

February 5, 2019

BY HAND DELIVERY AND ELECTRONIC MAIL

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

**RE: Docket 4755 – 2018 Energy Efficiency Program Plan
Supplemental Responses to Division Data Requests – Set 9**

Dear Ms. Massaro:

I have enclosed ten copies of National Grid's¹ Supplemental Responses to Division 9-6, Division 9-12, Division 9-24, and Division 9-25 in the above-referenced docket.

This filing also contains a Motion for Protective Treatment of Confidential Information in accordance with Rule 810-RICR-00-00-1.3(H) of the Public Utilities Commission's (PUC) Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B). National Grid seeks protection from public disclosure of certain confidential and privileged information, which is contained in its attachments to Supplemental Responses to Division 9-6, Division 9-12, Division 9-24, and Division 9-25. In compliance with Rule 810-RICR-00-00-1.3(H)(3), National Grid has provided the PUC with one complete, unredacted copy of the confidential materials on USB Flash Drive in a sealed envelope marked "**Contains Privileged and Confidential Materials – Do Not Release.**"

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

Sincerely,



Raquel J. Webster

Enclosures

cc: Docket 4755 Service List
Jon Hagopian, Esq.

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

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

February 5, 2019

Date

Docket No. 4755 - National Grid – Energy Efficiency Program Plan for 2018
Docket No. 4756 - National Grid – 2018 System Reliability Procurement
Report (SRP)
Service list updated 1/8/2019

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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
BEFORE THE PUBLIC UTILITIES COMMISSION**

IN RE: THE NARRAGANSETT ELECTRIC COMPANY)
d/b/a NATIONAL GRID – ELECTRIC AND GAS)
DISTRIBUTION RATE FILING)

Docket No. 4755

**THE COMPANY’S MOTION
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

The Company¹ respectfully requests that the Rhode Island Public Utilities Commission (PUC) provide confidential treatment and grant protection from public disclosure of certain confidential and proprietary information submitted in this proceeding, as permitted by PUC Rule 810-RICR-00-00-1.3(H) and R.I. Gen. Laws. § 38-2-2(4)(B). The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to PUC Rule 810-RICR-00-00-1.3(H)(2).

I. BACKGROUND

On February 5, 2019, the Company filed supplemental responses to the Rhode Island Division of Public Utilities and Carriers’ (the Division) Ninth Set of Data Requests in Docket 4755 (Division Set 9). Division Set 9 included: (a) Data Request Division 9-12, which sought “copies of any and all internal communications, emails, and presentations that address the issue of the adequacy or inadequacy of gas capacity to the Aquidneck Island and Portsmouth areas, as it relates to the operation and potential impact of the proposed Navy CHP project taking any form of firm or interruptible service[;]” (b) Data Request Division 9-24, which asked whether “there any internal emails or presentations between and among the Company employees that

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

discuss the question of how much to offer the Navy or BQ Energy for the CHP incentive[;]" and (c) Data Request Division 9-25, which sought "copies of [any] emails and presentations" responsive to Division Data Request 9-24."

The Company's supplemental responses to Data Request Division 9-12, Data Request Division 9-14, and Data Request Division 9-25 include Attachment DIV 10-12 Confidential and Attachment DIV 9-25 Confidential. These attachments include numerous categories of confidential information. In particular, these attachments contain attorney-client privileged communications, customer financial information, customer usage information, and information about the location of energy infrastructure. Accordingly, the Company seeks confidential treatment of Attachment DIV 9-12 Confidential and Attachment DIV 9-25 Confidential.

II. LEGAL STANDARD

PUC Rule 810-RICR-00-00-1.3(H) provides that access to public records shall be granted in accordance with the Access to Public Records Act (APRA), R.I. Gen. Laws § 38-2-1, *et seq.* Under the 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. Gen. Laws § 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 the APRA to deem such information to be confidential and to protect that information from public disclosure.

In that regard, R.I. Gen. Laws § 38-2-2(4) 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.

All records relating to a client/attorney relationship and to a doctor/patient relationship, including all medical information relating to an individual in any files.

Records, reports, opinions, information, and statements required to be kept confidential by federal law or regulation or state law or rule of court.

The Rhode Island Supreme Court has held that this confidential information exemption applies where disclosure of information would be likely either to (1) impair the Government's ability to obtain necessary information in the future; or (2) 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). Disclosure of information would impair the Government's ability to obtain such information in the future when: (a) information is provided voluntarily to the governmental agency, and (b) that information is of a kind that customarily would not be released to the public by the person from whom it was obtained. Providence Journal, 774 A.2d at 47. Further, the provision of attorney-client privileged information to a public body, even on a confidential basis, would eliminate the privilege with respect to those communications and their subject matter, and as such, it is inappropriate to provide such information. DeCurtis v. Visconti, Boren & Campbell, Ltd., 152 A.3d 413, 425 (R.I. 2017) (stating rule that privilege is waived when confidential communications are disclosed to a third party).

III. BASIS FOR CONFIDENTIALITY

The information contained in Attachment DIV 9-12 Confidential and Attachment DIV 9-25 Confidential falls within the exceptions under the APRA. Specifically, these attachments include attorney-client privileged communications, customer financial information, customer usage information, and information about the location of energy infrastructure. The Company

does not and should not reveal this confidential information, and the Company ordinarily would not share this information with the public. Further, disclosure of information about the location of infrastructure to the public would cause potential danger to the distribution system. Lastly, the disclosure of attorney-client privileged communications would eliminate the privilege attached to those communications vis-à-vis third parties.

The Company, therefore, is providing Attachment DIV 9-12 Confidential and Attachment DIV 9-25 Confidential to the PUC on a voluntary basis to assist the PUC with its decision-making in this proceeding. These confidential attachments do not include the attorney-client communications for the reasons stated herein. The Company respectfully requests that the PUC provide confidential treatment to these attachments.

IV. CONCLUSION

Accordingly, the Company respectfully requests that the PUC grant protective treatment to Attachment DIV 9-12 Confidential and Attachment 9-25 Confidential.

WHEREFORE, the Company respectfully requests that the PUC grant this Motion for Protective Treatment.

Respectfully submitted,

THE NARRAGANSETT ELECTRIC COMPANY

By its attorney,



Raquel J. Webster, RI Bar # 9064
National Grid
40 Sylvan Road
Waltham, MA 02451
781-907-2121

Dated: February 5, 2019

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4755
In Re: 2018 Energy Efficiency Plan
Notification of an Energy Efficiency Incentive Greater Than \$3,000,000
Responses to the Division's Ninth Set of Data Requests
Issued on October 29, 2018

Division 9-6 - Supplemental

Request:

Referring to the response to Division 6-6, the response states: "[T]he Company understood that it needed to analyze whether additional pipeline capacity was necessary, and did identify the need for the analysis before making the incentive offer. Despite identifying the need for the [gas capacity] analysis, the results of such an analysis were not confirmed before the Company extended the incentive offer." This response states that "the Company" understood the need and identified the need. Please be more specific about who at the Company "understood" and "identified" the need by answering the questions below. (NOTE: Where the questions below seek the identity of employees, the Division is only requesting the identification of position, title, and corporate department at this time, without the names of the employees. If needed, the Division will supplement this request later.):

- (a) Among employees familiar with the fact that the Company was preparing a possible incentive offer for the CHP unit, who among them understood (before the offer was made) that the Company needed to analyze whether additional pipeline capacity was necessary?
- (b) Who first identified the need for the analysis?
- (c) When was the need for the analysis first identified?
- (d) Who at the Company had the expertise and personal knowledge of the actual capacity constraint at the time the incentive offer was made? Was that person or were those persons consulted prior to the incentive offer being made?
- (e) Did anyone make any decisions to overrule or postpone any action on any requests to perform the analysis before the incentive offer was made to the Navy or before the Notification was filed? If so, please identify and explain what happened.
- (f) Were there any internal email communications regarding the need for an analysis before the incentive offer was made or the Notification filed? If so, please provide copies.

Response:

- (a) The following employees were familiar with the fact that the Company was preparing a possible incentive offer for the CHP unit and understood (before the offer was made) that The Narragansett Electric Company d/b/a National Grid (the Company) needed to analyze whether additional pipeline capacity was necessary:
 - Lead Account Manager – Customer Gas Connections
 - Manager – Strategic Sales MA South/RI

Division 9-6, page 2

The Manager – Gas Operations Engineering identified the need to reach out to the Manager – New England (NE) Portfolio Planning to analyze whether additional pipeline capacity was necessary for gas supply but was not familiar with the fact that the Company was preparing an incentive offer for the CHP unit.

The Lead Account Manager – Customer Gas Connections thought that an engineering analysis by Gas Operations Engineering would completely confirm the Company's ability to serve the proposed CHP equipment. Until April 28, 2017, the Lead Account Manager – Customer Gas Connections was not aware that a consultation with NE Portfolio Planning regarding the upstream gas supply portfolio was required as part of the engineering review.

- (b) As part of the Gas Operations Engineering review of the proposed CHP equipment, on April 28, 2017, the Manager – Gas Operations Engineering first identified the need to consult with the Manager – NE Portfolio Planning to determine whether or not the Company's existing upstream gas portfolio could accommodate the proposed CHP equipment.

To provide additional context, the following is a sequence of events related to the engineering analysis of the proposed CHP equipment.

On February 22, 2017, the Lead Account Manager – Customer Gas Connections first identified the need to perform an engineering analysis for the proposed CHP load addition with a general understanding that there were constraints on Aquidneck Island. The Lead Account Manager – Customer Gas Connections did not understand these constraints to be related to upstream pipeline capacity. The Lead Account Manager – Customer Gas Connections was responsible for collecting the proposed gas load and pressure information, submitting a Gas Capacity Request to Gas Operations Engineering, and confirming the Company's ability to provide firm gas service for the proposed CHP equipment. The Lead Account Manager – Customer Gas Connections submitted a Gas Capacity Request to the Associate Engineer – Gas Operations Engineering who was responsible for performing the engineering review. This review was supposed to include a review of the required local distribution system, the required take station capacity, and a consultation with NE Portfolio Planning given that the proposed load for the CHP equipment exceeded 50,000 cfh.

The Associate Engineer who performed the engineering review was a relatively new employee (approximately three months) at the time and was not aware that a consultation

Division 9-6, page 3

with NE Portfolio Planning was required. On March 31, 2017, the Associate Engineer provided approval of the proposed load contingent upon the installation of a growth main reinforcement and a new service line. Additionally, on April 3, 2017, the Associate Engineer stated that he was consulting Long Term Planning to evaluate how much the supply flow rates and contract maximum daily quantity (MDQ) at the Portsmouth take station would be affected. On April 14, 2017, the Lead Engineer – Long Term Planning confirmed with the Engineer – Pressure Regulation that the Portsmouth take station had adequate capacity to handle the additional load and asked for verification that the Spectra meters and heater capacities would also allow the additional volume.

On April 28, 2017, the Lead Account Manager – Customer Gas Connections informed the Energy Efficiency (EE) Sales team (including the Lead Sales Representative – Strategic Sales RI; the Lead Program Manager – CHP, EE Program Execution; and the Manager – Strategic Sales MA South/RI) that the CHP project could receive firm gas service. On that same day, the Manager – Strategic Sales MA South/RI suggested that the Manager – Gas Operation Engineering be consulted directly to confirm. In an effort to assist with finalizing the engineering review, the Manager – Gas Operations Engineering reached out via email to the Engineer – Pressure Regulation to confirm the Spectra meter capacities and heater capacities at the Portsmouth take station and the Manager – NE Portfolio Planning to determine whether or not the Company's existing upstream gas portfolio could accommodate the proposed CHP equipment. Among those copied on this email were the Associate Engineer – Gas Operations Engineering, the Lead Account Manager – Customer Gas Connections, and the Manager – Strategic Sales MA South/RI. The Manager – NE Portfolio Planning did not provide a response to any of the individuals included on this email communication.

In a response to this email, on May 1, 2017, Pressure Regulation Engineering confirmed that the Portsmouth take station had adequate capacity to flow the added load associated with the CHP equipment, including the Spectra meters and heater capacities at the station.

(c) Please see the Company's response to part (b) above.

Division 9-6, page 4

- (d) The Manager – NE Portfolio Planning and Director – Energy Procurement, Gas Supply Planning had the expertise and personal knowledge of the actual capacity constraint at the time the incentive offer was made. Yes, as noted in the Company's response to part (b) above, the Manager – Gas Operations Engineering identified the need to consult with the Manager – NE Portfolio Planning regarding the gas supply portfolio impact and contacted this employee via email on April 28, 2017, a copy of which is provided in Attachment DIV 9-6; however, the Manager – Gas Operations Engineering did not receive a response from the Manager – NE Portfolio Planning nor did the individuals copied on that email identified in the Company's response to part (b) above.
- (e) No. No one made any decisions to overrule or postpone any action related to confirmation of pipeline capacity and gas supply before the incentive offer was made to the Navy or before the Notification was filed. As of May 1, 2017, Gas Operations Engineering had provided its approval of the project contingent on the required scope of the main reinforcement and it had confirmed the necessary take station capacities. Gas Operations Engineering did not suspend its approval of the CHP load pending final review from NE Portfolio Planning. If Gas Operations Engineering had suspended its approval of the CHP load pending final review from NE Portfolio Planning, it would have been clearer to the Lead Account Manager – Customer Gas Connections that the review and approval from NE Portfolio Planning was an outstanding item that was required to be completed for the gas project to move forward. That being said, despite being copied on the email addressed to the Manager – NE Portfolio Planning, the Lead Account Manager – Customer Gas Connections did not follow up with either the Manager – NE Portfolio Planning or the Manager – Gas Operations Engineering to confirm whether or not additional supply questions needed to be answered. Please also refer to the Company's response to part (b) above.
- (f) Please see the internal email communications regarding the need for an analysis by NE Portfolio Planning, provided as Attachment DIV 9-6.

Additionally, the Company is in the process of performing an electronic search for internal emails and presentations between and among the Company employees regarding the need for an analysis before the incentive offer was made or the Notification was filed. The search is being conducted using the following criteria:

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4755
In Re: 2018 Energy Efficiency Plan
Notification of an Energy Efficiency Incentive Greater Than \$3,000,000
Responses to the Division's Ninth Set of Data Requests
Issued on October 29, 2018

Division 9-6, page 5

- Company Employees: Matt Foran, Stephen Caliri, Elizabeth Arangio, Mark Sevier, Gerald Ferris, Jeff Dunham, Thomas Dion, Fred Paine, Michael Mokey, Faye Brown, and Nancy Culliford
- Search Terms: (Navy or CHP or BQ) and (pipeline or capacity or analysis or Portsmouth or MDQ or supply or Aquidneck or constraint or constrained)
- Timeframe: September 16, 2016 through the present

Once the electronic search is complete and the Company has reviewed any documents identified from the search, the Company will supplement this response with the results.

Supplemental Response:

Please see Attachment DIV 9-6(f) for copies of additional responsive documents identified after completing the document collection and review of the more expanded search terms agreed upon with the Division.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4755
In Re: 2018 Energy Efficiency Plan
Notification of an Energy Efficiency Incentive Greater Than \$3,000,000
Responses to the Division's Ninth Set of Data Requests
Issued on October 29, 2018

Attachment DIV 9-6(f)

REDACTED

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4755
In Re: 2018 Energy Efficiency Plan
Notification of an Energy Efficiency Incentive Greater Than \$3,000,000
Responses to the Division's Ninth Set of Data Requests
Issued on October 29, 2018

Division 9-12 - Supplemental

Request:

Please provide copies of any and all internal communications, emails, and presentations that address the issue of the adequacy or inadequacy of gas capacity to the Aquidneck Island and Portsmouth areas, as it relates to the operation and potential impact of the proposed Navy CHP project taking any form of firm or interruptible service.

Response:

The Narragansett Electric Company d/b/a National Grid (the Company) is in the process of performing an electronic search for internal e-mails and presentations between and among Company employees that discuss the issue of the adequacy or inadequacy of gas capacity to the Aquidneck Island and Portsmouth areas, as it relates to the operation and potential impact of the proposed Navy CHP project taking any form of firm or interruptible service. The search is being conducted using the following criteria:

- Company Employees: Matt Foran, Stephen Caliri, Elizabeth Arangio, Mark Sevier, Gerald Ferris, Jeff Dunham, Thomas Dion, Fred Paine, Michael Mokey, Faye Brown, and Nancy Culliford
- Search Terms: Navy and CHP and "adequacy and "gas capacity" and ("aquidneck island" or Portsmouth or Middletown or Newport) and (firm or interruptible) and (operation or impact)
- Timeframe: September 16, 2016 to the present

Once the electronic search is complete, and the Company has reviewed any documents identified from the search, the Company will supplement this response with the results and provide copies of any responsive documents.

Supplemental Response:

Please see Attachment DIV 9-12 for copies of additional responsive documents identified after completing the document collection and review of the more expanded search terms agreed upon with the Rhode Island Division of Public Utilities and Carriers.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4755
In Re: 2018 Energy Efficiency Plan
Notification of an Energy Efficiency Incentive Greater Than \$3,000,000
Responses to the Division's Ninth Set of Data Requests
Issued on October 29, 2018

Attachment DIV 9-12

REDACTED

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4755
In Re: 2018 Energy Efficiency Plan
Notification of an Energy Efficiency Incentive Greater Than \$3,000,000
Responses to the Division's Ninth Set of Data Requests
Issued on October 29, 2018

Division 9-24 - Supplemental

Request:

Are there any internal emails or presentations between and among the Company employees that discuss the question of how much to offer the Navy or BQ Energy for the CHP incentive?

Response:

The Narragansett Electric Company d/b/a National Grid (the Company) is in the process of performing an electronic search for internal emails and presentations between and among the Company employees that discuss the question of how much to offer the Navy or BQ Energy, LLC (BQ) for the CHP incentive. The search is being conducted using the following criteria:

- Company Employees: Rachel Henschel, Gerald Ferris, Jeffrey Dunham, Fred Paine, and David Moreira
- Search Terms: (Navy or BQ) and (CHP or "combined and heat and power") and Incentive
- Timeframe: September 16, 2016 through May 31, 2018

The Company does not believe there are any emails or presentations responsive to this request. Once the electronic search is complete and the Company has reviewed any documents identified from the search, the Company will supplement this response with the results and will supplement the response to Data Request Division 9-25 with copies of any responsive documents.

Company employees did discuss internally the question of how much to offer for the CHP incentive. The Sales team, the Sales manager, and the CHP program manager discussed the incentive and determined it was appropriate because it was within the approved CHP incentive levels called for by the Energy Efficiency (EE) Annual Plan. Company employees considered that the CHP Incentive levels are approved by the Public Utilities Commission, publicly available, and were provided to the Navy, which set the customer expectations for the range of incentive levels available as part of their determination of the appropriate incentive to offer for the Navy CHP project.

As part of preliminary considerations, the Company determined that the Navy CHP project would qualify for an incentive of \$1000/kW for the 7MW unit under the CHP Incentive levels, and thus a \$7 million incentive. The Company communicated this preliminary determination to the Navy and BQ when discussing the development of the project for high level discussion

Division 9-24, page 2

purposes only. The Navy and BQ would have to prove their system met the CHP program rules to qualify for that published range of incentives.

Over the course of project development and through further discussions with the Navy and BQ, the Company determined that the Navy CHP project, the design for which had been modified to a 7.965 MW unit, would qualify for a \$1,125/kW incentive under the CHP Incentive levels, as described in the

Company's response to Data Request Division 2-9. Accordingly, the Navy CHP project qualified for an incentive up to \$8,721,000. Nevertheless, the Company team determining the incentive amount to offer decided to offer the \$7 million incentive originally discussed, plus an additional \$242,000 in performance payments. To make this decision, Company employees considered the high value of the energy efficiency savings that would flow from the proposed incentive. Specifically, the Company considered that, at the \$7 million dollar incentive level, the project would have an excellent incentive cost of 0.96 cents per lifetime kWh saved (\$7 million/723,115,140 lifetime kWh). The Company's planned incentive cost per lifetime kWh in 2018 is 4.0 cents. Accordingly, in determining the incentive value to offer to the Navy and BQ, the Company employees considered that the per-lifetime-kWh cost of the \$ 7 million incentive for the Navy CHP project represents significant value that will benefit all customers.

The Company approved the proposed incentive via a work management system called In Demand. Through that system, multiple levels of Company leadership, including manager, director, vice president, and senior vice president, approved the incentive. For this project, the In Demand system included access to the following supporting documentation for the individuals approving the incentive to review:

- Benefit Cost Analysis
- Minimum Requirements Document
- Technical Assistance Study
- Peer Review documentation
- The energy model
- The Heat Recovery Steam Generator cutsheet
- Cost reference document

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4755
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Supplemental Response:

Please see Attachment DIV 9-25 for copies of additional responsive documents identified after completing the document collection and review of the more expanded search terms agreed upon with the Rhode Island Division of Public Utilities and Carriers.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4755
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Attachment DIV 9-25

REDACTED

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4755
In Re: 2018 Energy Efficiency Plan
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Division 9-25 - Supplemental

Request:

If the answer to Division 9-24 above is yes, please provide copies of the emails and presentations.

Response:

Please see the Company's response to Data Request Division 9-24.

Supplemental Response:

Please see Attachment DIV 9-25 for copies of responsive documents identified after completing the document collection and review of the more expanded search terms agreed upon with the Rhode Island Division of Public Utilities and Carriers.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4755
In Re: 2018 Energy Efficiency Plan
Notification of an Energy Efficiency Incentive Greater Than \$3,000,000
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Attachment DIV 9-25

REDACTED