

KEEGAN WERLIN LLP

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

(617) 951-1400

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

September 14, 2016

BY HAND DELIVERY

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

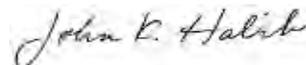
Re: Docket 4627 – In Re: Request for Approval of Firm Transportation Contracts
with Algonquin Gas Transmission, LLC for the Access Northeast Project
Responses to Data Requests – OER Set 5

Dear Ms. Massaro:

On behalf of National Grid,¹ enclosed are National Grid's responses to the Fifth Set of Data Requests issued by the Rhode Island Office of Energy Resources in the above-referenced matter. Please note that Attachment CLF 1-9(a) (Supplemental) provided in response to Data Request OER 5-2 and Attachment OER 5-3(a) contain Highly Sensitive Confidential Information. A Motion for Protective Treatment² is enclosed and the confidential versions of these attachments will be provided only to the Public Utilities Commission and those parties that have executed the appropriate non-disclosure agreement.

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

Enclosures

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

² Attachment CLF 1-9(a) (Supplemental) was previously provided in response to Data Request PUC 1-1 together with a Motion for Protective Treatment; the enclosed Motion for Protective Treatment applies only to Attachment OER 5-3(a).

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 14, 2016 National Grid filed its responses to the Office of Energy Resources (OER) Fifth Set of Data Requests that reference these highly sensitive confidential terms. Specifically, the Company is seeking protective treatment of Attachment OER 5-3(a) (the HSCI Document).

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 the HSCI Document. This document contains confidential and proprietary economic analysis information. Therefore, National Grid requests that the PUC give the information contained in the unredacted version of the HSCI Document 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 Document contains information and outputs that flows 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, this document 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 Attachment OER 5-3(a) filed in response to OER's Fifth Set of Data Requests on September 14, 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

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

Dated: September 14, 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 Office of Energy Resources' Fifth Set of Data Requests
Issued September 7, 2016

OER 5-1

Request:

The values of "Total Pollutant Emissions 2019-2038" in Schedule GJW-2 differ from the values provided in National Grid's response to DR OER 3-1(a). Please confirm that the values in DR OER 3-1(a) supersede the earlier data provided in Schedule GJW-2. If not, please provide the correct data.

Response:

The total pollutant emissions values provided in response to Data Request OER 3-1, part (a), supersede the earlier data provided in Schedule GJW-2.

The Narragansett Electric Company
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OER 5-2

Request:

Please provide the CO2 allowance prices that were submitted in Massachusetts Docket DPU 16-05 as Attachment CLF-1-9(a) (Supplemental) (Highly Sensitive Confidential Information). OER has been unable to locate this document in the response to DR PUC 1-1. If different CO2 allowance prices were utilized for Sensitivity Reference Case A and/or Sensitivity Reference Case B, please provide those values.

Response:

Please see Attachment CLF-1-9(a) (Supplemental) (Highly Sensitive Confidential Information) previously filed by the Company's Massachusetts affiliates in D.P.U. 16-05 for the requested information. This exhibit was provided in response to Data Request PUC 1-1. The CO2 allowance prices used remain the same for Sensitivity Reference Case A and Case B.

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OER 5-3

Request:

Please provide the monthly prices over the period 2019 to 2038 for coal and for all types of liquid fuels used as generation fuel in Black & Veatch's PROMOD model. If different values were used for Sensitivity Reference Case A and/or Sensitivity Reference Case B, please provide those values.

Response:

Please see Attachment OER-5-3(a) Highly Sensitive Confidential Information for the coal and liquid fuel prices used in the analysis. These values were kept constant for the Reference Case, Sensitivity Reference Case A and B.

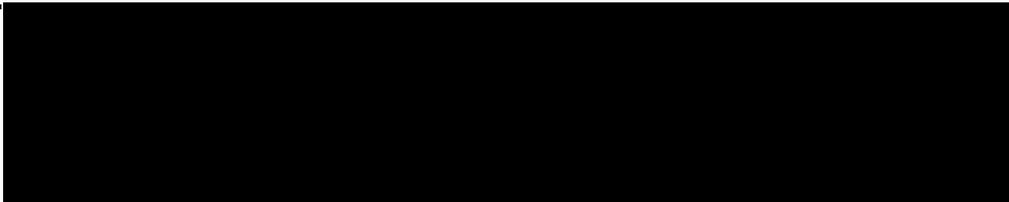
Column	A	B	C	D	E	F
Line #	Year	Diesel (2015\$/MMBtu)	FO#2-NPCC (2015\$/MMBtu)	Kerosene/Jet Fuel (2015\$/MMBtu)	Oil#6 - 0.7% (2015\$/MMBtu)	Coal (2015\$/MMBtu)
1	Jan-19					
2	Feb-19					
3	Mar-19					
4	Apr-19					
5	May-19					
6	Jun-19					
7	Jul-19					
8	Aug-19					
9	Sep-19					
10	Oct-19					
11	Nov-19					
12	Dec-19					
13	Jan-20					
14	Feb-20					
15	Mar-20					
16	Apr-20					
17	May-20					
18	Jun-20					
19	Jul-20					
20	Aug-20					
21	Sep-20					
22	Oct-20					
23	Nov-20					
24	Dec-20					
25	Jan-21					
26	Feb-21					
27	Mar-21					
28	Apr-21					
29	May-21					
30	Jun-21					
31	Jul-21					
32	Aug-21					
33	Sep-21					
34	Oct-21					
35	Nov-21					
36	Dec-21					
37	Jan-22					
38	Feb-22					
39	Mar-22					
40	Apr-22					
41	May-22					
42	Jun-22					
43	Jul-22					
44	Aug-22					
45	Sep-22					
46	Oct-22					
47	Nov-22					

Column	A	B	C	D	E	F
Line #	Year	Diesel (2015\$/MMBtu)	FO#2-NPCC (2015\$/MMBtu)	Kerosene/Jet Fuel (2015\$/MMBtu)	Oil#6 - 0.7% (2015\$/MMBtu)	Coal (2015\$/MMBtu)
48	Dec-22					
49	Jan-23					
50	Feb-23					
51	Mar-23					
52	Apr-23					
53	May-23					
54	Jun-23					
55	Jul-23					
56	Aug-23					
57	Sep-23					
58	Oct-23					
59	Nov-23					
60	Dec-23					
61	Jan-24					
62	Feb-24					
63	Mar-24					
64	Apr-24					
65	May-24					
66	Jun-24					
67	Jul-24					
68	Aug-24					
69	Sep-24					
70	Oct-24					
71	Nov-24					
72	Dec-24					
73	Jan-25					
74	Feb-25					
75	Mar-25					
76	Apr-25					
77	May-25					
78	Jun-25					
79	Jul-25					
80	Aug-25					
81	Sep-25					
82	Oct-25					
83	Nov-25					
84	Dec-25					
85	Jan-26					
86	Feb-26					
87	Mar-26					
88	Apr-26					
89	May-26					
90	Jun-26					
91	Jul-26					
92	Aug-26					
93	Sep-26					
94	Oct-26					

Column	A	B	C	D	E	F
Line #	Year	Diesel (2015\$/MMBtu)	FO#2-NPCC (2015\$/MMBtu)	Kerosene/Jet Fuel (2015\$/MMBtu)	Oil#6 - 0.7% (2015\$/MMBtu)	Coal (2015\$/MMBtu)
95	Nov-26					
96	Dec-26					
97	Jan-27					
98	Feb-27					
99	Mar-27					
100	Apr-27					
101	May-27					
102	Jun-27					
103	Jul-27					
104	Aug-27					
105	Sep-27					
106	Oct-27					
107	Nov-27					
108	Dec-27					
109	Jan-28					
110	Feb-28					
111	Mar-28					
112	Apr-28					
113	May-28					
114	Jun-28					
115	Jul-28					
116	Aug-28					
117	Sep-28					
118	Oct-28					
119	Nov-28					
120	Dec-28					
121	Jan-29					
122	Feb-29					
123	Mar-29					
124	Apr-29					
125	May-29					
126	Jun-29					
127	Jul-29					
128	Aug-29					
129	Sep-29					
130	Oct-29					
131	Nov-29					
132	Dec-29					
133	Jan-30					
134	Feb-30					
135	Mar-30					
136	Apr-30					
137	May-30					
138	Jun-30					
139	Jul-30					
140	Aug-30					
141	Sep-30					

Column	A	B	C	D	E	F
Line #	Year	Diesel (2015\$/MMBtu)	FO#2-NPCC (2015\$/MMBtu)	Kerosene/Jet Fuel (2015\$/MMBtu)	Oil#6 - 0.7% (2015\$/MMBtu)	Coal (2015\$/MMBtu)
142	Oct-30					
143	Nov-30					
144	Dec-30					
145	Jan-31					
146	Feb-31					
147	Mar-31					
148	Apr-31					
149	May-31					
150	Jun-31					
151	Jul-31					
152	Aug-31					
153	Sep-31					
154	Oct-31					
155	Nov-31					
156	Dec-31					
157	Jan-32					
158	Feb-32					
159	Mar-32					
160	Apr-32					
161	May-32					
162	Jun-32					
163	Jul-32					
164	Aug-32					
165	Sep-32					
166	Oct-32					
167	Nov-32					
168	Dec-32					
169	Jan-33					
170	Feb-33					
171	Mar-33					
172	Apr-33					
173	May-33					
174	Jun-33					
175	Jul-33					
176	Aug-33					
177	Sep-33					
178	Oct-33					
179	Nov-33					
180	Dec-33					
181	Jan-34					
182	Feb-34					
183	Mar-34					
184	Apr-34					
185	May-34					
186	Jun-34					
187	Jul-34					
188	Aug-34					

Column	A	B	C	D	E	F
Line #	Year	Diesel (2015\$/MMBtu)	FO#2-NPCC (2015\$/MMBtu)	Kerosene/Jet Fuel (2015\$/MMBtu)	Oil#6 - 0.7% (2015\$/MMBtu)	Coal (2015\$/MMBtu)
189	Sep-34					
190	Oct-34					
191	Nov-34					
192	Dec-34					
193	Jan-35					
194	Feb-35					
195	Mar-35					
196	Apr-35					
197	May-35					
198	Jun-35					
199	Jul-35					
200	Aug-35					
201	Sep-35					
202	Oct-35					
203	Nov-35					
204	Dec-35					
205	Jan-36					
206	Feb-36					
207	Mar-36					
208	Apr-36					
209	May-36					
210	Jun-36					
211	Jul-36					
212	Aug-36					
213	Sep-36					
214	Oct-36					
215	Nov-36					
216	Dec-36					
217	Jan-37					
218	Feb-37					
219	Mar-37					
220	Apr-37					
221	May-37					
222	Jun-37					
223	Jul-37					
224	Aug-37					
225	Sep-37					
226	Oct-37					
227	Nov-37					
228	Dec-37					
229	Jan-38					
230	Feb-38					
231	Mar-38					
232	Apr-38					
233	May-38					
234	Jun-38					
235	Jul-38					

Column	A	B	C	D	E	F
Line #	Year	Diesel (2015\$/MMBtu)	FO#2-NPCC (2015\$/MMBtu)	Kerosene/Jet Fuel (2015\$/MMBtu)	Oil#6 - 0.7% (2015\$/MMBtu)	Coal (2015\$/MMBtu)
236	Aug-38					
237	Sep-38					
238	Oct-38					
239	Nov-38					
240	Dec-38					

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OER 5-4

Request:

For the sensitivity cases that Black & Veatch examined in their PROMOD model:

- a) Please provide the energy delivery profile, delivery point, and in-service date assumed for the large scale hydropower resource and associated transmission project, reflective of the 1,090 MW Northern Pass proposal submitted under the Clean Energy RFP, that was incorporated in Sensitivity Reference Case A and Sensitivity Reference Case B.
- b) Please provide the energy delivery profile(s), delivery point(s), and in-service date(s) assumed for the 1,200 MW of new wind resources that were incorporated in Sensitivity Reference Case B.

Response:

a-b) Please see Exhibit DIV-1-23 for the energy delivery profile used for the large scale hydropower resource and associated transmission project, reflective of the 1,090 MW Northern Pass proposal, as well as the 1,200 MW of new wind resources. For the large scale hydropower resource and associated transmission project, Black & Veatch assumed that the delivery point would be to the Franklin Substation in New Hampshire, starting in 2019. For the 1,200 MW of new wind resources, the delivery point is the Keene Road Substation in Maine, starting in 2020.