

December 3, 2013

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Docket 4451 – The Narragansett Electric Company, d/b/a National Grid
2014 Energy Efficiency Program Plan
Responses to Commission Data Requests – Set 2**

Dear Ms. Massaro:

Enclosed are ten (10) copies of National Grid's¹ responses to the Commission's Second Set of Data Requests concerning the above-referenced proceeding.

Thank you for your attention to this filing. If you have any questions, please feel free to contact me at (401) 784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

cc: Docket 4451 Service List
Karen Lyons, Esq.
Jon Hagopian, Esq.
Steve Scialabba, Division

¹ The Narragansett Electric Company d/b/a National Grid (referred to herein as "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 RI Public Utilities Commission and the RI Division of Public Utilities and Carriers.



Joanne M. Scanlon

December 3, 2013

Date

Docket No. 4451 - National Grid - 2014 Energy Efficiency Program Plan
Service list updated 11/5/13

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Commission 2-1

Request:

Attachment 2, p.41. (Footnote 10). Explain why the Company feels the triennial review of the Standards due in 2014 is an appropriate time to take up the TRC issues raised in Order No. 21122 (Dkt. 4397). Include in your response the date of the triennial review of the Standards.

Response:

The Company has interpreted the concurring opinion in Order No. 21122 (Docket No. 4397) as raising some foundational issues about the TRC test and its application in Rhode Island for determining the cost effectiveness of energy efficiency programs, not only limited to combined heat and power projects. In light of this interpretation, and because Section 1.2.A.2 of the Standards include requirements for how the Company should measure program and portfolio cost-effectiveness, it seems appropriate that addressing these issues related to the TRC test occur within the triennial review of the Standards. Addressing the TRC test during the triennial review will also allow for an open stakeholder process to fully examine how potential changes to the TRC may impact the next three-year procurement plan for the period of 2015-2017.

Pursuant to the System Reliability and Least Cost Procurement Statute R.I.G.L. § 39-1-27.7(b),

The standards and guidelines provided for by subsection (a) shall be subject to periodic review and as appropriate amendment by the commission, which review will be conducted not less frequently than every three (3) years after the adoption of the standards and guidelines.

The Standards were first reviewed and approved by the Commission in 2008 and were revised in 2011 and approved in Docket No. 4202. The next triennial cycle for review of the Standards would occur in 2014. The Statute does not specify a date for the triennial review; however, the Company expects this process to begin in early 2014.

Commission 2-2

Request:

Please provide the evaluation reports relied upon to develop the TRM.

Response:

Evaluations commissioned by National Grid and completed in 2008-2013 are located on the website of the Rhode Island Energy Efficiency & Resource Management Council: <http://www.rieermc.ri.gov/evaluationstudies/>. The Company is providing the studies completed before 2008 as Attachment COMM 2-2. Because of the voluminous nature of these studies, Company is providing Attachment COMM 2-2 on a CD-ROM.

Commission 2-3

Request:

Please provide a copy of the Technical Reference Manual.

Response:

Please see Attachment COMM 1-16 for the 2014 Technical Reference Manual submitted in response to Commission 1-16. The Company provided the CD-ROM on December 2, 2013 containing a copy of this attachment.

Commission 2-4

Request:

Please provide copies of the excel spreadsheets that are the basis of the TRC test used to support the 2014 EEPP. Provide legible hard copies, as well as the electronic versions with formulas intact.

Response:

Please see Attachment COMM 2-4-A for an Excel version of the electric benefit cost model. This model is consistent with the Company's revised electric tables submitted in a supplemental filing on November 22, 2013. Please see Attachment COMM 2-4-B for an Excel version of the gas benefit cost model. This model is consistent with the Company's revised gas tables submitted in a supplemental filing made on November 26, 2013. Several tabs in the benefit cost model contain approximately 9,000 cells; therefore, it is not possible to provide legible and comprehensible hard copies. The Company is providing both of these Attachments on CD-ROM.