

# Robinson+Cole

STEVEN J. BOYAJIAN

One Financial Plaza, Suite 1430  
Providence, RI 02903-2485  
Main (401) 709-3300  
Fax (401) 709-3399  
sboyajian@rc.com  
Direct (401) 709-3359

Also admitted in Massachusetts

*Via First Class Mail*

September 9, 2016

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

**Re: The Narragansett Electric Co. d/b/a National Grid – Docket 4627**

Dear Ms. Massaro:

Enclosed please find an original and nine (9) copies of the Response of Algonquin Gas Transmission, LLC to the Lieutenant Governor's First Set of Data Requests.

Please note that an electronic copy of this document has been sent to the service list.

Thank you for your attention to this matter.

Very truly yours,



Steven J. Boyajian

Enclosures

McKEE-AGT 1-1

Request:

Please provide an unredacted copy of the following document filed in the Maine PUC docket number 2014-00071:

- A. "Maine Energy Cost Reduction Act: Cost benefit analysis of ECRC proposals" dated June 20, 2015, prepared by Frayer and Fagan of London Economics International LLC

Response:

Algonquin Gas Transmission, LLC ("Algonquin") has no wholly unredacted LEI report in its possession. As a bidder, Algonquin is permitted to access only two redacted versions of the LEI report: (1) a public version in which all confidential bid information is redacted, and (2) a confidential Algonquin-specific version in which the confidential bid information of Algonquin's competitors is redacted but Algonquin's confidential information is unredacted. Algonquin's access to confidential information in the Maine proceeding (Maine Public Utilities Commission Docket No. 2014-00071) is limited because Algonquin is a competing bidder in that case. Any unredacted versions of the LEI report contain confidential bid information that is subject to confidential treatment under bidder-specific protective orders. Algonquin's attorneys do not have access to wholly unredacted versions of the LEI report because they are subject to the same limited access as the company.

Moreover, Algonquin is not permitted to disclose any confidential version of the LEI report outside of the Maine case, including the confidential Algonquin-specific LEI report. The protective order under which the confidential versions of the LEI report were issued contain standard language providing that the confidential information of bidders "shall neither be used nor disclosed for any purpose other than the purposes of preparation and conduct of these proceedings." *Me. Pub. Utils. Comm'n, Investigation of Parameters for Implementation of Maine Energy Cost Reduction Act 35-A M.R.S. § 1901*, No. 2014-00071 Protective Order No. 6 – Pricing Information and Material Terms and Conditions of Contract Proposal of Maritimes & Northeast Pipeline, L.L.C. and Algonquin Gas Transmission, LLC at 2 (Me. P.U.C. Dec. 3, 2014). The protective order goes on to state that "[n]o person to whom access to Designated Confidential Information is accorded pursuant to Paragraph 4 of this Order shall disclose or reveal, directly or indirectly, the content of the Designated Confidential Information to others except as provided in Paragraph 4." *Id.* at 2. Paragraph 4 of the protective order limits access to the Maine Commission, a stenographer, and the parties to the case who are not competing bidders or potential bidders, along with their consultants and attorneys. *Id.* at 3. Thus, Algonquin is not permitted to disclose any partially or wholly unredacted versions of LEI's report, for doing so would violate the protective order in the Maine proceeding.

State of Rhode Island Public Utilities Commission  
Docket # 4627  
Response of Algonquin Gas Transmission, LLC to  
Lt. Governor's McKee's First Set of Data Requests

---

McKEE-AGT 1-2

Request:

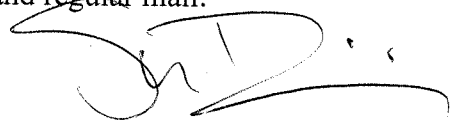
What efforts have you made to market the Access Northeast project's capacity and LNG services to gas-fired electric generators in New England? How successful have these efforts been to date?

Response:

Algonquin Gas Transmission, LLC held an open season for the Access Northeast Project from February 18, 2015 through May 1, 2015 and held a reverse open season from October 2, 2015 through October 30, 2015. While some generators participated in the open season, none reached agreement for transportation services on the Access Northeast Project. Electric generators compete and operate under a business model that encourages them primarily to focus on short run marginal operating costs. As a result, although individual generators have competitive market incentives to bid their generation into the wholesale market, they have virtually no operating incentives to invest long-term in pipeline infrastructure to address the constraints. Among the AIM, Atlantic Bridge and Access Northeast projects Algonquin's efforts to reach agreement for firm transportation with a natural gas fired generator have been unsuccessful.

## CERTIFICATION

I hereby certify that on September 9, 2016, I sent a copy of the above document to all parties set forth on the attached service list by electronic mail and copies to Luly Massaro, Commission Clerk, by electronic mail and regular mail.



Steven J. Boyajian

### **Docket No. 4627 – National Grid - Gas Capacity Contract and Cost Recovery Service List updated 9/7/16**

<b>Name &amp; Company</b>	<b>E-mail</b>	<b>Phone</b>
<b>The Narragansett Electric Co. d/b/a National Grid</b> John K. Habib, Esq. Keegan Werlin LLC 265 Franklin St. Boston MA 02110-3113  Jennifer Hutchinson, Esq. National Grid 280 Melrose St. Providence, RI 02907	<a href="mailto:JHabib@keeganwerlin.com">JHabib@keeganwerlin.com</a> ;	617-951-1400
	<a href="mailto:JBuno@keeganwerlin.com">JBuno@keeganwerlin.com</a> ;	
	<a href="mailto:Jennifer.hutchinson@nationalgrid.com">Jennifer.hutchinson@nationalgrid.com</a> ;	
	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com</a> ;	
	<a href="mailto:Timothy.brennan@nationalgrid.com">Timothy.brennan@nationalgrid.com</a> ;	
	<a href="mailto:Ann.leary@nationalgrid.com">Ann.leary@nationalgrid.com</a> ;	
	<a href="mailto:John.allocca@nationalgrid.com">John.allocca@nationalgrid.com</a> ;	
	<a href="mailto:Jessica.vongsa@nationalgrid.com">Jessica.vongsa@nationalgrid.com</a> ;	
	<a href="mailto:Jeremy.newberger@nationalgrid.com">Jeremy.newberger@nationalgrid.com</a> ; <a href="mailto:Mike.calviou@nationalgrid.com">Mike.calviou@nationalgrid.com</a> ;	
<b>National Grid Algonquin LLC</b> Celia O'Brien Mary Coleman	<a href="mailto:celia.obrien@nationalgrid.com">celia.obrien@nationalgrid.com</a> ;	781-907-2153
	<a href="mailto:mary.coleman@nationalgrid.com">mary.coleman@nationalgrid.com</a> ;	781-907-2132
<b>Division of Public Utilities &amp; Carriers</b> Jon Hagopian, Esq. Steve Scialabba  Richard Hahn Daymark Energy Associates	<a href="mailto:Jon.hagopian@dpuc.ri.gov">Jon.hagopian@dpuc.ri.gov</a> ;	401-784-4775
	<a href="mailto:Steve.scialabba@dpuc.ri.gov">Steve.scialabba@dpuc.ri.gov</a> ;	
	<a href="mailto:rhahn@daymarkea.com">rhahn@daymarkea.com</a> ;	617-778-2467
<b>Office of Energy Resources (OER)</b> Andrew Marcaccio, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4 <sup>th</sup> Floor Providence, RI 02908  Nicholas Ucci, OER Rebecca Bachelder (Consultant) CJ Meeske (Consultant) Ellen Cool (Consultant)	<a href="mailto:Andrew.Marcaccio@doa.ri.gov">Andrew.Marcaccio@doa.ri.gov</a> ;	401-574-9113
	<a href="mailto:Nicholas.Ucci@energy.ri.gov">Nicholas.Ucci@energy.ri.gov</a> ;	
	<a href="mailto:Christopher.kearns@energy.ri.gov">Christopher.kearns@energy.ri.gov</a> ;	
	<a href="mailto:rbachelder@bflame.com">rbachelder@bflame.com</a> ;	
	<a href="mailto:CJMeeske@EMDEC.net">CJMeeske@EMDEC.net</a> ;	
	<a href="mailto:egc@levitan.com">egc@levitan.com</a> ;	
<b>Office of Lt. Governor</b> Mike McElroy, Esq. Leah Donaldson, Es	<a href="mailto:Michael@McElroyLawOffice.com">Michael@McElroyLawOffice.com</a> ;	401-351-4100

Schacht & McElroy PO Box 6721 Providence, RI 02940-6721	<a href="mailto:Leah@McElroyLawOffice.com">Leah@McElroyLawOffice.com</a> ;	
John Farley (Consultant)	<a href="mailto:jfarley316@hotmail.com">jfarley316@hotmail.com</a> ;	954-575-2212
<b>Dept. of Environmental Mgmt.</b> Mary Kay, Esq.	<a href="mailto:mary.kay@dem.ri.gov">mary.kay@dem.ri.gov</a> ;	401-222-6607 Ext. 2304
<b>Commerce Corporation</b> Thomas Carlotto, Esq. Shechtman Halperin Savage, LLP	<a href="mailto:Tcarlotto@shslawfirm.com">Tcarlotto@shslawfirm.com</a> ;	401-272-1400
<b>NextEra Energy Resources (NextEra)</b> Joseph A. Keough, Jr., Esq. Keough & Sweeney 41 Mendon Ave. Pawtucket, RI 02861	<a href="mailto:jkeoughjr@keoughsweeney.com">jkeoughjr@keoughsweeney.com</a> ;	401-724-3600
Amie Jamieson, Senior Attorney NextEra Energy Resources, LL	<a href="mailto:Amie.Jamieson@nee.com">Amie.Jamieson@nee.com</a> ;	
<b>Algonquin Gas Transmission, LLC</b> Dana Horton, Esq. Steven J. Boyajian, Esq. Robinson & Cole LLP One Financial Plaza Suite 1430 Providence, RI 02903	<a href="mailto:dhorton@rc.com">dhorton@rc.com</a> ;	401-709-3352
	<a href="mailto:sboyajian@rc.com">sboyajian@rc.com</a> ;	
	<a href="mailto:jmiranda@rc.com">jmiranda@rc.com</a> ;	
Jennifer R. Rinker, Esq. Algonquin Gas Transmission, LLC 5400 Westheimer Court Houston, TX 77056	<a href="mailto:Jrinker@spectraenergy.com">Jrinker@spectraenergy.com</a> ;	
<b>Exelon Generation Co., LLC (ExGen)</b> Melissa Lauderdale, Esq. Exelen Business Services, Co., LLC 100 Constellation Way, Suite 500C Baltimore, MD 21202	<a href="mailto:Melissa.lauderdale@exeloncorp.com">Melissa.lauderdale@exeloncorp.com</a> ;	410-470-3582
James William Litsey, Esq. McGuireWoods LLP Fifth Third Center 201 North Tryon St., Suite 3000 Charlotte, NC 28202	<a href="mailto:Jlitsey@mcguirewoods.com">Jlitsey@mcguirewoods.com</a> ;	704-343-2337
<b>Repsol Energy North American Corp.</b> William M. Dolan, Esq. Donoghue Barrett & Singal, P.C. One Cedar Street, Suite 300 Providence, RI 02903	<a href="mailto:wdolan@dbslawfirm.com">wdolan@dbslawfirm.com</a> ;	401-454-0400
Robert Neustaedter Director-Regulatory Affairs Carolynn Mayhew, Esq. Repsol Energy North American Corp. 2455 Technology Forest Blvd. The Woodlands, Texas 77381	<a href="mailto:Robert.neustaedter@repsol.com">Robert.neustaedter@repsol.com</a> ;	832-442-1548
	<a href="mailto:Carolynn.mayhew@repsol.com">Carolynn.mayhew@repsol.com</a> ;	832-442-1533

<b>Conservation Law Foundation (CLF)</b> Jerry Elmer, Esq. Max Greene, Esq. Conservation Law Foundation 55 Dorrance Street Providence, RI 02903	<a href="mailto:jelmer@clf.org">jelmer@clf.org</a> ;	401-351-1102 Ext. 2012
	<a href="mailto:Mgreene@clf.org">Mgreene@clf.org</a> ;	
Megan Herzog Conservation Law Foundation 62 Summer Street Boston, MA 02110-1008	<a href="mailto:MHerzog@clf.org">MHerzog@clf.org</a> ;	617-850-1727
<b>The Energy Council of RI (TEC-RI)</b> Douglas Gablinske, Executive Director The Energy Council of RI  S. Paul Ryan, Esq. 201 Washington Rd. Barrington, RI 02806	<a href="mailto:doug@tecri.org">doug@tecri.org</a> ;	401 741-5101
	<a href="mailto:spryan@eplaw.necoxmail.com">spryan@eplaw.necoxmail.com</a> ;	401-289-0184
<b>Public Utilities Commission (PUC)</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Cynthia.wilsonfrias@puc.ri.gov">Cynthia.wilsonfrias@puc.ri.gov</a> ;	
	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
<b>Interested Persons</b>		
Linda George, Esq., Senate Policy Office	<a href="mailto:LGeorge@rilegislature.gov">LGeorge@rilegislature.gov</a> ;	401-276-5563
Patricia French, Esq. Bernstein Shur	<a href="mailto:Tfrench@bernsteinshur.com">Tfrench@bernsteinshur.com</a> ;	207 228-7288
Todd, Bohan Sprague Energy	<a href="mailto:TBOHAN@spragueenergy.com">TBOHAN@spragueenergy.com</a> ;	