

September 23, 2014

**BY HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket 4393 - Standard Offer Service Procurement Plan and Renewable  
Energy Standard Procurement Plan  
Response to PUC's Data Request – Set 1**

Dear Ms. Massaro:

I have enclosed National Grid's<sup>1</sup> response to the Rhode Island Public Utilities Commission's (PUC) First set of Data Requests in the above referenced docket. This filing is also accompanied by a Motion for Protective Treatment in accordance with Rule 1.2(g) of the PUC's Rules of Practice and Procedure and R.I.G.L. § 38-2-2(4)(i)(B). Therefore, and pursuant to PUC's rules, the Company has provided the PUC with one (1) copy of the unredacted confidential materials for its review and has otherwise included redacted copies of those materials.

Thank you for your attention to this transmittal. If you have any questions, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4393 Service List  
Steve Scialabba (w/confidential attachments)

---

<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically transmitted to the individuals listed below. Copies of this filing were hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Raquel J. Webster

Date: September 23, 2014

**Docket No. 4393 - National Grid – 2014 SOS and RES Procurement Plans  
Service List updated 6/25/13**

<b>Name/Address</b>	<b>E-mail Distribution</b>	<b>Phone</b>
Thomas R. Teehan, Esq. National Grid 280 Melrose St. Providence, RI 02907	<a href="mailto:Thomas.teehan@nationalgrid.com">Thomas.teehan@nationalgrid.com</a>	401-784-7667
	<a href="mailto:Celia.obrien@nationalgrid.com">Celia.obrien@nationalgrid.com</a>	
	<a href="mailto:Brooke.Skulley@nationalgrid.com">Brooke.Skulley@nationalgrid.com</a>	
	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com</a>	
	<a href="mailto:margaret.janzen@nationalgrid.com">margaret.janzen@nationalgrid.com</a>	
Leo Wold, Esq. Karen Lyons, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Lwold@riag.ri.gov">Lwold@riag.ri.gov</a>	401-222-2424
	<a href="mailto:Dstearns@ripuc.state.ri.us">Dstearns@ripuc.state.ri.us</a>	
	<a href="mailto:Sscialabba@ripuc.state.ri.us">Sscialabba@ripuc.state.ri.us</a>	
	<a href="mailto:Klynch@ripuc.state.ri.us">Klynch@ripuc.state.ri.us</a>	
	<a href="mailto:Jspirito@ripuc.state.ri.us">Jspirito@ripuc.state.ri.us</a>	
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a>	
	<a href="mailto:jmunoz@riag.ri.gov">jmunoz@riag.ri.gov</a>	
Richard Hahn LaCapra Associates One Washington Mall, 9 <sup>th</sup> floor Boston, MA 02108	<a href="mailto:rhahn@lacapra.com">rhahn@lacapra.com</a> 617-778-2467	
Mary Neal LaCapra Associates	<a href="mailto:mneal@lacapra.com">mneal@lacapra.com</a>	

<b>File an original &amp; 10 copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a>	401-780-2017
	<a href="mailto:Cynthia.WilsonFrias@puc.ri.gov">Cynthia.WilsonFrias@puc.ri.gov</a>	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a>	
	<a href="mailto:Nicholas.ucci@puc.ri.gov">Nicholas.ucci@puc.ri.gov</a>	
	<a href="mailto:Dilip.shah@puc.ri.gov">Dilip.shah@puc.ri.gov</a>	
	<a href="mailto:Amy.Dalessandro@puc.ri.gov">Amy.Dalessandro@puc.ri.gov</a>	

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
RHODE ISLAND PUBLIC UTILITIES COMMISSION

---

In Re: 2014 Standard Offer Service Procurement  
Plan and 2014 Renewable Energy  
Standard Procurement Plan

---

Docket No.: 4393

**NATIONAL GRID'S MOTION FOR PROTECTIVE TREATMENT  
OF CONFIDENTIAL INFORMATION**

National Grid<sup>1</sup> respectfully requests that the Rhode Island Public Utilities Commission (PUC) provide confidential treatment and grant protection from public disclosure certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by PUC Rule 1.2(g) and R.I.G.L. § 38-2-2(4)(B). National Grid also respectfully requests that, pending entry of that finding, the PUC preliminarily grant National Grid's request for confidential treatment pursuant to Rule 1.2 (g)(2).

**I. BACKGROUND**

On September 23, 2014, National Grid filed with the PUC its responses to the PUC's First Set of Data Requests in this docket. In PUC Data Request 1-1, the PUC requests information regarding expected Standard Offer Service (SOS) rates and bill impacts that are derived from the Company's contracts for Residential SOS. In responding to PUC Data Request 1-1, the Company has submitted confidential versions of PUC Attachments 1 through 4. These four confidential attachments include expected SOS rates developed from competitive and proprietary SOS bid prices and other wholesale transaction information. In addition, the rates provided in

---

<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

response to PUC 1-1 are derived from this confidential information. Because National Grid considers this information as confidential and proprietary, National Grid respectfully requests that the PUC treat the information contained in PUC Attachments 1 through 4 and the pricing information contained in its response to PUC 1-1 as confidential.

## **II. LEGAL STANDARD**

The PUC's Rule 1.2(g) provides that access to public records shall be granted in accordance with the Access to Public Records Act ("APRA"), R.I.G.L. §38-2-1 *et seq.* Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a "public record," unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I.G.L. §38-2-2(4). Therefore, to the extent that information provided to the PUC falls within one of the designated exceptions to the public records law, the PUC has the authority under the terms of the APRA to treat such information as confidential and to protect that information from public disclosure.

In that regard, R.I.G.L. § 38-2-2(4)(B) provides that the following types of records shall not be deemed public:

Trade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature.

The Rhode Island Supreme Court has held that this confidential information exemption applies where disclosure of information would likely either (1) impair the Government's ability to obtain necessary information in the future; or (2) cause substantial harm to the competitive position of the person from whom the information was obtained. Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I. 2001). The first prong of the test is satisfied when information is voluntarily provided to the governmental agency and that information is of a

kind that would customarily not be released to the public by the person from whom it was obtained. Providence Journal, 774 A.2d at 47. National Grid meets the second prong of this test, which applies here.

## **II. BASIS FOR CONFIDENTIALITY**

The Company seeks confidential treatment on winning bid prices and estimated SOS rates derived from these prices. Release of this type of information would be commercially harmful to the Company and to its customers since potential bidders could use this information in such a way that would impede the Company's ability to obtain the best possible bid for its customers. This information is confidential and privileged information of the type that the Company would ordinarily not make public. Moreover, as previously noted, the dissemination of this type of information could impact the Company's ability to obtain advantageous pricing in the future.

## **III. CONCLUSION**

Accordingly, the Company requests that the PUC grant protective treatment to the confidential bill impact information provided in its response to PUC 1-1 and the confidential un-redacted versions of PUC 1-1 Attachments 1 through 4.

**WHEREFORE**, for the foregoing reasons, the Company respectfully requests that the PUC grant its Motion for Protective Treatment.

Respectfully submitted,

**NATIONAL GRID**

By its attorneys,



---

Raquel J. Webster, RI Bar # 9064  
National Grid  
40 Sylvan Road  
Waltham, MA 02451  
(781) 907-2121

Dated: September 23, 2014

**Redacted**  
PUC 1-1


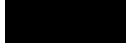
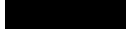
Request:

Based on the contracts currently executed for Residential Standard Offer Service, and assuming the remaining procurements for the periods identified in subparts a, b & c below do not change the embedded cost of power, please provide the expected SOS rate and associated bill impacts compared to the current rate assuming the following:

- a. A six month rate – January through June 2015
- b. A six month rate – December 2014 through May 2015
- c. A twelve month rate – January through December 2015

Response:

Under the assumptions specified in the request, the illustrative Standard Offer Service Residential rates for each period are as follows:

- |    |  |   |         |
|----|--|---|---------|
| a. | A six month rate – January through June 2015:        |  | per kWh |
| b. | A six month rate – December 2014 through May 2015:   |  | per kWh |
| c. | A twelve month rate – January through December 2015: |  | per kWh |

As requested, the illustrative rates calculated in Attachment 1 for each pricing period are based on the load procured to date and do not reflect estimated spot market prices for the respective periods.

Pages 1 and 2 of Attachment 2 to this request show the monthly increase at various usage levels of the illustrative rate calculated for the period January through June 2015 for Basic Residential Rate A-16 and Low Income Rate A-60, respectively.

Pages 1 and 2 of Attachment 3 to this request show the monthly increase at various usage levels of the illustrative rate calculated for the period December 2014 through May 2015 for Basic Residential Rate A-16 and Low Income Rate A-60, respectively.

Pages 1 and 2 of Attachment 4 to this request show the monthly increase at various usage levels of the illustrative rate calculated for the period January through December 2015 for Basic Residential Rate A-16 and Low Income Rate A-60, respectively.



The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4393  
2014 Standard Offer Service Procurement Plan  
2014 Renewable Energy Standard Procurement Plan  
Responses to the Public Utilities Commission's First Set of Data Requests  
Issued September 17, 2014

---

**Redacted**  
PUC 1-1, page 2

Please note that Attachments 1 through Attachment 4 contain confidential information.  
Therefore, the Company has redacted the public versions of these attachments.

**REDACTED DOCUMENT**

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4393  
2014 Standard Offer Service Procurement Plan  
2014 Renewable Energy Standard Procurement Plan  
Responses to the Public Utilities Commission's First Set of Data Requests  
PUC 1-1  
Attachment 1  
Page 1 of 1

**REDACTED DOCUMENT**

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4393  
2014 Standard Offer Service Procurement Plan  
2014 Renewable Energy Standard Procurement Plan  
Responses to the Public Utilities Commission's First Set of Data Requests  
PUC 1-1  
Attachment 2  
Page 1 of 2

Calculation of Monthly Typical Bill  
Total Bill Impact of Illustrative Jan. 2015-June 2015  
Rates Applicable to A-16 Rate Customers

**REDACTED DOCUMENT**

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4393  
2014 Standard Offer Service Procurement Plan  
2014 Renewable Energy Standard Procurement Plan  
Responses to the Public Utilities Commission's First Set of Data Requests  
PUC 1-1  
Attachment 2  
Page 2 of 2

Calculation of Monthly Typical Bill  
Total Bill Impact of Illustrative Jan. 2015-June 2015  
Rates Applicable to A-60 Rate Customers

**REDACTED DOCUMENT**

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4393  
2014 Standard Offer Service Procurement Plan  
2014 Renewable Energy Standard Procurement Plan  
Responses to the Public Utilities Commission's First Set of Data Requests  
PUC 1-1  
Attachment 3  
Page 1 of 2

Calculation of Monthly Typical Bill  
Total Bill Impact of Illustrative Dec. 2014-May 2015  
Rates Applicable to A-16 Rate Customers

**REDACTED DOCUMENT**

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4393  
2014 Standard Offer Service Procurement Plan  
2014 Renewable Energy Standard Procurement Plan  
Responses to the Public Utilities Commission's First Set of Data Requests  
PUC 1-1  
Attachment 3  
Page 2 of 2

Calculation of Monthly Typical Bill  
Total Bill Impact of Illustrative Dec. 2014-May 2015  
Rates Applicable to A-60 Rate Customers

**REDACTED DOCUMENT**

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4393  
2014 Standard Offer Service Procurement Plan  
2014 Renewable Energy Standard Procurement Plan  
Responses to the Public Utilities Commission's First Set of Data Requests  
PUC 1-1  
Attachment 4  
Page 1 of 2

Calculation of Monthly Typical Bill  
Total Bill Impact of Illustrative Jan. 2015-Dec. 2015  
Rates Applicable to A-16 Rate Customers

**REDACTED DOCUMENT**

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4393  
2014 Standard Offer Service Procurement Plan  
2014 Renewable Energy Standard Procurement Plan  
Responses to the Public Utilities Commission's First Set of Data Requests  
PUC 1-1  
Attachment 4  
Page 2 of 2

Calculation of Monthly Typical Bill  
Total Bill Impact of Illustrative Jan. 2015-Dec. 2015  
Rates Applicable to A-60 Rate Customers