



Jennifer Brooks Hutchinson  
Senior Counsel

September 2, 2014

**VIA HAND DELIVERY & ELECTRONIC MAIL**

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

**RE: Docket 4520 - 2014 Gas Cost Recovery Filing**

Dear Ms. Massaro:

Enclosed please find ten (10) copies of the National Grid's<sup>1</sup> Annual Gas Cost Recovery (GCR) filing, which is being submitted pursuant to the Gas Cost Recovery Clause found in the Company's tariffs at RIPUC NG-Gas No. 101, Section 2, Schedule A. The proposed rates contained in this GCR filing reflect the customer class-specific factors necessary for the Company to collect sufficient revenues to recover projected gas costs for the period November 1, 2014 through October 31, 2015.

This filing consists of the pre-filed testimony and schedules of Elizabeth D. Arangio, Ann E. Leary, and Stephen A. McCauley. Ms. Arangio provides testimony relative to the Company's projected gas costs and in support of the Company's proposed GCR factors. She also discusses the Company's plans to enter into a Precedent Agreement with Tennessee Gas Pipeline, L.L.C. Ms. Leary's testimony describes the development of the GCR charges proposed for effect November 1, 2014 and provides a bill impact analysis relative to those proposed rates. Mr. McCauley discusses the results of the Gas Procurement Incentive Plan for the period July 1, 2013 through June 30, 2014. He also discusses the results of the Natural Gas Portfolio Management Plan for the period April 1, 2013 through March 31, 2014 and the recommendation to continue with that plan for an additional year.

As described in Ms. Leary's testimony, based on the GCR rates proposed for effect November 1, 2014 through October 31, 2015, an average residential heating customer using 846 therms per year will experience a total bill decrease related to the proposed GCR and Distribution Adjustment Charge (DAC) rates of approximately \$108.79<sup>2</sup>, or an annual 8.3 percent decrease from the current year's existing rates. This decrease is comprised of a \$48.02 decrease in the GCR-related costs and a \$57.51 decrease in the DAC-related costs, which was filed on August 29, 2014 under separate cover.

This filing also contains a Motion for Protective Treatment in accordance with Rule 1.2(g) of the Commission's Rules of Practice and Procedure and RIGL § 38-2-2(4)(B). The Company seeks protection from public disclosure of certain gas-cost pricing information and forecasts, which are provided in Attachments EDA-1, EDA-2, and EDA-4 to the testimony of Ms. Arangio and in Attachments AEL-1 and AEL-2 to the testimony of Ms. Leary. Accordingly, the Company has provided

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

<sup>2</sup> Includes decrease in Gross Earnings Tax of \$3.26.

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the PUC with the un-redacted confidential materials for its review and has included redacted copies of these materials in the filing.

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

Very truly yours,



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4520 Service List  
Leo Wold, Esq.  
Steve Scialabba  
Bruce Oliver

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

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**Annual Gas Cost Recovery Filing 2014**  
**Docket No. 4520**

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**NATIONAL GRID'S REQUEST  
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

National Grid<sup>1</sup> hereby requests that the Rhode Island Public Utilities Commission (PUC) provide confidential treatment and grant protection from public disclosure of 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 hereby 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 September 2, 2014, National Grid filed with the PUC its Annual Gas Cost Recovery filing in this docket. This filing includes gas-cost pricing information and forecasts, which are provided in Attachments EDA-1, EDA-2, and EDA-4 to the testimony of Ms. Arangio and in Attachments AEL-1 and AEL-2 to the testimony of Ms. Leary. The Company has provided a redacted public version as well as a confidential version of these portions of the filing pursuant to Rule 1.2(g)(2).

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

## **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 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 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 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 be likely either (1) to impair the Government's ability to obtain necessary information in the future; or (2) to 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.

## **II. BASIS FOR CONFIDENTIALITY**

The gas-cost pricing information and forecasts, which are provided in Attachments EDA-1, EDA-2, and EDA-4 to the testimony of Ms. Arangio, and in Attachments AEL-1 and AEL-2 to the testimony of Ms. Leary is confidential and privileged information of the type that the Company would ordinarily not make public. The dissemination of this type of information could impact the Company's ability obtain advantageous pricing in the future.

## **III. CONCLUSION**

Accordingly, the Company requests that the PUC grant protective treatment to those previously identified portions of its GCR filing.

**WHEREFORE**, the Company respectfully requests that the PUC grant its Motion for Protective Treatment as stated herein.

Respectfully submitted,

**NATIONAL GRID**

By its attorney,

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

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Dated: September 2, 2014