

KEEGAN WERLIN LLP

ATTORNEYS AT LAW
265 FRANKLIN STREET
BOSTON, MASSACHUSETTS 02110-3113

(617) 951-1400

TELECOPIERS:
(617) 951- 1354
(617) 951- 0586

September 13, 2016

BY HAND DELIVERY

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

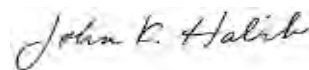
Re: Docket 4627 – In Re: Request for Approval of Firm Transportation Contracts
with Algonquin Gas Transmission, LLC for the Access Northeast Project
Responses to Division Data Requests – Set 4

Dear Ms. Massaro:

On behalf of National Grid,¹ enclosed are National Grid's responses to the Fourth Set of Data Requests issued by the Rhode Island Division of Public Utilities and Carriers in the above-referenced matter. Please note that Attachments DIV-4-2(a), DIV-4-4(a), and DIV-4-6(a) contain Highly Sensitive Confidential Information; a Motion for Protective Treatment is enclosed and the confidential versions of these attachments will be provided only the Public Utilities Commission and those parties that have executed the appropriate non-disclosure agreements.

Thank you for your attention to matter. If you have any questions, please contact me at (617) 951-1400, or Jennifer Brooks Hutchinson at 401-784-7685.

Very truly yours,



John K. Habib

Enclosure

¹ The Narragansett Electric Company d/b/a National Grid.

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

RHODE ISLAND PUBLIC UTILITIES COMMISSION

**Review of Precedent Agreement with
Algonquin Gas Transmission LLC for
Capacity on the Access Northeast Project
Pursuant to R.I.G.L. § 39-31 *et seq.***

Docket No. 4627

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

National Grid¹ 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 June 30, 2016, National Grid filed with the PUC its request for approval of a precedent agreement with Algonquin Gas Transmission LLC (Algonquin) for capacity on the Access Northeast Energy Project (ANE Project). In support of its request for approval, National Grid submitted initial testimony and supporting exhibits including a copy of the precedent agreement and the Company's analysis of the precedent agreement and ANE Project, including proprietary modeling information and analysis provided by

¹ The Narragansett Electric Company d/b/a National Grid (National Grid or the Company).

the Company's third-party consultants. For example, the testimony of Gary Wilmes of Black & Veatch Management Consulting LLC (Black & Veatch), provided detailed cost-benefit analysis related to the ANE Project that was created using Black & Veatch's proprietary modeling.

On September 13, 2016 National Grid filed its responses to the Division of Public Utilities' (Division) Fourth Set of Data Requests that reference these highly sensitive confidential terms. Specifically, the Company is seeking protective treatment of Attachments DIV-4-2(a), DIV-4-4(a), and DIV-4-6(a) (the HSCI Documents).

As noted above, the Company's affiliates Massachusetts Electric Company and Nantucket Electric Company each d/b/a National Grid have filed a similar request for approval of precedent agreements with Algonquin for capacity on the ANE Project with the Department. The Department has approved a two tier confidential document designation to provide an added layer of protective treatment in this related proceeding. This additional layer of protective treatment is necessary because certain intervenors granted full-party status in the Massachusetts proceeding are classified as bidders with respect to the request for proposals (RFP) that resulted in the precedent agreement that is the subject of this proceeding. The RFP was jointly simultaneously with the RFP issued by the Company's Massachusetts affiliates and Eversource Energy and, therefore, the Company expects that some or all of the parties who have intervened in the Massachusetts proceeding will also seek to intervene in this proceeding. Therefore, in order to ensure that confidential information is treated consistently across jurisdictions, the Company proposes to implement the same two-tier system for this proceeding. If the same parties intervene in this proceeding and the two-tier system is not utilized, the two-

tier system being used in Massachusetts will be undermined and the Company (and its affiliates) will be placed at a competitive disadvantage. This result would be particularly problematic because it is expected that other pipeline projects will be proposed in the near future to address capacity restraint in the New England region.

In this proceeding, the Company proposed to adopt the same approach to ensure consistency across New England jurisdictions, and to prevent intervenors from gaining access to confidential information that has been restricted in Massachusetts. Each of the documents referenced in this Motion have been classified as either Confidential or Highly Sensitive Confidential Information, consistent with the Company's initial filing and as filed in Massachusetts. Although the PUC has declined to adopt the two-tier method of protective treatment proposed, the PUC has determined that National Grid can still mark documents as either HSCI or Confidential and enter into non-disclosure agreements appropriate for each classification.

The Company has provided redacted and unredacted versions of each of the HSCI Documents. Each of these documents and/or files contains confidential and proprietary contractual or economic analysis information. Therefore, National Grid requests that the PUC give the information contained in the unredacted version of the HSCI Documents protective treatment.

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.

III. BASIS FOR CONFIDENTIALITY

The HSCI Documents contain information and outputs that flow from proprietary modeling systems that are the property of the Company's consultant, Black & Veatch. These models, including the assumptions, and the outputs resulting from the models were developed by Black & Veatch for its use in providing analytical and other services to its

business clients, including the Company. The models are not available in the public domain, nor may the public access the models, inputs or outputs absent a binding contract for services with Black & Veatch. If publicly disclosed, these documents would provide competitively sensitive information to other parties and could seriously harm the competitive business position of Black & Veatch. Such a result would be contrary to the public interest.

IV. CONCLUSION

Accordingly, the Company requests that the PUC grant protective treatment to Attachments DIV-4-2(a), DIV-4-4(a), and DIV-4-6(a) filed in response to the Division's Fourth Set of Data Requests on September 13, 2016.

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

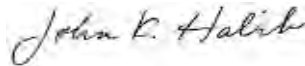
Respectfully submitted,

NATIONAL GRID

By its attorneys,



Jennifer Brooks Hutchinson (RI Bar #6176)
National Grid
280 Melrose Street
Providence, RI 02907
(401) 784-7288



John K. Habib, Esq. (RI Bar #7431)
Keegan Werlin LLP
265 Franklin Street
Boston, Massachusetts 02110
(617) 951-1400

Dated: September 13, 2016

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4627
National Grid's Request for Approval
Of a Gas Capacity Contract and Cost Recovery
Pursuant to R.I. Gen. Laws § 39-31-1 to 9
Responses to Division's Fourth Set of Data Requests
Issued August 30, 2016

Division 4-1

Request:

Please list all demand nodes modeled within New England in B&V's version of GPCM.

Response:

Please see Attachment DIV-4-2(a) (Highly Sensitive Confidential Information) for a list of all major demand nodes modeled within New England.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4627
National Grid's Request for Approval
Of a Gas Capacity Contract and Cost Recovery
Pursuant to R.I. Gen. Laws § 39-31-1 to 9
Responses to Division's Fourth Set of Data Requests
Issued August 30, 2016

Division 4-2

Request:

For each demand node modeled within New England in B&V's GPCM, please provide live excel spreadsheets with all inputs and calculations intact that provide the monthly demand curves for each demand sector, such as but not limited to residential/commercial (LDC), industrial, and electric generation sectors. Provide this information for each scenarios and/or sensitivity analyzed by B&V.

Response:

Please see Attachment DIV-4-2(a) (Highly Sensitive Confidential Information) for the demand nodes modeled within New England and the associated monthly demand curves.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4627
National Grid's Request for Approval
Of a Gas Capacity Contract and Cost Recovery
Pursuant to R.I. Gen. Laws § 39-31-1 to 9
Responses to Division's Fourth Set of Data Requests
Issued August 30, 2016

Division 4-3

Request:

Please list all supply nodes modeled in B&V's version of GPCM.

Response:

Please see Attachment DIV-4-4(a) (Highly Sensitive Confidential Information).

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4627
National Grid's Request for Approval
Of a Gas Capacity Contract and Cost Recovery
Pursuant to R.I. Gen. Laws § 39-31-1 to 9
Responses to Division's Fourth Set of Data Requests
Issued August 30, 2016

Division 4-4

Request:

For each supply node modeled within B&V's version of GPCM, please provide live excel spreadsheets with all inputs and calculations intact that provide the monthly supply curves including but not limited to price and quantity. Provide this information for each scenarios and/or sensitivity analyzed by B&V.

Response:

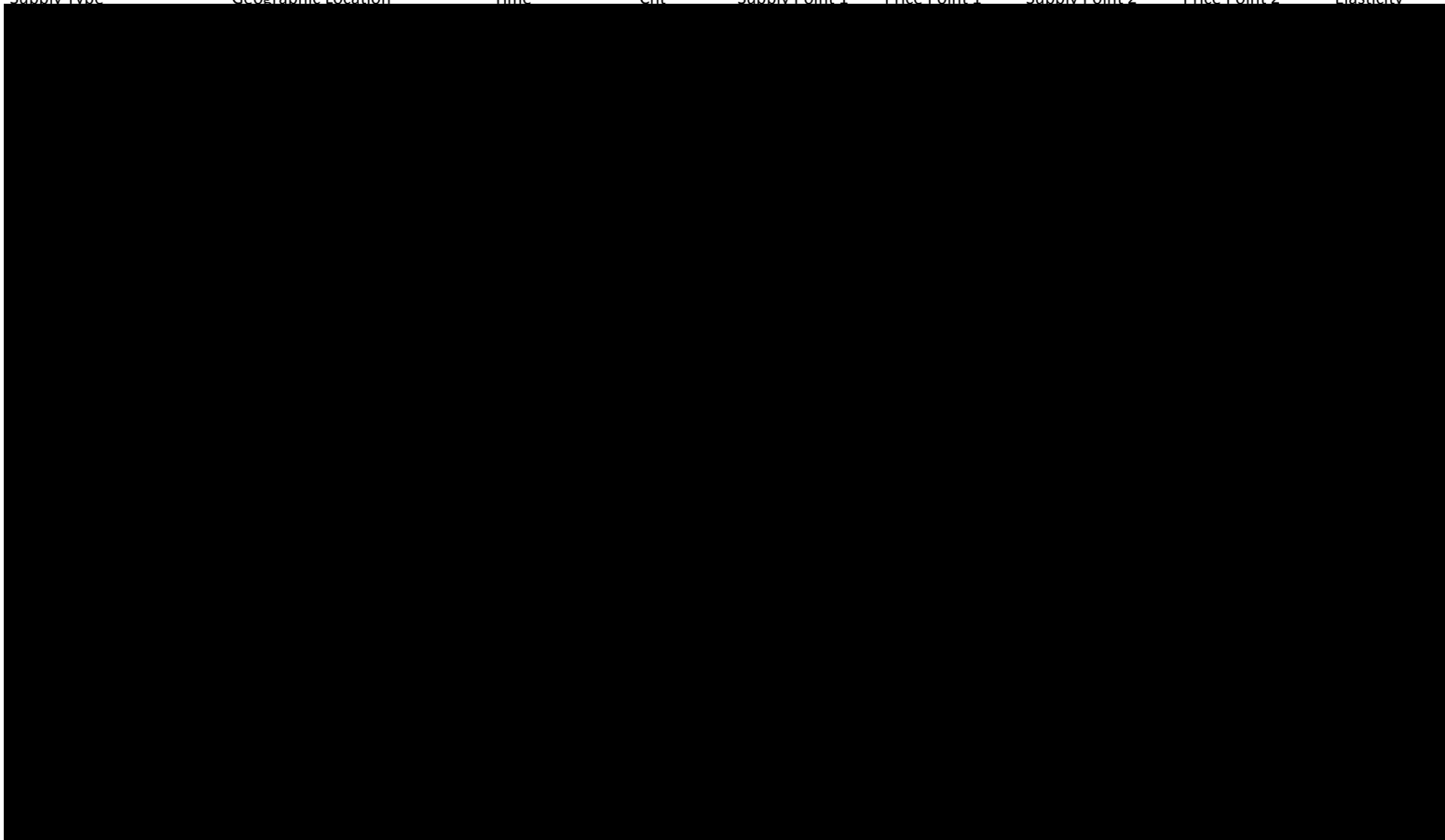
Please see Attachment DIV-4-4(a) (Highly Sensitive Confidential Information) for the monthly supply curves for the supply nodes used in Black & Veatch's analysis which have material impact on the net benefits analysis associated with the ANE Project. Such nodes include those located in the Gulf Coast, as well as the Marcellus and Utica shale regions which serve New England. These supply curves remained unchanged for each scenario/sensitivity. The Company will supplement this response with information from Eastern Canada supply nodes by Friday, September 16, 2016, although such supply nodes did not provide a meaningful level of information ultimately relevant to the Black & Veatch's net benefits analysis because supply from that area declines significantly over time due to high local demand for such supply.

REDACTED

Column A B C D E F G H I

Line # Supply Type Geographic Location Time Cnt Supply Point 1 Price Point 1 Supply Point 2 Price Point 2 Elasticity

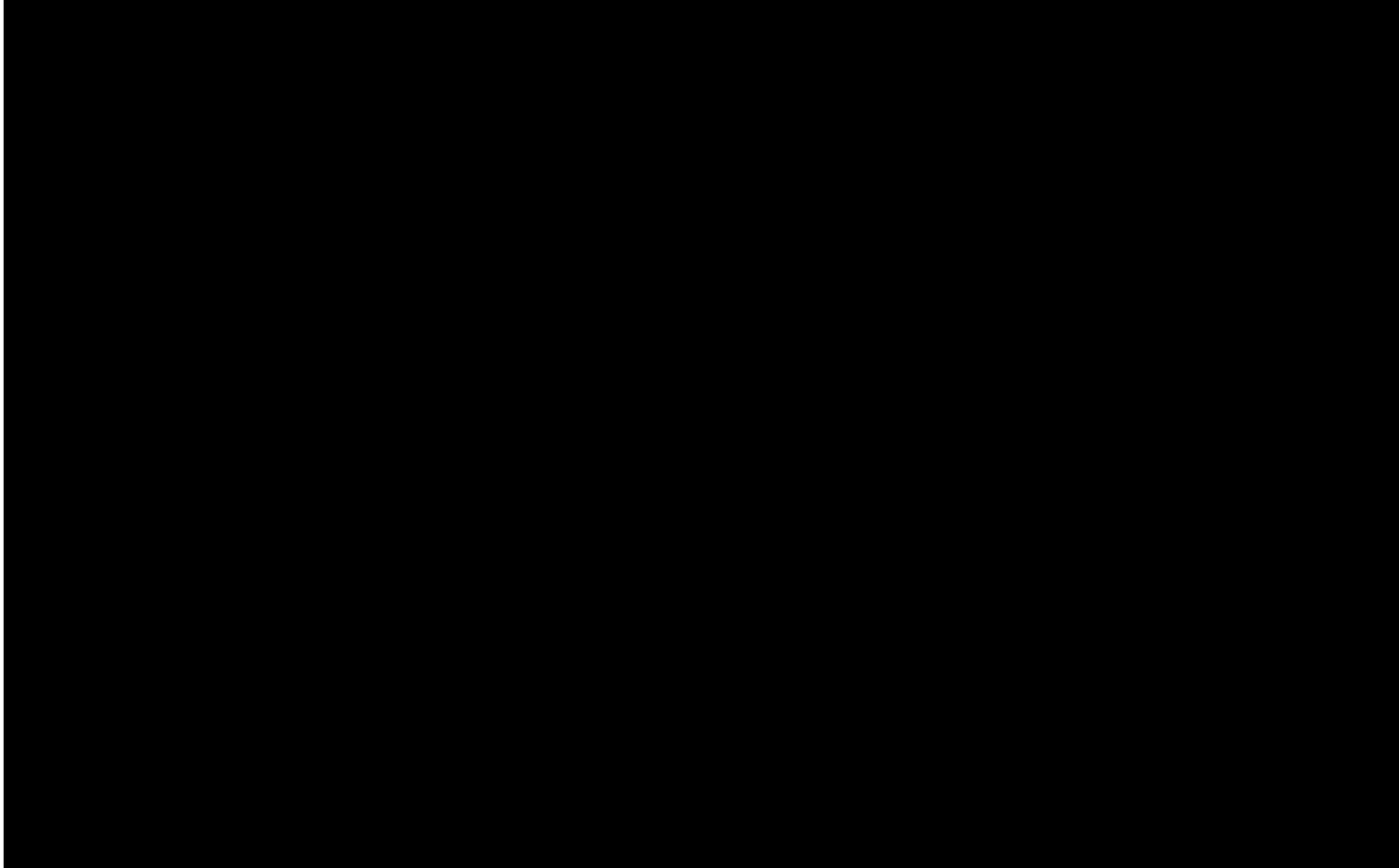
1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31
32



REDACTED

Column A B C D E F G H I

Line # Supply Type Geographic Location Time Cnt Supply Point 1 Price Point 1 Supply Point 2 Price Point 2 Elasticity

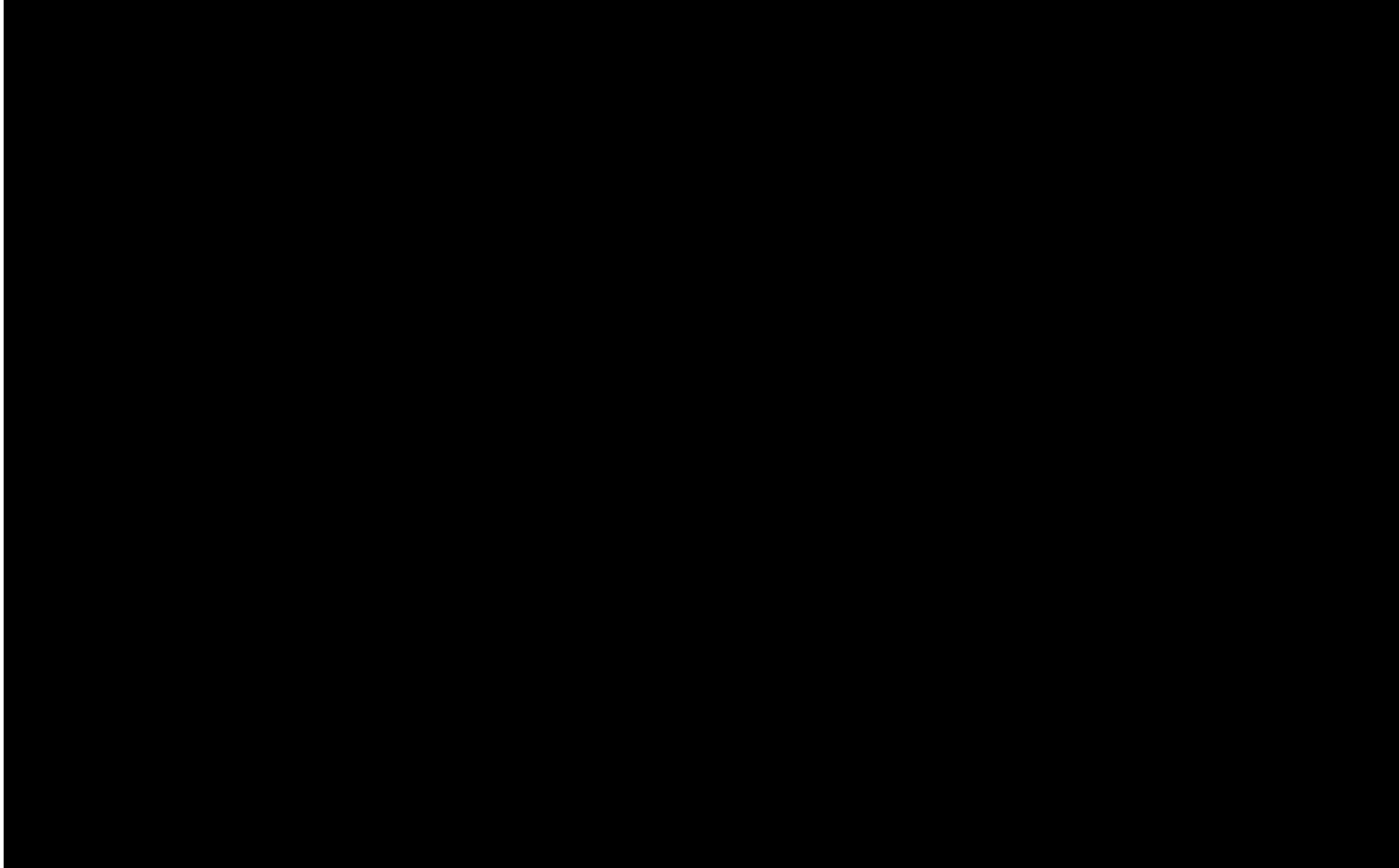


The table contains 35 rows of data, numbered 33 through 67. The columns are: Supply Type, Geographic Location, Time, Cnt, Supply Point 1, Price Point 1, Supply Point 2, Price Point 2, and Elasticity. The entire data area is redacted with a solid black box.

REDACTED

Column A B C D E F G H I

Line # Supply Type Geographic Location Time Cnt Supply Point 1 Price Point 1 Supply Point 2 Price Point 2 Elasticity



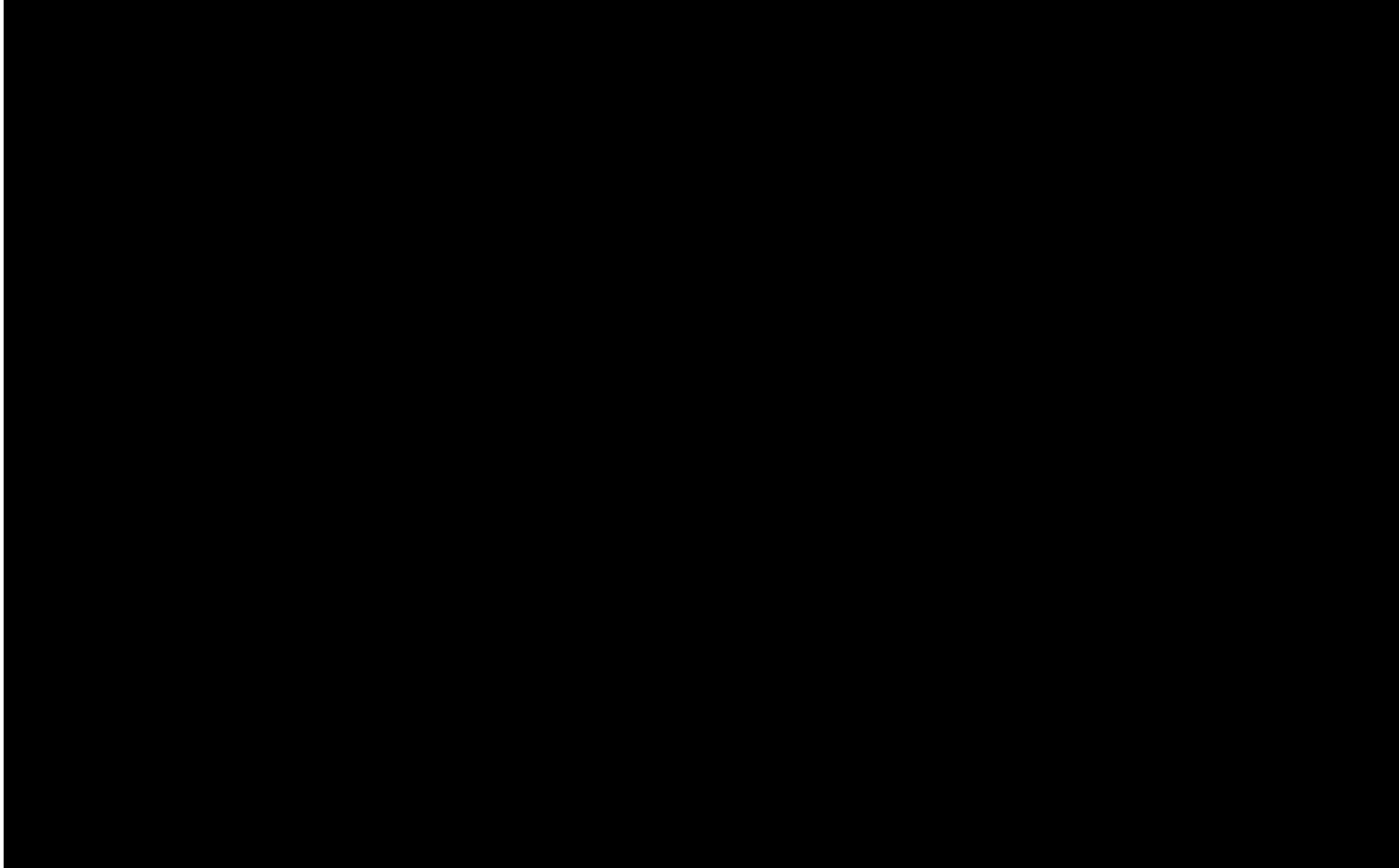
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137

REDACTED

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4627
Pursuant to R.I. Gen. Laws § 39-31-1 to 9
Responses to Division's First Set of Data Requests
Attachment DIV-4-4(a)
Issued August 30, 2016
Page 13 of 261

Column A B C D E F G H I

Line # Supply Type Geographic Location Time Cnt Supply Point 1 Price Point 1 Supply Point 2 Price Point 2 Elasticity

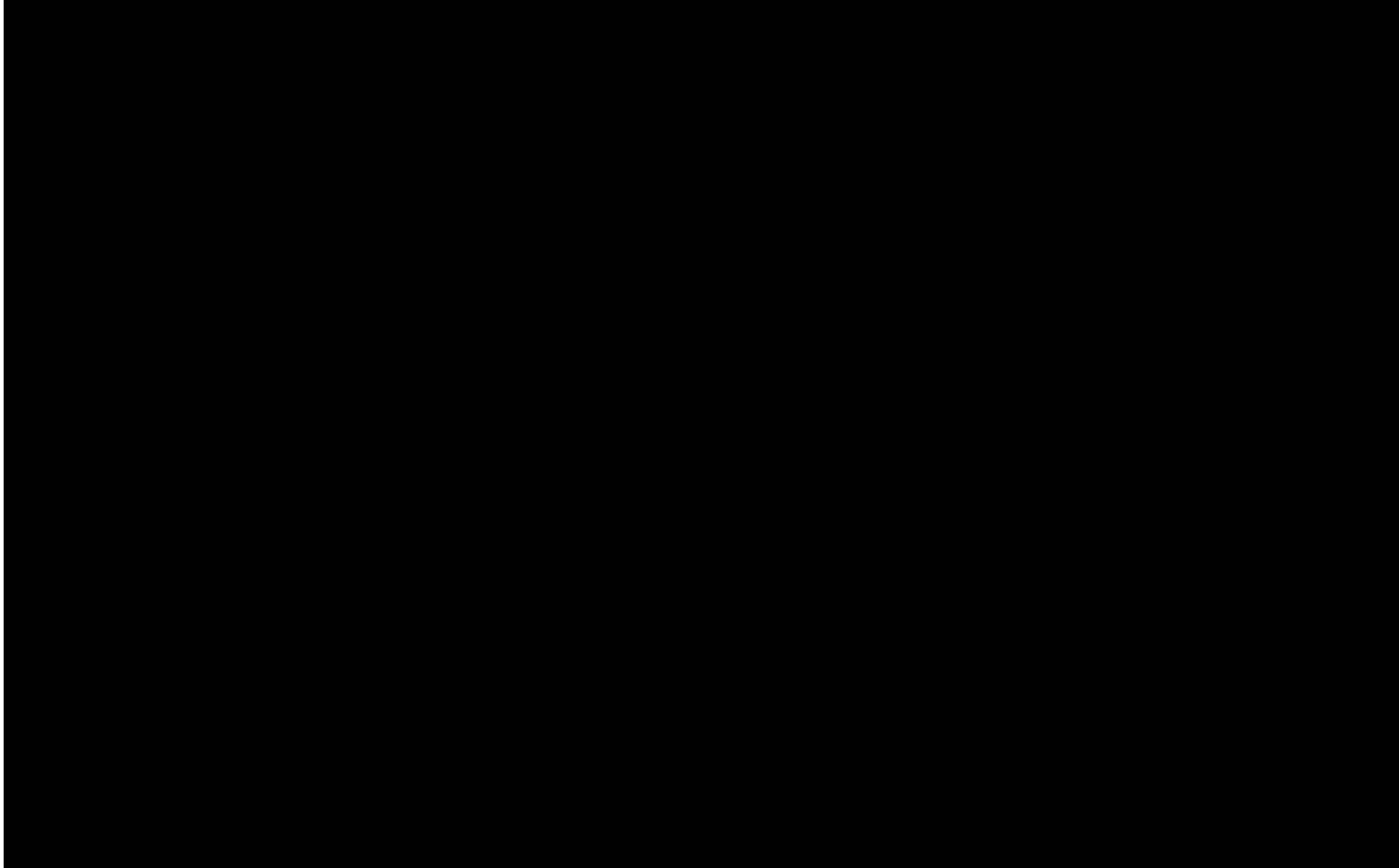


The data rows from line 418 to 452 are completely redacted with a solid black box. Only the column headers and line numbers are visible.

REDACTED

Column A B C D E F G H I

Line # Supply Type Geographic Location Time Cnt Supply Point 1 Price Point 1 Supply Point 2 Price Point 2 Elasticity



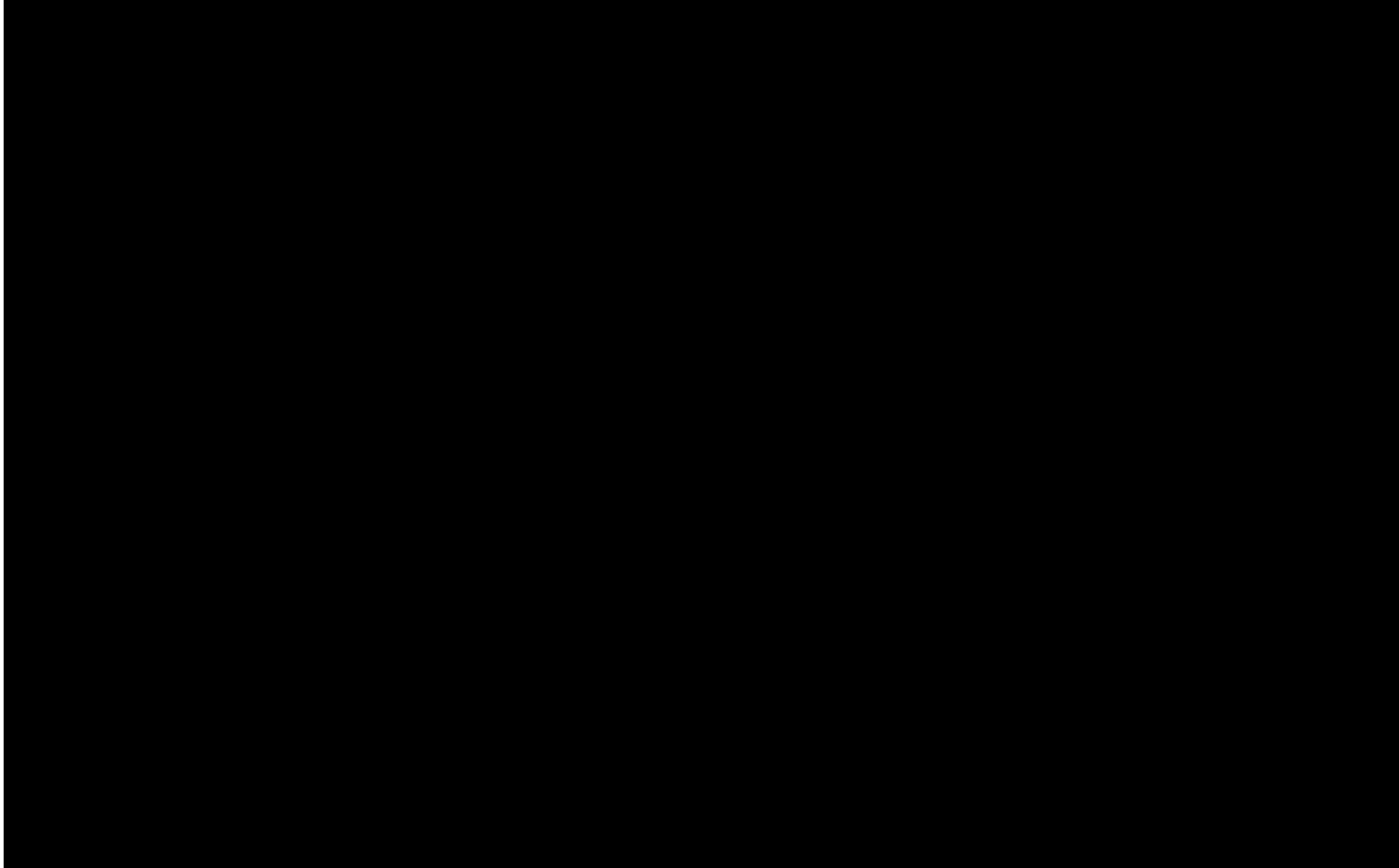
453
454
455
456
457
458
459
460
461
462
463
464
465
466
467
468
469
470
471
472
473
474
475
476
477
478
479
480
481
482
483
484
485
486
487

REDACTED

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4627
Pursuant to R.I. Gen. Laws § 39-31-1 to 9
Responses to Division's First Set of Data Requests
Attachment DIV-4-4(a)
Issued August 30, 2016
Page 25 of 261

Column A B C D E F G H I

Line # Supply Type Geographic Location Time Cnt Supply Point 1 Price Point 1 Supply Point 2 Price Point 2 Elasticity



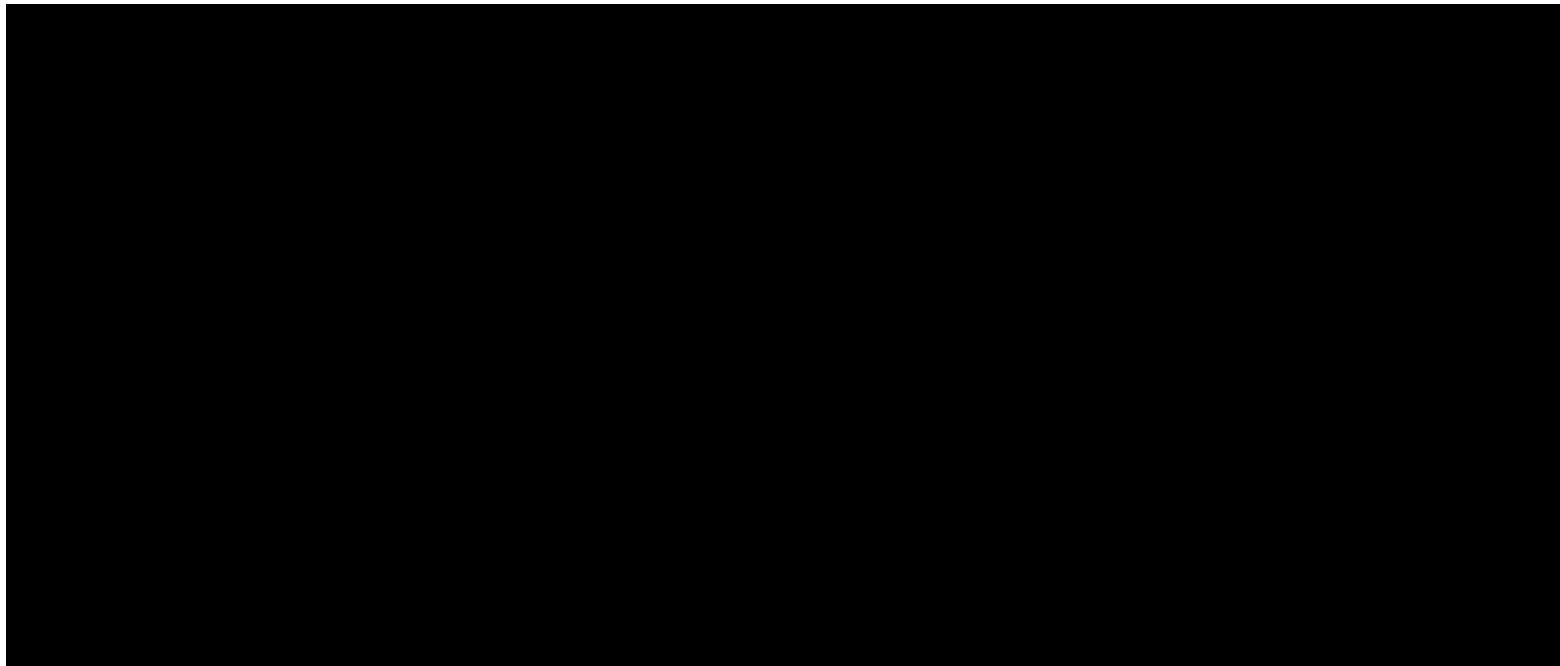
838
839
840
841
842
843
844
845
846
847
848
849
850
851
852
853
854
855
856
857
858
859
860
861
862
863
864
865
866
867
868
869
870
871
872

REDACTED

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4627
Pursuant to R.I. Gen. Laws § 39-31-1 to 9
Responses to Division's First Set of Data Requests
Attachment DIV-4-4(a)
Issued August 30, 2016
Page 261 of 261

Column A B C D E F G H I

Line #
9098
9099
9100
9101
9102
9103
9104
9105
9106
9107
9108
9109
9110
9111
9112
9113
9114
9115
9116
9117
9118
9119
9120



The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4627
National Grid's Request for Approval
Of a Gas Capacity Contract and Cost Recovery
Pursuant to R.I. Gen. Laws § 39-31-1 to 9
Responses to Division's Fourth Set of Data Requests
Issued August 30, 2016

Division 4-5

Request:

Please list all pipeline zones within New England or that connect New England to neighboring areas modeled in B&V's version of GPCM.

Response:

Please see Attachment DIV-4-6(a) (Highly Sensitive Confidential Information).

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4627
National Grid's Request for Approval
Of a Gas Capacity Contract and Cost Recovery
Pursuant to R.I. Gen. Laws § 39-31-1 to 9
Responses to Division's Fourth Set of Data Requests
Issued August 30, 2016

Division 4-6

Request:

For each pipeline zone listed in the response to the previous question, please provide live excel spreadsheets with all inputs and calculations intact that provide the GPCM inputs for each scenarios and/or sensitivity analyzed by B&V. Please provide the transportation value function for each pipeline zone within new England, please include the capacity, FDQ (full discount quantity) and ZDQ (Zero discount quantity) (please also include the associated price levels with the FDQ and ZDQ).

Response:

Please see Attachment DIV-4-6(a) (Highly Sensitive Confidential Information).

Division 4-7

Request:

Please provide live excel spreadsheets with all inputs and calculations intact that contain the following information as it was used or produced by B&V in its evaluation of the ANE project.

- a) Natural gas demand outputs monthly from GPCM for New England (aggregated or by state), separated by residential/commercial (LDC), industrial, and electric generation sectors for each scenarios and/or sensitivity analyzed by B&V.
- b) Prices assumed at National Balancing Point ("NBP") monthly and the "infra-marginal" prices used in GPCM at Canaport and Everett for each scenarios and/or sensitivity analyzed by B&V.
- c) Residual fuel oil prices (NY Harbor Heating Oil No. 2) monthly, used as an input in the PROMOD and GPCM iterative process for each scenarios and/or sensitivity analyzed by B&V, if one was not used can you briefly describe the process or assumptions relating to fuel switching.
- d) The outputs for the gas pipeline flows monthly into New England on the following pipelines from GPCM (or the closest approximation to each point in the B&V model) for each scenarios and/or sensitivity analyzed by B&V (in MMcf/d).
 - i. Flows from New York to Connecticut on Algonquin Gas Transmission
 - ii. Flows from New York to Massachusetts on the 200 Line of Tennessee Gas Pipeline
 - iii. Flows on the Iroquois Pipeline that are delivered to customers in Connecticut and the net receipts onto Iroquois at the Brookfield interconnect with Algonquin.
 - iv. Flows on the Portland Natural Gas pipeline (imports or exports).
 - v. Flows on the Maritimes and North East Pipeline (imports or exports) net of the Canaport LNG imports.

Response:

- a) Please see Attachment DIV-4-7(a) for the monthly outputs by sector for the Reference Case, Sensitivity Reference Case A and Sensitivity Reference Case B. The With ANE scenarios generally did not impact the monthly demand outputs.
- b) Black & Veatch did not make any assumptions regarding the projected National Balancing Point (NBP) monthly prices. The inframarginal costs do not exceed \$3.50/MMBtu (2015\$) over the analysis period.
- c) Please see Attachment OER-5-3(a) (Highly Sensitive Confidential Information) for the monthly liquid fuel prices used in the PROMOD analysis. These prices remained constant for all scenarios.
- d) Please see Exhibit AG-4-2 filed by the Company's Massachusetts affiliates in D.P.U. 16-05 for the requested information above. This exhibit was provided in response to Data Request PUC 1-1. The Company will supplement this part of the response with additional information by Friday, September 16, 2016.