

August 16, 2018

VIA HAND DELIVERY AND ELECTRONIC MAIL

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

**RE: Docket 4770 – Application of The Narragansett Electric Company d/b/a National Grid for Approval of a Change in Electric and Gas Base Distribution Rates
Docket 4780 – The Narragansett Electric Company d/b/a National Grid
Proposed Power Sector Transformation Vision and Implementation Plan
Compliance Filing**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (the Company), enclosed is an original and nine (9) copies of a seven-volume set entitled “Compliance Filing.” This filing consists of the final, executed version of the Amended Settlement Agreement that the Company filed on August 10, 2018 in compliance with the Rhode Island Public Utilities Commission’s (PUC) rulings at its Open Meeting on August 3, 2018 in the above-referenced dockets, which includes the revenue requirement numbers and bill impacts, together with revised attachments – consisting of revised schedules, workpapers, calculations, tariff terms, and other documents. The Company also has updated Schedule A – List of Attachments with the book numbers where the attachments may be found. The enclosed Amended Settlement Agreement has been executed by all of the Settling Parties in these two dockets. The Company is providing the Excel versions of Compliance Attachments 1-12, 14, 16-18, 20, 21, 28, and 29 on a USB flash drive.

In addition to minor clean-up edits, the enclosed Amended Settlement Agreement incorporates the following revisions:

- Article II, Section C.13.c., Cyber Security and Information Systems (IS) Technology Modernization Programs Deferral: slightly increased the cap on the deferral to reflect the increase to the three year revenue requirement presented in the original Settlement resulting from the Company’s revised IS plan submitted in discovery (p. 45); and
- Article II, Section C.22.f., Low Income Reporting: modified to reflect more accurately the PUC’s ruling that the Company, the Division of Public Utilities and Carriers, and the George Wiley Center will work together with PUC Staff to develop reporting requirements for existing and new electric and gas low-income rates, programs, and discounts (p. 82).

The Company has updated the attachments to reflect (a) changes to the original Settlement gas and electric revenue requirements as a result of the Company's July 27, 2018 issuance of \$350 million of long-term debt as contemplated in the Amended Settlement Agreement, and (b) the inclusion in rate base of capital additions that are currently being recovered through the Electric and Gas Infrastructure, Safety and Reliability (ISR) plans.

Pursuant to Article II, Sections C.7 and C.11 of the Amended Settlement Agreement, following the PUC's ruling on the Amended Settlement Agreement on August 24, 2018, the Company will submit compliance tariffs, which will reflect all changes that the PUC approves as a result of the Amended Settlement Agreement, as well as the final Attachment 12 to update the Efficiency Program (EEP) Charge (Docket No. 4654) and factors associated with various electric reconciling mechanisms that operate outside of base distribution rates, and the final Attachment 18 to update the Gas Cost Recovery charge (Docket No. 4719), the Distribution Adjustment Charge (Docket No. 4708), and the gas EEP Charges (Docket No. 4654), all of which will go into effect for usage on and after September 1, 2018, the same date as all other rate changes that the PUC approves. The Company will be providing revised Attachments 12 and 18 prior to August 24, 2018 for informational purposes to provide the PUC with sufficient time to review the updates due to the limited time between August 24, 2018 and September 1, 2018, the effective date of all rate changes.

Debt Issuance Impacts on Revenue Requirements

The Company issued the debt on July 27, 2018 at a rate of 3.919% for a term of 30 years. The effect of this debt issuance reduced the weighted average cost of capital to 6.97% and 7.15% for electric and gas, respectively, thus reducing the electric and gas revenue requirements by \$0 and \$0.3 million, respectively, from the revenue requirements contained in the original Settlement. The capital structure reflected in the Amended Settlement Agreement has been revised to reflect the \$350 million long-term debt issuance.

As a result, the compliance electric revenue requirement is \$293.2 million, reflecting a rate base of \$729.5 million and resulting in a total base revenue increase of \$14.1 million for Rate Year 1, \$10.5 million for Rate Year 2, and \$4.3 million for Rate Year 3. The compliance gas revenue requirement is \$218.6 million, reflecting a rate base of \$760.6 million and resulting in a total base revenue increase of \$5.8 million for Rate Year 1, \$7.6 million for Rate Year 2, and \$4.0 million for Rate Year 3.

The compliance revenue requirements, the newly approved uncollectible expense rates, and the capital-related ISR plan adjustments have been reflected in the electric and gas rate design attachments as follows:

Electric Compliance Rates

- All base distribution rates, including customer, demand (per kW), energy (per kWh) rates, and street lighting charges have been changed to reflect the compliance revenue requirement of \$293.2 million.
- The ISR CapEx Factors implemented on April 1, 2018 have been set to \$0 to reflect the inclusion in base distribution rates of the revenue requirement associated with capital investment that is currently being recovered through these factors. The ISR O&M Factors implemented on April 1, 2018 and the ISR CapEx and O&M reconciling factors, resulting from the reconciliation of actual billed revenue to the revenue requirement on actual ISR capital investment through Fiscal Year 2017 and implemented October 1, 2017, remain in effect.
- Consistent with the impact of the results of a general rate case and the PUC's ruling, Narragansett Electric shall implement changes to its other factors and charges associated with its various reconciling mechanisms, effective September 1, 2018, to reflect the updated net write off percentage and consolidation of Rate G-32 and Rate G-62. Narragansett Electric will update its EEP Charge and factors associated with its various reconciling mechanisms in the revised Attachment 12 that it will submit for informational purposes following this Compliance Filing to reflect the currently-effective EEP Charge and factors adjusted to include the uncollectible rate of 1.30%, and the updated factors resulting from the approved consolidation of Rate G-32 and Rate G-62, such that these updated factors will be effective for usage on and after September 1, 2018. Narragansett Electric will submit the final revised Attachment 12 as part of its tariff compliance filing.

Gas Compliance Rates

- All base distribution rates, including customer, demand (per therm of maximum average daily quantity), and energy (per therm) rates, have been changed to reflect the compliance revenue requirement of \$218.6 million.
- The ISR CapEx Factors implemented on April 1, 2018 have been set to \$0 to reflect the inclusion in base distribution rates of the revenue requirement associated with capital investment that is currently being recovered through these factors. The ISR reconciling factors, resulting from the reconciliation of actual billed revenue to the revenue requirement on actual ISR capital investment through fiscal year 2017, implemented November 1, 2017, remain in effect.

Luly E. Massaro, Commission Clerk
Docket Nos. 4770/4780 – Compliance Filing
August 16, 2018
Page 4 of 4

- Consistent with the impact of the results of a general rate case and the PUC's ruling, Narragansett Gas will update the EEP Charges and the Gas Cost Recovery (GCR) Factors in the revised Attachment 18 that it will submit for informational purposes following this Compliance Filing to reflect the currently-effective EEP Charges and GCR Factors adjusted to include the uncollectible rate of 1.91%. Narragansett Gas will submit the final revised Attachment 18 as part of its tariff compliance filing.

Thank you very much for your time and attention to this matter. If you have any questions, please contact Celia O'Brien at 781-907-2153 or Jennifer Brooks Hutchinson at 401-784-7288.

Very truly yours,



Celia B. O'Brien



Jennifer Brooks Hutchinson

Enclosures

cc: Docket 4770 Service List
Docket 4780 Service List
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Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically transmitted and/or hand delivered to the individuals listed below.

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Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically transmitted and/or hand delivered to the individuals listed below.

Najat Coye

August 16, 2018
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**Docket No. 4780 - National Grid – Power Sector Transformation Filing
Service list updated 6/7/2018**

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