \$4,000,000 for the electric business only, rather than the \$10,000,000 of the year before. In the "corrections and updates" process, the company will use the actual fiscal 2009 "flowthru effect" of \$4,135,000 as an estimate for the rate case years. The "flowthru effect" represents the reversal of timing differences related to prior accelerated depreciation that was flowed through as a benefit to the ratepayers in the past. For those older vintages, the book

2. The actual "flowthru effect" of the prior three fiscal years is as follows:

	<u>Electric</u>	<u>Gas</u>	<u>Total</u>
Fiscal Year 3/31/06	3,397,671	1,756,767	5,154,438
Fiscal Year 3/31/07	10,804,416	2,653,235	13,457,651
Fiscal Year 3/31/08	4,066,513	1,274,782	5,341,295

At the time of the initial filing, the actual "flowthru effect" for fiscal year ended March 31, 2009 had not been calculated. Please see the attached file for workpapers to support the "flowthru effect." The Company relies on the PowerTax software application to calculate the annual "flowthru effect" for depreciation. The Company has removed the "flowthru effect" of cost of removal as the "flowthru effect" on cost of removal is calculated through separate amortization schedules.

- F. In the calculation of ADIT related to depreciation, the company starts with the premise that deferred taxes are recorded on the difference between book and tax depreciation expense. That deferred tax is calculated on line 11 of your referenced schedule. Because the Company does not record a debit to the deferred tax liability and credit to deferred tax expense on those older vintages that are considered "flowthru" and explained in E. 1, there is an increase in rate base deferred tax liability as shown on line 12. That amount should be the same as the net "flowthru" charge as seen on the calculation of the tax rate in Exhibit RRP-5.
- G. Please see Attachment A to this information response.
- H. To be provided by May 14, 2010.

Name of Respondent:

Pamela Bushmich

Date of Reply:

April 30, 2010

Date of Request: March 18, 2010  
Due Date: March 29, 2010

Request No. RAv-65  
NMPC Req. No. NM 300 DPS 172

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Infrastructure and Operations Panel

Request

On pages 226-229, you provide a list of expense activities (OPEX) related to infrastructure investment (CAPEX). And, on page 229, you state that you used the 3 year (FY 2007 – FY 2009) historical average of such OPEX to project rate year incremental OPEX. Using the list of activities on those pages, as well as others that might not have been provided in your testimony, for each of the 3 fiscal years, please provide the OPEX by activity by cost component.

Response:

Please refer to Attachment 1 (RAV-65\_Attach 1\_CRE Calculation) for three years of OPEX by activity for distribution, sub-transmission, transmission line and transmission substation. In addition, a summary sheet of the OPEX related to CAPEX calculation is provided.

Name of Respondent:  
Tom Sullivan / Chris Brouillard

Date of Reply:  
March 29, 2010

**OPEX related to CAPEX Summary**

	<b>FY09</b>	<b>FY08</b>	<b>FY07</b>	<b>Average</b>	<b>Rate Used to Project Incremental Opex</b>	<b>Note:</b>
<b>Distribution</b>						
Operating Expenses	13,250,032	18,851,966	18,959,341	17,020,447		
Capital Expenditures	218,775,301	203,009,712	228,901,772	216,895,595		
Ratio O&M to Capital	6.1%	9.3%	8.3%	7.85%	7.89%	(1)
<b>Sub-Transmission (TxD)</b>						
Operating Expenses	1,234,230	894,175	1,103,288	1,077,231		
Capital Expenditures	31,452,853	26,636,741	23,847,679	27,312,424		
Ratio O&M to Capital	3.9%	3.4%	4.6%	3.94%	4.27%	(2)
<b>Transmission Line</b>						
Operating Expenses	4,674,707	2,292,805	879,923	2,615,812		
Capital Expenditures	29,582,143	26,300,357	20,586,875	25,489,792		
Ratio O&M to Capital	15.8%	8.7%	4.3%	10.26%	10.26%	
<b>Transmission Substation</b>						
Operating Expenses	178,099	497,106	181,706	285,637		
Capital Expenditures	37,078,858	36,181,794	24,595,785	32,618,812		
Ratio O&M to Capital	0.5%	1.4%	0.7%	0.88%	0.88%	

(1) Rounding

(2) An error was identified on the original spreadsheet used to calculate the ratio for TxD in FY2009. Project C14082 had \$271k in the CRE column when it should have had \$0. We have checked the file and found no other significant differences. This changes the overall sub-transmission cap related % for FY09 from 4.8% to 3.9%. This change reduces the 3-year CRE % average by only .33%. This percentage change represents a dollar difference of \$158k on the \$48M FY11 capital budget. However, given the increase in the I&M program (which has a higher cap-related expense than most work) and the fact that the test year percentage was 5.23%, the Company believes that 4.27% is still a reasonable budgeted percentage for the FY11-FY15 plan.

Date of Request: March 18, 2010  
Due Date: March 29, 2010

Request No. RAV-66  
NMPC Req. No. NM 301 DPS 173

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Robert Visalli

TO: Revenue Requirement Panel

Request

In response to IR RAV-3, the Company provided a list of existing deferrals/true-ups it wants continued in the rate year 2011 as well as newly proposed deferrals/true-ups it wants in rate year 2011.

- A. For each such deferral/true-up, provide the targeted amount in the Company's rate year forecast to which actuals would be compared. Include an exhibit and page reference for where the amounts can be found.
- B. For each such deferral/true-up, provide the Company's estimate of the amount of variance (\$\$ and %'s) that it deemed likely to occur such that it was necessary to request rate year deferral/true-up mechanisms. Briefly explain how you came up with each of these likely variance amounts and percentages.

Response:

A. Please refer to Attachment 1 to RAV-66 for a listing of deferrals/true-ups and targeted amounts in the Company's rate year forecast to which actuals would be compared. Exhibit and page references are included. This information can also be found in the Company's response to RAV-3 part C.

B. The Company does not project variances for these deferrals. RY levels are the Company's expected spending levels. The likelihood is that spending will fall below or exceed these targeted amounts. For existing deferrals, reconciliation mechanisms have been previously approved in the Merger Joint Proposal in Case 01-M-0075 or in various Commission orders. For newly proposed deferrals, there are various reasons that the Company felt it was necessary to request a rate year deferral/true-up mechanism.

- In light of current economic conditions, the Company has a very limited ability to control expenses such as property taxes, bad debt, and interest on pollution control auction debt.

- In the case of variable pay, the company is not asking customers to fund variable pay that is not actually paid to employees. It is a downward only mechanism.
- The storm deferral was previously approved in the MJP and further refined pursuant to the March 22, 2007 Stipulation of the Parties. The Company requests to establish a storm fund to provide better matching of cost recovery with cost incurrence and to provide a source of funds to respond to these significant events.
- As stated in the pre-filed testimony of Andrew Sloey, page 13, lines 1 through 15, National Grid USA intends to combine or reorganize the existing Service Companies. To the extent that costs increase or decrease to Niagara Mohawk as a result of this change, Niagara Mohawk will reflect the debit or credit in a deferral account. None of the Service Companies have been restructured at this time.
- The Company is committed to providing safe, reliable, environmentally sound service and the need for investment in the company's infrastructure is significant and increasing. The Company requests to track its actual annual Capital investment expenditures and to reconcile the difference annually with a proposed 10% cap for amounts over the target. As explained in the pre-filed testimony of the Infrastructure and Operations Panel, pages 175 through 177, this mechanism will protect customers and will provide the Company with the necessary flexibility to respond to unforeseen circumstances that may warrant significant capital investments that are in the best interest of its customers.

Name of Respondent:  
James Molloy  
Peter Zschokke

Date of Reply:  
March 25, 2010

**NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID**  
**Rate Allowances for Deferral Mechanisms**  
**Electric Only**  
**(000's)**

		Reference	Rate Allowance
<b>Pension</b>			
Rate Year 1	December 31, 2011	Exhibit RRP-2, Schedule 24	\$ 50,769.4
Rate Year 2	December 31, 2012	Exhibit RRP-2, Schedule 24	\$ 44,562.2
Rate Year 3	December 31, 2013	Exhibit RRP-2, Schedule 24	\$ 35,759.6
<b>OPEB</b>			
Rate Year 1	December 31, 2011	Exhibit RRP-2, Schedule 19	\$ 108,946.3
Rate Year 2	December 31, 2012	Exhibit RRP-2, Schedule 19	\$ 92,541.4
Rate Year 3	December 31, 2013	Exhibit RRP-2, Schedule 19	\$ 83,233.8
<b>SIR</b>			
Rate Year 1	December 31, 2011	Exhibit RRP-2, Schedule 40	\$ 29,750.0
Rate Year 2	December 31, 2012	Exhibit RRP-2, Schedule 40	\$ 29,750.0
Rate Year 3	December 31, 2013	Exhibit RRP-2, Schedule 40	\$ 29,750.0
<b>Storm Costs</b>			
Rate Year 1	December 31, 2011	Infrastructure & Operations Panel Testimony; Pages 234 lines 14 -20	\$ 6,000.0
Rate Year 2	December 31, 2012	Infrastructure & Operations Panel Testimony; Pages 234 lines 14 -20	\$ 6,000.0
Rate Year 3	December 31, 2013	Infrastructure & Operations Panel Testimony; Pages 234 lines 14 -20	\$ 6,000.0
<b>Low Income</b>			
Rate Year 1	December 31, 2011	Exhibit RLW-4	\$ 14,538.0
Rate Year 2	December 31, 2012	Exhibit RLW-4	\$ 14,538.0
Rate Year 3	December 31, 2013	Exhibit RLW-4	\$ 14,538.0
<b>Economic Development</b>			
Rate Year 1	December 31, 2011	RDCM Testimony	\$ 44,363.1
Rate Year 2	December 31, 2012	RDCM Testimony	\$ 44,363.1
Rate Year 3	December 31, 2013	RDCM Testimony	\$ 44,363.1
<b>Transmission Revenue Adjustment Charge</b>			
Rate Year 1	December 31, 2011	Design Cust & Markets Panel; line 1 through 12, page 87 of 131	\$ 132,128.8
Rate Year 2	December 31, 2012	Design Cust & Markets Panel; line 1 through 12, page 87 of 131	\$ 137,808.6
Rate Year 3	December 31, 2013	Design Cust & Markets Panel; line 1 through 12, page 87 of 131	\$ 143,282.7
<b>Capital Investment Tracker</b>			
Rate Year 1	December 31, 2011	Exhibit (RRP-8); Schedule 1; Sheet 1 of 8	\$ 502,005.0
Rate Year 2	December 31, 2012	Exhibit (RRP-8); Schedule 1; Sheet 1 of 8	\$ 553,547.0
Rate Year 3	December 31, 2013	Exhibit (RRP-8); Schedule 1; Sheet 1 of 8	\$ 611,327.0
<b>Bad Debt</b>			
Rate Year 1	December 31, 2011	RDCM-1; Schedule 4, line 93	\$ 19,104.0
Rate Year 2	December 31, 2012		\$ -
Rate Year 3	December 31, 2013		\$ -
<b>Property Taxes</b>			
Rate Year 1	December 31, 2011	Exhibit RRP-4, Schedule 1	\$ 141,781.0
Rate Year 2	December 31, 2012	Exhibit RRP-4, Schedule 1	\$ 150,892.3
Rate Year 3	December 31, 2013	Exhibit RRP-4, Schedule 1	\$ 162,554.7
<b>Variable Pay</b>			
Rate Year 1	December 31, 2011	Exhibit RRP-2, Schedule 31, sheet 6, line 10 - Exhibit RRP-10, for RRP-2, Schedule 31, Workpaper 14, sheet 1, line 2, col h	\$ 19,156.5
Rate Year 2	December 31, 2012	Exhibit RRP-2, Schedule 31, sheet 6, line 21 - Exhibit RRP-10, for RRP-2, Schedule 31, Workpaper 14, sheet 1, line 3, col h	\$ 19,720.0
Rate Year 3	December 31, 2013	Exhibit RRP-2, Schedule 31, sheet 6, line 32 - Exhibit RRP-10, for RRP-2, Schedule 31, Workpaper 14, sheet 1, line 4, col h	\$ 20,282.8
<b>Interest on Pollution Control Auction Debt</b>			
Rate Year 1	December 31, 2011	Exhibit (AED-1); Schedule 1; Page 1 & Schedule 2 page 1	\$ 29,593.0
Rate Year 2	December 31, 2012	Exhibit (AED-1); Schedule 2; Page 2	\$ 44,878.0
Rate Year 3	December 31, 2013	Exhibit (AED-1); Schedule 2; Page 3	\$ 58,101.0
* before electric allocation factor			
<b>Changes to Service Company Allocation Methodology</b>			
Rate Year 1	December 31, 2011	Andrew F. Sloey Testimony; Pages 13 - 14	\$ -
Rate Year 2	December 31, 2012	Andrew F. Sloey Testimony; Pages 13 - 14	\$ -
Rate Year 3	December 31, 2013	Andrew F. Sloey Testimony; Pages 13 - 14	\$ -

The following deferrals are handled outside of base rates:  
RPS Program Costs  
NYPA Residential Hydropower Benefit Reconciliation  
SBC Program Cost

New costs are not included in base rates for the following:  
NYISO Tariff Schedule Costs - Schedule 1 and 2  
Generation Stranded Costs  
Exit Fees  
Aggregation Fees  
Voltage Migration Fees

Date of Request: March 19, 2010  
Due Date: March 29, 2010

Request No. DAG-15  
NMPC Req. No. NM 303 DPS 175

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: Denise Gerbsch

TO: Revenue Requirement Panel

Request Exhibit \_\_ (RRP-2) Summary Sheet 1

In the same format as Exhibit \_\_ (RRP-2) Summary Sheet 1, please provide actual operating expenses, by component, for historic years ending (a) 9/30/06; (b) 9/30/07; and (c) 9/30/08.

Response:

Please see Attachment 1 to this response for the operating expenses, by component, for the historic years requested, in the same format as Exhibit \_\_ (RRP-2) Summary, Sheet 1.

Name of Respondent:

James M. Molloy

Date of Reply:

March 26, 2010



NIAGARA MOHAWK POWER CORPORATION d/b/a NATIONAL GRID (COMPANY 36)  
Operating Expenses by Component  
Summary  
(\$000's)

Expense Type	Historic Year Ended September 30, 2008 (per books)			Historic Year Ended September 30, 2007 (per books)			Historic Year Ended September 30, 2006 (as Adjusted)		
	Total	Electric	Gas	Total	Electric	Gas	Total	Electric	Gas
<b>Provider Company:</b>									
Niagara Mohawk Power Corp.	\$ 2,607,489.8	\$ 1,897,610.1	\$ 709,879.7	\$ 2,606,126.0	\$ 1,914,607.1	\$ 691,518.8	\$ 2,683,064.5	\$ 1,860,269.9	\$ 822,794.6
National Grid USA Service Co.	249,843.8	219,830.6	30,013.2	227,817.4	197,489.0	30,328.4	174,995.9	152,080.2	22,915.6
All Other Companies	37,110.3	32,080.5	5,029.9	7,589.2	7,098.3	490.9	(15,137.9)	(12,163.8)	(2,974.1)
<b>TOTAL</b>	<b>\$ 2,894,443.9</b>	<b>\$ 2,149,521.2</b>	<b>\$ 744,922.8</b>	<b>\$ 2,841,532.5</b>	<b>\$ 2,119,194.4</b>	<b>\$ 722,338.1</b>	<b>\$ 2,842,922.5</b>	<b>\$ 2,000,186.3</b>	<b>\$ 842,736.1</b>
<b>Operation &amp; Maintenance Expenses:</b>									
<b>Depreciation:</b>									
100	\$ 21,691.7	\$ 21,310.6	\$ 2,381.1	\$ 19,188.5	\$ 16,451.4	\$ 2,737.0	\$ 9,845.7	\$ 11,023.9	\$ 1,178.2
110	140,663.5	128,915.8	11,747.7	85,659.7	75,558.8	10,100.9	60,361.8	70,059.5	9,797.7
120	6.7	3.2	1.5	0.4	0.4	0.0	3.5	3.6	0.1
130	11,391.9	9,892.9	1,499.0	8,650.9	7,589.3	1,061.6	6,209.1	7,175.4	966.3
200	6,267.8	5,394.1	875.7	5,822.6	4,940.8	881.8	4,271.4	3,609.7	661.7
300	8,422.4	7,191.6	1,230.8	10,457.6	8,819.0	1,638.7	10,093.5	8,532.1	1,561.4
350	8,697.6	3,810.2	4,887.3	37,581.4	32,613.3	4,968.1	28,079.5	24,741.0	3,338.6
400	29,508.6	26,533.2	2,975.4	30,269.1	27,388.0	2,881.1	29,492.4	27,339.8	1,952.6
500	2.2	2.1	0.1	4.1	2.5	1.5	1.1	1.1	-
A10	(2,755.0)	(2,755.0)	-	(3,024.4)	(3,024.4)	-	(759.4)	-	-
A20	(164.0)	(155.3)	(8.7)	(328.6)	(325.7)	(2.9)	(361.0)	(360.8)	(0.1)
A30	4.0	4.0	12.9	12.9	12.9	-	-	-	-
A40	(412.9)	(455.9)	43.0	83.2	(102.8)	186.0	(303.4)	(303.4)	58.4
A42	92.7	85.9	6.8	492.4	492.4	-	10.7	10.7	-
A50	87.6	77.3	10.3	1,067.8	1,008.2	59.6	771.6	696.2	75.4
A60	(272.2)	(239.2)	(33.0)	308.5	262.8	45.8	(637.8)	(531.5)	(106.3)
A65	1,024.4	856.3	168.1	6,428.4	6,030.2	398.3	4,876.9	4,298.3	578.6
A70	38,239.9	33,012.4	5,227.5	39,521.4	33,769.3	5,752.1	40,273.9	34,457.6	5,816.4
B01	2,975.3	2,486.0	489.4	4,314.4	3,576.1	738.3	2,909.9	2,331.1	578.7
B02	25,463.6	19,920.9	5,542.7	27,468.3	21,672.9	5,795.4	21,976.5	17,168.0	4,808.5
B03	2,433.2	2,057.5	375.8	2,571.9	2,166.5	405.4	2,070.8	1,738.1	332.7
B04	1,283.3	1,130.7	152.6	981.4	892.7	88.7	770.3	706.2	64.1
B05	8,866.9	8,816.3	50.6	59,452.3	48,314.3	11,138.1	24,864.2	21,309.6	3,554.5
B06	6,708.0	5,160.2	1,547.7	6,828.0	6,889.4	(61.4)	6,261.9	6,466.9	(205.0)
B07	4,150.3	3,915.2	235.1	4,256.4	3,548.4	707.9	7,137.5	5,741.6	1,395.8
B08	344.1	293.3	50.7	3,039.0	2,556.3	482.8	(2,945.4)	(2,467.5)	(487.9)
B09	24,385.2	20,301.5	4,083.7	22,108.5	18,842.0	3,266.5	20,458.3	17,675.7	2,782.6
M10	7,184.6	5,981.3	1,203.3	12,698.5	10,431.4	2,267.1	6,582.5	5,570.5	612.0
M20	934.5	760.4	174.1	1,820.5	1,458.4	362.1	1,331.0	1,149.3	118.3
M50	275,864.3	234,833.5	41,030.8	281,679.0	240,095.0	41,584.0	266,641.0	221,937.3	44,703.7
All P's	283,104.4	22,956.1	5,354.3	26,959.4	21,863.2	5,096.2	28,075.5	22,441.7	5,633.8
T10	11,035.6	9,829.9	1,205.7	16,470.0	14,543.4	1,926.5	9,497.9	8,070.6	1,427.3
<b>Insurance &amp; Damages</b>									
Liability Insurance	-	-	-	-	-	-	-	-	-
Other Initiatives	-	-	-	-	-	-	-	-	-
Productivity Adjustment	-	-	-	-	-	-	-	-	-
Rate Case Expense	15,837.3	11,979.3	3,858.0	13,309.6	10,296.2	3,013.3	11,047.4	8,856.8	2,190.6
Regulatory Assessment Fees	18,158.6	18,158.6	-	12,633.1	12,633.1	-	7,086.7	7,086.7	-
Renewable Portfolio Standard	12,391.5	10,224.2	2,167.3	11,523.0	9,355.7	2,167.3	11,958.3	9,789.5	2,168.9
Site Investigation & Remediation Expenses	-	-	-	-	-	-	-	-	-
Storm Fund	-	-	-	-	-	-	-	-	-
Synergy Savings	44,803.2	44,803.2	-	44,768.2	44,768.2	-	40,796.4	40,796.4	-
System Benefits Charge	86,340.6	62,198.6	24,142.0	70,007.7	49,670.7	20,337.0	43,936.0	30,943.2	12,992.8
Uncollectible Accounts	-	-	-	-	-	-	-	-	-
Sub Total - Departmental	\$ 841,987.3	\$ 719,313.0	\$ 122,674.3	\$ 865,085.1	\$ 735,070.3	\$ 130,014.8	\$ 714,646.7	\$ 605,990.4	\$ 108,656.3
<b>Non-Departmental Items:</b>									
Purchased Power/Gas	\$ 2,052,456.6	\$ 1,430,208.1	\$ 622,248.5	\$ 1,976,447.5	\$ 1,384,124.2	\$ 592,323.3	\$ 2,128,275.8	\$ 1,394,195.9	\$ 734,079.9
Sub Total - Non-Departmental	\$ 2,052,456.6	\$ 1,430,208.1	\$ 622,248.5	\$ 1,976,447.5	\$ 1,384,124.2	\$ 592,323.3	\$ 2,128,275.8	\$ 1,394,195.9	\$ 734,079.9
<b>TOTAL</b>	<b>\$ 2,894,443.9</b>	<b>\$ 2,149,521.2</b>	<b>\$ 744,922.8</b>	<b>\$ 2,841,532.5</b>	<b>\$ 2,119,194.4</b>	<b>\$ 722,338.1</b>	<b>\$ 2,842,922.5</b>	<b>\$ 2,000,186.3</b>	<b>\$ 842,736.1</b>

Date of Request: March 22, 2010  
Due Date: April 1, 2010

Request No. DKS-7  
NMPC Req. No. NM 306 DPS 178

NIAGARA MOHAWK POWER CORPORATION d/b/a National Grid

Case 10-E-0050 - Niagara Mohawk Power Corporation d/b/a National Grid  
Electric Rates

Request for Information

FROM: David Shahbazian

TO: Revenue Requirement Panel

Request

1. Exhibit RRP-2, Schedule 32, sheet 1 of 16, shows adjustments to normalize the HTY. For each of the following below, please provide a detailed explanation by activity code, including all supporting workpapers.
  - a) Niagara Mohawk Power Corp -\$4,354.2
  - b) National Grid \$ 1,588.3
2. Exhibit RRP-2, Schedule 32, sheet 2 of 16, shows adjustments to reflect conditions in RY 1. For each of the following below, please provide a detailed explanation by activity code, including all supporting workpapers.
  - a) Niagara Mohawk Power Corp \$ 4,145.2
  - b) National Grid -\$ 148.2
3. Exhibit RRP-2, Schedule 32, sheet 8 of 16, shows Lease expenses for RY1. Please provide the following.

Niagara Mohawk Power Corp.

  - a) Provide the detail showing how the RY1 monthly existing PHH lease cost (\$1,676,390) was calculated. For each item included in the detail, please provide the monthly amount and the lease term.
  - b) Provide the calculation of the monthly PHH leases reaching full amortization credit. Show the number, and type, of vehicle coming off lease.

National Grid USA Service Co.

  - c) Provide the detail showing how the RY1 monthly existing PHH lease cost (\$148,301) was calculated. For each item included in the detail, please provide the monthly amount and the lease term.
  - d) Provide the detail showing how the RY1 monthly New PHH lease cost (\$16, 934) was calculated. For each item included in the detail, please provide the monthly amount and the lease term.

4. Exhibit RRP-2, Schedule 32, sheets 9 & 10 of 16, show the Motor Fuel RY projections for each Company 36, and 99, respectively. In the same format, please provide for each Company, the 2005 – 2009 historical motor fuel consumption in gallons and associated cost. Please also provide the 2010 motor fuel projection in a similar format.

5. Please describe and explain any motor fuel conservation programs / strategy implemented at each Company 36 & 99 over the 2005 – current period. Please provide all cost/benefit analysis and supporting workpapers.

Response:

1. Please refer to Attachment 1 for workpapers detailing HTY normalization adjustments by activity code. Exclusion of labor is the largest component of the NIMO normalization adjustment of -\$4,354.2.

2. Please refer to Attachment 2 for workpapers detailing RY1 normalization adjustments by activity code with an explanation for each adjustment per activity code.

3. Niagara Mohawk Power Corp.

a. Attachment 3a provides a breakdown of the components of the \$1,676,390 RY1 monthly PHH lease cost. Also included in the same attachment is a breakdown of the current lease charge component by each item/ asset id and the lease term of each item.

b. While Exhibit RRP-2, Schedule 32, sheet 8 of 16 shows \$229,536 as PHH leases reaching full amortization, this is incorrect. PHH leases reaching full amortization should have been zero and the \$229,536 should have been on the line titled Replacements – New PHH leases which was zero. This would not result in any change to the rate year. Attachment 3b provides the detail of the New PHH lease forecast. All items are based on a lease term of 84 months.

National Grid USA Service Co.

c. Attachment 3c provides a breakdown of the components of the \$148,301 RY1 monthly PHH lease cost. Also included in the same attachment is a breakdown of the current lease charge component by each item/ asset id and the lease term of each item.

d. Attachment 3d provides a detail of New PHH lease costs of \$16,934 for RY1. All items are based on a lease term of 84 months.

4. Please refer to Attachment 4, Sheets 1 through 5, for 2005 through 2009 historical motor fuel consumption gallons and associated costs provided in the same format as Exhibit RRP-2, Schedule 32, sheets 9 & 10 of 16. Also included in Attachment 4 on Sheet 6 is the 2010 motor fuel projection in the same format.

5. National Grid aims to reduce its greenhouse gas emissions 80% by 2050. The following are ways that Fleet Services has been working towards that goal via motor fuel strategies:

- National Grid works on decreasing its vehicle inventory through identification of under utilized and surplus units in an effort to decrease fuel consumption.
- National Grid maximizes its purchase of bio-diesel for on-site fueling throughout the year, adjusting blends only as necessary because of extreme temperature changes across the state and from season to season.

- National Grid maximizes the purchase of alternatively fueled vehicles when practical for business purposes to decrease consumption of unleaded gasoline and diesel fuels.

In support of these strategies, the Company submits the following attachments. Attachment 5 is the EPA's alternative compliance annual report that was submitted to the DOE for MY09 on December 7, 2009. Attachment 5a is a schedule that shows the decrease of company vehicles from 2006 to 2009.

Name of Respondent:  
Fleet Services Department  
James Molloy

Date of Reply  
April 1, 2009

Niagara Mohawk Power Corp. (Company 00036)						
			Monthly	Annual		
Current Lease Charges (Sept. 2009 Invoice)			\$1,480,301	\$17,763,612		
Lease Invoice Taxes			\$85,932	\$1,031,184		
Current Lease Charges (less taxes)			\$1,394,369	\$16,732,428		
Units Coming off lease FY2010-2011			\$48,839	\$586,068		
FY 2009-2010 replacements (expected prior to 03/2010)			\$318,892	\$3,826,704		
Pending Fleet Additions (expected prior to 03/2010)			\$11,968	\$143,616		
Pending Fleet Reductions			\$0	\$0		
Estimated Lease Payment FY2010-2011			\$1,676,390	\$20,116,680		
Compy	Client Number	Client Asset ID	Invoice Number	SumOfTotal Amount (Charge + Tax)	Lease Term	Asset Category
00036	7167	00425	0005480971	\$16.31	72	CAR
00036	7167	00426	0005480971	(\$103.81)	72	CAR
00036	7167	00439	0005480971	\$16.16	72	CAR
00036	7167	00443	0005480971	\$16.20	72	CAR
00036	7167	00454	0005480971	\$16.20	72	CAR
00036	7167	00455	0005480971	\$16.20	72	CAR
00036	7167	00458	0005480971	\$16.20	72	CAR
00036	7167	00474	0005480971	\$16.06	72	CAR
00036	7167	00476	0005480971	\$16.06	72	CAR
00036	7167	00479	0005480971	\$16.06	72	CAR
00036	7167	00493	0005480971	\$16.20	72	CAR
00036	7167	00494	0005480971	\$16.20	72	CAR
00036	7167	00502	0005480971	\$16.20	72	CAR
00036	7167	00545	0005480971	\$16.20	72	CAR
00036	7167	00583	0005480971	(\$99.44)	72	CAR
00036	7167	00604	0005480971	\$16.31	72	CAR
00036	7167	00618	0005480971	\$16.20	72	CAR
00036	7167	00695	0005480971	\$16.20	50	VAN
00036	7167	00714	0005480971	\$16.06	50	VAN
00036	7167	00725	0005480971	\$16.31	50	PICKUP
00036	7167	00732	0005480971	\$16.20	50	VAN
00036	7167	00744	0005480971	\$16.31	50	VAN
00036	7167	00779	0005480971	\$16.31	72	VAN
00036	7167	00796	0005480971	\$16.20	50	VAN
00036	7167	00961	0005480971	\$16.31	72	VAN
00036	7167	00977	0005480971	\$16.20	72	VAN
00036	7167	01002	0005480971	\$16.20	72	VAN
00036	7167	01013	0005480971	\$16.31	72	VAN
00036	7167	01036	0005480971	(\$138.81)	72	PICKUP
00036	7167	01046	0005480971	\$16.20	72	PICKUP
00036	7167	01047	0005480971	\$16.20	72	VAN
00036	7167	01092	0005480971	\$16.20	72	VAN
00036	7167	01095	0005480971	\$16.31	72	PICKUP
00036	7167	01098	0005480971	\$16.31	72	VAN
00036	7167	01152	0005480971	\$16.31	72	VAN
00036	7167	01174	0005480971	\$16.20	72	PICKUP
00036	7167	01178	0005480971	\$16.31	72	PICKUP
00036	7167	01179	0005480971	\$16.31	72	VAN
00036	7167	01180	0005480971	\$16.31	72	VAN
00036	7167	01181	0005480971	\$16.31	72	VAN
00036	7167	01185	0005480971	\$16.31	72	VAN
00036	7167	01186	0005480971	\$16.31	72	PICKUP
00036	7167	01198	0005480971	\$16.20	72	VAN
00036	7167	01206	0005480971	\$16.20	72	VAN
00036	7167	01209	0005480971	\$16.20	72	VAN
00036	7167	01213	0005480971	\$16.20	72	VAN

Vehicle  
count =  
2966

**National Grid USA Service Company (Company 00099)**

	Monthly	Annual
Current Lease Charges (Sept. 2009 Invoice)	\$177,099	\$2,125,188
Lease Invoice Taxes	\$8,961	\$107,532
Current Lease Charges (less taxes)	\$168,138	\$2,017,656
Units Coming off lease FY2010-2011	\$7,004	\$84,048
FY 2009-2010 replacements (expected prior to 03/201)	\$0	\$0
Pending Fleet Additions (expected prior to 03/2010)	\$0	\$0
Pending Fleet Reductions	\$12,833	\$153,996

*vehicle count*  
*353*

at FY2010-2011

<b>\$148,301</b>	<b>\$1,779,612</b>
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Compy	Client Number	Client Asset ID	Invoice Number	SumOfTotal Amount (Charge + Tax)	Lease Term	Asset Category
00099	1581	07087	0005482754	\$15.94	72	PICKUP
00099	1581	07112	0005482754	\$15.94	50	VAN
00099	1581	07123	0005482754	\$15.94	50	VAN
00099	1581	07124	0005482754	\$432.61	72	VAN
00099	1581	07145	0005482754	(\$136.48)	50	VAN
00099	1581	07147	0005482754	\$460.67	72	VAN
00099	1581	07149	0005482754	\$171.90	72	VAN
00099	1581	07162	0005482754	\$493.12	72	VAN
00099	1581	07166	0005482754	\$493.24	72	VAN
00099	1581	07217	0005482754	\$444.27	72	PICKUP
00099	1581	07218	0005482754	\$375.34	72	PICKUP
00099	1581	07219	0005482754	(\$139.59)	72	VAN
00099	1581	07220	0005482754	\$258.26	72	PICKUP
00099	1581	07224	0005482754	\$15.94	72	VAN
00099	1581	07225	0005482754	\$230.10	72	VAN
00099	1581	07230	0005482754	\$15.94	72	PICKUP
00099	1581	07234	0005482754	\$284.91	72	PICKUP
00099	1581	07236	0005482754	\$421.23	72	PICKUP
00099	1581	07238	0005482754	\$298.84	72	VAN
00099	1581	07246	0005482754	(\$456.22)	72	PICKUP
00099	1581	07252	0005482754	\$15.94	72	PICKUP
00099	1581	07257	0005482754	\$15.94	72	PICKUP
00099	1581	07260	0005482754	\$2,695.71	72	PICKUP
00099	1581	07263	0005482754	(\$485.82)	72	PICKUP
00099	1581	07264	0005482754	\$240.99	72	PICKUP
00099	1581	07265	0005482754	\$2,844.09	72	PICKUP
00099	1581	07266	0005482754	\$2,733.28	72	PICKUP
00099	1581	07267	0005482754	\$242.41	72	PICKUP
00099	1581	07268	0005482754	\$253.57	72	PICKUP
00099	1581	07290	0005482754	\$15.94	50	VAN
00099	1581	07291	0005482754	\$15.94	50	VAN
00099	1581	07302	0005482754	\$3,068.08	72	PICKUP
00099	1581	07303	0005482754	\$253.93	72	PICKUP
00099	1581	07490	0005482754	\$238.98	72	VAN
00099	1581	07576	0005482754	\$408.74	72	VAN
00099	1581	07579	0005482754	\$262.28	72	PICKUP
00099	1581	07585	0005482754	\$15.94	72	PICKUP
00099	1581	07599	0005482754	(\$314.69)	50	PSGR CAR
00099	1581	07610	0005482754	\$15.94	72	SUV
00099	1581	07611	0005482754	\$555.67	72	SUV
00099	1581	07612	0005482754	(\$693.95)	72	SUV
00099	1581	07620	0005482754	\$277.82	72	PICKUP
00099	1581	07621	0005482754	\$356.90	72	PICKUP
00099	1581	07622	0005482754	\$318.02	72	PICKUP
00099	1581	07623	0005482754	\$322.10	72	PICKUP
00099	1581	07624	0005482754	\$295.18	72	PICKUP

