

December 9, 2014

VIA 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 Rates
Period of January – June 2015 for Residential and Commercial
Period of January – March 2015 for Industrial
National Grid's Motion to Assert Objections to
Lt. Governor Elect Daniel McKee's Data Requests – Set 2**

Dear Ms. Massaro:

Enclosed is National Grid's¹ Motion to Assert Objections to Lt. Governor Elect Daniel McKee's Second Set of Data Requests issued on December 3, 2014 in the above-referenced docket.

Thank you for your attention to this transmittal. If you have any questions, please contact me at 401-784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4393 Service List
Steve Scialabba

¹ 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**

IN RE: NATIONAL GRID STANDARD OFFER SERVICE RATES PERIOD OF JANUARY – JUNE 2015 FOR RESIDENTIAL AND COMMERCIAL PERIOD OF JANUARY – MARCH 2015 FOR INDUSTRIAL	DOCKET NO.: 4393
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**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A NATIONAL
GRID TO ASSERT OBJECTIONS TO LT. GOVERNOR ELECT DANIEL MCKEE'S
DATA REQUESTS – SET 2**

National Grid¹ objects to Intervenor Lt. Governor Elect Daniel McKee's (McKee) Data Requests - Set 2 (Request) pursuant to Rule 1.18(c) of the Rules of Practice and Procedure for the Rhode Island Public Utilities Commission (PUC). A copy of the Request is attached as Exhibit A.

McKee Data Request 2-1 seeks “final bid prices (cents per kWh) received on [May 14, 2014, August 13, 2014, and November 12, 2014] for the three tranches each consisting of 30% of the commercial load obligations for the January 2015 through June 2015 time period.” National Grid objects to this request for the reasons set forth in its response to McKee Data Request 2-1, which the Company filed on December 9, 2014 simultaneously with this Motion. In response to this request, National Grid provided the publicly available Average Winning Price data in lieu of providing the confidential monthly contract prices.

¹ The Narragansett Electric Company d/b/a National Grid (referred to herein as “National Grid” or the “Company”).

In addition, McKee Data Request 2-2 (a) through (c) seeks the unredacted versions of the Company's Summary of Bids dated May 15, 2014, August 14, 2014, and November 13, 2014, including Attachment 1 of the Company's corresponding Summary of Bids filings with the PUC. McKee Data Request 2-2(d) seeks the unredacted versions of the Results of Competitive Procurement for the Months of January 2015 through December 2016 for the Residential Group, for the Months of January 2015 through December 2015 for the Commercial Group, and for the Months January 2015 through March 2015 for the Industrial Group, dated November 19, 2014, including Attachments 5 and 6 of National Grid's November 19, 2014 Standard Offer Procurement Plan Filing (SOS Filing).

National Grid objects to parts (a) through (c) of the request, which seeks the confidential versions of the Company's Summary of Bids dated May 15, 2014, August 14, 2014, and November 13, 2014, including Attachment 1 of the Company's corresponding Summary of Bids filings. Attachment 1 contains commercially sensitive market information in that it includes all final bids submitted, as well as a historical summary of previous winning bids. Public disclosure of this type of information could affect the balance of the wholesale markets, as well as National Grid's ability to negotiate competitive terms with its wholesale electric suppliers, and is, therefore, confidential and proprietary to those suppliers. This information is also the type of information that the PUC has historically recognized as confidential and proprietary.

In addition, National Grid objects to part (d) of the request, which seeks the confidential versions of Attachments 5 and 6 of the Company's SOS Filing for the reasons set forth above

and in its response to McKee Data Request 2-2, which the Company filed on December 9, 2014 simultaneously with this Motion.² A copy of the Company's Response is attached as Exhibit B.

National Grid respectfully requests that the PUC limit the Request only to the information that is publicly available as provided in response to McKee Data Request 2-1.

Respectfully submitted,

NATIONAL GRID

By its attorney,

A handwritten signature in dark ink, appearing to read "Jennifer Hutchinson", written over a horizontal line.

Jennifer Hutchinson, RI Bar # 6176
National Grid
280 Melrose Street
Providence, Rhode Island
(401) 784-7288

Dated: December 9, 2014

²In its response to McKee Data Request 2-2, National Grid asserted objections with respect to the portion of the request seeking Attachments 5 and 6 of the Company's SOS Filing. With this Motion, National Grid hereby supplements its response to McKee Data Request 2-2 to assert the objections set forth in this Motion.

Schacht & McElroy

Michael R. McElroy
Robert M. Schacht (retired)

Attorneys at Law

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Members of Rhode Island
and Massachusetts Bars

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December 3, 2014

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

In Re: 2014 Standard Offer Service Procurement Plan and 2014 Renewable Energy
Standard Procurement Plan – Docket No. 4393

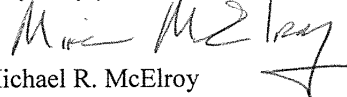
Dear Luly:

Enclosed for filing are an original and 10 copies of Daniel J. McKee's Second Set of Data Requests Directed to National Grid in this matter.

We recognize that we are requesting confidential information, but it is essential that we have access to this information to properly evaluate the filing. We would be happy to sign an appropriate confidentiality agreement.

If you have any questions, please feel free to call.

Very truly yours,


Michael R. McElroy

MRMc:tmg
cc: Service List

McKee/Second Set of Data Requests

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

IN RE: 2014 STANDARD OFFER SERVICE :
PROCUREMENT PLAN AND : DOCKET No.: 4393
2014 RENEWABLE ENERGY :
STANDARD PROCUREMENT PLAN :

DAN MCKEE'S SECOND SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID

December 3, 2014

(Please respond as soon as possible, but no later than December 8, 2014)

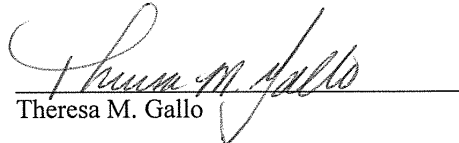
1. With regard to the RFPs that National Grid conducted in 2014 for Standard Offer Service in Rhode Island, the Company issued three RFPs for commercial load for the period January 2015 through June 2015. Each RFP included one tranche consisting of 30% of the commercial load obligations for the period beginning January 2015 through June 2015. The Company received final bid prices for those commercial load obligations on May 14, 2014, August 13, 2014, and November 12, 2014, respectively, according to the National Grid bid summaries posted on the Commission web site.

Please provide these final bid prices (cents per kWh) received on those three dates in 2014 for the three tranches each consisting of 30% of the commercial load obligations for the January 2015 through June 2015 time period. Please provide the prices at the retail customer meter, excluding RES compliance.

2. Please provide the unredacted versions of the following documents:
 - a. Docket 4393 Standard Offer Service Procurement Plan: Summary of Bids dated May 15, 2014, including Attachment 1.
 - b. Docket 4393 Standard Offer Service Procurement Plan: Summary of Bids dated August 14, 2014, including Attachment 1.
 - c. Docket 4393 Standard Offer Service Procurement Plan: Summary of Bids dated November 13, 2014, including Attachment 1.
 - d. Results of Competitive Procurement for the Months of January 2015 through December 2016 for the Residential Group, for the Months of January 2015 through December 2015 for the Commercial Group, and for the Months January 2015 through March 2015 for the Industrial Group, dated November 19, 2014, including Attachments 5 and 6.

CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of December, 2014, I sent a true copy of the foregoing to the attached service list.


Theresa M. Gallo

McKee/Second Set of Data Requests

**Docket No. 4393 - National Grid – 2014 SOS and RES Procurement Plans
Service List updated 12/1/14**

Name/Address	E-mail Distribution	Phone
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	Joanne.scanlon@nationalgrid.com	
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Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Lwold@riag.ri.gov	401-222-2424
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Mary Neal LaCapra Associates	mneal@lacapra.com	
File an original & 10 copies w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov	401-780-2017
	Alan.nault@puc.ri.gov	
	Amy.Dalessandro@puc.ri.gov	
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	Christopher.Kearns@energy.ri.gov	
Michael McElroy Schacht & McElroy P.O. Box 6721 Providence, RI 02940-6721	Michael@McElroyLawOffice.com	401-351-4100



Jennifer Brooks Hutchinson
Senior Counsel

December 9, 2014

VIA 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 Rates
Period of January – June 2015 for Residential and Commercial
Period of January – March 2015 for Industrial
Responses to Lt. Governor Elect Daniel McKee's Data Requests – Set 2**

Dear Ms. Massaro:

Enclosed are National Grid's¹ responses to the Lt. Governor Elect Daniel McKee's Second Set of Data Requests in the above-referenced docket.

Thank you for your attention to this transmittal. If you have any questions, please contact me at 401-784-7288.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Jennifer Brooks Hutchinson".

Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4393 Service List
Steve Scialabba

¹ 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 was 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 Carriers.



Joanne M. Scanlon

December 9, 2014
Date

Docket No. 4393 - National Grid – 2014 SOS and RES Procurement Plans Service List updated 12/3/14

Name/Address	E-mail Distribution	Phone
Raquel Webster, Esq. National Grid 280 Melrose St. Providence, RI 02907	Raquel.webster@nationalgrid.com	401-784-7667
	Celia.obrien@nationalgrid.com	
	Jennifer.hutchinson@nationalgrid.com	
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	Joanne.scanlon@nationalgrid.com	
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	dmacrae@riag.ri.gov	
	jmunoz@riag.ri.gov	
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Michael McElroy (for Daniel McKee) Schacht & McElroy P.O. Box 6721 Providence, RI 02940-6721	Michael@McElroyLawOffice.com	401-351-4100
Christy Hetherington, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Chetherington@riag.ri.gov	
File an original & 10 copies w/:	Luly.massaro@puc.ri.gov	401-780-2017
	Alan.nault@puc.ri.gov	

Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Amy.Dalessandro@puc.ri.gov	
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Office of Energy Resources Nicholas Ucci Christopher Kearns	Nicholas.ucci@energy.ri.gov	
	Christopher.Kearns@energy.ri.gov	

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4393
2014 Standard Offer Service Rates
Period of January – June 2015 For Residential and Commercial
And Period of January – March 2015 For Industrial
Responses to the Lt. Governor Elect Daniel McKee's Second Set of Data Requests
Issued on December 3, 2014

Lt. Governor Elect
Daniel McKee 2-1

Request:

With regard to the RFPs that National Grid conducted in 2014 for Standard Offer Service in Rhode Island, the Company issued three RFPs for commercial load for the period January 2015 through June 2015. Each RFP included one tranche consisting of 30% of the commercial load obligations for the period beginning January 2015 through June 2015. The Company received final bid prices for those commercial load obligations on May 14, 2014, August 13, 2014, and November 12, 2014, respectively, according to the National Grid bid summaries posted on the Commission web site.

Please provide these final bid prices (cents per kWh) received on those three dates in 2014 for the three tranches each consisting of 30% of the commercial load obligations for the January 2015 through June 2015 time period. Please provide the prices at the retail customer meter, excluding RES compliance.

Response:

The Company objects to this data request on the basis that public disclosure of this information would violate the confidentiality provisions of the Company's contracts for Commercial Standard Offer Service.

Notwithstanding the aforementioned objection, while the monthly contract prices are considered confidential information and cannot be released, the Average Winning Price is public information. Below are the Average Winning Prices for each 30% tranche for the Commercial Group for the period January 1, 2015 to June 30, 2015.

Final Bid Date	Average Winning Price
5/14/2014	12.23
8/13/2014	11.43
11/12/2014	12.97

The Average Winning Prices are shown in cents per kWh as a retail price (that includes transmission and distribution losses and excludes RES compliance) and are calculated with the estimated monthly volumes for the period at the time of each Final Bid Date.

The Narragansett Electric Company
d/b/a National Grid
R.I.P.U.C. Docket No. 4393
2014 Standard Offer Service Rates
Period of January – June 2015 For Residential and Commercial
And Period of January – March 2015 For Industrial
Responses to the Lt. Governor Elect Daniel McKee's Second Set of Data Requests
Issued on December 3, 2014

Lt. Governor Elect
Daniel McKee 2-2

Request:

Please provide the unredacted versions of the following documents:

- a. Docket 4393 Standard Offer Service Procurement Plan: Summary of Bids dated May 15, 2014, including Attachment 1.
- b. Docket 4393 Standard Offer Service Procurement Plan: Summary of Bids dated August 14, 2014, including Attachment 1.
- c. Docket 4393 Standard Offer Service Procurement Plan: Summary of Bids dated November 13, 2014, including Attachment 1.
- d. Results of Competitive Procurement for the Months of January 2015 through December 2016 for the Residential Group, for the Months of January 2015 through December 2015 for the Commercial Group, and for the Months January 2015 through March 2015 for the Industrial Group, dated November 19, 2014, including Attachments 5 and 6.

Response:

The Company objects to this data request on the basis that it seeks the confidential versions of Attachments 5 and 6 of the Company's November 19, 2014 Standard Offer Service Procurement Plan filing, which are the subject of a Motion for Confidential Treatment currently pending with the PUC.

Notwithstanding the aforementioned objection, please see the Company's response to Lt. Governor Elect Daniel McKee 2-1 for final bid dates and Average Winning Price data.