Thomas R. Teehan
Senior Counsel

July 5, 2011

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4206 - Revenue Decoupling Mechanism Proposal ("RDM")
Post Hearing Brief

Dear Ms. Massaro:

Enclosed please find ten (10) copies of National Grid's[1] Post Hearing Brief, concerning the above-captioned proceeding.

Thank you for your attention to this transmittal. If you have any questions, please feel free to contact me at (401) 784-7667.

Very truly yours,

Thomas R. Teehan

Enclosures

cc: Docket 4206 Service List
Leo Wold, Esq.
Steve Scialabba, Division

[1] The Narragansett Electric Company d/b/a National Grid.

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

RHODE ISLAND PUBLIC UTILITIES COMMISSION

National Grid's Revenue Decoupling Mechanism Proposal	Docket No. 4206

National Grid's Post Hearing Brief

Pursuant to the provisions of the recently enacted Revenue Decoupling Statute ("Decoupling Act"), the Company's electric and gas revenue decoupling mechanism ("RDM") proposals are consistent with the intent and objectives contained in the Decoupling Act, and as the consultant for the Division of Public Utilities and Carriers ("Division") acknowledges, they conform to the parameters for electric and gas RDMs that are specified in the legislation. (Direct Pre-filed Testimony of Bruce Oliver ("BRO"), p. 11, ll. 5-9). As required by the statute, the Company's electric and gas RDM proposals contain annual reconciliations between the Company's actual billed revenue during the RDM year and the revenue requirement resulting from the Company's last general rate case for its electric and gas distribution operations.[1] As is the goal of the statute, the operation of this type of reconciliation mechanism removes a barrier to the Company more fully embracing and implementing wider-scale energy efficiency programs beyond levels that have traditionally been performed by the Company and its customers.

[1] The Company will reduce the revenue requirement in its last electric general rate case in RIPUC 4065 by the operation and maintenance expense removed from base rates in its electric Infrastructure, Safety and Reliability Plan in RIPUC 4218 to ensure it does not double-recover this cost.

Moreover, the effect of the Company's RDM proposals is to provide an allowed level of revenue, which will accomplish the legislature's goal of supporting safe, efficient, and reliable electric and gas distribution systems. In this post hearing brief the Company addresses the major issues raised by the parties during this proceeding.

a. Capping RDM rate adjustments and deferring reconciliation amounts in excess of those caps is inconsistent with the Decoupling Act's mandate that actual revenue be reconciled to target revenue on an annual basis.

The Division has recommended that the Commission cap RDM rate adjustments resulting from the Company's proposed annual reconciliations by limiting the revenue to be refunded to or recovered from any rate class[2] to no more than plus or minus five percent of the authorized base revenue for that class. The Division goes on to propose that amounts in excess of the cap for any rate class should be deferred with interest for refund or recovery in future periods. (BRO Direct Pre-filed Testimony, p. 49, ll. 6-10) The Division's suggested rate cap and future deferral requirements should be rejected as they run contrary to the stated intent and provisions of the Decoupling Act. (R.I.G.L. §39-1-27.7.1)

One of the key statutorily-required components of an RDM proposal under the Decoupling Act is that it "annually" reconcile the Company's allowed revenue requirement from its rate case to revenue actually billed during that "applicable twelve month period" and that it credit to customers any over-recoveries or recover from customers any under-recovered amounts. R.I.G.L. §39-1-27.7.1(c)(1). The statute ensures the refund or recovery of an amount in excess of or less than a target revenue

[2] The Company requested a single RDM reconciliation and RDM adjustment factor applicable to all customers subject to the proposed RDMs, while the Division proposed multiple RDM reconciliation groups and adjustment factors for each individual rate class. The Company addresses this below in Section d.

amount, which has been decoupled from sales. As written, the statute does not contemplate that over-collections be credited or under-collections be collected in future periods, nor is it good public policy to defer the disposition of such revenue.

Deferring credits to customers that exceed the rate cap into the future could fail to provide customers with the full benefit of the annual reconciliation. This is because under the rate cap and deferral proposal recommended by the Division, the refund or collection of reconciliation amounts is postponed to sometime in the future, possibly indefinitely. As the Division's witness concedes, the refund to or recovery from customers may not occur for years. (Tr. p. 151-152) In addition, not only is such a rate cap and deferral proposal not contemplated by the statute, but it can create generational inequities by re-directing refunds or recoveries to those who are less likely to have been customers during the twelve-month RDM period being reconciled. More importantly, the lag in any recovery resulting from lower billed revenue as compared to the revenue target could create a disincentive for the Company to more fully embrace energy efficiency measures since the lag introduces uncertainty as to when the Company may fully recover the deferred revenue, ultimately impacting the Company's cash flow. Such uncertainty directly conflicts with the Decoupling Act's goal of eliminating "disincentives to support energy efficiency programs." Deferring the Company's recovery of any under-recoveries also undermines the Decoupling Act's statutory goal of supporting the maintenance of a safe and reliable delivery system for Rhode Island. R.I.G.L. §39-1-27.7.1(a).

To the extent the Division's witness bases his recommendation of a rate cap and deferral proposal on rate stability, that concern is already addressed in the Company's RDM proposals, as the proposed single RDM reconciliation and adjustment factor will

offset credits and surcharges that would otherwise be charged to individual service classes, resulting in one level surcharge or credit. In addition, the electric RDM proposal addresses rate stability with a mechanism that would allow for an interim rate adjustment during the applicable twelve-month period should the projected over- or under-collection of the annual target revenue exceed ten percent. (Direct Pre-filed Testimony of Jeanne A. Lloyd, pp. 8-9)[3] The Company intends to measure the need for an interim adjustment by comparing the annual target revenue against the sum of actual billed revenue for months for which billings have occurred and forecasted revenue for the remainder of the RDM year based upon the most recent forecast of billing units applied against distribution rates in effect. In fact, the Division's witness conceded at the evidentiary hearing that the Commission has in the past employed interim rate adjustments such as the Company is proposing to avoid large bill impacts on customers. (Tr. pp. 158-161) Thus, to the extent that the Commission is concerned with rate stability, the goal of limiting large rate increases to customers is best met as it is traditionally handled, not with a rate cap, but rather with an interim rate adjustment provision such as the one found in the Company's electric RDM proposal. In turn, deferred revenue will be mitigated in the near term and the Company will not have to carry deferrals into future years.

Finally, the Division's witness offers no convincing support for his recommendation of a five percent rate cap. He readily conceded that there is no precisely correct answer relative to the appropriate amount of a cap. (Tr. p. 153) Indeed, in testimony in the most recent electric rate case where revenue decoupling was considered by the Commission, Mr. Oliver recommended a cap based on ten percent of distribution revenues. However,

[3] The Company has not requested an interim rate adjustment for its gas RDM because as a practical matter the peak season for gas usage occurs just prior to the end of the RDM year and there would be insufficient time to implement an effective interim adjustment. See: Company Response to Commission 1-8.

in this proceeding, he changed his recommendation to a five percent cap by rate class. When questioned at the hearing, Mr. Oliver further indicated his uncertainty about even the correct level of a rate cap, stating that he is open to discussion of something in the five to ten percent range. (Tr. p.155) Hence, even if the Commission were to conclude that imposing a rate cap is allowed under the Decoupling Act (a conclusion that is not supported by the statutory language), the recommendation of the Division's witness in this case is nonetheless one with no certainty in the record, and it should be rejected.

b. The statutory framework for the RDM is premised on a twelve-month reconciliation and not a nine-month reconciliation.

The Company's RDM proposals were filed in October 2010 seeking an initial reconciliation period of April 1, 2011 through March 31, 2012. Thus, at the end of this RDM period, the RDM proposals would compare actual billed revenue during that period to the revenue requirement (or revenue per customer) resulting from the Company's last general rate case for its electric and gas distribution operations.

The Division's witness proposes that the initial reconciliation under the electric RDM should not apply to the full fiscal year as proposed by the Company. Instead, he recommends that the initial year of implementation be for a "partial year" period running from July 1, 2011 through March 31, 2012. (BRO Pre-filed Direct Testimony, p. 47, ll 1-17) However, as previously noted, the Decoupling Act provides for an RDM that "reconciles annually the revenue requirement for the applicable twelve-month period." R.I.G.L.§31-1-27.7.1(c)(1). That is why under the Company's proposal the initial RDM period will reconcile actual billed revenue from April 1, 2011 through March 31, 2012, its fiscal year, to the annual target revenue which is proposed to be the annual revenue requirement allowed in the Company's last base distribution rate case. There is no

evidence nor does the Division contend that the Company cannot track the actual billed revenue for the months that precede the Commission's approval of the Company's RDM.

Nor is there a legal prohibition against having the reconciliation period cover April 1, 2011 through March 31, 2012. When referring to retroactive rate making, the Rhode Island Supreme Court has noted that "no rule shall be blindly applied, however, without prior consideration of the underlying policy that the application of the rule in a particular instance will not undermine its original purpose." *Narragansett Electric Company v. Burke*, 415 A.2d at 178." The court has recognized a number of exceptions to the rule on retroactive rate making including where a statute allows for it. Here the legislature has created a statutory exception to that general rule. *See e.g. Providence Water Supply v. Malakowski, 624 A.2d 215, 217 (R.I. 1993).* That is, the Decoupling Act specifically provides for the reconciling of past actual billed revenue to annual target revenue over a twelve month period. Moreover, in this case the Commission is not establishing a rate, but is simply approving a mechanism by which the RDM will operate.

c. Adjustments to customer bills that occur outside of the RDM year should not be excluded from the reconciliation

There is no record evidence that the Company's proposed RDM would result in inappropriate out-of-period billing adjustments. Adjustments to customer bills are part of the ordinary course of providing utility service. There are numerous reasons for billing adjustments such as a customer challenge of a bill or service charge or a misread or malfunctioning meter. When the concern over an incorrect billing is brought to the Company's attention, the Company is required to address that situation by investigating a customer's claim, and should the claim have merit, by either granting a refund in the case of an over-billing or seeking to collect an additional charge in the case of an under-billing.

The Division's consultant admits that billing adjustments that are made during the RDM period should be included in the RDM reconciliation (Tr. p. 165, ll. 24), and that it is appropriate to include certain out-of-period adjustments. (Tr. p. 164, ll. 16-25) Since the intent of the regulatory policies underlying billing adjustments is for the Company to render a correct bill to a customer and for a customer to pay only for the services received, there is no reason to exclude billing adjustments for periods outside the RDM period.

Billing adjustments and the timing of billing adjustments are outside of the Company's control and the Company should not be discouraged from making legitimate billing adjustments simply because they relate to billing periods that occurred outside of the RDM year. Nor is there any evidence that the Company's approach to investigating or granting billing adjustments will be changed with the implementation of an RDM. The overriding principle of providing customers a correct bill for the services that they receive and the energy they use is not altered by the implementation of an RDM. Therefore, the Division's proposal should be rejected.

Moreover, as the Company has stated, attempting to implement a tracking mechanism for out-of period billing adjustments for the RDM proposals would be extremely complex and costly. (Company's Supplemental Response to Div. 1-9) The Company is presently in the process of converting its existing Advantage billing system for gas service to its Customer Service System ("CSS") used for electric service, effective November 1, 2011. (Company's Supplemental Response to Div. 1-9) Thus, any attempt to modify the existing gas billing system to track out-of period adjustments would be wasteful and inappropriate. Additionally, neither billing system segregates the distribution portion of billing adjustments or has the ability to identify situations in which

the Company identified and corrected billing errors before the bill is sent to the customer. Thus, even after conversion, extensive administrative manual work would also be required to track and report billing adjustments. The Company estimates that to upgrade its CSS to perform these tasks would require a significant expense estimated at $800,000. (Company's Supplemental Response to Div. 1-9)

Finally, as noted above, "out-of-period" billing adjustments are part of the normal ebb and flow of providing utility service, and depending on whether they involve the correction of an under- or over- billing situation may result in either an increase or a decrease to actual billed revenue. These billing adjustments impact the actual billed revenue during the current RDM year. To exclude that impact on revenue from the RDM reconciliation would unfairly misrepresent the fact that during the RDM period in which the billing adjustment is made the Company's actual revenue had been either increased or reduced by the amount of the adjustment. In addition, to the extent that an adjustment is made to billed revenue in a current RDM period that related to service rendered during a prior RDM period, it would then be necessary and appropriate under this same logic to adjust the billed revenue from the prior RDM period to reflect these billing adjustments.

d. Uniform RDM factors and not class specific RDM factors should be approved.

Under the Company's RDM proposals, uniform RDM factors would be calculated for the upcoming year. The Division has, however, proposed that those factors be calculated on a rate class basis, under the rationale of allocating costs to the responsible rate classes. The RDM proposals should not be treated as vehicles to adjust cost of service allocations. The proper and comprehensive manner to allocate costs is through an allocated cost of service study such as is conducted at the time of a rate case. The use of a uniform factor is

consistent with how the Company currently recovers its expenses for energy efficiency programs, which is one of the major underlying policy drivers for revenue decoupling. In addition, uniform factors are employed by the Commission in a variety of the Company's other reconciliation mechanisms.[4] Moreover, the Division's witness concedes that using class-specific RDM factors could have the effect of providing benefits to rate classes that are not conserving energy, which would undermine the Decoupling Act's stated purposes of achieving the goals of energy efficiency and conservation procurement. (See Tr p. 24, ll. 19-23) Accordingly, the Commission should adopt the Company's proposal of a single uniform RDM factor.

e. Adjustments to ensure Service Quality should be made after implementation of an RDM and within the Electric Service Quality Plan

The Division has suggested that the existence of an RDM will potentially provide an incentive to the Company to delay its electric restoration efforts at the time of a major service outage, and has proposed that imputed lost distribution revenue that result from major service outages be included in the same manner as actual billed distribution revenue in the electric RDM reconciliation. This position is unsupported as there is no evidence that the Company would delay its response to major outages as a result of the adoption of an RDM. Moreover, the Division's position ignores the success of the Company's existing Service Quality Plan ("Plan") approved in Docket No. 3628, under which the Company incurs penalties for non-performance if customer service interruptions exceed established thresholds for frequency and duration. As the Division's

[4] For example, the gas RDM proposal will replace the Weather Normalization Factor which currently is recovered through a uniform factor in the Company's annual November 1 Distribution Adjustment Charge ("DAC") filing. In fact, all of the November 1 DAC filing components are included in a single uniform factor. Consistent with this, the Company has proposed to reconcile its gas RDM in its annual November 1 DAC filing as part of a single uniform factor as well.

service quality/engineering consultant, Gregory Booth, indicated in a recent letter that was made part of the record in this case: "I'm convinced to a reasonable degree of engineering certainty that National Grid has, in fact, embraced the reliability assessment program and instituted all of the action items and recommendations." (Tr, p 73)

The penalty levels to which the Company is subjected in the Plan are significantly larger than an expected loss of distribution revenue during a major outage. As demonstrated in the Company's Response to Record Request Commission-1, under the Plan, if the Company failed to meet the annual reliability metrics in their entirety, it would incur a penalty of $1,832,000, well in excess of the estimated lost distribution revenue of $46,460 in such a situation. For example, during 2010, the Company reported SAIFI and SAIDI results that exceeded the penalty thresholds and incurred penalties totaling $386,991. During that year, the Company experienced a major two-day storm that occurred on March 30 and 31, yet the estimated lost distribution revenue associated with that storm was only about $25,000. (Company Response to Record Request Commission-1) Clearly the Plan already provides an effective incentive to the Company to restore service promptly, and the existence of an RDM does not weaken that incentive. Even during Major Event Days, which because of their severity may be excluded from the calculation of a penalty, the Company still has a separate and powerful incentive to restore electric service promptly, because the Company's recovery of incremental costs from a major storm through the Storm Fund is subject to review by the Commission and the Division.

Finally and more importantly, the Decoupling Act directly addresses the issue of when the Commission can consider service quality as part of the RDM framework.

Specifically, the Decoupling Act provides that the Commission shall have the authority "to maintain reasonable and adequate service quality and standards, *after decoupling*, that are in effect at the time of the proposal and were established pursuant to §39-3-7." R.I.G.L. 39-1-27.7.1(e)(1) (emphasis added). Thus, after the implementation of revenue decoupling, were the Commission to become concerned about the Company's reliability performance, the statutory remedy is through adjusting the requirements of the Plan established under §39-3-7, and not to adjust the operation of the RDM for imputed lost distribution revenues associated with a major storm.

f. Large and Extra Large Commercial and Industrial (C&I) customers should be exempted from the gas RDM.

The Company's proposal to exclude the large and extra-large C&I gas customers from the gas RDM addresses legitimate concerns that a change in usage or makeup of a very small number of these customers could have a significant impact on the average use per customer and the associated average revenue per customer in these customer classes. (Company Rebuttal Testimony at p. 14) In recognition of these concerns, the Decoupling Act specifically allows for the exclusion of these rate classes from the gas RDM. R.I.G.L. 39-1-27.7.1(e)(2).

In the recent past, these same concerns caused the Division's consultant to testify in favor of excluding these rate classes from the revenue decoupling proposal in the most recent gas rate case, where he testified that "[a]pplication of the proposed RPC mechanism are clearly inappropriate." (Docket 3943, Also see Tr p. 178, ll. 5-18) However, now, in this RDM proceeding, the Division's consultant has reversed his position and inexplicably proposes that these rate classes not be excluded. His proposal is to implement an RDM with a cap for all customers, and in hindsight if that does not

appear to have provided adequate protection for the large and extra-large gas customer classes, he recommends that the Commission investigate a straight fixed variable rate design for the large C&I customers. (Tr. 197) However, as discussed above the Decoupling Act does not permit annual rate caps. Rather, the need to address C&I rate classes that contain small numbers of customers, the Decoupling Act's specific allowance of this rate class exclusion, and the Division's consultant's prior testimony in support of such an exclusion all argue in favor of simply excluding the large and extra large C&I customer classes from the gas RDM. The Commission is always free to move to an increased use of straight fixed variable charges for the large and extra large C&I customers in a separate proceeding or at the time of a rate case.

The Company believes that its proposal excluding the large and extra large gas C&I customers is the correct way to address the concerns related to these rate classes that have a small number of customers with diverse usage patterns. However, as indicated in the Company's rebuttal testimony, should the Commission decide to include these rate classes in the gas RDM, the Commission must address the Contribution in Aid of Construction ("CIAC") calculation for these classes. CIACs are intended to recognize the amount of unsupported investment made on behalf of an individual customer and they are calculated assuming a level of incremental revenue to be received by the customer for whom the investment is being made. The unsupported investment is therefore charged directly to the benefitting customer. The CIACs paid by those individual customers are recorded as a reduction to the Company's rate base in order to avoid recovering that contribution a second time from all customers as a component of rate base.

If the Commission includes the large and extra large gas C&I customers in the gas RDM and agrees with the Division that when calculating a CIAC for those customers, the Company incorporate an individual customer's projected billed revenue in arriving at that customer's required contribution, then any difference in the required customer contribution calculated incorporating projected billed revenue versus incorporating the class average revenue per customer ("RPC") must also be recognized, preferably in the Company's gas Infrastructure, Safety and Reliability plan. Failure to recognize that calculated difference in the required customer contribution is simply inequitable. Specifically, if projected billed revenue for a particular customer is less than the class RPC, the Company would collect a higher contribution than otherwise would be calculated incorporating the greater RPC revenue in the contribution calculation. The Company however, will recover the billed versus RPC difference through the operation of the RDM. Consequently the difference in the required customer contribution as calculated by using billed versus RPC would result in double-recovery of that amount of the investment. The converse is similarly inequitable, where projected billed revenue for a particular customer is greater than the RPC. In that instance, the difference in the required customer contribution calculated by using billed versus per-customer class average revenue would result in an amount of investment not recovered by the Company. Recognition of this CIAC difference merely retains economic neutrality for both customers and the Company

g. Low Income Rate Classes

With respect to low income customers, the Company has not proposed to exclude the revenue associated with low income customers or the refund or recovery of any reconciliation amount from either the electric or gas RDMs, and is proposing that low income customers be treated in the same manner as all other residential customers. While the question of exempting the low income class from any refund or recovery that arises from the RDM reconciliations is a policy decision for the Commission, the Company urges that, in any event, actual billed revenue from low income customers should be included in the RDM reconciliation since these customers benefit from energy efficiency programs. Inclusion of low income customers helps assure that the disincentive to the Company to implement aggressive energy efficiency programs is eliminated as is required by the Decoupling Act.

CONCLUSION

The Company has proposed relatively simple and straightforward RDMs, which comply with the mandates of the Decoupling Act. By contrast, the Division witness's recommendations conflict with the Decoupling Act and attempt to make the RDM proposals unnecessarily complex and offer questionable specific-customer benefits. The Decoupling Act's language establishes an annual reconciliation providing the Company with its target revenue for that twelve-month period by comparing actual billed revenue to annual target revenue. The statute does not allow for arbitrary caps on any refund or recovery nor does it permit unlimited deferrals into the future. Doing so would simply frustrate the statutory goal of removing disincentives to the utility's full engagement in energy efficiency measures and would undermine the legislative goal of providing the

necessary funding levels to support the provision of safe and reliable delivery service to customers. The Company's proposed first-year RDM reconciliation running from April 1, 2011 through March 31, 2012 should not be shortened or adjusted since to do so conflicts with the statutory direction that the reconciliation period cover a full twelve months, and it is not necessary since the Company can track the actual billed revenue for the full twelve-month period. The statute anticipates the exclusion of large and extra-large C&I customers and the proposed gas RDM does just that. The statute does not, however, anticipate the exclusion of billing adjustments that occur during the RDM year but relate to billing that occurred in a prior period. Rather, it requires that the RDM year's actual billed revenue -- not a redacted portion of it -- be compared to the target revenue established in the prior base rate case. The Company's proposed RDMs utilize uniform RDM factors as is common in other rate mechanisms that the Commission has approved in the past. Finally, adjustments to the Company's revenue to take into consideration revenue lost during major storm events are not warranted. The method provided in the statute is to address any deficiencies in service restoration that occur after an RDM proposal is implemented through revisions to the existing service quality plan.

In light of the forgoing and the arguments made in the Company's testimony and data responses, the Company respectfully requests that its proposed electric and gas RDMs be approved.

Respectfully submitted,

THE NARRAGANSETT ELECTRIC COMPANY

By its attorney,

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Thomas R. Teehan (RI #4698)
280 Melrose Street
Providence, RI 02907
(401) 784-7667

Dated: July 5, 2011

Certificate of Service

I hereby certify that a copy of the cover letter and / or any materials accompanying this certificate has been electronically transmitted, sent via U.S. mail or hand-delivered to the individuals listed below.

_____ July 5, 2011

Joanne M. Scanlon Date

Docket No. 4206 - National Grid (NGrid) – Revenue Decoupling Mechanism Filing
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