

June 7, 2013

**BY HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket 4402 - The Narragansett Electric Company, d/b/a National Grid  
Tariff Advice Filing to Amend RIPUC NG-GAS No. 101  
(Modification of General Terms and Conditions, Section 1, Schedule A, Part 6.0 –  
Installation of Meters)  
Responses to Division's First Set of Data Requests**

Dear Ms. Massaro:

On behalf of National Grid<sup>1</sup> attached are responses to the Division's First Set of Data Requests concerning this proceeding.

Thank you for your attention to this matter. If you have any questions regarding this filing, please contact me at (401) 784-7667.

Very truly yours,



Thomas R. Teehan

Enclosures

cc: Leo Wold, Esq.  
Steve Scialabba, Division  
Jim Lanni, Division

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

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cc: Docket 4402 Service List  
Leo Wold, Esq.  
Steve Scialabba, Division  
Jim Lanni, Division

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Division 1-1

Request:

- a) Please provide rate impacts, either actual or estimated, if the Company was to eliminate all requirements for secondary metering for all customers in all classes with NG generation back-up with a nameplate output below 30kW.
- b) By lost revenue and also by actual/estimated rate impact, what effect would there be by eliminating the requirement for a separate meter for customers within all classes with NG generation back-up?

Response:

- a) The Company does not have information on which of its customers have backup generation with a nameplate output below 30 kW.
- b) The effect of eliminating the requirement for a separate meter for customers with gas-fired back-up generators would be the elimination of a customer charge on the separate gas meter (associated with a separate service point and in most cases also a separate account).

Below is a summary of the annual revenue impact of the customer charge on 367 gas accounts identified as having a separate meter for customers with a gas-fired back-up generator.

Total: \$76,808.40

Residential: \$32,744.40

Commercial: \$44,064.00

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Division 1-2

Request:

Please list how many customers, by customer class, are now being charged for a secondary meter for NG generation back-up.

Response:

Please see table below.

<u>Rate</u>	<u>Rate Class</u>	<u>Description</u>	<u>Count</u>
400	1247	Gas 1247 Res Heat	111
401	1012	Gas 1012 Res Non Heat	98
402	1301	Gas 1301 Res Low Inc Heat	1
404	2107	Gas 2107 C&I Small	148
405	2237	Gas 2237 C&I Medium	3
406	2221	Gas 2221 C&I Medium FT2	2
430	S350	Gas S350 Dominion Virginia Power	1
443	2121	Gas 2121 C&I Small FT2	3
			<u>367</u>

The Narragansett Electric Company

d/b/a National Grid

Docket No. 4402

In re: Tariff Advice Filing to Amend R.I.P.U.C. Gas No. 101  
Responses to Division's First Set of Data Requests

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Division 1-3

Request:

Considering the other National Grid territories in New England and New York, please provide any policies related to metering back-up NG generation for any customer class.

Response:

The Company does not currently have specific tariffed policies in other National Grid service territories that would require a customer to obtain a separate meter if they have a back-up gas fueled generator at their premises.

Prepared by or under the supervision of: Jennifer Feinstein and Ann Leary

Division 1-4

Request:

Please describe why, under which circumstances, would a second meter be physically required for NG generation backup.

Response:

The requirement of a second meter for a gas-fired emergency back-up generator helps to avoid a system pressure drop on start-up of the natural gas generator. Additionally, installing a separate meter for the generator addresses the situation where the SCFH demand of the generator is so great that it needs a meter that cannot capture (register) the minimum flow of appliances operating individually at the premises. In other words, with large generators the meter needed to capture the total usage when the generator and all other gas appliances at the location are in use may have a low-end registration capability greater than the minimum demand of any one appliance connected to that meter. Also, for very large generators, if there is significant variability between the usual load and the load at times when the generator is operating, that variability can lessen the accuracy of the Company's determination of expected load and capacity requirements calculated using the hydraulic network analysis models.

In addition to those situations, one of the leading reasons for installing a second meter is where the customer has requested a second meter due to the location of the emergency back-up generator. In those situations, if the generator is not located adjacent to the existing meter fit, the customer would be required to pipe from the existing meter to the generator. However, by installing a second meter the customer avoids the cost of the additional piping from the existing meter to the generator.