

March 28, 2014

# VIA HAND DELIVERY & ELECTRONIC MAIL

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

#### Re: Docket 4371 - Long-Term Contracting for Renewable Energy Recovery Factor Responses to Division Post Hearing Data Requests – Set 3

Dear Ms. Massaro:

Enclosed are National Grid's<sup>1</sup> responses to the Division's Third Set of Post Hearing Data Requests concerning the above-referenced proceeding.

In this transmittal, the Company is providing the Excel files requested by the Division in this set on CD-ROM. National Grid respectfully requests confidential and privileged treatment of the enclosed CD-ROM and the confidential Excel files contained within it. These files contain the market price forecasts for energy, capacity, and renewable energy credits ("RECs") prepared by Energy Security Analysis, Inc. ("ESAI"). ESAI prepared this forecast acting as consultant to National Grid and at National Grid's request. Under National Grid's arrangement with ESAI, the energy, capacity and REC forecasts are considered proprietary. Therefore, National Grid requests that the Commission give the information contained in the Excel files confidential treatment. Disclosure of this information could adversely affect ESAI's competitive position and would tend to make it less likely that such information would be provided voluntarily in the future. Moreover, such disclosure would impede National Grid's future ability to obtain this type of proprietary information from third-party consultants or would increase the cost at which that information could be obtained. This is also the type of information that the Rhode Island Public Utilities Commission ("PUC") has historically recognized as proprietary information.

For the reasons set forth above, the Company requests that this letter serve as the Company's request for confidential treatment pursuant to Rule 1.2(g)(3), and that the PUC grant protection from public disclosure of the enclosed CD-ROM and the Excel files contained within it. National Grid also hereby requests that, pending entry of that finding, the Commission preliminarily grant National Grid's request for confidential treatment pursuant to Rule 1.2(g)(2). In compliance with Rule 1.2(g), National Grid is providing one copy of the confidential CD-

<sup>&</sup>lt;sup>1</sup> The Narragansett Electric Company d/b/a National Grid.

Luly Massaro, Commission Clerk Long-Term Contracting Renewable Energy Recovery March 26, 2014 Page 2 of 2

ROM in a sealed envelope marked "Contains Privileged and Confidential Materials – Do Not Release." One copy of the confidential CD-ROM has also been provided to Steve Scialabba at the Rhode Island Division of Public Utilities and Carriers pursuant to the terms of the Confidentiality and Nondisclosure Agreement dated December 10, 2012 in this proceeding.

Thank you for your attention to this filing. Please feel free to contact me if you have any questions concerning this matter at (401) 784-7288.

Very truly yours,

Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4371 Service List Steve Scialabba, Division Leo Wold, Esq.

### Request:

Regarding the Company's response filed on December 13, 2013 to Division 2-2 issued October 21, 2013, please provide the following information.

a) Please provide all schedules in Excel worksheet format.

## Response:

Please see the Excel files associated with the above-mentioned request on CD-ROM. In addition, the Company has provided the electronic version of its response to Division 2-2 dated December 13, 2013 as a reference.

### Request:

Regarding the Company's response filed on December 13, 2013 to Division 2-3 issued October 21, 2013, please provide the following information.

a) Please provide all schedules in Excel worksheet format

## Response:

Please see the Excel files associated with the above-mentioned request on CD-ROM. In addition, the Company has provided the electronic version of its response to Division 2-3 dated December 13, 2013 as a reference.

### Request:

Regarding the Company's response filed on October 25, 2013 to Commission 5-1 issued October 3, 2013, please provide the following information.

a) Please provide all schedules in Excel worksheet format.

#### Response:

Please see the Excel files associated with the above-mentioned request on CD-ROM. In addition, the Company has provided the electronic version of its response to Commission 5-1 dated October 25, 2013 as a reference.

### Request:

Regarding the Company's response filed on October 25, 2013 to Commission 5-2 issued October 3, 2013, please provide the following information.

a) Please provide all schedules in Excel worksheet format.

## Response:

Please see the Excel files associated with the above-mentioned request on CD-ROM. In addition, the Company has provided the electronic version of its response to Commission 5-2 dated October 25, 2013 as a reference.