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June 30, 2016

***VIA ELECTRONIC MAIL
ORIGINAL BY HAND DELIVERY***

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

*Re: D.P.U. 15-122
Petition of NSTAR Electric Company and Western Massachusetts Electric
Company, each d/b/a Eversource Energy, for Approval by the DPU of their
Grid Modernization Plan.*

Dear Secretary Marini:

Enclosed for filing please find the original and two (2) copies of the Cape Light Compact's First Set of Document and Information Requests to Eversource Energy in the above-referenced matter. Also enclosed is a Certificate of Service.

Thank you for your attention to this matter. If you require further information or have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Rebecca F. Zachas". The signature is written in a cursive style.

Rebecca Zachas

RFZ/drb
Enclosures

cc: Tina Chin, Hearing Officer (via email and hand delivery)
Sarah Herbert, Hearing Officer (via email and hand delivery)
Service List in DPU 15-122 (via email and/or first class mail delivery)
Margaret T. Downey, Cape Light Compact Administrator (via email and first class mail)

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF PUBLIC UTILITIES

Petition of NSTAR Electric Company and)
Western Massachusetts Electric Company) D.P.U. 15-122
d/b/a Eversource Energy For Approval of)
their Grid Modernization Plan)

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document(s) upon Secretary Mark D. Marini and Hearing Officers Tina Chin and Sarah Herbert via electronic mail and hand delivery and upon the Service List via electronic mail and/or first class mail in this matter.

Dated this 30th day of June, 2016.



Rebecca Zachas, Esq. (rzachas@bck.com)
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**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC UTILITIES**

Petition of NSTAR Electric Company and Western)	
Massachusetts Electric Company d/b/a Eversource)	D.P.U. 15-122
Energy for Approval of their Grid Modernization Plans.)	
)	

**CAPE LIGHT COMPACT’S FIRST SET OF DOCUMENT AND
INFORMATION REQUESTS TO EVERSOURCE ENERGY**

Date Issued: June 30, 2016

INSTRUCTIONS

The following instructions apply to this set of document and information requests (“Requests”) and all subsequent document and information requests issued by the Cape Light Compact (the “Compact”) to NSTAR Electric Company and Western Massachusetts Electric Company, both d/b/a Eversource Energy (“Eversource” or the “Company”) in this proceeding:

1. These Requests call for all information, including information contained in documents, which relates to the subject matter of the requests and which is known or available to the Company and its affiliates or to any individual or entity sponsoring testimony or retained by them to provide information, advice, testimony or other services in connection with this proceeding.
2. The term “Company” refers to NSTAR Electric Company and Western Massachusetts Electric Company d/b/a Eversource Energy. Unless the request specifically provides otherwise, the term Company includes all witnesses, representatives, employees, and legal counsel.
3. Each Request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-holed punched paper. Individual responses of more than one page should be stapled or bound and each page consecutively numbered.
4. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
5. These Requests shall be deemed continuing so as to require supplemental responses from the Company when further or different information with respect to the same is obtained.

6. The phrase “provide complete and detailed documentation” means to provide all data, assumptions, and calculations on which the response relies; 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; and provide and explain all supporting workpapers.
7. For each document produced or identified in a response which is computer generated, state separately (a) what types of data, files, or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (e.g., punch cards, tapes), (c) a description of the recording system employed (including descriptions, flow charts, etc.), and (d) the identity of the person who was in charge of the collection of input materials, the processing of input materials, the data bases utilized, and the programming to obtain the output.
8. 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, e-mails, 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.
9. If the Company finds that any of these Requests is ambiguous, please notify the Compact’s attorney, Rebecca Zachas, so that the Requests can be clarified prior to the preparation of a written response.
10. Provide copies of all requested documents. A response which does not provide the Compact with the responsive documents and requests the Compact to inspect documents at any location is not responsive.
11. Please serve a single hard copy of the responses on the Compact’s attorney, Rebecca Zachas, and the service list in this proceeding. In addition, please serve by email a copy of the responses to the service list, including the Compact’s attorneys, Jeffrey M. Bernstein, Rebecca Zachas, Jo Ann Bodemer and Audrey A. Eidelman.
12. Where a Request has a number of separate subdivisions or related parts or portions, a complete response is required to each such subdivision, part, or portion. Any objection to a Request should clearly indicate the subdivision, part, or portion of the Request to which it is directed.
13. If information requested is not available in the exact form requested, provide such information or documents as are available that best respond to the Request.
14. If a Request can be answered in whole or part by reference to the response to another Request served in this proceeding, it is sufficient to so indicate by specifying the other Request by participant and number, by specifying the parts of the other response which

are responsive, and by specifying whether the response to the other Request is a full or partial response to the instant Request. If it constitutes a partial response, the balance of the instant Request must be answered.

15. If the Company cannot answer a Request in full, after exercising due diligence to secure the information necessary to do so, state the answer to the extent possible, state why the Company cannot answer the Request in full, and state what information or knowledge is in the Company's possession concerning the unanswered portions.
16. If a document requested is no longer in existence, identify the document, and describe in detail the reasons the document is unavailable.
17. If you refuse to respond to any Document and Information Request by reason of a claim or privilege, or for any other reason, state in writing the type of privilege claimed and the facts and circumstances you rely upon to support the claim of privilege or the reason for refusing to respond. With respect to requests for documents to which you refuse to respond, identify each such document.
18. If the response contains attachments with confidential materials and the cover sheet with the request is filed separately from the public filing, provide a copy of the cover sheet with the confidential attachment.
19. Please submit responses within ten (10) business days of receiving the request.

INFORMATION REQUESTS

- CLC 1-1 Reference the Department of Public Utilities' ("DPU" or the "Department") D.P.U. 14-04-C Order at 3. Please explain in detail and provide complete and detailed documentation on where in its Grid Modernization Plan ("GMP" or the "Plan") the Company addresses how "targeted energy efficiency and demand response" will play a role in "reducing peak energy and capacity market costs; increasing system efficiencies and support [*sic*] the distribution system by reducing peak demand."
- CLC 1-2 Refer to the Department's D.P.U. 12-76-B Order at 9.
- a) Please explain in detail and provide complete and detailed documentation on how the Plan serves as a "means for advancing the statutory requirements and policy goals of further development of energy efficiency."
 - b) Please explain in detail and provide complete and detailed documentation on how the Company will integrate its grid modernization and energy efficiency investments.
 - c) Please explain in detail and provide complete and detailed documentation on specific synergies between grid modernization investments and energy efficiency activities that the Company plans to pursue.
 - d) Please explain in detail and provide complete and detailed documentation on how costs related to any synergies identified in c) above will be defined and treated.
- CLC 1-3 Please explain in detail and provide complete and detailed documentation on the following questions:
- a) Did the Company review any other states' grid modernization orders or initiatives?
 - b) Please identify those states.
 - c) Please explain in detail the consideration the Company gave to grid modernization plans of each state reviewed in developing its Plan in this proceeding.

d) Please provide all documents reviewed or pertaining to the consideration of orders or initiatives in other states identified in subpart (b) above.

CLC 1-4 Please explain in detail and provide complete and detailed documentation on what other (if any) states' grid modernization initiatives the Company considered in developing its GMP?

CLC 1-5 Reference Section I (B)(5) of the Plan at 11, which states "Eversource has had direct experience with grid-modernization investments that have provided important advantages for customers by reducing the number of outage events, reducing the time associated with restoration after an outage event, and managing the costs associated with maintaining the grid." Please explain in detail and provide complete and detailed documentation on the Company's "direct experience," including a summary of the costs, benefits and specific technologies and location deployed, as well as whether it involved funding awarded to the Company by the U.S. Department of Energy pursuant to the American Recovery and Reinvestment Act of 2009 ("ARRA").

CLC 1-6 Reference Section II (B)(2) of the Plan at 21-22 and Section II (B)(3)(a)(1) of the Plan at 23-26. Given the Company's investments to date in Distribution Feeder Supervisory Control and Data Acquisition ("DSCADA"), please explain in detail and provide complete and detailed documentation on why the rollout of DSCADA in other areas of the Company's territory should be considered "incremental investments" and thus eligible for recovery through a capital expenditure tracker mechanism?

CLC 1-7 Reference the Plan at 32, noting that the Company deployed a new Energy Control System ("ECS") across Massachusetts in 2015.

a) Please explain in detail and provide complete and detailed documentation on the functions of an ECS.

b) Please explain in detail and provide complete and detailed documentation on the functions of a Distribution Management System ("DMS").

c) Please explain in detail and provide complete and detailed documentation on the differences between the Company's current ECS and its proposed DMS.

- d) Please explain in detail and provide complete and detailed documentation on any functions of the Company's current ECS that will be reproduced by the proposed investment into a new DMS.
- e) With respect to the ECS, please explain in detail and provide complete and detailed documentation on any regulatory directives or approvals associated with the costs and implementation of the system, as well as any Company decisions related to the deployment of the system.

CLC 1-8 Reference the Plan at 68-69, where the Company describes Enhanced Tree Trimming ("ETT").

- a) Please explain in detail and provide complete and detailed documentation on the differences between the Company's 2016 ETT proposal and the ETT program undertaken between 2012 and 2015.
- b) Please explain in detail and provide complete and detailed documentation on the difference between ETT and non-enhanced tree trimming.
- c) Please explain in detail and provide complete and detailed documentation on the costs of the ETT program undertaken between 2012 and 2015, including what work was done each year.
- d) Please explain in detail and provide complete and detailed documentation on any annual differences between the yearly costs of the 2012-2015 ETT program and the Company's 2016 proposed ETT program.
- e) Please explain in detail and provide complete and detailed documentation on why the proposed 2016 ETT program should be a part of the Company's GMP when it was already undertaking ETT outside its GMP from 2012 to 2015?

CLC 1-9 Reference Section II (C)(1) of the Plan at 63 on Resilient Grid. The Company states that "[m]any jurisdictions have recognized the monumental task that exists in reinforcing the backbone system..." Please identify the jurisdictions referenced and provide complete and detailed documents and references for each jurisdiction.

- CLC 1-10 Reference Section II (C) of the Plan at 65-68. Please explain in detail and provide complete and detailed documentation on the Company's current investment practices in Eversource East and Eversource West for each proposed activity, including manhole inspections, damage and voltage-indication testing of underground infrastructure, damage and voltage-indication testing of additional infrastructure, monitoring and tracking systems, forensic analysis of failed equipment, pole inspections and replacements, double-pole transfers and removals, and vegetation-related resiliency initiatives.
- CLC 1-11 Reference Appendix 8, Business Case Template, Tab 3 ("Benefits"). Please explain in additional detail and provide additional complete and detailed documentation on, including references to the Plan, on the investments that will yield the estimated \$700,000 in benefits associated with Wide Area Monitoring, Visualization, and Control.
- CLC 1-12 Reference Exhibit Eversource-DPH-1 at 6. Please explain in detail and provide complete and detailed documentation on how and why "Resilient Grid" investments, including vegetation management, manhole cover inspections, are prerequisites to specific grid modernization investments.
- CLC 1-13 Reference the Plan at 25, 28 and 29, noting values in dollars per customer minute saved ("CMS") for various investments. Please explain in detail and provide complete and detailed documentation on survey results of the Company's customers or other documentation and information the Company referred to in considering appropriate targets for dollars per CMS or other measures of improved performance.
- CLC 1-14 Reference Sections II (B) and II (C) of the Plan. Please explain in detail and provide complete and detailed documentation on whether the Company considered the metrics, goals, and incentives that are a part of the Service Quality ("SQ") Guidelines in D.P.U. 12-120 in proposing the reliability investments in the Plan. If yes, please explain the specific parts of the SQ Guidelines that were considered.
- CLC 1-15 Refer to the Plan at 28-30. Please explain in detail and provide complete and detailed documentation on quantities, costs, and estimated CMS separately for underground and overhead remote fault circuit indicators (i) by individual service territories (i.e., BECO, Cambridge Electric, Commonwealth Electric, WMECO); and (ii) for Cape Cod and Martha's Vineyard.

- CLC 1-16 Reference the Plan at 41, which states that, “[i]n Eversource West and the coastal areas of Eversource East, a barrier to full automated feeder reconfiguration (“AFR”) is the lack of alternate supply sources via circuit ties.”
- a) The Plan further states at 41 that “[a]s part of the Plan, Eversource will build out the infrastructure where *cost effective* to tie radial circuits to deliver the benefits of automation.” (Emphasis added.) Please explain in detail and provide complete and detailed documentation on what metrics the Company will use to determine which investments – either in new ties or bolstered existing ties – meet the stated “cost effective” standard.
 - b) Please explain in detail and provide complete and detailed documentation on what percentage of the \$47.6 million requested for automated feeder reconfiguration will be spent on new ties or bolstering existing ties.
 - c) Please explain in detail and provide complete and detailed documentation on the location and cost of any such new or bolstered ties the Company has already identified as appropriate “cost effective” investments.
 - d) Please explain in detail and provide complete and detailed documentation on how the costs of any new or bolstered ties would be allocated between customer classes and territories.
- CLC 1-17 Reference the Plan at 43, which states that, “[i]n Eversource East, a smaller percentage of customers benefit from the automatic transfer.” Please explain in detail and provide complete and detailed documentation on what percentage of non-network customers in Eversource East benefit from having an auto transfer to an alternate source such that they do not experience an outage for a fault on the mainline.
- CLC 1-18 Reference the Plan at 11, which states “Eversource deployed an innovative power line carrier transfer trip protection scheme at its solar facility in Springfield. [T]he Company has worked with *multiple customers* to deploy the scheme at their solar facilities.” (Emphasis added.)
- a) Please explain in detail and provide complete and detailed documentation on each of the “multiple customers” indicated above:
 - (i) location,
 - (ii) size (kW),

- (iii) peak summer demand,
- (iv) peak winter demand, and
- (v) interconnection date.

b) Please explain in detail and provide complete and detailed documentation on how the costs for the Springfield upgrades were allocated by the Company.

CLC 1-19 Reference the Plan at 33, which describes automatic generation control as a “control function by which all [Distributed Energy Resources (“DERs”)] on a specified part of the distributed system may be disconnected-from or reconnected-to the grid. This could include situations such as loss of a transmission line takes [sic] a number of large generators off-line on a circuit and control is required to bring facilities back into service in a staggered process.”

a) In addition to remotely disconnecting and reconnecting DERs from the grid in the event of an extraordinary event, such as the loss of a transmission line or other outage, would the proposed investment allow the Company to use automatic generation control for other purposes, such as dispatching resources during high-loading conditions or for participating in various Independent System Operator-New England (“ISO-NE”) capacity or ancillary markets? Please explain in detail and provide complete and detailed documentation on whether the Company anticipates taking advantage of such other stated capabilities.

b) Please explain in detail and provide complete and detailed documentation on whether there are any additional capabilities of automatic generation control of which the Company anticipates taking advantage?

CLC 1-20 Reference Energy Storage in the Plan at 56-59, which states (at 58) that “[t]he eventual result will be a more streamlined process to ensure safe and effective energy storage implementations going forward.”

a) Please explain in detail and provide complete and detailed documentation on whether that “eventual result” and its associated, anticipated benefits would apply to storage systems owned only by the Company, or would also apply to third-party and customer-owned systems. If benefits would only accrue to the Company, please explain in detail and provide complete and detailed documentation on why that would be the case.

b) Please explain in detail and provide complete and detailed documentation on why the proposed energy storage investment was included in the Company’s

Short Term Investment Plan ("STIP") when it is also included as a specific focus area identified by the Company for Research and Development (Plan at 141)?

- CLC 1-21 Reference the Plan at 57-58. Regarding the New Bedford Energy Storage Project:
- a) Please explain in detail and provide complete and detailed documentation on what criteria were utilized to screen and select the New Bedford Energy Storage Project?
 - b) Please explain in detail and provide complete and detailed documentation on whether other alternative or additional locations were considered? If so, please explain in detail and provide complete and detailed documentation on those locations and the specific reasons why those locations were not proposed in the Plan?
- CLC 1-22 Reference the Plan at 45-47. Given the Company's estimates for reduced energy consumption for customers on affected circuits and reduced peak load resulting from implementation of VVO, please explain in detail and provide complete and detailed documentation on monetized estimates for these benefits and indicate where they are accounted for in the Company's Business Case Template (Appendix 8).
- CLC 1-23 Reference Exhibit Eversource-DPG-1 at 5-6, Exhibit Eversource-RDC-3 at 2-3, and the "Costs" tab of Appendix 8. Please explain in detail and provide complete and detailed documentation on whether the Company is proposing targeted cost recovery of operation and maintenance ("O&M") costs through the capital expense tracking mechanism.
- CLC 1-24 Reference Business Case Template at Appendix 8. Please provide two versions of the Business Case Template, one for Eversource East and one for Eversource West.
- CLC 1-25 Reference Section II (D) of the Plan and five-year Customer Engagement investment of \$19 million at 104-105. Please explain in detail and provide complete and detailed documentation on whether the Company's proposed Customer Engagement spending level of \$19 million would change if it were required to make Time-Varying Rates ("TVR") available on an opt-out basis?
- CLC 1-26 Reference "Utility Collaboration" in the Plan at 108-109. If the Company adopted TVRs of similar design to the other Massachusetts electric distribution

companies (National Grid in D.P.U. 15-120 and Unitil in D.P.U. 15-121), please explain in detail and provide complete and detailed documentation on whether there would be greater opportunity to collaborate with these distribution companies in state-wide marketing efforts?

- CLC 1-27 Reference Department Order in D.P.U. 12-76-B at 27. In that Order, the Department required the company-specific marketing, education and outreach plan to include a local component that should reflect the Company's relative starting point in the grid modernization process.
- a) Please explain in detail and provide complete and detailed documentation on whether and how the Company has complied with this requirement, including page numbers referencing compliance in the Plan.
 - b) Specifically, please explain in detail and provide complete and detailed documentation on whether and how the Company has (i) collaborated in developing the Plan; and (ii) included a timeline describing the expected major marketing, education and outreach milestones.
- CLC 1-28 Reference the Plan at 109-110. Please explain in detail and provide complete and detailed documentation on what percentage of its Customer Engagement budget the Company will spend on television advertising.
- CLC 1-29 Reference Section IV (Stakeholder Engagement) of the Plan at 132.
- a) Please explain in detail and provide complete and detailed documentation on a list of the stakeholders, including their towns, who attended the Company's April 14, 2015 meeting.
 - b) Please explain in detail and provide complete and detailed documentation on those stakeholders with whom the Company met individually following that meeting, including stakeholder names, addresses, organization name, addresses, and specific feedback received from each.
 - c) Please explain in detail and provide complete and detailed documentation on those stakeholders attending the April 14, 2015 meeting on behalf of municipal aggregators.
 - d) Please explain in detail and provide complete and detailed documentation on municipal aggregators that met individually with the Company pursuant to CLC 1-29(b).

- CLC 1-30 Reference Table 22 of the Plan at 133, which states as feedback: “[c]onsideration of differential impacts of different types of outages on different customers (e.g., momentary outages can update sensitive systems).” Please explain in detail and provide complete and detailed documentation on whether and how the Company incorporated the stakeholder feedback that varying reliability and power quality of different customers be considered in making investment decisions and cost allocation.
- CLC 1-31 Reference Section IV (Stakeholder Engagement) of the Plan, beginning at 132. Please explain in detail and provide complete and detailed documentation on all opportunities offered by the Company to provide feedback into the development of the Company’s Plan, including opportunities for members of the public to provide input (not including the one stakeholder meeting and individual follow-up meetings indicated in the Company’s response to CLC 1-29).
- CLC 1-32 Reference “Decision-Making Process and Focus Areas for R&D Efforts” in Section V (C) of the Plan. Please explain in detail and provide complete and detailed documentation on how the Company will rank and select which RD&D projects it will pursue. The Company’s response should include its decision-making tree, names of representatives in the decision-making process, and any involvement of consultants (which should be identified).
- CLC 1-33 Refer to Section II (B)(3) of the Plan. Given that the Company’s East and West territories are starting from significantly different baselines in terms of grid modernization technology, please explain in detail and provide complete and detailed documentation on how the Company proposes in its Plan to allocate those costs between the two territories?
- CLC 1-34 Refer to Section II (B)(3) (Proposed STIP Investments) of the Plan at 22-62. Please explain in detail and provide complete and detailed documentation (including any formulas) on how the Company determines the cost allocation of each investment by customer class and what factors go into that decision-making.
- CLC 1-35 Reference the Plan at 34.
- a) Please explain in detail and provide complete and detailed documentation on whether the \$7.8 million cost for Network Load Flow is allocated to customers or areas that do not have secondary area networks?

- b) Specifically, please explain in detail and provide complete and detailed documentation on whether the Company operates any major secondary area networks on Cape Cod or Martha's Vineyard?

CLC 1-36 Reference STIP costs and benefits in Sections II and III of the Plan.

- a) Please explain in detail and provide complete and detailed documentation on how the Company's proposed costs will be allocated between the different regions in its service territory (e.g., BECO, Cambridge Electric, Commonwealth Electric, and WMECO).
- b) Please explain in detail and provide complete and detailed documentation on whether customers in areas that would not benefit from a specific investment (e.g. investments in secondary area networks) would share in the cost of these investments?
- c) Reference Eversource-RDC-1 at 10.
 - (i) Please explain in detail and provide complete and detailed documentation on what negative impacts on goals established in Department orders, including DER integration and energy efficiency, will result from the Company recovering STIP costs through demand charges for large and medium C&I customers.
 - (ii) Please explain in detail and provide complete and detailed documentation on whether the Company considered those negative impacts in its decision to recover STIP costs through demand charges for large and medium C&I customers.

CLC 1-37 Please explain in detail and provide complete and detailed documentation on whether the Company gave consideration to submitting different GMPs for Eversource East and Eversource West? If yes, please explain in detail and provide complete and detailed documentation pertaining to or referring to that decision-making.

CLC 1-38 Please explain in detail and provide complete and detailed documentation on any expenses included in the STIP, including RD&D, that have benefits that span Eversource East and Eversource West territories, and explain how these costs were allocated between customers in these territories.

- CLC 1-39 Reference RDC-4 (revised) and RDC-6 (revised). Please explain in detail and provide complete and detailed documentation on why bill impacts associated with the STIP are so much greater for Eversource East customers than for Eversource West customers. In the explanation, please explain in detail and provide complete and detailed documentation on the reasons why grid modernization costs are so much higher in Eversource East. Please do not simply explain why proposed expenses per total kilowatt-hour ("kWh") in the territory are higher in Eversource East.
- CLC 1-40 Reference RDC-4 (revised) at 1 and RDC-6 (revised) at 1. Please explain in detail and provide complete and detailed documentation on why there are greater percentage changes from year to year in the STIP for Eversource West customers than Eversource East customers?
- CLC 1-41 Reference RDC-8 at 1 and 4. Please explain in detail and provide complete and detailed documentation on why the summary on page 1 shows a Year 1 vs. Current change of 1.0%, while page 4 shows an average winter change of 1.9% and an average summer change of 2.0%?
- CLC 1-42 Reference RDC-8 (revised) at 1 and 3. Given the comparable average R1 kWh and Year 1 versus Current total dollar changes for the Greater Boston and South Shore, Cape Cod, and Martha's Vineyard territories, please explain in detail and provide complete and detailed documentation on why there is a 1.0% year 1 versus current change shown on page 1 and a 1.8% change on page 3?