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March 25, 2009

VIA HAND DELIVERY

Ms. Luly Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**Re: In Re: The Narragansett Electric Company d/b/a National Grid
(Advisory Opinion to EFSB regarding need and cost-justification for
proposed Rhode Island Reliability Project)
Docket No. 4029**

Dear Luly:

I am enclosing an original and 9 copies of National Grid's Response to the Division's Second Set of Data Requests for filing in the above-reference matter. I am also enclosing a CD with the attachments to requests 2-4, 2-5, 2-10 and 2-12. The attachments to the other requests are either Critical Energy Infrastructure Information ("CEII") or ICF proprietary information and will be made available to parties that sign appropriate non-disclosure agreements.

Please time stamp and return a copy of this letter and Response with our messenger.
Thank you.

Sincerely,



Peter V. Lacouture

PVL/lco
Enclosures

cc: Leo Wold, Esq.
Mr. Andrew C. Dzykewicz
Mr. Jared Rhodes
Mr. Gregory Booth
Mr. Richard Hahn

Ms. Luly Massaro
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Eric J. Krathwohl, Esq.
Kevin Flynn, Esq.
Erica P. Bigelow, Esq.
W. Mark Russo, Esq.
William J. Conley, Jr., Esq.
Timothy A. Williamson, Esq. (via Electronic Mail)
Richard Nadeau, Esq. (via Electronic Mail)
Peter D. Ruggiero, Esq. (via Electronic Mail)
Anthony A. Cipriano, Esq. (via Electronic Mail)
Ed Alves, Jr., Esq. (via Electronic Mail)
Christopher Colardo, Esq. (via Electronic Mail)

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REQUEST DPUC 2-1:

Please indicate if and how the load forecasts found in the Needs Analysis (Environmental Report, Volume 1, Appendix D) were used to develop Table 3-1 on page 3-6 of the Environmental Report, Volume 1.

RESPONSE:

The load forecast documented in the Needs Analysis was used to scale the load in the system model on which contingency analysis was performed to create Table 3-1 (on page 3-6 of the Environmental Report, Volume 1).

(Response prepared by or under
the supervision of Mark A. Stevens, P.E.)

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REQUEST DPUC 2-2:

Please provide the work papers used to develop tables 3-1 and 3-2 on page 11 of the Needs Analysis (Environmental Report, Volume 1, Appendix D) in electronic spreadsheet format with all formulae intact.

RESPONSE:

The requested information is within the knowledge and control of ISO-NE.

(Response prepared by or under
the supervision of Mark A. Stevens, P.E.)

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REQUEST DPUC 2-3:

Please describe in detail the process used to calculate the 2016 load forecast in table 3-2 on page 11 of the Needs Analysis (Environmental Report, Volume 1, Appendix D), given that the 2005 RSP forecast that is referenced load only contains a load forecast through 2014.

RESPONSE:

The requested information is within the knowledge and control of ISO-NE.

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the supervision of Mark A. Stevens, P.E.)

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REQUEST DPUC 2-4:

Please provide the amount of demand side resources included in the load forecast in the Needs Analysis (Environmental Report, Volume 1, Appendix D). Please include all work papers and documentation used to develop the demand side resource estimates including a description of the process used to develop the estimates.

RESPONSE:

Please see the attached spreadsheet, RI-2-4_ngrid05.xls, to see the load forecast referenced above. RI specific savings are found on the RI tab.

The information presented in RI-2-4_ngrid05.xls represents cumulative actual and forecast incremental effects for Summer kW, Winter kW, and Annual MWh. Incremental energy effects and incremental peak load reductions are defined as the effects caused by new program participants and new demand side management (DSM) programs during a given year. Incremental effects are actual in the first year, not annualized. The actual savings assume that only a half-year's savings will be realized for Summer kW and Annual MWh. These data thus differ from annualized data presented in National Grid year-end filings. Winter kW receives a full year of actual savings. In corresponding fashion, the Summer kW and Annual MWh data once again receive a half-year's savings in that last year of the program's useful life. These incremental energy and peak load reductions are incorporated into the current and projected annual energy effects and peak load reductions.

Current and projected annual energy effects and peak load reductions are defined as the total effects and peak load reductions caused by all participants (new and existing) in all DSM programs (new and existing) that are in effect during a given year. This includes the energy effects caused by programs initiated in prior years that are still in effect and programs that were terminated, but are still producing energy effects and/or peak load reductions.

Process: The spreadsheet is updated with each year's actual incremental effects added to prior years. Both energy and demand savings are taken from Company tracking systems and correspond to what has been filed at the PUC in the Company's Year End Reports. Summer kW and Annual kWh are equal to a half-year of savings in the current year. The lifetime of the

(Response prepared by or under
the supervision of Jeremy J. Newberger)

savings is then applied for the total number of years that a program provides savings with the final year again resulting in a half-year's savings. Winter demand realizes a full year of savings in year one and for each year thereafter throughout the program's lifetime. The current year's savings are then added in to each previous year's annual energy effects to arrive at the cumulative savings which are displayed in the Totals worksheet.

The forecast is based on each year's actual savings for measures installed in previous years. Savings are tracked by program and therefore have different lifetimes depending on what measures were installed. The forecast does not project future installations, but actually documents realized savings. Declines in savings indicate that measures installed in earlier years have reached the end of their useful life and are no longer contributing savings in the outer years.

Attachments: RI-2-4_ngrid05.xls

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REQUEST DPUC 2-5:

Please provide the analysis, supporting work papers and documentation for the 125 MW adjustment to peak load described in section 5.1.1 of the Non Transmission Alternatives report (Environmental Report, Volume 1, Appendix F). To the extent that any of the documents are spreadsheets, please provide them in electronic format with all formulae intact.

RESPONSE:

On page 41 of the attached document, "RI-2-5_load_forecast_methodology_review.pdf", published by ISO-NE, the ISO states that its fifth year average forecast error is a 4.2% under-forecast. The attached spreadsheet, "RI-2-5_isonc_2008_forecast_data.xls", also published by ISO-NE, shows that 2013 90/10 peak demand forecast for the Rhode Island sub-area is 2,965 MW. Applying the fifth year average forecast error shows that the actual demand in 2013 will be 4.2% or 125 MW higher than the 2008 forecast.

Note that ICF used the conservative forecast of 2,965 MW in its analysis, and did not adjust the peak demand forecast by the forecast error amount of 125 MW.

Attachments:

1. RI-2-5_load_forecast_methodology_review.pdf
2. RI-2-5_isonc_2008_forecast_data.xls

(Response prepared by or under
the supervision of Kenneth K. Collison)

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REQUEST DPUC 2-6:

Please provide the analysis, supporting work papers and documentation for the DSM and CHP adjustment to peak load described in section 5.1.2 of the Non Transmission Alternatives report (Environmental Report, Volume 1, Appendix F). To the extent that any of the documents are spreadsheets please provide them in electronic format with all formulae intact.

RESPONSE:

Please see the attached documents.

The spreadsheet document "RI-2-6-DSM_Assumptions_DSM.xls" describes the DSM adjustment to peak demand.

The documents that describe the CHP adjustment to peak demand are:

- RI-2-6-CHP_CHP Market Model New England Analysis Appendices 4-15-08.doc
- RI-2-6-CHP_NE Incentive Summary.xls

The summary document "RI-2-6_Demand Assumptions.xls" shows the demand forecast net of DSM, CHP and losses.

Chapters 3 and 4 of ICF's report discuss the underlying assumptions for CHP and DSM respectively, and Section 5.1 of the report describes the CHP, DSM and transmission loss adjustments to peak load.

Attachments (Note: Attachments contain ICF Proprietary information and will be provided upon execution of a Confidentiality Agreement):

1. RI-2-6-DSM_Assumptions_DSM.xls
2. RI-2-6-CHP_CHP Market Model New England Analysis Appendices 4-15-08.doc
3. RI-2-6-CHP_NE Incentive Summary.xls
4. RI-2-6_Demand Assumptions.xls

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the supervision of Kenneth K. Collison)

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REQUEST DPUC 2-7:

Please provide the analysis, supporting work papers and documentation for the Transmission Loss adjustment to peak load described in section 5.1.3 of the Non Transmission Alternatives report (Environmental Report, Volume 1, Appendix F). To the extent that any of the documents are spreadsheets please provide them in electronic format with all formulae intact.

RESPONSE:

The ISO-NE demand forecast comprises load and losses. Since the power flow software automatically calculates losses associated with delivery of power to loads, the demand forecast used in the power flow analysis must be net of losses. ICF estimated average loss factors for each sub-area in the ISO-NE zone, as shown in the attached spreadsheet "RI-2-7_Losses-Calculation.xls", using the power flow case provided for the study, which is attached as "RI-2-7_prenews-newgen-v2.raw". The loss factors were applied to the peak demand forecast for each sub-area to estimate the losses for that area in MW.

Attachments (Note: Attachments contain Critical Energy Infrastructure Information ("CEII") and ICF proprietary information and will be provided upon execution of a CEII Non-Disclosure Agreement and a Confidentiality Agreement):

1. RI-2-7_Losses-Calculation.xls
2. RI-2-7_prenews-newgen-v2.raw

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REQUEST DPUC 2-8:

Please describe fully how future energy efficiency and demand side management programs affect the load forecast used in the Needs Analysis (Environmental Report, Volume 1, Appendix B). Please include all work papers and documentation in electronic format. To the extent that any of the documents are spreadsheets please provide them in electronic format with all formulae intact.

RESPONSE:

Future energy efficiency and demand side management programs would act to effectively reduce the load forecast that was used for the Needs Analysis. In practice, ISO-NE now considers energy efficiency and demand side management programs that are cleared through the FCM auctions, as resources instead of load decrements. See question 2-19 for details on how the energy efficiency and demand side management programs from the latest FCM auction impact the load forecast used in the Needs Analysis.

(Response prepared by or under
the supervision of Mark A. Stevens, P.E.)

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REQUEST DPUC 2-9:

Please describe fully how future energy efficiency and demand side management programs affect the load forecast used in the Non Transmission Alternatives Assessment (Environmental Report, Volume 1, Appendix F). Please include all work papers and documentation in electronic format. To the extent that any of the documents are spreadsheets please provide them in electronic format with all formulae intact.

RESPONSE:

See response to Request DPUC 2-8.

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the supervision of Mark A. Stevens, P.E.)

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REQUEST DPUC 2-10:

Has National Grid prepared, developed, or had developed by a third party any forecasts of the peak and energy requirements of loads for the National Grid system, including but not limited to loads in Rhode Island, since 2006? If so, please provide those load forecasts, the date they were prepared, and all underlying assumptions and work papers.

RESPONSE:

Every year National Grid develops peak load forecasts for its service territory. Since 2006, a forecast has been developed in both 2007 and 2008. These forecasts are organized into 27 power supply areas. They include Summer and Winter forecasts, coincident and non-coincident forecasts, and normal and extreme weather forecasts. A document titled "2008 Power Supply Area Forecast" is included with this response. This document was prepared on April 1, 2008. The document includes a description of the assumptions and methodology. The *2009 Power Supply Area Forecast* will be published on April 1, 2009.

Attachment: RI-2-10_2008 PSA Forecast.pdf.

(Response prepared by or under
the supervision of Mark A. Stevens, P.E.)

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REQUEST DPUC 2-11:

Please provide, in electronic format such as Excel, a listing of all RI load buses that are modeled in the load flow runs performed by National Grid and/or ICF Consulting. For each load bus, please provide the latest actual load value recorded and any forecast of those load values in future years. Also, provide a one-line diagram of the RI system that shows these buses.

RESPONSE:

Included is an Excel spreadsheet, listing the Rhode Island Load busses along with their 2008 Summer Peak actual loads, 2014 summer peak coincident extreme weather forecast loads, and the 2022 summer peak coincident extreme weather forecast loads. The forecasted loads were obtained from the *2008 Power Supply Area Forecast*. Also included is a one-line diagram of the National Grid System.

Attachments (Note: Attachments contain Critical Energy Infrastructure Information ("CEII") and will be provided upon execution of a CEII Non-Disclosure Agreement):

1. RI-2-11_*Rhode Island Loads.xls*
2. RI-2-11_*NGRID-NE-Transmission-one-line.pdf*

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REQUEST DPUC 2-12:

Please list, in electronic format such as Excel, all Rhode Island generating resources assumed in the National Grid and/or ICF Consulting analyses of the RIRP, identifying any existing and new (i.e., not in-service as of today) generating units assumed.

RESPONSE:

See attached RI generator list in Excel format: *RI-2-12_RI Generator list for Needs and NTA Analyses.xls*. Note that in the Needs Analysis, only existing units were considered, while in the NTA Analysis all units – new and existing – were included.

Attachment: *RI-2-12_RI Generator list for Needs and NTA Analyses.xls*

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REQUEST DPUC 2-13:

Please provide an electronic copy of all input load flow data files and solved output files (in PSS/E or PSLF format) used by National Grid and/or ICF Consulting in the analyses of the RIRP. If this data is CEII confidential, please provide the necessary confidentiality agreement for La Capra Associates to sign.

RESPONSE:

(a) Included is a folder containing a recent key subset of the load flow input and output files used by National Grid in the analyses of RIRP. These files were used for the analyses of NEEWS (RIRP is one part of NEEWS). These are not all of the NEEWS load flow files that National Grid used, as there were very many load flow analyses files used by National Grid for NEEWS over the last four years.

Attachment (folder) (Note: Attachments contain Critical Energy Infrastructure Information ("CEII") and will be provided upon execution of a CEII Non-Disclosure Agreement):

RI-2-13_*NEEWS Loadflow Analysis*.

(b) The attached files are power flow cases, a contingency list file, and a contingency analysis control file used by ICF in the NTA Analysis for the Rhode Island Reliability Project. They cover the Reference Scenario, the RISE Unit Outage Scenario, and the Demand-side Reduction Scenarios described in Chapter 6 of ICF's report.

While compiling the data in response to this data request, ICF realized that some of the results of the Demand-side Reduction Scenarios described in ICF's Report and in Mr. Collison's testimony were based on power flow cases that were a different vintage from those used in the Reference Scenario. Specifically, the new wind generation facility was sited at the West Kingston substation in the Reference Scenario, but it was sited at a different substation in Rhode Island in some of the Demand-side Reduction Scenarios.

The attached files represent the correct set of power flow cases. That is, in all these power flow cases, the new wind facility is sited at the West Kingston. With this adjustment, the

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maximum demand reduction required in the Demand-side Reduction Scenarios is approximately 1,500 MW and not 2,000 MW. This does not change the conclusion of ICF's study. That is, there is no satisfactory NTA solution available for the Rhode Island Reliability Project.

ICF will correct the Report and Mr. Collison's testimony to reflect the changes.

Attachments (Note: Attachments contain Critical Energy Infrastructure Information ("CEII") and ICF proprietary information and will be provided upon execution of a CEII Non-Disclosure Agreement and a Confidentiality Agreement):

1. RI-2-13_File Descriptions.xls
2. RI-2-13_Master-outage-needs-rpt-new.otg
3. RI-2-13_needsreport.cntl
4. RI-2-13_Exhibit 6-1,6-2-Pre-NEEWS Case.raw
5. RI-2-13_Exhibit 6-1,6-2-RIRP Case.raw
6. RI-2-13_Exhibit 6-4, 6-5, Pre-NEEWS Case.raw
7. RI-2-13_Exhibit 6-4, 6-5-RIRP Case.raw
8. RI-2-13_rirp-nta1.raw
9. RI-2-13_rirp-nta2.raw
10. RI-2-13_rirp-nta3.raw
11. RI-2-13_rirp-nta4.raw
12. RI-2-13_rirp-nta5.raw
13. RI-2-13_rirp-nta6.raw
14. RI-2-13_rirp-nta7.raw
15. RI-2-13_rirp-nta8.raw
16. RI-2-13_rirp-nta13.raw
17. RI-2-13_rirp-nta14.raw
18. RI-2-13_rirp-nta15.raw

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REQUEST DPUC 2-14:

Please provide the forecast described on page 3-5 of the Environmental Report, Volume 1, as the "2012 extreme summer forecast (90/10) peak-load level." Indicate the source of the forecast and include, in electronic format with all formulae intact, all calculations and workpapers involved in developing this forecast.

RESPONSE:

The requested information is within the knowledge and control of ISO-NE.

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REQUEST DPUC 2-15:

Please define the time period over which electrical studies were conducted, as referenced on page 4, lines 7-9 of Mr. Stevens' Testimony.

RESPONSE:

Electrical studies for NEEWS (of which Rhode Island Reliability is a part) were done for the following years: 2009, and 2012 through 2022. The majority of the analysis focused on the years 2012, 2014, and 2016.

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REQUEST DPUC 2-16:

Please quantify and provide all workpapers, in electronic format with all formulae intact, that support the phrase "high load growth (especially in Southern Rhode Island and the coastal communities)," as referenced on page 5, lines 6 and 7 of Mr. Stevens' Testimony.

RESPONSE:

The following paragraph from the *2008 Power Supply Area Forecast* supports the "high load growth" phrase used in Mr. Stevens' testimony.

Narragansett Electric, the second largest Distribution Company in the New England system, accounts for 27% of the system peak and serves all but a small portion of the state of Rhode Island. Narragansett's peak demand grew 2.1% per year on average over the last ten years and 2.2% per year on a weather-adjusted basis. Like Massachusetts Electric and the system, Narragansett has seen strong residential and commercial growth, negative industrial growth, increased residential air conditioning saturation and a decline in load factor. Over the next ten years, the Narragansett peak is expected to increase 2.8% annually. Spot loads contribute about 10 MW to the Narragansett peak forecast. Most spot loads are located in "Western NECo," Narragansett's largest and fastest growing PSA. Load growth in the Western NECo PSA has been similar to the Southeast District in Massachusetts. The areas share characteristics favorable to residential development.

"Western NECo" is primarily made up of the Rhode Island load located west and south of Providence. A large part of this load is in southern Rhode Island and the coastal communities.

Additionally, *Chart 3* on page 7 of the *2008 Power Supply Area Forecast* (this file is included, see Response to Request DPUC 2-10), graphically shows the peak demand trends and forecasts for the Narragansett Electric Company and the other National Grid companies.

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REQUEST DPUC 2-17:

Please explain how the load levels for the "State of RI" and "Load Pocket" were derived. Include a discussion of assumptions and data sources.

RESPONSE:

The load levels for the "State of RI" and "Load Pocket", as specified in the table on page 6 of Mr. Stevens' testimony, were derived directly from the load flow model by adding up all of the individual loads in each of these areas.

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REQUEST DPUC 2-18:

Please provide all sources and workpapers, in electronic format with all formulae intact, underlying the load forecast figures found in the table on page 6 of Mr. Steven's Testimony.

RESPONSE:

The following list indicates the sources for the load forecast figures found in the table on page 6 of Mr. Stevens' testimony:

- *Load level at which Needs Analysis was performed:* the source for these figures is from the load flow model. The load level specified in the load flow model came from the 2006 CELT Report for the 10% probability summer 2012 forecast.
- *Adjustment for ISO-NE 2008 CELT 2014 90/10 peak load forecast:* the source for these figures is the 2008 CELT Report for the 10% probability summer 2014 forecast.
- *Demand Side Management from Forward Capacity Auction (FCA) #2:* the source for these figures is the results of the FCA #2, provided to National Grid by ISO-NE.
- *Adjustment due to Ridgewood Generator on S-171S line (cleared in FCA #2):* the source for this figure is the results of the FCA #2, provided to National Grid by ISO-NE.
- *Adjustment due to early prediction of 2009 forecast:* the source for these figures is ISO-NE. These figures represent a preliminary estimate to the 2009 CELT forecast, provided to National Grid by ISO-NE.

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REQUEST DPUC 2-19:

Please indicate whether the analysis shown in the table on page 6 of Mr. Stevens' Testimony incorporates ISO-NE most recent long-run forecast as presented to the PAC committee meeting on February 25, 2009. If not, please perform the analysis using this forecast.

RESPONSE:

The table on page 6 of Mr. Stevens' testimony does not specifically incorporate the ISO-NE most recent long-run forecast as presented to the PAC committee meeting on February 25, 2009. The long-run forecast, as presented to the PAC committee, was not available at the time that Mr. Stevens' testimony was completed. Instead, the table on page 6 incorporates a preliminary estimate to the forecast provided to National Grid by ISO-NE. This is reflected in the row: *Adjustment due to early prediction of 2009 forecast*. The table from page 6 is recreated here with updates to reflect the long-run forecast as presented to the PAC committee (changes are in italicized text).

	New England Load	State of Rhode Island Load	Load Pocket (47% of RI load)
Load level at which Needs Analysis was performed	32,648 MW	2,137 MW	1009 MW
Adjustment for ISO-NE 2008 CELT 2014 90/10 <i>summer</i> peak load forecast	+127 MW (32,775 forecast)	+65 MW <i>(assuming RI load is 6.72% of New England load, which is 2202 MW)</i>	+31 MW
Demand Side Management from Forward Capacity Auction (FCA) #2	-1521 MW	-76 MW	-36 MW
Adjustment due to Ridgewood Generator on S-171S line (cleared in FCA #2)			-34 MW
<i>Adjustment due to the long-run forecast for the year 2014, as presented to the PAC committee</i>	-875 MW (31,900 forecast)	-12 MW (2,190 forecast)	-6 MW
Total Net Adjustment to the load value that was used in the Needs Analysis			-45 MW

Additionally, the table was updated to reflect the fact that the RI load forecast should actually be 6.72% of the ISO-NE 2008 CELT 2014 90/10 summer load forecast, not 6.5% as was used in the table in Mr. Stevens' testimony. Using the long-run forecast as presented to the PAC committee, the reduction in load in the Load Pocket would now be 45 MW. In the table on page 6 of Mr. Stevens' testimony the reduction was 82 MW. Therefore, the latest long-run forecast and the results of the latest Forward Capacity Auction have even less of an impact on the need

(Response prepared by or under
the supervision of Mark A. Stevens, P.E.)

for the Rhode Island Reliability Project than was documented in Mr. Stevens' testimony. In conclusion, there is still a very strong need for the Rhode Island Reliability Project. This conclusion is confirmed by Mr. Mezzanotte of ISO-NE on pages 14 and 15 of his pre-filed testimony.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

In re The Narragansett Electric Company :
d/b/a National Grid (Advisory Opinion : Docket No. 4029
to EFSB regarding need and cost-justification :
for proposed Rhode Island Reliability Project) :

National Grid's Response
to the Division's Second Set of Data Requests

REQUEST DPUC 2-20:

Please discuss the differences between the reductions found in Table 3-1 of Volume 1 of the Environmental report, which appear to be between 100 and 500 MW, and the statement on 50 in the Non Transmission Alternatives report (Environmental Report, Volume 1, Appendix F) that reads, "The resulting peak demand in the Rhode Island sub-area would need to be between 800 and 1,500 MW to achieve the reliability benefits of the Project."

RESPONSE:

The 100 MW to over 500 MW demand reduction refers to load that would have to be shed in a specifically targeted area to address the most severe dispatch and contingency conditions, such as voltage collapse resulting in blackouts. The targeted load shedding does not, however, address all criteria violations observed in the Needs Analysis.

In contrast, the demand reduction that results in a Rhode Island sub-area peak demand of 800 MW to 1,500 MW refers to the amount of demand reduction that would provide the same level of reliability as the proposed Rhode Island Reliability Project. This reflects a higher amount of demand response (spread over many area substations) than that required to relieve only the most severe conditions. The two reports are therefore consistent.

Please see the response to REQUEST DPUC 1-12 for a more detailed explanation.

Note that as described in the response to REQUEST DPUC 2-13, ICF will make corrections to ICF's Report and Mr. Collison's testimony as a result of the adjustment to the location of the new wind generation facility. Following this adjustment, the resulting peak demand in the Rhode Island sub-area, as referred to in this request (REQUEST DPUC 2-20), would need to be between 1,300 MW and 1,500 MW to achieve the reliability benefits of the Project. The conclusion of ICF's study, however, remains the same. That is, there is no satisfactory NTA solution available for the Rhode Island Reliability Project.

(Response prepared by or under
the supervision of Kenneth K. Collison)

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REQUEST DPUC 2-21:

Please provide the analysis, supporting work papers and documentation for "2013 peak demand projection," as referenced on page 10, lines 13 and 14 of Mr. Collison's Testimony. To the extent that any of the documents are spreadsheets, please provide them in electronic format with all formulae intact.

RESPONSE:

The "2013 peak demand projection" is the ISO-NE 2013 90/10 peak demand forecast. Please see the document, "RI-2-5_isonne_2008_forecast_data.xls", which is attached to the Response to Request DPUC 2-5.

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REQUEST DPUC 2-22:

Please provide a list of “the projected generation resource additions and retirements” and [in-service] and retirement dates referenced on page 10 of Mr. Collison’s testimony. Indicate whether meeting Rhode Island’s RPS and renewable energy goals were considered when developing this list.

RESPONSE:

The generation resource additions and retirements are shown in the attached spreadsheet document “RI-2-22_Generation Addition and Retirement Assumptions.xls”. ICF’s generation capacity additions and retirements are discussed in Chapter 4 of ICF’s report. Further, as described in Section 4.1 of ICF’s report, renewable generation of 196 MW was added to help meet Rhode Island’s RPS requirements.

Attachment (Note: Attachments contain ICF Proprietary information and will be provided upon execution of a Confidentiality Agreement):

1. RI-2-22_Generation Addition and Retirement Assumptions.xls

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REQUEST DPUC 2-23:

Regarding Mr. Collison's discussion on page 13 of the Non-Transmission Alternatives, please indicate whether any NTA generation scenarios were analyzed.

RESPONSE:

ICF studied the effect of demand reduction as a proxy for generation addition in Rhode Island in its NTA scenarios. Pages 49 and 50 of ICF's report outline the demand reduction scenarios analyzed by ICF. As explained there, ICF studied the effect of demand reductions in Rhode Island of more than 1000 MW. At the time of the analysis, no new generation facilities had bid into and cleared in the ISO New England First Forward Capacity Auction (FCA #1). Further, there were no generation facilities in advanced stages of planning in Rhode Island. Thus there were no proposed generation facilities that were considered to be potential NTAs.

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