



**DEPARTMENT OF THE NAVY**

NAVAL FACILITIES ENGINEERING COMMAND  
1322 PATTERSON AVENUE, SE, SUITE 1000  
WASHINGTON NAVY YARD, DC 20374-5065

**VIA FIRST CLASS MAIL AND ELECTRONIC MAIL**

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

October 23, 2015

Re: Review of the Narragansett Electric Company d/b/a National Grid Rate Design  
Pursuant to R.I. Gen. Laws § 39-26.6-24 – Docket No. 4568;  
Direct Testimony and Exhibits of Ali Al-Jabir

Dear Ms. Massaro:

Enclosed for filing on behalf of the Federal Executive Agencies, represented by the Department of the Navy, is an original and nine (9) copies of the Direct Testimony and Exhibits of Ali Al-Jabir.

Please call me at (202) 685-9122 if you have any questions concerning this filing. Thank you for your assistance.

Sincerely,

A handwritten signature in blue ink, appearing to read "AG", followed by a horizontal line extending to the right.

Allison M. Genco, Esq.  
Department of the Navy  
Filing on Behalf of the  
Federal Executive Agencies

cc: Service List for Docket No. 4568

**BEFORE THE  
RHODE ISLAND PUBLIC UTILITIES COMMISSION**

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**IN RE: REVIEW OF THE NARRAGANSETT  
ELECTRIC COMPANY D/B/A NATIONAL  
GRID'S RATE DESIGN PURSUANT TO R.I.  
GEN. LAWS § 39-26.6-24**

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**DOCKET NO. 4568**

Direct Testimony and Exhibit of

**Ali Al-Jabir**

On behalf of

**The Federal Executive Agencies**

October 23, 2015



BEFORE THE  
RHODE ISLAND PUBLIC UTILITIES COMMISSION

<b>IN RE: REVIEW OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A NATIONAL GRID’S RATE DESIGN PURSUANT TO R.I. GEN. LAWS § 39-26.6-24</b>	) ) ) ) ) ) )	<b>DOCKET NO. 4568</b>
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BEFORE THE  
RHODE ISLAND PUBLIC UTILITIES COMMISSION

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IN RE: REVIEW OF THE NARRAGANSETT )  
ELECTRIC COMPANY D/B/A NATIONAL ) DOCKET NO. 4568  
GRID'S RATE DESIGN PURSUANT TO R.I. )  
GEN. LAWS § 39-26.6-24 )

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Direct Testimony of Ali Al-Jabir

1 **Introduction**

2 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A My name is Ali Al-Jabir and my business address is 5151 Flynn Parkway, Suite 412  
4 C/D, Corpus Christi, Texas, 78411.

5 **Q WHAT IS YOUR OCCUPATION?**

6 A I am an energy advisor and a Senior Consultant in the field of public utility regulation  
7 with the firm of Brubaker & Associates, Inc. ("BAI").

8 **Q PLEASE SUMMARIZE YOUR EDUCATIONAL BACKGROUND AND**  
9 **EXPERIENCE.**

10 A These are set forth in Appendix A to my testimony.

11 **Q ON WHOSE BEHALF ARE YOU TESTIFYING IN THIS PROCEEDING?**

12 A I am appearing on behalf of the Federal Executive Agencies ("FEA"). Our firm is  
13 under contract with The United States Department of the Navy ("Navy") to perform  
14 cost of service, rate design and related studies. The Navy represents the Department

1 of Defense and all other Federal Executive Agencies in this proceeding. The FEA is  
2 a large consumer of electricity in the service territory of the Narragansett Electric  
3 Company ("National Grid" or "the Company") and takes electric service from the  
4 Company primarily on Rate G-62.

5 **Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

6 A My testimony focuses on National Grid's proposal to consolidate Rate G-32 and  
7 Rate G-62 into a single rate class with a unified set of distribution rates. The fact that  
8 I am not addressing other issues in the Company's application in this proceeding  
9 should not be construed as an endorsement of the Company's position with regard to  
10 such issues.

11 **Q PLEASE SUMMARIZE YOUR CONCLUSIONS AND RECOMMENDATIONS.**

12 A My conclusions and recommendations can be summarized as follows:

- 13 1. The Rhode Island Public Utilities Commission ("Commission") should reject the  
14 Company's proposal to consolidate Rate G-32 and Rate G-62 into a single rate  
15 class with a unified set of distribution rates.
- 16 2. This proposal should be rejected because it is inconsistent with the Commission's  
17 decision in Docket No. 4065. Moreover, this rate consolidation is not necessary  
18 to achieve the goals of Rhode Island General Laws Section 39-26.6-24 ("the Act").  
19 In fact, the Company's proposal is contrary to the goals of the Act because it  
20 would create a new per kWh energy charge for current Rate G-62 customers  
21 where no such charge now exists. This new per kWh energy charge would  
22 increase the Company's exposure to the loss of fixed cost recovery due to the  
23 reduced metered energy consumption associated with distributed generation  
24 ("DG") deployment, where such exposure is already minimal under the current  
25 Rate G-62 distribution service rate design.
- 26 3. The Commission should also reject this proposal because it would result in a  
27 significant adverse rate impact to the Navy in excess of \$300,000 annually.

1 **Policy Context for the Company's Filing**

2 **Q CAN YOU PLEASE SUMMARIZE THE IMPETUS FOR THE COMPANY'S FILING**  
3 **IN THIS PROCEEDING?**

4 A Section 24 of the Act requires the Commission to open a docket to consider rate  
5 design and distribution cost allocation among rate classes in light of the introduction  
6 of net metering for renewable DG and in anticipation of the inclusion of more  
7 distributed energy resources on the Company's system.

8 National Grid made its filing in the instant proceeding to comply with  
9 Section 24 of the Act, which requires the Company to file a revenue-neutral class cost  
10 of service study for all rate classes and a proposal to re-design distribution rates  
11 using the distribution revenue requirement upon which the Company's current  
12 distribution rates were set in its last base rate case (Docket No. 4323). The Company  
13 elected to base its filing on the compliance class cost of service study that National  
14 Grid submitted in Docket No. 4323.<sup>1</sup>

15 **Q HOW DOES THE DESIGN OF DISTRIBUTION RATES INTERACT WITH THE**  
16 **POLICY GOAL OF ENHANCING THE DEPLOYMENT OF DG RESOURCES?**

17 A Under a net metering arrangement, the deployment of additional DG resources  
18 reduces the amount of metered energy that is used to calculate distribution charges  
19 for rate components that are assessed on a per kWh basis, thereby reducing the  
20 Company's revenues through such per kWh charges. To the extent that a portion of  
21 the fixed costs of distribution service is recovered through per kWh energy rate  
22 components, the Company will experience reduced recovery of its fixed delivery  
23 service costs from DG customers as DG deployment increases. To ensure full

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<sup>1</sup>Docket No. 4568, Direct Testimony of Company witnesses Peter T. Zschokke and Jeanne A. Lloyd, pp. 7-8.

1 recovery of its distribution fixed costs, National Grid would face pressure to increase  
2 delivery charges to non-DG customers as DG deployment on its system expands.

3 It should be noted that this under-recovery of distribution fixed costs is  
4 primarily related to the residential and small commercial classes because their  
5 standard rate offerings do not include per kW demand charges. For larger customer  
6 classes, where both customer and demand charges are a component of the customer  
7 class rate structure, a significant portion of distribution fixed costs are generally  
8 recovered through such charges.

9 A more reasonable approach in addressing the fixed cost recovery concerns  
10 associated with DG deployment is to re-design distribution rates in a manner that  
11 increases the recovery of the fixed costs of distribution service through flat customer  
12 charges or per kW demand charges and correspondingly reduces the recovery of  
13 such costs through variable per kWh charges. This technique would provide for a  
14 more stable level of fixed distribution cost recovery on the Company's system,  
15 irrespective of the level of DG deployment.

## 16 **Consolidation of Rate G-32 and Rate G-62**

17 **Q PLEASE SUMMARIZE THE COMPANY'S RATE CONSOLIDATION PROPOSAL.**

18 A Currently, customers with a maximum 12-month average demand in excess of 5 MW  
19 may take service under Rate G-62, at their option. The current Rate G-62 distribution  
20 rates include a monthly customer charge and a demand charge, but no per kWh  
21 energy charge. Smaller customers with a maximum 12-month average demand of  
22 200 kW or greater take service under Rate G-32. The current Rate G-32 distribution  
23 rates include a monthly customer charge, a demand charge for kW in excess of 200

1 kW and a per kWh energy charge. Under both rate schedules, customers receive  
2 rate discounts for taking service at higher voltages.

3 The Company proposes to consolidate Rate G-32 and Rate G-62 into one set  
4 of rates applicable to all customers in both rate classes by combining the revenue  
5 requirements and billing units of the separate classes.<sup>2</sup>

6 **Q HOW WOULD THIS RATE CONSOLIDATION PROPOSAL IMPACT THE**  
7 **DISTRIBUTION RATE STRUCTURE AND DISTRIBUTION RATE DESIGN FOR**  
8 **CURRENT RATE G-62 CUSTOMERS?**

9 A The consolidation proposal would decrease the Rate G-62 customer charge from  
10 \$17,000 to \$215 per month, but it would significantly increase the Rate G-62 demand  
11 charge from its current level of \$2.99 per kW-month to \$4.50 per kW-month. This  
12 represents a 50% increase in the Rate G-62 demand charge. In addition, the rate  
13 consolidation would result in the imposition of a new distribution energy charge of  
14 \$0.00230 per kWh on Rate G-62 customers when no distribution energy charge  
15 currently exists for such customers.<sup>3</sup>

16 **Q IS THIS RATE CLASS CONSOLIDATION PROPOSAL APPROPRIATE?**

17 A No. The proposal should be rejected because it is inconsistent with Commission  
18 precedent, is not needed to implement the goals of the Act and in fact runs counter to  
19 the achievement of these goals.

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<sup>2</sup>Docket No. 4568, Direct Testimony of Company witnesses Peter T. Zschokke and Jeanne A. Lloyd, pp. 56-57.

<sup>3</sup>Docket No. 4568, Direct Testimony of Company witnesses Peter T. Zschokke and Jeanne A. Lloyd, page 58 and Schedule NG-12, page 4.

1 **Q WHAT IS THE FINANCIAL IMPACT OF THE COMPANY'S RATE**  
2 **CONSOLIDATION PROPOSAL ON THE NAVY?**

3 A National Grid calculated that consolidating Rate G-32 and Rate G-62 would increase  
4 the Navy's total electricity charges from the Company by \$306,961 annually, an  
5 increase of 2.8%. This information is provided in the Company's supplemental  
6 response to PUC Discovery Request No. 1-31, which is included in my testimony as  
7 Exhibit AZA-1.

8 **Q IS THIS LEVEL OF RATE IMPACT REASONABLE?**

9 A No. The proposed rate consolidation, particularly when considered in the context of  
10 the Navy's existing fiscal situation, is unacceptable due to the adverse impact it would  
11 have on the Navy's budget in Rhode Island. The Commission should reject this  
12 proposed rate increase, particularly at a time when all branches of the U.S. Armed  
13 Forces, including the Navy, are facing significant financial pressures due to the  
14 budget sequester and the Federal Government's overall effort to reduce spending.

15 As an indication of the severity of the Navy's budget situation, the Navy's  
16 Chief of Naval Operations stated on 28 January 2015 in his Statement Before the  
17 Armed Services Committee on Impact of Sequestration of National Defense that fiscal  
18 constraints had forced the Navy to reduce facilities restoration and modernization  
19 activities by about 30%. Base operations, including port and airfield operations, have  
20 been reduced by about 8%. The same statement itemized the following recent  
21 budget shortfalls imposed on the Navy due to fiscal constraints: \$9 billion in fiscal  
22 year ("FY") 2013, \$5 billion in FY 2014 and \$11 billion in FY 2015. If the Budget

1 Control Act of 2013 spending caps are imposed on a going-forward basis, the Navy  
2 estimates that this would result in future annual budget reductions of \$5 - \$10 billion.<sup>4</sup>

3 In light of these severe and ongoing financial constraints, the Commission  
4 should reject rate proposals that would significantly increase the Navy's utility costs in  
5 Rhode Island.

6 **Q IS CUSTOMER RATE IMPACTS AN IMPORTANT CONSIDERATION IN THE RATE**  
7 **DESIGN PROCESS?**

8 A Yes. The rate design process should consider a variety of factors, including equity,  
9 cost-causation and sending appropriate price signals to customers. Another  
10 important consideration is the desire to avoid large and rapid rate increases that may  
11 result in adverse economic impacts for individual customer or customer classes. A  
12 related consideration is that large rate increases can have adverse economic  
13 development impacts in the local region.

14 **Q DID THE COMPANY CONSIDER ECONOMIC DEVELOPMENT IMPACTS IN**  
15 **DEVELOPING ITS PROPOSAL TO CONSOLIDATE RATE G-32 AND RATE G-62?**

16 A In response to discovery, National Grid stated that it did not analyze the economic  
17 development impacts of this rate consolidation proposal, nor did it consider the  
18 impact of the rate consolidation on manufacturing jobs in Rhode Island.<sup>5</sup>

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<sup>4</sup>Statement of Admiral Jonathan Greenert, U.S. Navy Chief of Naval Operations, before the Senate Armed Services Committee on the Impact of Sequestration on National Defense, January 28, 2015, pages 1 and 8.

<sup>5</sup>National Grid's response to Discovery Request Nos. PUC 1-29 and PUC 1-30.

1   **Q     NATIONAL GRID CONTENDS THAT ITS RATE CONSOLIDATION PROPOSAL IS**  
2           **JUSTIFIED BECAUSE ITS CLASS COST OF SERVICE STUDY SHOWS THAT**  
3           **THE AVERAGE PER UNIT DEMAND-RELATED COST OF SERVICE IS SIMILAR**  
4           **FOR RATE G-32 AND RATE G-62.<sup>6</sup> HOW DO YOU RESPOND?**

5   **A**    The Company's assertion relies on the class cost of service study results from the  
6           compliance class cost of service study it filed in Docket No. 4323, which is based on  
7           customer load and billing data for calendar year 2012.<sup>7</sup> Thus, the data used to  
8           support National Grid's conclusion is almost three years old and may no longer reflect  
9           the current customer composition and cost characteristics of Rate G-32 and  
10          Rate G-62. If the Commission wishes to reevaluate the consolidation of Rate G-32  
11          and Rate G-62, it should do so in a full rate proceeding that relies on an updated  
12          class cost of service study to ensure that its policy decisions are reflective of current  
13          circumstances.

14                 Even if the Company's observations with respect to the per unit cost  
15                 characteristics of Rate G-32 and Rate G-62 are ultimately found to be true based on  
16                 updated cost and load data and a current class cost of service study, this  
17                 determination would not be sufficient to conclude that the rate consolidation proposal  
18                 is reasonable. As I noted above, cost-causation is a central, but not an exclusive,  
19                 driver of rate design decisions. Another important and relevant consideration in the  
20                 rate design process is the bill impact on customer classes and individual customer  
21                 within the class, along with the attendant implications of these bill impacts on the local  
22                 economy.

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<sup>6</sup>Docket No. 4568, Direct Testimony of Company witnesses Peter T. Zschokke and Jeanne A. Lloyd, page 57.

<sup>7</sup>Docket No. 4568, Direct Testimony of Company witnesses Peter T. Zschokke and Jeanne A. Lloyd, page 8.

1 **Q HAS THE COMMISSION PREVIOUSLY CONSIDERED AND REJECTED A**  
2 **SIMILAR RATE CONSOLIDATION PROPOSAL BY NATIONAL GRID?**

3 A Yes. National Grid presented a similar proposal in Docket No. 4065. The  
4 Commission rejected the Company's proposal in that case, citing the significant  
5 increase in the demand charge for Rate G-62 customers that would result from the  
6 rate consolidation. The Commission further found that the Company had not  
7 submitted sufficient evidence to demonstrate that the rate consolidation would not  
8 result in a detrimental impact on Rate G-62 customers.<sup>8</sup>

9 Clearly, Commission precedent establishes that rate impact considerations  
10 justify the rejection of proposals to consolidate the Rate G-32 and Rate G-62 classes.  
11 Given the significant adverse rate impact of this proposal on the Navy in the instant  
12 proceeding and the large proposed demand charge increase for current Rate G-62  
13 customers, the Commission should once again reject this rate consolidation proposal.

14 **Q DID THE COMMISSION ADDRESS THE CONSOLIDATION OF RATE G-32 AND**  
15 **RATE G-62 IN NATIONAL GRID'S MORE RECENT RHODE ISLAND RATE**  
16 **PROCEEDING, DOCKET NO. 4323?**

17 A No. Docket No. 4323 was resolved through the Commission's approval of a  
18 settlement agreement. While the Commission's Final Order in that docket referenced  
19 the settlement agreement's provisions regarding the revenue distribution to the G-62  
20 rate class, the Order was silent regarding the merits of consolidating Rate G-32 and  
21 Rate G-62.<sup>9</sup>

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<sup>8</sup>Rhode Island Public Utilities Commission, Docket No. 4065, Decision and Order, April 29, 2010, p. 148.

<sup>9</sup>Rhode Island Public Utilities Commission, Docket No. 4323, Report and Order, April 11, 2013, pp. 105-106.

1 **Q IS NATIONAL GRID'S RATE CONSOLIDATION PROPOSAL NEEDED TO**  
2 **FURTHER THE GOALS OF THE ACT?**

3 A No. As I previously discussed, the design of distribution rates can be modified to  
4 better accommodate higher levels of DG deployment by enhancing the recovery of  
5 fixed distribution costs through customer or demand charges and minimizing the  
6 recovery of such fixed costs through per kWh energy charges. This objective can be  
7 accomplished by restructuring the Company's distribution charges under its existing  
8 set of delivery service classes to provide a higher level of fixed cost recovery through  
9 customer or demand charges. There is no need to consolidate rate classes to  
10 achieve this purpose.

11 Moreover, it should be emphasized that the current Rate G-62 rate structure  
12 contains no per kWh energy charge. All distribution cost recovery under the current  
13 Rate G-62 rate design occurs through the customer charge or the demand charge.  
14 Thus, the current Rate G-62 distribution rate structure effectively eliminates the  
15 concern that variable energy charges could erode the levels of fixed cost recovery on  
16 the Company's system if Rate G-62 customers expand their levels of DG deployment.  
17 Consequently, there is no need to revise the current Rate G-62 rate structure or rate  
18 design to address expanded DG deployment.

19 Ironically, the Company's rate consolidation proposal would introduce a per  
20 kWh energy charge for Rate G-62 customers where no such charge currently exists.  
21 The creation of a new per kWh energy charge for current Rate G-62 customers would  
22 be contrary to the objectives of the Act because it would increase the Company's  
23 exposure to the loss of fixed cost recovery due to the reduced metered energy  
24 consumption associated with DG deployment, where such exposure is already  
25 minimal under the current Rate G-62 distribution service rate design.

1                   For the foregoing reasons, the Commission should reject National Grid's  
2                   proposal to consolidate the Rate G-32 and Rate G-62 distribution rate classes.

3    **Q        DOES THIS CONCLUDE YOUR DIRECT TESTIMONY?**

4    **A        Yes.**

**Qualifications of Ali Al-Jabir**

1    **Q     PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

2    A     Ali Al-Jabir. My business address is 5151 Flynn Parkway, Suite 412 C/D, Corpus  
3       Christi, Texas, 78411.

4    **Q     WHAT IS YOUR OCCUPATION AND BY WHOM ARE YOU EMPLOYED?**

5    A     I am a consultant in the field of public utility regulation with the firm of Brubaker &  
6       Associates, Inc. ("BAI").

7    **Q     PLEASE STATE YOUR EDUCATIONAL BACKGROUND.**

8    A     I am a graduate of the University of Texas at Austin ("UT-Austin"). I hold the degrees  
9       of Bachelor of Arts and Master of Arts in Economics, both from UT-Austin. I have  
10      also completed course work at Harvard University. I received my B.A. degree with  
11      highest honors, and I am a member of the Phi Beta Kappa Honor Society.

12   **Q     PLEASE STATE YOUR EXPERIENCE.**

13   A     I joined BAI in January 1997. My work consists of preparing economic studies and  
14      economic policy analyses related to investor-owned, cooperative, and municipal  
15      utilities. Prior to joining BAI, I was employed at the Public Utility Commission of  
16      Texas ("Texas Commission") since 1991, where I held various positions including  
17      Policy Advisor to the Chairman. As Policy Advisor, I advised the Chairman on policy  
18      decisions in numerous rate and rulemaking proceedings. In 1995, I advised the  
19      Texas Legislature on the development of the statutory framework for wholesale  
20      competition in the Electric Reliability Council of Texas ("ERCOT"), and I was involved

1 in subsequent rulemakings at the Texas Commission to implement wholesale open  
2 access transmission service in the region.

3 During my tenure at the Texas Commission and in my present capacity, I have  
4 reviewed and analyzed several electric utility base rate and fuel filings in Texas. I  
5 have also worked on utility rate, fuel, and merger proceedings and rulemakings in  
6 Virginia, Missouri, Colorado, Indiana, Alberta, Pennsylvania, North Carolina, South  
7 Carolina, Michigan, Nova Scotia and Rhode Island. In addition to my work in such  
8 proceedings, I have drafted policy papers and comments regarding electric industry  
9 restructuring and competitive policy issues in Texas, Alabama, Louisiana, Georgia,  
10 and Delaware, as well as before the Federal Energy Regulatory Commission. I have  
11 been an invited speaker at several electric utility industry conferences, and I have  
12 presented seminars on utility regulation and industry restructuring. I have also  
13 advised clients on electricity procurement in competitive retail power markets.

14 BAI and its predecessor firms have been active in utility rate and economic  
15 consulting since 1937. The firm provides consulting services in the field of public  
16 utility regulation to many clients, including large industrial and institutional customers,  
17 some competitive retail power providers and utilities and, on occasion, state  
18 regulatory agencies. In addition, we have prepared depreciation and feasibility  
19 studies relating to utility service. We assist in the negotiation of contracts and the  
20 solicitation and procurement of competitive energy supplies for large energy users,  
21 provide economic policy analysis on industry restructuring issues, and present  
22 seminars on utility regulation. In general, we are engaged in regulatory consulting,  
23 economic analysis, energy procurement, and contract negotiation.

24 In addition to our main office in St. Louis, the firm also has branch offices in  
25 Corpus Christi, Texas and Phoenix, Arizona.

1 Q HAVE YOU PREVIOUSLY FILED TESTIMONY IN CONTESTED UTILITY  
2 PROCEEDINGS?

3 A Yes, I have filed written testimony in the following dockets:

- 4 1. Texas Docket No. 10035 – Application of West Texas Utilities Company to  
5 Reconcile Fuel Costs and for Authority to Change Fixed Fuel Factors;
- 6 2. Texas Docket No. 10200 – Application of the Texas - New Mexico Power  
7 Company for Authority to Change Rates;
- 8 3. Texas Docket No. 10325 – Application of the Central Texas Electric  
9 Cooperative, Inc. for Authority to Change Rates;
- 10 4. Texas Docket No. 10600 – Application of the Brazos River Authority for  
11 Approval of Rates;
- 12 5. Texas Docket No. 10881 – Application of the New Era Electric Cooperative, Inc.  
13 for Authority to Change Rates;
- 14 6. Texas Docket No. 11244 – Petition of the Medina Electric Cooperative, Inc. to  
15 Reduce its Fixed Fuel Factor and the Application of the South Texas Electric  
16 Cooperative, Inc. for Authority to Refund an Over-Recovery of Fuel Cost  
17 Revenues and to Reduce its Fixed Fuel Factor;
- 18 7. Texas Docket No. 11271 – Application of Bowie-Cass Electric Cooperative, Inc.  
19 for Authority to Change Rates;
- 20 8. Texas Docket No. 11567 – Application of Kaufman County Electric Cooperative,  
21 Inc. for Authority to Change Rates;
- 22 9. Texas Docket No. 18607 – Application of West Texas Utilities Company for  
23 Authority to Reconcile Fuel Costs;
- 24 10. Texas Docket No. 20290 – Application of Central Power & Light Company for  
25 Authority to Reconcile Fuel Costs;
- 26 11. Virginia Case No. PUE980814 – In the matter of considering an electricity retail  
27 access pilot program: American Electric Power – Virginia;
- 28 12. Texas Docket No. 21111 – Application of Entergy Gulf States Inc. for Authority  
29 to Reconcile Fuel Costs and to Recover a Surcharge for Under-Recovered Fuel  
30 Costs;
- 31 13. Virginia Case No. PUE990717 – Application of Virginia Electric and Power  
32 Company to Revise Its Fuel Factor Pursuant to Virginia Code Section 56-249.6;

- 1 14. Texas Docket No. 22344 – Generic Issues Associated with Applications for  
2 Approval of Unbundled Cost of Service Rates Pursuant to PURA Section  
3 39.201 and Public Utility Commission Substantive Rule § 25.344;
- 4 15. Texas Docket No. 22350 – Application of TXU Electric Company for Approval of  
5 Unbundled Cost of Service Rates Pursuant to PURA Section 39.201 and Public  
6 Utility Commission Substantive Rule 25.344 (Phase III);
- 7 16. Texas Docket No. 22352 – Application of Central Power and Light Company for  
8 Approval of Unbundled Cost of Service Rates Pursuant to PURA Section  
9 39.201 and Public Utility Commission Substantive Rule 25.344 (Final Phase);
- 10 17. Texas Docket No. 22353 – Application of Southwestern Electric Power  
11 Company for Approval of Unbundled Cost of Service Rates Pursuant to PURA  
12 Section 39.201 and Public Utility Commission Substantive Rule 25.344 (Final  
13 Phase);
- 14 18. Texas Docket No. 22354 – Application of West Texas Utilities Company for  
15 Approval of Unbundled Cost of Service Rates Pursuant to PURA Section  
16 39.201 and Public Utility Commission Substantive Rule 25.344 (Final Phase);
- 17 19. Texas Docket No. 22356 – Application of Entergy Gulf States, Inc. for Approval  
18 of Unbundled Cost of Service Rates Pursuant to PURA Section 39.201 and  
19 Public Utility Commission Substantive Rule 25.344;
- 20 20. Texas Docket No. 22349 – Application of Texas-New Mexico Power Company  
21 for Approval of Unbundled Cost of Service Rates Pursuant to PURA Section  
22 39.201 and Public Utility Commission Substantive Rule 25.344 (Final Phase);
- 23 21. Virginia Case No. PUE000584 – Application of Virginia Electric and Power  
24 Company for Approval of a Functional Separation Plan under the Virginia  
25 Electric Utility Restructuring Act;
- 26 22. Texas Docket No. 24468 – Staff’s Petition to Determine Readiness for Retail  
27 Competition in the Portions of Texas Within the Southwest Power Pool;
- 28 23. Texas Docket No. 24469 – Staff’s Petition to Determine Readiness for Retail  
29 Competition in the Portions of Texas Within the Southeastern Electric Reliability  
30 Council;
- 31 24. Virginia Case No. PUE-2002-00377 – Application of Virginia Electric and Power  
32 Company to Revise Its Fuel Factor Pursuant to Section 56-249.6 of the Code of  
33 Virginia;
- 34 25. Texas Docket No. 27035 – Application of Central Power and Light Company for  
35 Authority to Reconcile Fuel Costs;
- 36 26. Texas Docket No. 28818 – Application of Entergy Gulf States, Inc. for  
37 Certification of an Independent Organization for the Entergy Settlement Area in  
38 Texas;

- 1 27. Virginia Case No. PUE-2000-00550 -- Appalachian Power Company d/b/a  
2 American Electric Power: Regional Transmission Entities;
- 3 28. Texas Docket No. 29408 – Application of Entergy Gulf States, Inc. for the  
4 Authority to Reconcile Fuel Costs;
- 5 29. Texas Docket No. 29801 – Application of Southwestern Public Service  
6 Company for: (1) Reconciliation of its Fuel Costs for 2002 and 2003; (2) A  
7 Finding of Special Circumstances; and (3) Related Relief;
- 8 30. Texas Docket No. 30143 -- Petition of El Paso Electric Company to Reconcile  
9 Fuel Costs;
- 10 31. Texas Docket No. 31540 – Proceeding to Consider Protocols to Implement a  
11 Nodal Market in the Electric Reliability Council of Texas Pursuant to PUC  
12 Substantive Rule 25.501;
- 13 32. Texas Docket No. 32795 – Staff’s Petition to Initiate a Generic Proceeding to  
14 Re-Allocate Stranded Costs Pursuant to PURA Section 39.253(f);
- 15 33. Texas Docket No. 33309 – Application of AEP Texas Central Company for  
16 Authority to Change Rates;
- 17 34. Texas Docket No. 33310 – Application of AEP Texas North Company for  
18 Authority to Change Rates;
- 19 35. Michigan Case No. U-15245 – In the Matter of the Application of Consumers  
20 Energy Company for Authority to Increase its Rates for the Generation and  
21 Distribution of Electricity and for Other Rate Relief;
- 22 36. Texas Docket No. 34800 – Application of Entergy Gulf States, Inc. for Authority  
23 to Change Rates and to Reconcile Fuel Costs;
- 24 37. Texas Docket No. 35717 – Application of Oncor Electric Delivery Company LLC  
25 for Authority to Change Rates;
- 26 38. RIPUC Docket No. 4065 – Application of the Narragansett Electric Company  
27 d/b/a National Grid for Approval of a Change in Electric Base Distribution Rates  
28 Pursuant to R.I.G.L. Sections 39-3-10 and 39-3-11;
- 29 39. RIPUC Docket No. 4323 – Application of the Narragansett Electric Company  
30 d/b/a National Grid for Approval of a Change in Electric and Gas Base  
31 Distribution Rates Pursuant to R.I.G.L. Sections 39-3-10 and 39-1-3-11;
- 32 40. Oregon Docket No. UE 283 -- In the Matter of Portland General Electric  
33 Company’s Request for a General Rate Revision;
- 34 41. Washington Docket No. UE-141368 – In the Matter of the Petition of Puget  
35 Sound Energy to Update Methodologies Used to Allocate Electric Cost of  
36 Service and for Electric Rate Design Purposes; and  
37

- 1           42. Federal Energy Regulatory Commission Docket No. EL15-82-000 -- Illinois  
2           Industrial Energy Consumers, Complainant, v. Midcontinent Independent  
3           System Operator, Inc., Respondent.

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The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4568  
In Re: Review of Electric Distribution Rate Design  
Pursuant to R.I. Gen. Laws § 39-26.6-24  
Responses to Public Utilities Commission's First Set of Data Requests  
Issued on August 14, 2015

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Supplemental  
PUC 1-31

Request:

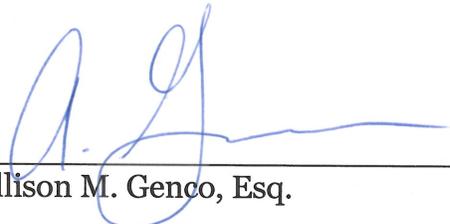
Is the Navy still on Rate G-62? If so, has the Company considered the effect of moving the Navy from G-62 to G-32? What effect will the proposed consolidation have on the Navy's annual electricity costs?

Response:

The Navy is a Rate G-62 customer. In proposing to consolidate the G-32 and G-62 rate classes, the Company considered the effect of this proposal on all customers in the affected rate classes, including the Navy. The annual bill impact of moving the Navy from Rate G-62 to Rate G-32 based on billing determinants for the twelve months ended December 2014 is an increase of \$306,961, or a 2.8% increase from calendar year 2014's total annual bill of \$10,826,320.

**CERTIFICATE OF SERVICE**  
RI PUC Docket No. 4568

I hereby certify on this 23<sup>rd</sup> day of October, 2015, a copy of the cover letter and the Department of the Navy's First Set of Data Requests to National Grid were electronically transmitted to the individuals listed below. An original hard copy was sent via first class mail to National Grid and the Division of Public Utilities & Carriers. An original hard copy and nine (9) copies of this filing have been sent via first class mail to the Clerk of the Rhode Island Public Utilities Commission.

  
\_\_\_\_\_  
Allison M. Genco, Esq.

**Docket No. 4568 National Grid's Rate Design Pursuant to R.I. Gen. Laws Sec 39-26.6-24  
Service List updated 10/2/15**

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