

March 15, 2019

VIA HAND DELIVERY AND E-FILING

Mark D. Marini, Secretary
Department of Public Utilities
One South Station, 5th Floor
Boston, MA 02110

Re: D.P.U. 19-36 –Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid 2018 Grid Modernization Program Costs Filing

Dear Secretary Marini:

On behalf of Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid (“Company” or “National Grid”), I am submitting for filing the documentation of the Company's costs as of December 31, 2018 for its Grid Modernization Program (“Program”). The Company is submitting this filing pursuant to the Department of Public Utilities’ (“Department’s”) May 10, 2018 and February 7, 2019 Orders in Dockets D.P.U. 15-120, 15-121 and 15-122.

The enclosed testimony and exhibits of William F. Jones describe the Company’s implementation of the Program and the documentation of the incremental Program costs. Because the Company’s Calendar Year 2018 (“CY 2018”) Program Costs are too small to generate a Grid Modernization Factor to bill to customers, the Company is not seeking to recover the CY 2018 costs beginning May 1, 2019 and therefore is not submitting a revenue requirement or bill impacts associated with these costs at this time. Rather, the Company will seek to begin recovering these costs on May 1, 2020, after it has submitted its March 15, 2020 filing for its Calendar Year 2019 Program Costs.

Specifically, the Company is enclosing the following items for filing with the Department:

- 1) Exhibit WFJ-1: Pre-Filed Direct Testimony of William F. Jones
- 2) Exhibit WFJ-2: Program Operations and Maintenance (“O&M”) Expenses
- 3) Exhibit WFJ-3: Documentation for Program O&M Expenses
- 4) Affidavit of William F. Jones
- 5) Motion for Protective Treatment of Confidential and Privileged Information
- 6) Notice of Appearance for Melissa G. Liazos
- 7) Certificate of Service

The Company is providing separately to Hearing Officer Tina Chin, under seal, the following exhibits:

Mark D. Marini, Secretary

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- 1) Exhibit WFJ-2 CONFIDENTIAL: Program O&M Expenses
- 2) Exhibit WFJ-3 CONFIDENTIAL: Vendor Invoices for Program O&M Expenses

Thank you for your time and attention to this matter. Please contact me with any questions regarding this filing.

Very truly yours,



Melissa G. Liazos

Enclosures

cc: Tina Chin, Hearing Officer (electronic and hard copy)
Rebecca Tepper, Nathan Forster, Elizabeth Anderson, Shannon Beale, Donald Boecke,
Joseph Dorfler and Elizabeth Mahony, Office of the Attorney General (electronic and one
hard copy)

Massachusetts Electric Company
Nantucket Electric Company
d/b/a National Grid
Grid Modernization Program CY 2018 Cost Filing
D.P.U. 19-36
Exhibit WFJ-1
March 15, 2019
H.O.: Tina Chin

Pre-filed Direct Testimony

of

William F. Jones

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I. INTRODUCTION

Q. Please state your name and business address.

A. My name is William F. Jones, Jr. My business address is 40 Sylvan Road, Waltham, MA 02451.

Q. By whom are you employed and in what capacity?

A. I am Director of Grid Modernization Program Delivery and am responsible for the Massachusetts Grid Modernization Program (“Program”) for National Grid USA Service Company, Inc.

Q. Please summarize your educational background.

A. I graduated from Babson College with a Bachelor of Science degree. I graduated from Bentley University with a Master of Business Administration degree.

Q. Please describe your current responsibilities.

A. I am responsible for delivery of Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid’s (together the “Company”) Grid Modernization program approved in D.P.U. 15-120. I have overall accountability for the full Program implementation, Program operation, and Program evaluations.

Q. Have you previously testified before any regulatory body?

1 A. I have submitted pre-filed testimony and testified at the evidentiary hearing in D.P.U. 14-109
2 and D.P.U. 15-21 addressing the Company's request for approval of its Smart Energy
3 Solutions Pilot-related costs for the years 2012-2013 and 2014, and I submitted pre-filed
4 testimony in D.P.U. 16-28, D.P.U. 17-53, D.P.U. 18-28/18-29 and D.P.U. 19-35 addressing
5 the Company's request for approval of Pilot-related costs for the years 2015, 2016, 2017 and
6 2018, respectively. I also submitted pre-filed testimony in D.P.U. 16-149 in support of the
7 Company's request to extend the Smart Energy Solutions Pilot.
8

9 **II. PURPOSE OF TESTIMONY**

10 **Q. What is the purpose of your testimony?**

11 A. The purpose of my testimony is to describe the operation of the Program through December
12 31, 2018, the process in place for monitoring the Program and budget, and documentation of
13 the incremental Program costs for calendar year 2018 ("CY 2018"). The Company's
14 incremental operations and maintenance ("O&M") costs for the Program in CY 2018 were
15 \$98,935. It is my understanding that these costs are too small to generate a Grid
16 Modernization Factor to bill to customers. Therefore, while the Company is submitting
17 information on and documentation of these costs in this filing, the Company will not be
18 seeking to recover these costs from customers until it makes its next Grid Modernization
19 Factor filing on March 15, 2020, and will include these costs with the costs for CY 2019
20 costs for recovery through the Grid Modernization Factor that would go into effect beginning
21 May 1, 2020.

III. OVERVIEW OF FILING

Q. Please briefly describe the history of the Department's orders related to Grid Modernization.

A. On August 19, 2015, the Company filed its petition for approval of its Grid Modernization Plan and related provisions ("GMP"), as well as testimony, exhibits, and other filing documents in docket D.P.U. 15-120, pursuant to the Department's grid modernization orders, D.P.U. 12-76-B (2014) and D.P.U. 12-76-C (2014). On May 10, 2018, the Department issued its order in D.P.U. 15-120, D.P.U. 15-121 (Fitchburg Gas and Electric d/b/a Until Grid Modernization Plan), and D.P.U. 15-122 (Eversource Grid Modernization Plan) ("Order"), approving in part National Grid, Eversource's and Until's (the "Electric Distribution Companies" or "EDCs") Grid Modernization Plans.

Q. Which of the Company's Grid Modernization investments and proposals did the Department approve in its Order?

A. In its Order, the Department pre-authorized a three year budget of \$82 million for National Grid's GMP for the following grid-facing investments: (1) Volt-Var Optimization (VVO); (2) advanced distribution automation; (3) feeder monitors; (4) communications and information/operational technologies; and (5) advanced distribution management/Supervisory Control and Data Acquisition (SCADA) system (which also includes Geographic Information System investments). The Order directed National Grid to coordinate the deployment of these technologies and allowed the Company to shift spending among these categories and among

1 years but did not allow re-allocation of any pre-authorized funds to other spending categories.
2 Costs for any necessary cybersecurity investments were part of this \$82 million budget.
3

4 **Q. What is your understanding of the requirements contained in the Department's Order**
5 **for this filing?**

6 A. My understanding of the requirements in the Department's Order for this filing is that this
7 filing must include testimony and supporting exhibits, including full contemporaneous project
8 documentation of all grid modernization capital projects placed in service during the plan
9 investment year and documentation of O&M expenses, describing in detail how the proposed
10 costs meet the eligibility requirements. The testimony and documentation must show the costs
11 are: preauthorized; incremental; prudently incurred; in service; and used and useful. The
12 testimony also must describe any cost variances as defined in the Company's capital
13 authorization policies, provide a demonstration that the proposed factors are calculated
14 appropriately, and provide bill impacts. As noted, because the Company will not be seeking
15 to recover the CY 2018 costs until it makes its March 15, 2020 Grid Modernization Factor
16 filing, the Company has not included proposed factors or bill impacts in this filing. Also, there
17 are no capital expenditure costs included in this filing, so the Company has not included a
18 copy of its capital authorization policy.
19

20 My understanding of the Order's requirements for "Incremental" investments are that their
21 primary purpose must be to accelerate progress in achieving grid modernization objectives and
22 they must be either (1) new types of technology or (2) an increase in the level of investment a

1 company proposes relative to its current investment practices. Incremental O&M expenses
2 must be (1) incremental to the representative level of expenses recovered through rates, and
3 (2) solely attributable to preauthorized grid modernization expenses.
4

5 **Q. What exhibits are you sponsoring with your testimony?**

6 A. In addition to this testimony, I am providing the following exhibits for CY 2018, in
7 confidential and redacted form:

8 Exhibit WFJ-2 Summary of Program Operations and Maintenance
9 Expenses

10 Exhibit WFJ-3 Documentation for Program O&M Expenses: Vendor
11 Invoices
12

13 **Q. Please describe Exhibit WFJ-2.**

14 A. Exhibit WFJ-2 summarizes the Program O&M incremental costs by category for CY 2018.
15 This includes communications costs. Exhibit WFJ-2 provides a listing of vendor invoices
16 for incremental Program costs in CY 2018.
17

18 Specifically, Exhibit WFJ-2 includes the: (1) cost category; (2) vendor name; (3) vendor
19 invoice (number or description); (4) 2018 monthly total; (5) 2018 total overall; and (6) cross-
20 reference to the page in Exhibit WFJ-3 where the referenced invoice can be found.
21

22 **Q. Please describe Exhibit WFJ-3.**

1 A. Exhibit WFJ-3 contains copies of the invoices for incremental Program O&M costs in 2018.
2 The invoices are cross-referenced in Exhibit WFJ-2 by page number.
3

4 **Q. Are the costs which the Company is including in this filing for items that the**
5 **Department pre-authorized in its Order?**

6 A. Yes, all the costs which the Company is including in this filing are for items that the
7 Department pre-authorized in its Order. Specifically, the Company is including costs for
8 communications. The Company is undertaking an analysis and review of the options and
9 technologies for developing a wide area and field area network to support the data collection
10 and control of grid device investments approved in the Order. The Department pre-
11 authorized spending for communications in its Order at 154-155.

12 **Q. Are the costs which the Company is including in this filing (1) directly related to the**
13 **Program and would not be incurred but for the Program's implementation; and (2) not**
14 **currently recovered through base rates or through any other reconciling mechanisms,**
15 **i.e., incremental to costs recovered through base rates or any other mechanism?**

16 A. All costs which the Company is including in this filing are directly related to the Program,
17 would not have been incurred by the Company but for the implementation of the Program,
18 and are not recovered through base distribution rates or any other recovery mechanism.
19

20 **Q. Is the Company including incremental internal labor costs in this filing?**

21 A. No, it is not. The costs included in this filing are for a contractor hired specifically to work
22 on the Program.
23

1 **Q. Were the costs which the Company is including in this filing reasonably and prudently**
2 **incurred?**

3 A. Yes, they were. My description of the Company's actions in incurring these costs, the
4 Company's decisions regarding the Program, and the information contained in the exhibits
5 to my testimony, all demonstrate that the costs included in this filing were reasonably and
6 prudently incurred.

7
8 **Q. How has the Company monitored Grid Modernization-related costs to date?**

9 A. The Company has established a program management structure and a rigorous set of change
10 controls that will ensure that all scope, schedule, and costs that vary from the approved Grid
11 Modernization Plan allowances are reviewed by the Program Director and/or the Program's
12 Executive Steering Committee and accepted or rejected. The accepted changes will then be
13 associated with the specific cost classification.

14
15 **Q. Are the costs included in this filing for investments that are in service, and that are used**
16 **and useful?**

17 A. Not at this time. These costs are a necessary component, however, for investments that will
18 be in service and will be used and useful to customers.

19
20 **Q. Are the Company's total expenditures for preauthorized eligible GMP Projects under**
21 **the three-expenditure cap determined by the Department for the Company's Grid**
22 **Modernization Plan?**

1 A. Yes. In its Order, the Department pre-authorized a three-year budget of \$82 million for
2 National Grid's GMP. The costs for which the Company is submitting documentation in this
3 filing, and which are the Company's total expenditures for preauthorized eligible GMP
4 projects as of December 31, 2018, are \$98,935.

5
6 **Q. Please describe the progress made to date on the Evaluation Plan for the Program as**
7 **required by the Department in its Order.**

8 A. The Company, along with Fitchburg Gas and Electric Light Company d/b/a Unitil and
9 NSTAR Electric Company d/b/a/ Eversource Energy (collectively, "EDCs") made their
10 evaluation plan compliance filings with the Department on August 8, 2018 in dockets D.P.U.
11 15-120, 15-121, and 15-122. The EDCs developed a draft request for proposals ("RFP") for
12 an evaluation consultant and conducted several conference calls with representatives from
13 the Department of Energy Resources ("DOER") to solicit input in order to further refine the
14 RFP. The RFP was issued to bidders on August 8, 2018. The Companies, in consultation
15 with DOER, selected Navigant Consulting as their evaluation consultant. On December 20,
16 2018, the Department issued a Memorandum directing the EDCs to file a jointly-proposed
17 evaluation plan for the 2018 through 2020 grid modernization investment term on or before
18 May 1, 2019. The EDCs have been working with Navigant to develop the proposed
19 evaluation plan and will be filing the proposed evaluation plan by May 1, 2019.

20
21 **Q. What is the status of the process for approving performance metrics as provided for in**
22 **the Department's Order?**

1 A. The EDCs made their compliance filing with proposed performance metrics on August 15,
2 2018 in dockets D.P.U. 15-120, 15-121, and 15-122. The EDCs responded to discovery
3 requests from the Department and the Department of Energy Resources (“DOER”) on the
4 proposed performance metrics. The Department conducted a technical session on the
5 proposed performance metrics on February 13, 2019.

6
7 **Q. Will the Company be providing a further update on the implementation of its Grid**
8 **Modernization Program?**

9 A. Yes. The Company will be making its first annual Grid Modernization Report filing on April
10 1, 2019, and the Company will provide a further update on the implementation of tis Grid
11 Modernization Program in that report.

12
13 **IV. COMMUNICATIONS AND INFORMATIONAL/OPERATIONAL**
14 **TECHNOLOGINES COMPONENT**

15 **Q. Please describe the Communications and Informational/Operational Technologies**
16 **(“IT/OT”) component of the Program that the Department approved in its Order.**

17 A. This represents all infrastructure to connect National Grid IT/OT infrastructure with field
18 devices in the service territory. This includes additional backhaul networks, substation fiber
19 installations, a multi-tiered field based wireless communication network, and radios for
20 devices without embedded communications. This also includes integrating computer
21 systems with communications infrastructure necessary to support the exponential increase in
22 data and control.

1 **Q. Please describe what the Company accomplished during CY 2018 with its**
2 **Communications and IT/OT component.**

3 A. The Company has launched a reassessment of the communications and IT/OT strategy and
4 assumptions in the original plan in light of the approvals granted and the passage of time
5 since the initial Grid Modernization Plan development. This reassessment will inform the
6 planning and engineering effort to define the necessary network, computer and
7 communications investments, and develop the detailed plans to deliver these investments and
8 capabilities to progress the Grid Modernization investments and objectives.

9
10 **Q. Where are the costs for the Communications and IT/OT component of the Program**
11 **documented in this filing?**

12 A. The Communications costs are documented in Exhibits WFJ-2 and WFJ-3.

13
14 **Q. What work does the Company have planned for 2019 and 2020 for the Communications**
15 **and IT/OT component of the Program?**

16 A. The Company intends to progress from confirming the strategy and approach based on the
17 approved plan components and define the technology investments to initiate planning,
18 design, build and delivery of the necessary investments for the Communications and IT/OT
19 components of the Program.

20
21 **V. CONCLUSION**

22 **Q. Please summarize your testimony.**

1 A. The Company has begun implementing its Grid Modernization Program. Because of the
2 relatively small amount of costs for CY 2018, the Company is not seeking to begin recovery
3 of these costs from customers on May 1, 2019. Rather, the Company will seek to begin
4 recovery of these costs from customers commencing May 1, 2020 as part of the cost recovery
5 filing for its CY 2019 Program costs.

6

7 **Q. Does this conclude your testimony?**

8 A. Yes, it does.

Massachusetts Electric Company
Nantucket Electric Company
Grid Modernization
O&M Expenses - Summary
Calendar Year 2018

Cost Category	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	2018 Total
1 Communications	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	98,395
2 Total	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	98,395

Line Notes
1 Communications Detail, line 2

Massachusetts Electric Company
Nantucket Electric Company
d/b/a National Grid
DPU 19-XX
Grid Modernization Program CY2018 Cost Filing
Exhibit WFJ-2
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Exh. WFJ-3	Page Ref.

Vendor Name	Vendor Invoice	Jan-18	Feb-18	Mar-18	Apr-18	May-18	Jun-18	Jul-18	Aug-18	Sep-18	Oct-18	Nov-18	Dec-18	2018 Total
1 Pontoon Solutions, Inc.		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$	\$	\$	98,395
2 Total Communications		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$	\$	\$	98,395

2018 MA Grid Mod Communications

REDACTED

Pontoon

Mike Key Time	\$ 80,136.36	see tab: 'Mike Key Time'
Mike Key Expenses	<u>18,258.59</u>	see tab: 'Mike Key Expenses'
	<u><u>\$ 98,394.95</u></u>	

REDACTED

Time Sheet				Billable Hours					
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REDACTED

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Worker: Worker				Time Sheet						
Time Sheet End Date	Supervisor	Worker	Time Entry Date	Billable Hours [ST/Hr]	Time Sheet ID	Invoice Amount	Invoice Approved Date	Invoice ID	Parent Org Unit	
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							\$ 80,136.36			

REDACTED

Worker	Expense Sheet Submit Date	Expense Sheet ID	Expense Name	Merchant	Parent Org Unit	Invoice ID	Billable Expenses	Approver	Expense Sheet Approved Date
Key, Mike	10/17/2018 11:58	NGGES00031207	Airfare-Domestic	Delta Airlines	Grid Modernization Execution	NGGIN00152948	647.60	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/17/2018 11:59
Key, Mike	10/17/2018 11:58	NGGES00031207	Car Rental	Avis	Grid Modernization Execution	NGGIN00152948	199.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/17/2018 11:59
Key, Mike	10/17/2018 11:58	NGGES00031207	Hotel-Domestic	Marriott Newton MA	Grid Modernization Execution	NGGIN00152948	740.58	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/17/2018 11:59
Key, Mike	10/17/2018 11:58	NGGES00031207	Meals-Domestic	Various	Grid Modernization Execution	NGGIN00152948	111.63	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/17/2018 11:59
Key, Mike	10/17/2018 11:58	NGGES00031207	Mileage	Personal Vehicle Mileage	Grid Modernization Execution	NGGIN00152948	64.31	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/17/2018 11:59
Key, Mike	10/17/2018 11:58	NGGES00031207	Miscellaneous Exp	Airport Parking	Grid Modernization Execution	NGGIN00152948	20.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/17/2018 11:59
Key, Mike	10/17/2018 11:58	NGGES00031207	Miscellaneous Exp	Gulf	Grid Modernization Execution	NGGIN00152948	26.05	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/17/2018 11:59
Key, Mike	10/17/2018 11:58	NGGES00031207	Miscellaneous Exp	Plate Pass - State of Mass	Grid Modernization Execution	NGGIN00152948	27.45	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/17/2018 11:59
Key, Mike	10/20/2018 20:36	NGGES00031415	Airfare-Domestic	Delta	Grid Modernization Execution	NGGIN00153713	676.60	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/20/2018 21:10
Key, Mike	10/20/2018 20:36	NGGES00031415	Car Expense	Speedway	Grid Modernization Execution	NGGIN00153713	22.75	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/20/2018 21:10
Key, Mike	10/20/2018 20:36	NGGES00031415	Car Rental	Hertz	Grid Modernization Execution	NGGIN00153713	199.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/20/2018 21:10
Key, Mike	10/20/2018 20:36	NGGES00031415	Hotel-Domestic	Marriott	Grid Modernization Execution	NGGIN00153713	867.90	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/20/2018 21:10
Key, Mike	10/20/2018 20:36	NGGES00031415	Meals-Domestic	Various	Grid Modernization Execution	NGGIN00153713	86.36	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/20/2018 21:10
Key, Mike	10/20/2018 20:36	NGGES00031415	Mileage	Mileage	Grid Modernization Execution	NGGIN00153713	64.31	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/20/2018 21:10
Key, Mike	10/20/2018 20:36	NGGES00031415	Miscellaneous Exp	Airport Parking	Grid Modernization Execution	NGGIN00153713	20.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/20/2018 21:10
Key, Mike	10/26/2018 11:41	NGGES00031721	Airfare-Domestic	Delta	Grid Modernization Execution	NGGIN00155380	724.10	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/26/2018 12:25
Key, Mike	10/26/2018 11:41	NGGES00031721	Car Expense	Hertz	Grid Modernization Execution	NGGIN00155380	199.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/26/2018 12:25
Key, Mike	10/26/2018 11:41	NGGES00031721	Hotel-Domestic	Hilton Garden Inn	Grid Modernization Execution	NGGIN00155380	159.09	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/26/2018 12:25
Key, Mike	10/26/2018 11:41	NGGES00031721	Hotel-Domestic	Marriot	Grid Modernization Execution	NGGIN00155380	740.58	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/26/2018 12:25
Key, Mike	10/26/2018 11:41	NGGES00031721	Meals-Domestic	Various	Grid Modernization Execution	NGGIN00155380	48.89	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/26/2018 12:25
Key, Mike	10/26/2018 11:41	NGGES00031721	Mileage	Personal Vehicle	Grid Modernization Execution	NGGIN00155380	107.91	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/26/2018 12:25
Key, Mike	10/26/2018 11:41	NGGES00031721	Miscellaneous Exp	Shell	Grid Modernization Execution	NGGIN00155380	21.55	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/26/2018 12:25
Key, Mike	10/26/2018 11:41	NGGES00031721	Miscellaneous Exp	State of Mass	Grid Modernization Execution	NGGIN00155380	17.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	10/26/2018 12:25
Key, Mike	11/2/2018 16:55	NGGES00032060	Airfare-Domestic	Delta	Grid Modernization Execution	NGGIN00157019	621.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/2/2018 17:09
Key, Mike	11/2/2018 16:55	NGGES00032060	Car Rental	Hertz	Grid Modernization Execution	NGGIN00157019	158.72	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/2/2018 17:09
Key, Mike	11/2/2018 16:55	NGGES00032060	Hotel-Domestic	Marriott	Grid Modernization Execution	NGGIN00157019	851.16	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/2/2018 17:09
Key, Mike	11/2/2018 16:55	NGGES00032060	Meals-Domestic	Various	Grid Modernization Execution	NGGIN00157019	115.50	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/2/2018 17:09
Key, Mike	11/2/2018 16:55	NGGES00032060	Mileage	N/A	Grid Modernization Execution	NGGIN00157019	64.31	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/2/2018 17:09
Key, Mike	11/2/2018 16:55	NGGES00032060	Miscellaneous Exp	Plate Pass / State of Mass	Grid Modernization Execution	NGGIN00157019	23.15	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/2/2018 17:09
Key, Mike	11/2/2018 16:55	NGGES00032060	Miscellaneous Exp	Shell	Grid Modernization Execution	NGGIN00157019	17.25	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/2/2018 17:09
Key, Mike	11/9/2018 23:28	NGGES00032368	Airfare-Domestic	Delta	Grid Modernization Execution	NGGIN00158692	678.60	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/9/2018 23:44
Key, Mike	11/9/2018 23:28	NGGES00032368	Car Rental	Hertz	Grid Modernization Execution	NGGIN00158692	199.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/9/2018 23:44
Key, Mike	11/9/2018 23:28	NGGES00032368	Hotel-Domestic	Marriott	Grid Modernization Execution	NGGIN00158692	1,119.24	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/9/2018 23:44
Key, Mike	11/9/2018 23:28	NGGES00032368	Meals-Domestic	Various	Grid Modernization Execution	NGGIN00158692	77.36	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/9/2018 23:44
Key, Mike	11/9/2018 23:28	NGGES00032368	Mileage	Personal Mileage	Grid Modernization Execution	NGGIN00158692	64.31	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/9/2018 23:44
Key, Mike	11/9/2018 23:28	NGGES00032368	Miscellaneous Exp	Airport Parking	Grid Modernization Execution	NGGIN00158692	20.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/9/2018 23:44
Key, Mike	11/9/2018 23:28	NGGES00032368	Miscellaneous Exp	BP	Grid Modernization Execution	NGGIN00158692	23.13	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/9/2018 23:44
Key, Mike	11/16/2018 13:36	NGGES00032632	Airfare-Domestic	Delta	Grid Modernization Execution	NGGIN00160411	670.40	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/16/2018 13:46
Key, Mike	11/16/2018 13:36	NGGES00032632	Car Rental	Hertz	Grid Modernization Execution	NGGIN00160411	152.35	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/16/2018 13:46
Key, Mike	11/16/2018 13:36	NGGES00032632	Hotel-Domestic	Marriott	Grid Modernization Execution	NGGIN00160411	1,071.04	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/16/2018 13:46
Key, Mike	11/16/2018 13:36	NGGES00032632	Meals-Domestic	Various	Grid Modernization Execution	NGGIN00160411	77.53	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/16/2018 13:46
Key, Mike	11/16/2018 13:36	NGGES00032632	Mileage	Personal Vehicle	Grid Modernization Execution	NGGIN00160411	64.31	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/16/2018 13:46
Key, Mike	11/16/2018 13:36	NGGES00032632	Miscellaneous Exp	Airport Parking	Grid Modernization Execution	NGGIN00160411	20.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/16/2018 13:46
Key, Mike	11/16/2018 13:36	NGGES00032632	Miscellaneous Exp	Plate Pass Mass Tolls	Grid Modernization Execution	NGGIN00160411	10.45	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/16/2018 13:46
Key, Mike	11/16/2018 13:36	NGGES00032632	Miscellaneous Exp	Speedway	Grid Modernization Execution	NGGIN00160411	39.50	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/16/2018 13:46
Key, Mike	11/21/2018 9:09	NGGES00032986	Meals-Domestic	Fuji	Grid Modernization Execution	NGGIN00161751	24.32	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/21/2018 22:26
Key, Mike	11/21/2018 9:09	NGGES00032986	Miscellaneous Exp	Mass Tolls	Grid Modernization Execution	NGGIN00161751	17.35	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/21/2018 22:26
Key, Mike	11/21/2018 9:09	NGGES00032986	Miscellaneous Exp	Mass Tolls - PlatePass	Grid Modernization Execution	NGGIN00161751	40.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/21/2018 22:26
Key, Mike	11/30/2018 15:52	NGGES00033287	Airfare-Domestic	Delta Airlines	Grid Modernization Execution	NGGIN00163949	356.40	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/30/2018 15:53
Key, Mike	11/30/2018 15:52	NGGES00033287	Car Rental	Hertz	Grid Modernization Execution	NGGIN00163949	152.35	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/30/2018 15:53
Key, Mike	11/30/2018 15:52	NGGES00033287	Hotel-Domestic	Marriott	Grid Modernization Execution	NGGIN00163949	740.58	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/30/2018 15:53
Key, Mike	11/30/2018 15:52	NGGES00033287	Meals-Domestic	Various	Grid Modernization Execution	NGGIN00163949	50.78	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/30/2018 15:53
Key, Mike	11/30/2018 15:52	NGGES00033287	Mileage	Mileage	Grid Modernization Execution	NGGIN00163949	64.31	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/30/2018 15:53
Key, Mike	11/30/2018 15:52	NGGES00033287	Miscellaneous Exp	Gulf	Grid Modernization Execution	NGGIN00163949	16.70	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/30/2018 15:53
Key, Mike	11/30/2018 15:52	NGGES00033287	Miscellaneous Exp	Personal	Grid Modernization Execution	NGGIN00163949	20.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	11/30/2018 15:53
Key, Mike	12/7/2018 22:24	NGGES00033773	Airfare-Domestic	Delta	Grid Modernization Execution	NGGIN00165701	374.40	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/7/2018 22:47
Key, Mike	12/7/2018 22:24	NGGES00033773	Car Rental	Hertz	Grid Modernization Execution	NGGIN00165701	199.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/7/2018 22:47
Key, Mike	12/7/2018 22:24	NGGES00033773	Hotel-Domestic	Hilton Garden Inn Worcester	Grid Modernization Execution	NGGIN00165701	159.08	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/7/2018 22:47
Key, Mike	12/7/2018 22:24	NGGES00033773	Hotel-Domestic	Marriott	Grid Modernization Execution	NGGIN00165701	740.58	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/7/2018 22:47
Key, Mike	12/7/2018 22:24	NGGES00033773	Meals-Domestic	Various	Grid Modernization Execution	NGGIN00165701	198.84	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/7/2018 22:47

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Worker	Expense Sheet Submit Date	Expense Sheet ID	Expense Name	Merchant	Parent Org Unit	Invoice ID	Billable Expenses	Approver	Expense Sheet Approved Date
Key, Mike	12/7/2018 22:24	NGGES00033773	Mileage	Personal Vehicle	Grid Modernization Execution	NGGIN00165701	64.31	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/7/2018 22:47
Key, Mike	12/7/2018 22:24	NGGES00033773	Miscellaneous Exp	Airport Parking	Grid Modernization Execution	NGGIN00165701	25.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/7/2018 22:47
Key, Mike	12/7/2018 22:24	NGGES00033773	Miscellaneous Exp	Mass Tolls	Grid Modernization Execution	NGGIN00165701	23.15	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/7/2018 22:47
Key, Mike	12/7/2018 22:24	NGGES00033773	Miscellaneous Exp	Speedway	Grid Modernization Execution	NGGIN00165701	39.50	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/7/2018 22:47
Key, Mike	12/14/2018 17:23	NGGES00034103	Airfare-Domestic	Delta	Grid Modernization Execution	NGGIN00167478	351.40	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/15/2018 10:14
Key, Mike	12/14/2018 17:23	NGGES00034103	Car Rental	Hertz	Grid Modernization Execution	NGGIN00167478	150.41	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/15/2018 10:14
Key, Mike	12/14/2018 17:23	NGGES00034103	Hotel-Domestic	Marriott	Grid Modernization Execution	NGGIN00167478	740.58	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/15/2018 10:14
Key, Mike	12/14/2018 17:23	NGGES00034103	Meals-Domestic	Various	Grid Modernization Execution	NGGIN00167478	69.41	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/15/2018 10:14
Key, Mike	12/14/2018 17:23	NGGES00034103	Mileage	Personal	Grid Modernization Execution	NGGIN00167478	64.31	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/15/2018 10:14
Key, Mike	12/14/2018 17:23	NGGES00034103	Miscellaneous Exp	Airport Parking	Grid Modernization Execution	NGGIN00167478	20.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/15/2018 10:14
Key, Mike	12/14/2018 17:23	NGGES00034103	Miscellaneous Exp	Speedway	Grid Modernization Execution	NGGIN00167478	15.25	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/15/2018 10:14
Key, Mike	12/21/2018 23:46	NGGES00034583	Airfare-Domestic	Delta	Grid Modernization Execution	NGGIN00170201	783.40	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/22/2018 0:05
Key, Mike	12/21/2018 23:46	NGGES00034583	Car Rental	Hertz	Grid Modernization Execution	NGGIN00170201	152.35	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/22/2018 0:05
Key, Mike	12/21/2018 23:46	NGGES00034583	Hotel-Domestic	Hilton Garden Inn	Grid Modernization Execution	NGGIN00170201	422.31	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/22/2018 0:05
Key, Mike	12/21/2018 23:46	NGGES00034583	Meals-Domestic	Various	Grid Modernization Execution	NGGIN00170201	106.14	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/22/2018 0:05
Key, Mike	12/21/2018 23:46	NGGES00034583	Mileage	Personal Vehicle	Grid Modernization Execution	NGGIN00170201	64.31	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/22/2018 0:05
Key, Mike	12/21/2018 23:46	NGGES00034583	Miscellaneous Exp	Airport Parking	Grid Modernization Execution	NGGIN00170201	40.00	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/22/2018 0:05
Key, Mike	12/21/2018 23:46	NGGES00034583	Miscellaneous Exp	Gulf	Grid Modernization Execution	NGGIN00170201	21.20	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/22/2018 0:05
Key, Mike	12/21/2018 23:46	NGGES00034583	Miscellaneous Exp	Mass Turnpike	Grid Modernization Execution	NGGIN00170201	20.90	Diorio, Ronald (RONALD.DIORIO@NATIONALGRID.COM)	12/22/2018 0:05

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COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF PUBLIC UTILITIES

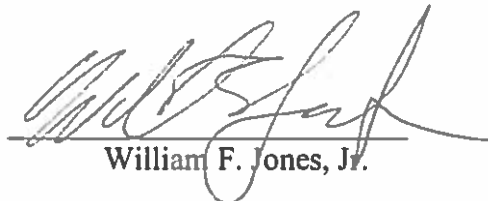
D.P.U. 19-36

Affidavit of William F. Jones, Jr.

I, William F. Jones, Jr., do attest and swear to the following:

1. I am a Director of Grid Modernization Execution for National Grid USA Service Company, Inc. In my current position, I am responsible for the Grid Modernization Program for Massachusetts Electric Company and Nantucket Electric Company (together, National Grid" or the "Company").
2. I am familiar with National Grid's Grid Modernization Cost Filing in this docket ("Filing").
3. I have reviewed the Filing and the representations made in my testimony and exhibits therein are true and accurate to the best of my knowledge.

Signed under the pains and penalties of perjury,



William F. Jones, Jr.

Date: March 15, 2019

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

)	
Massachusetts Electric Company and Nantucket)	
Electric Company d/b/a National Grid –)	D.P.U. 19-36
Grid Modernization Program Calendar Year 2018)	
Costs Filing)	
)	

**MOTION OF NATIONAL GRID FOR PROTECTIVE TREATMENT OF
CONFIDENTIAL INFORMATION**

Now comes Massachusetts Electric Company and Nantucket Electric Company d/b/a National Grid (“National Grid” or the “Company”) and hereby requests the Department of Public Utilities (the “Department”) to grant protection from public disclosure of certain confidential, competitively sensitive and proprietary information submitted in this proceeding in accordance with G.L. c. 25, § 5D. The Company requests that the Department protect from public disclosure information regarding vendor cost information and associated hours information in Exhibits WFJ-2 CONFIDENTIAL and WFJ-3 CONFIDENTIAL (collectively, the “Confidential Documents”).

The Confidential Documents contain competitively sensitive pricing terms associated with the Company’s Grid Modernization Program (“Program”), including vendors’ prices, hours and rates. Disclosure of the Confidential Documents would jeopardize the ability of the Company to ensure that customers are being served by the lowest cost option which would have an adverse impact on the Company’s customers.

I. LEGAL STANDARD

Confidential information may be protected from public disclosure in accordance with G.L. c. 25, § 5D, which states in part that:

The [D]epartment may protect from public disclosure, trade secrets, confidential, competitively sensitive or other proprietary information provided in the course of proceedings conducted pursuant to this chapter. There shall be a presumption that the information for which such protection is sought is public information and the burden shall be on the proponent of such protection to prove the need for such protection. Where the need has been found to exist, the [D]epartment shall protect only so much of the information as is necessary to meet such need.

In interpreting the statute, the Department has held that:

. . . [T]he burden on the company is to establish the need for protection of the information cited by the company. In determining the existence and extent of such need, the Department must consider the presumption in favor of disclosure and the specific reasons why disclosure of the disputed information benefits the public interest.

The Berkshire Gas Company et al., D.P.U. 93-187/188/189/190, at 16 (1994) as cited in Hearing Officers Ruling On the Motion of Boston Gas Company for Confidentiality, D.P.U. 96-50, at 4 (1996).

In practice, the Department has often exercised its authority to protect sensitive market information. For example, the Department has determined specifically that competitively sensitive information, such as price terms, are subject to protective status:

The Department will continue to accord protective status when the proponent carries its burden of proof by indicating the manner in which the price term is competitively sensitive. Proponents generally will face a more difficult task of overcoming the statutory presumption against the disclosure of other terms, such as the identity of the customer.

Standard of Review for Electric Contracts, D.P.U. 96-39, at 2, Letter Order (August 30, 1996). See also Colonial Gas Company, D.P.U. 96-18, at 4 (1996) (the Department determined that price terms were protected in gas supply contracts and allowed Colonial

Gas Company's request to protect pricing information including all "reservation fees or charges, demand charges, commodity charges and other pricing information").

Moreover, the Department has recognized that competitively sensitive terms in a competitive market should be protected and that such protection is desirable as a matter of public policy:

The Department recognizes that the replacement gas purchases . . . are being made in a substantially competitive market with a wide field of potential suppliers. This competitive market should allow LDC's to obtain lower gas prices for the benefit of their ratepayers. Clearly the Department should ensure that its review process does not undermine the LDC's efforts to negotiate low cost flexible supply contracts for their systems. The Department also recognizes that a policy of affording contract confidentiality may add value to contracts and provide benefits to ultimate consumers of gas, the LDC's ratepayers, and therefore may be desirable for policy reasons.

The Berkshire Gas Company et al., D.P.U 93-187/188/189/190, at 20 (1994).

II. BASIS FOR CONFIDENTIALITY

The information for which the Company is requesting confidential status meets the Department's requirements for protection. The Confidential Documents should be protected because the documents contain pricing and unit cost information derived from negotiations, business judgment, and other sources.

The costs included in this filing are for a contractor hired to support the Program. The contractor was hired pursuant to a negotiated agreement between the Company and Key Engineering. While the contractor was hired pursuant to a sole source request and not pursuant to a request for proposals, this specific contractor previously supported the communications for the Company's Smart Energy Solutions Pilot and Nantucket Communications Project, is familiar with the technology, and is familiar with the

Company's processes and procedures. He has specific expertise that is required to support the Program.

The Department has protected pricing information from public disclosure historically, because the public release of terms discloses the very types of information that the Department has previously and consistently held to be confidential. The Department has recognized that release of pricing information in particular would seriously undermine the Company's negotiating position in the market, and thus jeopardize the ability of the Company to ensure that customers are being served by the lowest cost option. See, e.g., Western Massachusetts Electric Company, D.T.E. 99-101, at 3 (2002), citing Boston Edison Company, D.T.E. 99-16 (1999); Western Massachusetts Electric Company, D.T.E. 99-56 (1999). See also Canal Electric Company/Cambridge Electric Light Company/Commonwealth Electric Company, D.T.E. 02-34 (Tr. A at 19 (June 12, 2002)) and Cambridge Electric Light Company, D.T.E. 01-94 (May 9, 2002 Approval by the Department of Amended Motion of Cambridge Electric Light Company for a Protective Order). Even though this contractor was hired pursuant to a sole source request, disclosure of this contractor's pricing information would still undermine the ability of the Company to negotiate with other third parties in the market and to secure the best possible price for customers.

Protection of the Confidential Documents allows the Company to procure the most cost-efficient resources to support its customers. Accordingly, the Company requests that the Department not require the Company to disclose its contractor pricing and information, and thus, provide potential vendors with a negotiating advantage that may lead to higher prices for the Company's customers than would otherwise be

achievable.

Lastly, to the best of the Company's knowledge, the redacted information in the Confidential Documents is not customarily available in the public domain and has not been publicly disclosed to other persons or to any other federal, state or local agencies.

III. CONCLUSION

The Department has consistently held that pricing information and the Company's strategic use thereof is considered to be proprietary, confidential and competitively sensitive. Disclosure on the public record of this information will negatively affect the Company's future bargaining position and could have a negative effect on the marketplace by dissuading potential parties from participating in competitive bid processes relating to the Massachusetts electric market, and could have a negative effect on customers by undermining the Company's ability to obtain the lowest possible pricing. Pursuant to Department precedent, the Company seeks protection for the competitively sensitive information for a period of two years from the date that a final Order is issued in this proceeding.

WHEREFORE, the Company respectfully requests that the Department grant its Motion for Protective Treatment as stated herein.

Respectfully submitted,

**MASSACHUSETTS ELECTRIC
COMPANY AND NANTUCKET
ELECTRIC COMPANY D/B/A
NATIONAL GRID**

By its attorney,



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Date: March 15, 2019

**THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Massachusetts Electric Company and Nantucket)	
Electric Company d/b/a National Grid -)	
Grid Modernization Program Calendar Year 2018)	D.P.U. 19-36
Cost Filing)	

NOTICE OF APPEARANCE

In the above-entitled proceeding, I hereby appear for and on behalf of Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid.



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**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

_____)
Massachusetts Electric Company and Nantucket)
Electric Company each d/b/a National Grid –)
Grid Modernization Program Calendar Year 2018)
Cost Filing)
_____)

D.P.U. 19-36

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused to be served the foregoing documents in the above-referenced docket upon all parties of record in this proceeding, in accordance with the requirements of 220 C.M.R. 1.05 (Department's Rules of Practice and Procedure), by hand delivery and/or first class mail and/or electronically (as appropriate), and E-Filing.

MASSACHUSETTS ELECTRIC COMPANY
NANTUCKET ELECTRIC COMPANY
d/b/a NATIONAL GRID



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