

October 17, 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 2**

Dear Ms. Massaro:

I have enclosed National Grid's<sup>1</sup> responses to the Rhode Island Public Utilities Commission's Second Set of Data Requests in the above-referenced docket. Also enclosed is a Motion for Protective Treatment of Confidential Information 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, pursuant to PUC's rules, I have enclosed one copy of the unredacted confidential materials and several redacted copies for the PUC's review.

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)

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

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

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

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**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 October 17, 2014, National Grid filed with the PUC its responses to the PUC's Second Set of Data Requests in this docket. These data requests include three questions, which request information regarding the Company's residential standard offer service (SOS) rates and bill impacts. The Company's responses to these data requests include information developed from competitive and proprietary SOS bid prices and other wholesale transaction information. Specifically, the Company's responses include confidential information that is derived from the Company's contracts for Residential SOS. In responding to PUC Data Request 2-1, the

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

Company has submitted redacted and confidential versions of Attachments 1 through 5 to PUC 2-1. The five attachments to PUC 2-1 include confidential information such as expected estimated SOS base charges for various pricing periods based upon prices from executed contracts, illustrative reconciliations of estimated revenue and expenses based on the rates referenced in the Company's responses, and bill impact data using the rates referenced in the Company's responses. The Company's responses to PUC 2-2 and 2-3 also include confidential and proprietary rate information, which is based on the Company's contracts for residential SOS. The information in Attachments 1 through 5 to PUC 2-1 and the Company's responses to PUC 2-2 and 2-3 is confidential and proprietary. Accordingly, National Grid respectfully requests that the PUC grant protective confidential treatment to Attachments 1 through 5 of PUC 2-1, and its responses to the PUC 2-2 and 2-3.

## **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 for the residential SOS rates, bill impacts, and illustrative calculations referenced in its responses to the PUC's second set of data requests. 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 in the future. Moreover, this information is confidential and privileged information of the type that the Company would ordinarily not make public.

## **III. CONCLUSION**

Accordingly, the Company respectfully requests that the PUC grant protective treatment to the confidential bill impact and rate information provided in Attachments 1 through 5 to PUC 2-1 and its responses PUC 2-2 and 2-3.

**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,



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

Dated: October 17, 2014

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 Second Set of Data Requests  
Issued on September 26, 2014

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PUC 2-1

Request:

Estimate the usage, demand, collection and bill impacts for the period December 2014 through June 2015 if the current six month SOS rate for the period January through June, 2015 were changed to a six-month rate for the period December, 2014 through May, 2015 or a 12-month rate for the period January through December, 2015.

Response:

Attachment 1 to PUC 2-1 shows the calculation of the estimated SOS base charge for various pricing periods based upon contract prices from executed contracts and an assumption that prices for the remaining contracts to be procured for the periods will be at the same average prices as the executed contracts. These prices do not reflect estimated spot market prices beyond December 2014.

Attachment 2 provides an illustrative 13-month reconciliation of estimated revenue and expense with an assumption that a December 2014 through May 2015 rate and a June 2015 through December 2015 rate is implemented in place of the typical January 2015 through June 2015 and July 2015 through December 2015 rates.

Attachment 3 provides an illustrative 12-month reconciliation of estimated revenue and expense with an assumption that a January 2015 through December 2015 rate is implemented in place of the typical January 2015 through June 2015 and July 2015 through December 2015 rates.

Attachment 4, pages 1 and 2 to this request shows the billing impact at various usage levels when comparing the illustrative rates calculated for the period January through June 2015 to the illustrative rates calculated for the period December 2014 through May 2015, for Basic Residential Rate A-16 and Low Income Rate A-60, respectively.

Attachment 5, pages 1 and 2 to this request shows the billing impact at various usage levels when comparing the illustrative rates calculated for the period January through June 2015 to the illustrative rates calculated for the period January through December 2015, for Basic Residential Rate A-16 and Low Income Rate A-60, respectively.

**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 Second Set of Data Requests  
PUC 2-1  
Attachment 1  
Page 1 of 1

**REDACTED DOCUMENT**

The Narragansett Electric Company  
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RIPUC Docket No. 4393  
2014 Standard Offer Service Procurement Plan  
2014 Renewable Energy Standard Procurement Plan  
Responses to the Public Utilities Commission's Second Set of Data Requests  
PUC 2-1  
Attachment 2



**REDACTED DOCUMENT**

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RIPUC Docket No. 4393  
2014 Standard Offer Service Procurement Plan  
2014 Renewable Energy Standard Procurement Plan  
Responses to the Public Utilities Commission's Second Set of Data Requests  
PUC 2-1  
Attachment 3

**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 Second Set of Data Requests

PUC 2-1

Attachment 4

Page 1 of 2

**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 Second Set of Data Requests  
PUC 2-1  
Attachment 4  
Page 2 of 2

**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 Second Set of Data Requests  
PUC 2-1  
Attachment 5  
Page 1 of 2

**REDACTED DOCUMENT**

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RIPUC Docket No. 4393  
2014 Standard Offer Service Procurement Plan  
2014 Renewable Energy Standard Procurement Plan  
Responses to the Public Utilities Commission's Second Set of Data Requests  
PUC 2-1  
Attachment 5  
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The Narragansett Electric Company  
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**Redacted**  
PUC 2-2

Request:

If the Commission were to order a six-month SOS rate (January through June, 2015) or a seven-month SOS rate (December, 2014 through June, 2015), please estimate the SOS rate for the following six-month period (July through December, 2015).

Response:

Based upon the contracts currently executed for Residential Standard Offer Service (SOS) and assuming that the remaining procurements of Residential SOS for July through December 2015 do not change the embedded cost of power, the illustrative Residential SOS rate for July 2015 through December 2015 is \$ [REDACTED] per kWh, as calculated in on Line (18) Column (d) of Attachment 1 to PUC 2-1.

Please note that the illustrative rate for the period July 2015 through December 2015 is based on the percentage of estimated SOS load under contract and does not reflect estimated spot market purchases during this period. Fifty-five percent (55%) of the SOS load is under contract for the July 2015 through December 2015 period.

The Narragansett Electric Company  
d/b/a National Grid  
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Issued on September 26, 2014

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**Redacted**  
PUC 2-3

Request:

Estimate the residential SOS rate assuming a thirteen-month SOS rate beginning December 1, 2014 through December 31, 2015.

Response:

Based on the contracts currently executed for Residential Standard Offer Service (SOS), and assuming that the remaining procurements of Residential SOS for December 2014 through December 2015 do not change, the embedded cost of power, the illustrative Residential SOS rate for December 2014 through December 2015 is \$ [REDACTED] per kWh, as calculated on Line (19), Column (d) of Attachment 1 to PUC 2-1.

Please note that the illustrative rate for the period December 2014 through December 2015 is based on the percentage of estimated SOS load under contract, and does not reflect estimated spot market purchases beyond December 2014. Seventy-five percent (75%) of the SOS load is under contract for the January 2015 through June 2015 period, and 55% of the SOS load is under contract for the July 2015 through December 2015 period.

National Grid recommends that the PUC support the Company's efforts to promote the mitigation of SOS-related bill impacts by encouraging the use by customers of balanced billing and energy efficiency options. Through balanced billing, a customer can spread the costs of SOS over a twelve-month period and alleviate the impact of SOS prices over the short-term. The Company offers balanced billing programs that are individualized for each customer based on their historical usage. The payments can be adjusted over the course of the payment plan term, if necessary. Through energy efficiency, customers can lower energy costs through the installation of energy efficient equipment in their homes and businesses. The Company offers a host of services, including a free energy audit and report of recommended energy efficiency improvements and a commitment to pay a substantial portion of the installation costs.