INVESTIGATION INTO SERVICE QUALITY GUIDELINES
D.T.E. 04-116

FIRST SET OF INFORMATION REQUEST OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO ALL ELECTRIC LOCAL DISTRIBUTION COMPANIES

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits the following information request(s) to all electric local distribution companies ("LDCs") with respect to Investigation into Service Quality Guidelines, D.T.E. 04-116.

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department in this proceeding.

1. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, one copy to the Service List, and three copies of the responses to Jody M. Stiefel, Hearing Officer. Submit copies of the Company's responses to the information requests to the Department by **10:00 a.m., May 3, 2005**. In addition to filing, all non-proprietary responses should be submitted by e-mail to dte.efiling@state.ma.us , jody.stiefel@state.ma.us, and to the e-mail address of any party required to be served.

2. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.

3. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.

4. These requests shall be deemed continuing so as to require further supplemental responses if the party or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.

5. The term "provide complete and detailed documentation" means:

   Provide all data, assumptions and calculations relied upon. Provide the source of and

basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.

6. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

7. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

Requests

DTE-LDC 1-1 Under the existing Service Quality Guidelines, each electric distribution company reports line losses. For example, MECo reports line loss in terms of energy losses for its entire system on a monthly basis. Please provide peak megawatt ("MW") loss separately at each voltage level, such as 345 kV to 120/240 kV, and calculate as a percentage of your annual system peak. Also, calculate total system peak MW loss as a percentage of system peak. In addition, please provide the method used to calculate these losses.

DTE-LDC 1-2 Refer to the Initial Comments of Massachusetts Electric Company and Nantucket Electric Company ("MECo") at 15-16, Att. 1, where MECo discusses discrepancies between indices collected using paper-based outage data collection systems verses mature/automated outage data collection and management systems. Please indicate:

a) whether this type of discrepancy applies to your company's outage data collection and management systems; and

b) whether the existing fixed SAIDI and SAIFI benchmarks are a true representation of your company's historical performance, and whether these existing benchmarks should be revised. If so, also propose new benchmarks.