

September 25, 2013

#### VIA HAND DELIVERY & ELECTRONIC MAIL

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

> Docket 4431 - 2013 Distribution Adjustment Charge ("DAC") Responses to Division Data Requests – Set 2

Dear Ms Massaro:

Enclosed are National Grid's responses to the Rhode Island Division's (the "Division") Second Set of Data Requests concerning the above-referenced proceeding.

Please be advised that the Company is seeking protective treatment of its response to Division 2-2, as permitted by Commission Rule 1.2(g) and by R.I.G.L. § 38-2-2(4)(B). The Company has submitted a Motion for Protective Treatment along with one (1) copy of the confidential response to the Commission pending a determination on the Company's Motion. The Company has submitted a redacted version of this document for the public record. The Company's responses to the remaining data requests in the Division's Second Set will be forthcoming.

Thank you for your attention to this filing. If you have any questions, please do not hesitate to contact me at (401) 784-7667.

Very truly yours,

Thomas R. Teehan

Enclosure

Leo Wold, Esq. cc:

> Steve Scialabba Bruce Oliver

### 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 RI Public Utilities Commission and the RI Division.

Joanne M. Scanlon National Grid

September 25, 2013 Date

# Docket No. 4431 – National Grid –2013 Annual Distribution Adjustment Charge Filing ("DAC") - Service List as of 8/7/13

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Warwick RI 02888		

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

	)	
National Grid	)	
Distribution Adjustment Charge (DAC)	)	
2013	)	Docket No. 4431
	)	
	)	

# MOTION OF THE NARRAGANSETT ELECTRIC COMPANY, D/B/A NATIONAL GRID FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION

Now comes The Narragansett Electric Company, d/b/a National Grid ("Company") and hereby requests that the Rhode Island Public Utilities Commission ("Commission") grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by Commission Rule 1.2(g) and R.I.G.L. § 38-2-2(4)(B).

#### I. BACKGROUND

On September 25, 2013, the Company filed with the Commission its responses to several of the Division's second set of data requests in this docket, for which it is seeking protective treatment. Specifically, the Company is seeking protective treatment for a customer's name contained in its response to DIV 2-2. For the reasons stated below, the Company requests that this information be protected from public disclosure. The Company has also filed redacted copies of its filing deleting the confidential information in question.

#### II. LEGAL STANDARD

Rule 1.2(g) of the Commission's Rules of Practice and Procedure 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 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 Commission falls within one of the designated exceptions to the public records law, the Commission has the authority under the terms of APRA to deem such information to be 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 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 the determination as to whether this exemption applies requires the application of a two-pronged test set forth in Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I.2001). The first prong of the test assesses whether the information was provided voluntarily to the governmental agency. Providence Journal, 774 A.2d at 47. If the answer to the first question is affirmative, then the question becomes whether the information is "of a kind that would customarily not be released to the public by the person from whom it was obtained." Id.

III. **BASIS FOR CONFIDENTIALITY** 

The information for which the Company seeks protective treatment is customer

information of the kind that would customarily not be released to the public by the

Company and its release could adversely impact the customer in question.

IV. **CONCLUSION** 

In light of the foregoing, the Company respectfully requests that the Commission

grant its Motion for Protective Treatment as stated herein.

Respectfully submitted,

THE NARRAGANSETT ELECTRIC

**COMPANY** 

By its attorney,

Thomas R. Teehan (RI #4698)

The Tucken

280 Melrose Street

Providence, RI 02907

(401) 784-7667

Dated: September 25, 2013

-3-

#### Division 2-1

### Request:

Re: witness Smith's Attachments MCS-1 through MCS-9, please provide the electronic spreadsheet files used to generate each of witness Smith's Attachments (with all cell formulae and cell references in tact) and all other supporting workpapers, studies and documents for those exhibits.

#### Response:

The electronic spreadsheets used to generate each of witness Smiths's schedules as filed on August 3, 2013 are included herein as Attachment DIV 2-1-1. The Company will provide the excel spreadsheets of Attachment DIV 2-1-1 to the Commission on CD-ROM. A copy of the CD ROM will also be provided to the Division and its consultant.

# **Redacted** Division 2-2

## Request:

Re: witness Smith's Direct Testimony at page 10 of 30, please provide a list of each described AGT project during the 2012-2013 period and for each project indicate:

- a. The name of the customer (may be provided subject to confidentiality restrictions);
- b. The projected annual gas use volumes for the proposed facility;
- c. The estimated amount of the rebate the Company would offer for the project and the basis for computing the estimated rebate;
- d. The estimated in-service date for the proposed facility;
- e. The anticipated schedule for payment of rebates;
- f. The estimated rebate amount per vehicle for the Natural Gas Vehicle project.

#### Response:

Since the time of the DAC's August 1 testimony, two of the customers will no longer seek the AGT funds for their projects. Below is the information for the remaining customers / projects.

#### <u>Project One</u> – New NGV fueling station and the purchase of 43 refuse trucks.

- a. The name of the customer is
- b. The projected annual gas usage is 506,905 therms.
- c. The rebate issued on April 2013 for the amount of \$187,172 was awarded based on 75% of the net present value of the Company's margin using the AGT screening tool.
- d. The estimated in-service date for this facility was October 2012.
- e. The rebate was paid on April 2013.
- f. The estimated rebate amount per vehicle for this Natural Gas Vehicle Project is \$4,353.

#### Division 2-2

# Request:

Re: witness Smith's Direct Testimony at page 10 of 30, please provide a list of each described AGT project during the 2012-2013 period and for each project indicate:

- a. The name of the customer (may be provided subject to confidentiality restrictions);
- b. The projected annual gas use volumes for the proposed facility;
- c. The estimated amount of the rebate the Company would offer for the project and the basis for computing the estimated rebate;
- d. The estimated in-service date for the proposed facility;
- e. The anticipated schedule for payment of rebates;
- f. The estimated rebate amount per vehicle for the Natural Gas Vehicle project.

#### Response:

Since the time of the DAC's August 1 testimony, two of the customers will no longer seek the AGT funds for their projects. Below is the information for the remaining customers / projects.

#### Project One – New NGV fueling station and the purchase of 43 refuse trucks.

- a. The name of the customer is
- b. The projected annual gas usage is 506,905 therms.
- c. The rebate issued on April 2013 for the amount of \$187,172 was awarded based on 75% of the net present value of the Company's margin using the AGT screening tool.
- d. The estimated in-service date for this facility was October 2012.
- e. The rebate was paid on April 2013.
- f. The estimated rebate amount per vehicle for this Natural Gas Vehicle Project is \$4,353.

#### Redacted

Division 2-2, page 2

# Project Two - Second phase of Project One including additional refuse trucks.

- a. The name of the customer is
- b. The projected annual gas usage is expected to be 235,770 therms if 20 refuse trucks are purchased. However, if purchases up to 37 more vehicles, the projected annual gas usage can reach 436,000 therms.
- c. The estimated amount of the rebate \$87,060 and it is based on adding 20 vehicles.
- d. The estimated in-service date is early 2014.
- e. Upon completion of the verification process of the equipment.
- f. The estimated rebate amount per vehicle for this Natural Gas Vehicle Project is \$4,353.

### Project Three - The installation of two cogeneration units.

- a. The name of the customer is Toray Plastics.
- b. The projected annual incremental gas usage is 6,349,418 therms.
- c. The Commission approved rebate is \$1.8 million. The approved rebate was calculated using the AGT screening tool.
- d. The estimated in-service date is March 2014.
- e. The anticipated schedule of payments of rebates is as follows: Four (4) annual incentive payments consisting of three (3) incentive payments of \$500,000 and one (1) final incentive payment of \$300,000 to be made in accordance with the AGT application.
- f. n/a

#### Division 2-3

# Request:

Re: witness Smith's Direct Testimony at page 11 of 30, please provide a list of each proposed AGT project the Company has identified for the 2013-2014 period, and for each project indicate:

- a. The name of the customer (may be provided subject to confidentiality restrictions);
- b. The projected annual gas use volumes for the proposed facility;
- c. The estimated amount of the rebate the Company would offer for the project and the basis for computing the estimated rebate;
- d. The estimated in-service date for the proposed facility;
- e. The anticipated schedule for payment of rebates.

#### Response:

Since the time of the August 1, 2013 filing, two of the four projects making up the \$2.4 million in rebates described on page 11 at 13 will not require AGT funding. The specifics of the remaining projects are shown as Projects 2 and 3 in the response to Divison 2-2.

#### Division 2-4

# Request:

Re: witness Smith's Direct Testimony at page 11 of 30, please:

- a. Provide a list of each AGT project for which the Company anticipates requirements for:
  - i. The twelve months ended March 31, 2015
  - ii. The twelve months ended March 31, 2016
- b. Provide the estimated amount of AGT funding that will be required by each of the projects identified in response to part a. of this request;
- c. Provide a description of each project identified in response to part a. of this request.

#### Response:

As approved by the Commission, the following project has scheduled AGT payouts in the 2015 and 2016 timeframe.

- a. Toray Plastics
  - i. A payout of \$500,000 for the twelve months ended March 31, 2015
  - ii. A payout of \$500,000 for the twelve months ended March 31, 2016
- b. It is estimated that the rebate amounts identified in response a. of this request will total \$1.0 million over the two year period.
- c. The rebates identified in part a. of this request relate to the same project described as Project Three in the response to Division 2-2.

#### Division 2-5

### Request:

Re: footnote 4 on page 13 of 30, please provide the analyses upon which the Company assesses that the current \$1,585,000 of LIHEAP funding in base rates remains necessary with the enactment of H6293A and its provision of a LIHEAP Enhancement Plan charge rate.

#### Response:

The current \$1,585,000 of Low Income Home Energy Assistance ("LIHEAP") funding collected in base rates is a long-standing PUC-approved program intended to assist the Company's low-income gas service customers by supplementing what they receive under the State-administrated federal LIHEAP program. Enactment of H6293A established a broad-reaching funding mechanism to provide additional funding to be used as part of the State administered program. There was no requirement or provision in H6293A to curtail or eliminate other low-income programs such as the Company's current program and accordingly, no change is being proposed.

#### Division 2-6

### Request:

Re: witness Smith's Direct Testimony page 15 of 30 please provide monthly throughput data used for the 9 month period to derive the PBOP Factor.

#### Response:

Although the Company has calculated the Pension & PBOB Reconciliation amount based on the nine month period of July 2012 through March 2013, the Company will seek recovery of its Pension and PBOB reconciliation amount from customers over a twelve month period of November 1, 2013 through October 31, 2014. Therefore the Company calculated the Pension and PBOB Factor by dividing the reconciliation amount by the annual projected throughput of 38,500,653 Dktherms.

The monthly volumes for this period are as follows:

Nov-13	2,605,454	Dktherm
Dec-13	4,405,494	Dktherm
Jan-14	6,313,298	Dktherm
Feb-14	6,115,828	Dktherm
Mar-14	5,635,770	Dktherm
Apr-14	3,950,046	Dktherm
May-14	2,666,640	Dktherm
Jun-14	1,612,196	Dktherm
Jul-14	1,218,453	Dktherm
Aug-14	1,164,534	Dktherm
Sep-14	1,258,241	Dktherm
Oct-14	1,554,701	Dktherm
Total	38,500,653	Dktherm

#### Division 2-8

### Request:

Re: footnote 8 on page 21 of 30, please provide the uncollectible amount included in the target revenue for the proposed RDA factor along with the supporting calculations used to derive the uncollectible amount.

#### Response:

The uncollectible percentage of 2.46% included in the target revenue used in the proposed RDA factor was derived and approved as part of the 2008 Rate Case, Docket No. 3943. The supporting calculation of that percentage is attached herein as Attachment DIV 2-8-1.

Attachment NG-MDL-1
Docket No. \_\_\_\_
April 1, 2008
Page 31 of 32

#### National Grid - RI Gas Pro Forma Income Statement Imputed Capitalization and Cost Rates

Line <u>No.</u>		Capital Structure (a)	Cost Rate (a)	Weighted <u>Return</u>	<u>Taxes</u>	Pre-tax <u>Return</u>
1	Long Term Debt	40.63%	7.99%	3.25%		3.25%
2 3	Short Term Debt	11.66%	4.59%	0.53%		0.53%
4 5	Total Common Equity	47.71%	11.50%	5.49%	2.96%	8.45%
6 7	Total Capitalization	100.00%		9.27%	2.96%	12.23%

#### Narragansett Gas Company Net Charge-offs as a Percentage of Revenues For the Twelve Months Ended September 30,

		Net		
	<u>Year</u>	Charge-offs 1/	Revenues	<u>Percentage</u>
0	2002	Ø 6 722 021	#2.40.412.002	1.000/
8	2003	\$6,723,821	\$340,413,903	1.98%
9	2004	12,038,660	369,521,878	3.26%
10	2005	4,707,352	400,363,658	1.18%
11	2006	10,874,648	444,770,165	2.45%
12	2007	14,526,132	430,544,056	3.37%
13				
14	5 Year Comp.	\$48,870,613	\$1,985,613,660	2.46%

<sup>1/</sup> Includes ciustomer accounts write-off adjustment recorded by the Company for Fiscal Year 2008, but after September 30, 2007 or the end of the Test Year

#### Division 2-9

### Request:

Re: witness Smith's Direct Testimony page 22 of 30, please provide the Rate Base Allocation factor and amount of actual capital investment.

#### Response:

The Rate Base Allocation percentages approved in the 2012 Rate Case in Docket No. 4323 and used for the allocation of the revenue requirement on actual capital investment to the Company's rate classes is shown below.

Rate Class	Rate Base	Rate Base
	Amount	%
Res-NH	\$13,905,382	3.73%
Res-H	\$229,406,864	61.56%
Small	\$30,510,711	8.19%
Medium	\$50,617,650	13.58%
Large LL	\$22,496,078	6.04%
Large HL	\$8,773,089	2.35%
XL-LL	\$2,865,290	0.77%
XL-HL	\$14,086,538	3.78%
Total	\$372,661,601	100.00%

Source: Docket No. 4323, Compliance Filing, Attachment 8A, Schedule PMN-2, pages 3 and 4.

As shown on Attachment WRR-1, page 6 of 11 (lines 1+4) in the Company's August 3, 2013 FY 2013 Gas Infrastructure, Safety, and Reliability Plan Reconciliation Filing in Docket No. 4306, the actual capital investment was \$59.60 million.

#### Division 2-10

### Request:

Re: witness Smith's Direct Testimony page 25 of 30, please provide monthly forecasted and actual throughput for each rate class for each of the previous five years, since the 2008 base rate case.

### Response:

Attached herein as Attachment DIV 2-10-1 is a compilation of actual and forecasted throughput per rate class since the 2008 base rate case.

Actual Throughput

Line No

		The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4431 2013 Distribution Adjustment Charge Filing Responses to Division's Second Set of Data Requests Attachment 2-10-1
Nov-Oct 748,917 15,493 16,376,004 1,376,834 2,354,620 4,968,943 2,656,120 877,020 834,584 4,978,013 82,911 35,269,460	Nov-Oct 646,551 21,950 14,709,569 1,750,443 2,233,285 4,885,368 2,347,332 1,091,535 663,035 4,890,213 90,142 33,329,423	25,039 22,592 16,174,218 1,768,40,705 5,265,007 1,030,743 1,030,743 1,032,861 5,202,740 62,168 36,165,279 36,165,279
Oct-09 40,239 799 521,159 56,558 59,806 241,430 111,650 75,378 37,387 37,387 37,387 5,111	0ct-10 33,639 756 425,857 51,457 65,398 196,447 99,205 69,027 38,137 360,859 3,429 1,344,214	28,795 667 377,486 48,508 47,648 195,868 69,654 60,163 46,703 370,086 2,170 1,247,749
Sep-09 3.2,573 505 343,477 36,910 (47,006) 119,052 45,164 84,189 18,975 366,733 7,733	Sep-10 28,156 655 338,065 43,526 46,311 152,484 38,826 68,627 20,013 339,859 2,834 1,079,356	28,158 638 351,381 45,777 46,018 166,023 21,217 39,935 21,217 39,935 1,137 1,135,116
Aug-09 33,686 574 353,365 38,489 132,518 204,967 50,564 71,900 17,646 381,913 8,891	Aug-10 26,038 585 321,108 40,882 42,040 142,448 27,900 61,050 17,068 380,857 3,253 1,063,229	25,313 26 338,829 42,811 46,827 121,538 42,566 60,854 18,268 395,175 1,094,353
43,168 770 450,719 54,251 50,311 180,948 59,152 61,517 (42,304) 378,308 3,697 1,240,536	11-10 31,337 681 366,674 47,950 50,135 149,455 38,049 60,689 16,783 380,905 2,303 1,144,962	29,795 705 367,550 31,639 54,697 189,986 41,662 56,843 15,713 32,576 4,023 1,165,590
Jun-09 39,059 509 507,219 61,202 60,022 224,696 48,288 71,304 127,047 446,267 61,411	1   10   1   1   1   1   1   1   1   1	55,440 945 514,509 71,759 68,788 208,954 58,087 64,285 16,660 390,642 1,961 1,432,031
May-09 51,342 1,767 924,654 105,449 132,795 313,913 102,132 70,947 31,062 348,269 1,705 2,084,035	Mav-10 43,806 1,465 766,843 107,144 102,574 295,416 100,305 86,261 38,794 340,319 4,098 4,098	42,710 1,609 913,059 115,189 115,189 125,613 73,082 52,426 379,698 3,930 2,149,631
Apr-09 80,975 2,234 1,854,829 179,606 268,425 369,225 364,889 84,857 115,198 489,115 4,896 3,814,249	Apr-10 56,075 2,198 1,308,570 165,907 183,324 439,102 244,444 91,765 47,925 10,153 10,153 10,153 10,153	60,827 2,654 1,843,901 220,131 275,546 554,864 282,755 95,529 117,347 443,910 6,143 3,903,607
Mar-09 87,796 2,559 2,456,092 218,543 404,908 699,226 411,649 100,492 133,474 486,423	Mar-10 75,061 3,696 2,247,579 289,312 354,709 671,940 365,310 114,752 8,471 438,676 3,609 4,650,116	71,380 3,139 2,557,241 263,112 407,231 786,557 389,060 120,363 139,442 496,568 7,946 5,242,037
Eeb-09 104,454 2,363 3,169,269 246,102 445,253 956,602 447,814 (3,583) 121,443 508,634 0 6,5998,350	Eeb-10 85,485 3,982 2,797,453 316,550 359,350 426,559 124,162 123,649,796 6,670 5,549,796	77,880 3,016,557 3,046,557 3,046,459 495,445 487,722 113,623 177,020 517,936 718,936 7
Jan-09 105,168 1,998 2,841,943 221,411 468,169 864,289 469,076 (77,559) 137,536 620,195 87	Jan-10 106,210 3,920 3,063,886 337,180 615,969 930,575 490,080 154,726 12,468 607,985 18,196 6,452,394	80,291 80,291 3,680 294,768 487,812 873,151 455,172 127,494 173,230 536,003 9,625 6,001,130
Dec-08 74,260 1,415 1,905,706 158,314 243,234 440,789 363,717 162,021 91,819 420,670 46	Dec-09 72,115 1,917 1,638,849 175,730 230,236 449,907 290,578 109,587 83,127 83,127 426,626 12,047 3,490,719	63,455 2,013,046 20013,048 202,499 626,850 367,168 116,825 184,501 530,783 8,866 4,412,249
Nov-08 56,197 1,047,572 136,185 353,805 182,026 175,556 45,301 156,199 (10,666) 2,142,175 et No 3982	Nov-109 53,856 1,228 976,902 109,132 1124,663 425,491 180,464 86,690 51,235 333,251 20,878 2,363,789 et 4097	40,798 1,398 920,353 104,771 115,197 322,479 176,764 81,749 90,335 419,788 6,488 2,280,120 rt No 4199
Total THROUGHPUT   Now-08	14 Total THROUGHPUT  15 Residential Non-Heating  16 Residential Non-Heating Low Income  17 Residential Heating Low Income  18 Residential Heating Low Income  19 Small C&I  20 Medium C&I  21 Large LLF  22 Extra Large LLF  23 Extra Large LLF  24 Extra Large HLF  25 Default  26 Total Throughput  Source: GCR Deferred Filed Oct 10 - Docket 4097	28 Residential Non-Heating 29 Residential Non-Heating 29 Residential Heating 30 Residential Heating 31 Residential Heating Low Income 32 Small C&I 33 Medium C&I 34 Large LLF 35 Large HLF 36 Extra Large HLF 37 Extra Large HLF 38 Default 39 Default 39 Total Throughput 39 Total Throughput 30 Total Throughput 30 Total Throughput 30 Total Throughput 30 Total Throughput 31 Total Throughput 32 Source: GCR Deferred Filed Oct 11 -Docket No 4199

40 Total THROUGHPUT 41 Residential Non-Heating	Nov-11 44,902	Dec-11 58,419	<u>Jan-12</u> 74,486	Feb-12 80,015	Mar-12 74,243	Apr-12 58,071	May-12 44,656	Jun-12 34,394	Jul-12 28.068	Aug-12 26.163	Sep-12 26,022	Oct-12 30,065	Nov-Oct 579,502
42 Residential Non-Heating Low Income	1,359	1,937	2,622	2,598	2,895	1,917	1,163	778	959	736	199	872	18,195
43 Residential Heating	960,000	1,459,048	2,163,628	2,410,188	2,120,996	1,370,734	837,999	497,026	368,362	341,313	331,780	434,145	13,295,220
44 Residential Heating Low Income	114,787	155,722	228,341	228,599	220,671	142,168	85,332	55,790	41,653	39,722	37,547	48,823	1,399,154
45 Small C&I	122,071	197,162	331,804	365,172	314,636	190,004	104,113	55,623	47,044	43,411	37,395	47,403	1,855,837
46 Medium C&I	354,746	479,700	662,670	792,433	628,082	468,331	262,106	144,216	174,869	152,213	151,656	200,672	4,471,693
47 Large LLF	209,947	279,896	367,039	494,826	347,270	217,441	111,848	64,048	28,500	38,057	41,427	64,497	2,264,794
48 Large HLF	79,582	84,517	95,169	108,139	95,733	77,086	64,492	62,286	53,390	47,435	67,858	67,115	902,801
49 Extra Large LLF	120,944	120,883	133,177	211,833	153,086	86,165	60,302	20,222	5,670	15,557	13,889	25,817	967,546
50 Extra Large HLF	431,555	445,798	463,288	581,948	472,111	422,375	376,980	375,871	380,328	379,943	410,312	363,453	5,103,962
51 Default	4,486	5,240	5,962	9,219	5,189	4,187	11,286	(4,444)	1,056	1,283	1,076	1,687	46,227
52 Total Throughput	2,444,380	3,288,323	4,528,185	5,284,970	4,434,912	3,038,478	1,960,277	1,305,809	1,129,595	1,085,833	1,119,620	1,284,548	30,904,930
Source: GCR Deferred Filed Oct 12 - Docket No 4283	et No 4283												
53 Total THROUGHPUT	Nov-12	Dec-12	Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13				Nov-Oct
54 Residential Non-Heating	45,986	78,983	706,86	109,290	100,574	85,531	54,040	36,130	28,862				638,304
55 Residential Non-Heating Low Income	1,703	3,229	4,277	4,875	3,978	2,925	1,352	914	865				24,119
56 Residential Heating	902,551	1,903,463	2,537,878	2,912,936	2,519,777	1,994,126	1,004,359	517,766	368,525				14,661,380
57 Residential Heating Low Income	94,997	190,048	248,229	279,036	237,030	188,891	94,414	52,160	41,890				1,426,696
58 Small C&I	106,317	269,726	399,055	480,777	383,824	277,229	127,784	48,653	40,237				2,133,601
59 Medium C&I	290,265	651,514	762,706	903,074	782,902	588,764	395,429	311,341	287,622				4,973,616
60 Large LLF	165,962	443,134	393,008	524,921	397,466	366,696	121,469	39,332	25,608				2,477,596
61 Large HLF	79,960	115,555	121,058	134,042	113,580	113,111	69,178	68,502	71,204				886,190
62 Extra Large LLF	95,882	201,014	187,246	316,328	97,718	300,780	(64,639)	(226)	(10,571)				1,123,533
63 Extra Large HLF	437,237	550,319	518,236	633,997	460,632	561,744	347,669	281,695	477,302				4,268,831
64 Default	1,820	8,109	7,008	9,834	5,832	6,429	740	(1,863)	4				37,913
65 Total Throughput	2,222,680	4,415,092	5,277,609	6,309,110	5,103,315	4,486,226	2,151,794	1,354,405	1,331,548				32,651,779

Source: GCR Deferred Filed July 13 - Docket No 4346

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4431 2013 Distribution Adjustment Charge Filing Responses to Division's Second Set of Data Requests Attachment 2-10-1 Page 2 of 4

# Forecasted Throughput

4,911,114 1,144,535 2,672,144 2,947,458 1,986,681 4,513,915 825,615 16,873,407 2,437,562 945,124 1,105,416 17,121,459 5,823,405 832,500 4,166,917 16,815,263 2,348,189 967,552 3,928,147 32,083,572 2,234,886 4,544,565 Total Dec-Oct Total Dec-Oct Total Nov-Oct Oct-09 33,466 528,984 63,181 204,197 94,760 64,307 62,354 558,900 90,438 260,845 108,342 74,511 40,527 Oct-11 39,380 506,454 51,998 186,498 77,599 73,523 30,327 39,674 295,370 89,003 ,440,252 327,791 261,149 (1,106) 311,008 444,060 51,801 175,996 72,145 33,359 407,299 75,604 188,841 63,335 79,808 29,260 Sep-11 33,888 378,664 20,031 129,491 30,799 66,847 51,935 387,969 37,067 319,180 969,622 200.39 Aug-09 30,092 Aug-11 33,934 324,025 40,721 139,727 116,710 378,980 46,472 150,652 39,617 31,799 381,306 37,916 374,569 67,983 174,705 52,596 81,556 29,602 270,396 58,178 16,197 272,408 57,791 37,131 922,322 089.32 469,333 51,712 166,117 65,848 34,015 39,370 404,535 58,320 149,943 36,018 48,898 9,099 46,977 63,018 29,754 460,692 77,031 184,607 69,399 365,370 262,033 263,168 41,240 194,866 35. 260,711 102,746 Jun-09 44,033 734,882 81,371 243,885 78,946 80,864 35,429 697,238 99,689 36,736 Jun-11 46,251 639,475 61,244 202,007 72,453 66,704 47,628 49,819 78,097 288,018 357,774 282,978 ,418,739 May-09 49,800 May-11 60,870 135,298 351,970 148,646 81,639 175,075 86,190 ,211,919 64,897 ,205,748 162,103 116,333 294,061 136,863 34,091 384 949 59,731 388,203 38,897 1,114,772 69,605 287,285 315,865 2,113,880 May-10 431.81 <u>Apr-09</u> 55,372 <u>Apr-11</u> 70,493 2,148,904 280,876 574,278 273,548 96,675 112,756 433,744 ,926,568 298,434 563,556 327,708 99,635 79,128 224,723 445,309 288,000 84,095 62,697 456,719 787,066, 98,094 814,446 Apr-10 590.51 <u>Mar-09</u> 57,950 424,232 113,038 177,116 122,203 111,303 Mar-11 78,867 326,862 662,446 378,527 118,617 2,808,834 401,070 470,334 413,015 886,185 445,219 103,174 382,070 776,269 65,606 2,636,773 388,649 ,542,355 1,687,33 Mar-10 Feb-09 60,105 456,590 104,590 124,629 119,271 847,326 194,370 3,018,749 481,750 494,466 2,917,818 380,345 756,775 409,350 3,070,998 74,836 949,435 145,431 385,607 444,457 462,232 Feb-11 87,827 99,221 372,201 640,668 182,37 448,103 107,830 127,363 124,814 Jan-11 82,003 174,056 64,564 2,914,739 396,526 788,795 199,344 74,986 2,916,336 460,582 916,290 421,606 2,750,982 356,367 716,407 394,697 108,659 390,788 503,601 475.348 112,565 114,316 374,209 103,228 164,238 Dec-10 70,653 102,715 631,629 297,612 654,350 377,970 311,925 96,473 56,687 2,161,773 436,538 60,595 358,521 2,046,100 232,014 470,932 354,899 282,121 ,973,922 949 85 ,685,71 147,903 395,678 227,001 92,131 74,630 1,104,878 360,318 174,826 64,465 46,350 385,937 54,674 78,177 117,722 ,039,084 313,556 2,408,7 2,408,7 Source: GCR Filing Docket No 3982 Source: GCR Filing Docket No 4097 Source: GCR Filing Docket No 4199 21 Total THROUGHPUT
22 Residential Non-Heating
23 Residential Heating
24 Small C&I
25 Medium C&I 2 Residential Non-Heating Residential Non-Heating 11 Total THROUGHPUT 1 Total THROUGHPUT 13 Residential Heating 3 Residential Heating 28 Extra Large LLF 29 Extra Large HLF 30 Total Throughput 10 Total Throughput 19 Extra Large HLF20 Total Throughput 9 Extra Large HLF 18 Extra Large LLF 8 Extra Large LLF 5 Medium C&I 15 Medium C&I 26 Large LLF 27 Large HLF 17 Large HLF 7 Large HLF 6 Large LLF 16 Large LLF 14 Small C&I 4 Small C&I Line No

The Narragansett Electric Company d/b/a National Grid R.I.P.U.C. Docket No. 4431 2013 Distribution Adjustment Charge Filing Responses to Division's Second Set of Data Requests Attachment 2-10-1 Page 3 of 4

Oct-12         Total Nov-Oct           35,143         572,364           409,966         17,436,451           80,503         2,466,704           213,538         5,205,395           94,057         2,804,893           94,502         1,157,639           37,324         951,676           451,689         5,560,462           441,6722         36,155,583	Oct-13         Nov-Oct           28,447         568,413           515,751         17,653,549           48,988         2,353,415           212,996         5,330,780           98,791         2,725,521           58,297         931,731           50,092         1,060,314           371,180         4,763,990           384,542         35,387,711
28,529 28,529 345,116 44 49,280 8134,162 2 34,149 87,951 16,500 381,374 4 4;1047,061 114	Sep-13 27,901 399,794 5,48,259 188,419 2,4797 62,527 23,719 336,990 336,290 1,202,406 1,31
Aug-12 28,744 362,367 34,558 80,628 19,091 70,556 8,024 333,465	Aug-13 27,280 388,331 47,990 172,711 46,769 59,555 18,206 379,890 1,140,732
101-12 31,804 422,847 42,243 128,572 20,845 65,664 12,130 385,094 1,109,1199	29,995 443,392 53,665 183,310 53,607 55,624 18,513 371,195 1,209,300
Jun-12 35,764 473,491 47,649 106,097 62,590 79,512 23,350 426,407 1,254,861	Jun-13 34,178 674,166 71,605 226,708 88,793 60,247 23,709 372,971 1,525,377
May-12 43,928 1,081,596 122,112 243,494 120,419 83,115 32,713 396,175 2,123,550	Mav-13 46,325 1,232,855 142,278 358,911 143,544 74,577 47,910 390,126 2,436,526
Apr-12 52,923 1,705,118 252,709 420,268 326,807 101,638 80,652 501,282 3,441,397	Apr-13 52,095 1,998,463 264,475 540,515 308,325 81,907 99,241 340,930 3,685,951
Mar-12 62,047 2,511,707 407,036 798,012 444,434 121,975 141,003 541,380	66,696 2,680,218 396,614 766,750 415,605 103,826 149,486 388,437 4,967,631
Eeb-12 72,427 3,365,922 478,896 972,492 496,664 126,073 161,912 550,308 6,224,693	Eeb-13 77,377 3,108,191 442,493 891,201 467,179 103,872 176,119 425,484 5,691,916
Jan-12 74,908 3,445,597 491,295 1,039,674 548,439 162,692 189,233 649,419 6,601,257	19a-13 78,573 3,053,892 460,531 838,975 475,113 99,967 182,320 441,981 5,631,350
Dec-11 57,359 2,284,131 306,277 683,624 411,067 95,115 161,401 481,256 4,480,229	Dec-12 59,594 2,058,633 254,777 885,632 350,835 92,901 161,825 490,008
Nov-11 48,787 1,028,594 154,145 384,835 226,330 98,847 87,436 442,612 2,408,713 o 4283	Nov-12 39,952 1,099,863 121,739 364,651 222,164 78,431 109,175 394,798
31 Total THROUGHPUT  32 Residential Non-Heating  33 Residential Heating  1,0  34 Small C&I  35 Medium C&I  36 Large LLF  37 Large HLF  38 Extra Large LLF  39 Extra Large HLF  30 Extra Large HLF  30 Extra Large HLF  30 Extra Large HLF  31 Extra Large HLF  32 Source: GCR Filing Docket No 4283	41 Total THROUGHPUT  42 Residential Non-Heating  43 Residential Heating  44 Small C&I  45 Medium C&I  76 Large LLF  77 Large HLF  48 Extra Large LLF  49 Extra Large HLF  70 Total Throughput

#### Division 2-11

# Request:

Re: footnote 13 on page 26 of 30, please provide the throughput data relied upon for the derivation of the nine month proration.

## Response:

The forecasted throughput relied upon to derive the nine month prorated targets can be found in Schedule MCS-7, page 5 of 10, lines 7, 19, and 31.

#### Division 2-12

### Request:

Re: footnote 13 on page 26 of 30, please identify any adjustments applied to account the seasonal differences between the nine month period from the 2008 Rate Case (July to January) and with the associated throughput for the 2012 Rate Case (February and March), if no weather normalization or adjustment was made please explain.

#### Response:

Both the 2008 Rate Case and 2012 Rate Case forecasted throughput used for the derivation of the nine month period from July 2012 through March 2013 were both weather normalized.

#### Division 2-13

### Request:

Re: witness Smith's Direct Testimony page 27 of 30, please provide the interest based on the timing of recoveries for each component of the reconciliation factor for the Large and Extra Large rate classes.

#### Response:

The monthly interest based on the timing of recoveries for each of the base rate reconciliation factors for the Large and Extra Large rate classes is shown in Attachment MCS-7, page 5 of 10, lines 15, 27, and 39. Please note the interest totaled a credit of \$7.

#### Division 2-14

### Request:

Re: witness Smith's Attachment MCS-1, page 1 of 1, please provide the electronic version of the schedule relied upon from Docket No. 4323 to determine the Uncollectible Percentage.

#### Response:

In Attachment DIV-2-14-1, the Company has provided the electronic version of the derivation of the uncollectible percentage of 3.18% relied upon on Schedule MCS-1, page 1 of 1, This schedule was part of Compliance Attachment 6, Schedule MDL-3-GAS in Docket No. 4323.

THE NARRAGANSETT ELECTRIC COMPANY
d/b/a NATIONAL GRID
R.I.P.U.C. Docket No. 4323
Compliance Attachment 6
Schedule MDL-3-GAS
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(i) = Sum of (d) through (h)

#### The Narragansett Electric Company d/b/a National Grid Adjustments To Operating Expenses Test Year Ended December 31, 2011 Five Year Average of Uncollectibles Summary

		(a)	(b)	(c)			
		Distribution	Net	% of Write-Offs			
		Revenue	Write-Offs	Distribution Revenue			
1	Year:						
2							
3	CY 2011	\$378,977,027	\$11,623,740	3 07%			
4	CY 2010	\$401,863,767	\$15,515,379	3 86%			
5	CY 2009	\$447,952,657	\$19,431,198	4 34%			
6	CY 2008	\$455,289,104	\$12,526,203	2 75%			
7	CY 2007	\$470,604,106	\$9,331,763	1 98%			
8							
9	Total	\$2,154,686,661	\$68,428,283	3 18%			
10							
11							
12							
13	Five Year Average Net Write-Off Rate			3.18%	Settlement Ad	justment	
14							
15				(d)	(e)	(f)	(g)
16				Distribution Base Rate			
17				Revenue	GRT	Gas Revenue	DAC Reven
18	Total Test Year Adjusted Revenue			\$138,466,302	\$11,149,139	\$217,689,572	(\$1,530,76
19	,						
20	Current Allowed Average Write-Off Rate			2.46%	0.00%	2.46%	2.46
21							
22	D. J.D. I. F + C A W.	- CC D - 4 - A 11 - 4 4 - 7	C4 W D	62 200 700	¢o.	05 255 162	62.00

17		Revenue	GRT	Gas Revenue	DAC Revenue	EE Revenue	Total
18	Total Test Year Adjusted Revenue	\$138,466,302	\$11,149,139	\$217,689,572	(\$1,530,767)	\$12,190,898	\$378,977,027
19							
20	Current Allowed Average Write-Off Rate	2.46%	0.00%	2.46%	2.46%	2.46%	
21							
22	Bad Debt Expense at Current Average Write off Rate Applied to Test Year Revenue	\$3,390,709	\$0	\$5,355,163	\$2,809	\$299,896	\$9,048,577
23	Less: Test Year Bad Debt Expense	\$4,779,294	\$0	\$5,449,212	\$109,541	\$195,146	\$10,533,193
24							
25	Test Year Normalization Adjustment for Bad Debt Expense	(\$1,388,585)	\$0	(\$94,049)	(\$106,732)	\$104,750	(\$1,484,616)
26							
27	Total Rate Year Revenue	\$149,526,262	\$0	\$200,956,268	(\$0)	\$0	\$350,482,530
28							
29	Five Year Average Net Write-Off Rate	3 18%	0 00%	3 18%	3 18%	3 18%	
30							
31	Rate Year Allowable Bad Debt Expenses	\$4,754,935	\$0	\$6,390,409	(\$0)	\$0	\$11,145,344
32	Bad Debt Expense at Current Average Write off Rate Applied to Test Year Revenue	\$3,390,709	\$0	\$5,355,163	\$2,809	\$299,896	\$9,048,577
33							
34	Total Pro Forma Bad Debt Expense Adjustment	\$1,364,226	\$0	\$1,035,246	(\$2,809)	(\$299,896)	\$2,096,767
35							
36	Total Adjustment	(\$24,359)	\$0	\$941,197	(\$109,541)	(\$195,146)	\$612,151

#### Line Notes

- 3-7 Per Company's response to Commission 2-25-ELEC/GAS
- 9 Cols (a) & (b) = Sum of Lines 3 through 5 Col (c) = Col (b) / Col (a)
- 13 Line 9(c)
- 18(d) From Page 4 of 65, Sum of Lines 4, 7, 8, 13, 15, 16, 31, 35, and 43 Column (a)
- 18(e) From Page 4 of 65, Line 18(a)
- 18(f) From Page 4 of 65, Sum of Lines 1, 21, 22, 23, and 24 Column(a)
- 18(g) From Page 4 of 65, Sum of Lines 2, 28, 29, and 33 Column (a)
- $18 (h) \quad From \ Page \ 4 \ of \ 65, \ Sum \ of \ Lines \ 3, \ 25, \ and \ 26 \ Column \ (a)$
- 20 From Commission Order at Docket No 3943, Appendix A Page 1 of 2, Line 11

#### Division 2-15

# Request:

Re: witness Smith's Attachment MCS-6, page 3 of 13, please: fully document the derivation from the detail on pages 4 through 9 of Attachment MCS-7 of the monthly totals shown for:

- a. Firm (dth)
- b. Firm Revenue
- c. Firm Revenue less GET
- d. Total Gas Costs
- e. Energy Efficiency Surcharges

#### Response:

Consistent with the methodology used in prior DAC filings, the monthly totals for Firm Usage (dth), Firm Revenue, Firm Revenue subject to Margin Sharing, Total Gas Costs, and Energy Efficiency Surcharges were derived based on the customers' actual billing information.

- a. Firm Usage (dth) this is the total billed volume in dekatherms from all the active Firm customers in a given month.
- b. Firm Revenue this is the total billed revenue from all the active Firm customers in a given month.
- c. Firm Revenue subject to Margin Sharing- this is the total billed revenue excluding Sales tax, Gross Earnings Tax, Energy Efficiency Surcharge, and other charges such as interest and the LIHEAP Enhancement charge from all the active Firm customers in a given month.
- d. Total Gas Costs this is the total billed gas charges from all the active Firm customers in a given month.
- e. Energy Efficiency Surcharges this is the total billed energy efficiency surcharges from all the active Firm customers in a given month.

The electronic spreadsheets that support the details have also been provided in response to Division 2-1.

#### Division 2-16

# Request:

Re: witness Smith's Attachment MCS-6 page 4 of 11, please: fully document the derivation from the detail on pages 5 through 11 of Attachment MCS-6 of the monthly totals shown for:

- a. Non-Firm (dth)
- b. Non-Firm Revenue
- c. Firm Revenue less GET
- d. Total Gas Costs
- e. Energy Efficiency Surcharges

#### Response:

Consistent with the methodology used in prior DAC filings, the monthly totals for Non-firm Usage (dth), Non-firm Revenue, Non-firm Revenue subject to Margin Sharing, Total Gas Costs, and Energy Efficiency Surcharges were derived based on the customers' actual billing information.

- a. Non-firm Usage (dth) this is the total billed volume in dekatherms from all the active Non-firm customers in a given month.
- b. Non-firm Revenue this is the total billed revenue from all the active Non-firm customers in a given month.
- c. Non-firm Revenue subject to Margin Sharing- this is the total billed revenue excluding Sales tax, Gross Earnings Tax, Energy Efficiency Surcharge, and other charges such as interest and the LIHEAP Enhancement charge from all the active Non-firm customers in a given month.
- d. Total Gas Costs this is the total billed gas charges from all the active Non-firm customers in a given month.
- e. Energy Efficiency Surcharges this is the total billed energy efficiency surcharges from all the active Non-firm customers in a given month.

The electronic spreadsheets that support the details have also been provided in response to Division 2-1.