

April 10, 2018

BY HAND DELIVERY AND ELECTRONIC MAIL

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

**RE: Docket 4805 - 2018 Annual Retail Rate Filing
Responses to Record Requests**

Dear Ms. Massaro:

I have enclosed ten (10) copies of National Grid's¹ responses to the record requests issued at the PUC's evidentiary hearing on March 28, 2018 in the above-referenced docket.

Please be advised that the Company's responses to Record Request Nos. 1, 2, and 9 are pending.

Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 4805 Service List
John Bell, Division
Leo Wold, Esq.

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

Record Request No. 3

Request:

Referencing Docket No. 4470, does the rate case test year include normalizing adjustment to account for the under-billing described in the Company's response to PUC 2-1? If yes, what was the amount of normalizing adjustment. If no, why not.

Response:

In the Company's general rate case currently under consideration in Docket No. 4770, the test year is July 1, 2016 through June 30, 2017. As referenced in the Company's response to PUC 2-1, the incorrectly configured meter for the large under-billed customer was replaced in September 2016. Consequently, the Company has calculated that a total of \$16,328 of distribution revenue was under-billed during the months of July 2016 through September 2016. Please see the Excel file titled "Attachment RR-8," which is provided with the Company's response to Record Request No. 8. The "Test Year Dist. Rev. Underbill" tab provides the detail of under-billed distribution revenue during the affected portion of the test year.

Pursuant to the Company's tariff provision R.I.P.U.C. No. 2073, Revenue Decoupling Mechanism (RDM) Provision, the Company reconciles actual billed distribution revenue to the approved Annual Target Revenue (ATR), as determined in the Company's most recent general rate case, Docket No. 4323. Any difference, positive or negative, between actual billed distribution revenue and the ATR for a RDM Year (i.e., April through the following March) results in a recovery or refund of the under-recovery or over-recovery of the ATR.

As shown in the Company's response to PUC 2-1, as well as in Line (8) of the "Summary for 2018 ARRF" tab in the "Attachment RR-8" Excel file provided by the Company in response to Record Request No. 8, the Company intends to include a Revenue Adjustment of \$320,728 (including cumulative interest) in its RDM Reconciliation filing, to be filed no later than May 15, 2018, to credit all customers the unbilled revenue related to the large customer, which was reflected in prior RDM Reconciliation filings and recovered from all customers through the operation of the RDM.

The Company did not make a normalizing adjustment for the three months of distribution revenue not billed to this customer during the beginning of the test year in Docket No. 4770. It is not necessary to make a normalizing adjustment of such a small amount, and the rate year normalized distribution revenue is based on forecasted billing units, not test year billing units.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket Nos. 4805 and 4692
In Re: 2018 Retail Rate and Renewable Energy Charge and Reconciliation Filing
Responses to Record Requests
Issued at the Commission's Evidentiary Hearing
On March 28, 2018

Record Request No. 4

Request:

How long will the Block Island Cable be out of service?

Response:

The Company will be performing work on the sea2shore transmission cable in the Fall of 2018. To perform this work safely, the cable must be de-energized for an estimated period of approximately three weeks (depending on the weather).

Record Request No. 5

Request:

Referencing Docket 4690 and BIPCo's response to PUC 1-(e) in that docket, BIPCo's response reads: "Grid has informed BIPCo that they will cover the cost of the fuel and urea used during this outage period." Will the Company recover the costs from ratepayers or shareholders? If ratepayers, where will the Company recover this cost? What is the Company's authority to pay these costs on behalf of another utility?

Response:

National Grid has offered to reimburse BIPCO for its reasonable cost of fuel oil required during the outage period to lessen the impact of National Grid's activity on BIPCO's customers. National Grid's shareholders will fund the cost of reimbursing BIPCO for its reasonable fuel costs, not National Grid's customers. Since the costs are to be funded by National Grid's shareholders, they are not and will not be included in National Grid's FERC-jurisdictional rates. As a result, no FERC-jurisdictional tariff or FERC precedent applies to this situation, and no FERC-mandated conditions or authorizations are required to authorize National Grid to pay these costs.

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Record Request No. 6

Request:

Referencing Docket 4690 and BIPCo's response to PUC 1-(f) in that docket, BIPCo's response reads: "BIPCo does not have any printed correspondence since formal notification was given to the Town." Provide copies of what National Grid sent to the Town.

Response:

Please see Attachment RR-6 for a copy of the letter the Company sent to the Town of New Shoreham on February 20, 2018.

February 20, 2018

Edward Roberge, Town Manager
Town of New Shoreham
PO Box 220
Block Island, RI 02807

Mr. Roberge:

In advance of the Town Council meeting on February 21st, I want to outline some background regarding the cable burial depth issue at Crescent Beach and our plan to install additional protective sleeving.

As we have discussed during our conversations in the last few weeks, National Grid has been monitoring the cable burial depth at Crescent Beach since the initial installation in June of 2016. During construction, unplowable material was encountered in an area approximately 100 feet seaward of Mean Low Water off Crescent Beach preventing the submarine cable from being buried to the target burial depth of four to six feet. In the spring of last year, we successfully installed a section of 80ft of protective sleeve (a product called "TekDuct") on a section of the sea2shore cable nearshore Crescent Beach to provide additional mechanical coverage. While the cable is safe to human touch and is both sheathed and armored, this sleeving provides additional protection to the cable to reduce the possibility of anchor damage in the shallow burial area. As we highlighted, the diver surveys that were done in 2017 revealed that the sleeves were working as expected and that section of cable does not require any additional protection. National Grid, under the direction of state agencies, also conducted monthly diver surveys from June through October 2017 to monitor cable burial depth over time. In January 2018, National Grid met with RI CRMC and RI DEM to review the results of the surveys, and proposed to install additional protections over approximately 275 feet of cable seaward from the existing sleeve that was found to be below the targeted burial depth. Surveys to date show that sand shifts in this area during the summer, and are redeposited during other times of the year.

National Grid is targeting the fall, after peak summer tourism season, to begin the proposed sleeving work after all approvals from the relevant agencies have been obtained, including federal and state and local agencies. Divers would expose sections of the cable to install the protective sleeving. In

Edward Roberge, Town Manager
February 20, 2018
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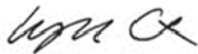
order to perform this work safely, the sea2shore cable must be de-energized for an estimated period of approximately three weeks (weather dependent). This will require coordination with Block Island Power Company and Deepwater Wind. We will be actively working with both entities to minimize disruption in service to the island.

Additionally, National Grid will be reviewing with the appropriate agencies any additional measures over the summer season. These measures will be reviewed in the near future with RIDEM, CRMC and Town Management.

During our last conversation on February 13th you raised concern about whether we consider the sleeve installation as a temporary measure. The protective sleeve proposal is one that is safe for the recreational use of the beach, will preserve the reliability of the cable and service to customers, and can be executed this year . We will continue to survey and monitor cable burial depth before, and after, this proposed work is completed to determine, in conjunction with the appropriate regulatory agencies, what additional actions, if any, are necessary.

We are committed to working with all stakeholders to complete this project on schedule and to maintain a positive relationship with the Town and our stakeholders during the sleeve installation. We look forward to working with you as a plan is further developed.

Thank you,



Kathryn Cox-Arslan
Director, Commercial Services

CC:

George Maximovich
Brian Wilson
Jeff Wright

National Grid
Deepwater Wind
Block Island Power Company

Record Request No. 7

Request:

What are the Company's plans for the unallocated fiber optic cable?

Response:

As of today, all fiber optic strands have been allocated to The Town of New Shoreham, Deep Water Wind, and National Grid. For the strands allocated to National Grid, National Grid is currently allocating both primary and backup strands to various internal departments to support the Company's equipment and protective devices required to operate the circuit. This allocation should be completed in the near future. Any unallocated fiber optic strands remaining after this process could potentially be leased to third parties.

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Record Request No. 8

Request:

Please provide all underlying supporting documents for the information detailed in Attachment PUC 2-1 to the Company's response to PUC 2-1.

Response:

Please see the attached Excel file, "Attachment RR-8.xlsx", which provides the supporting calculations related to the Company's response to PUC 2-1.