

June 6, 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
Settlement Agreement**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (the Company), we are pleased to present a comprehensive settlement of the contested issues in the above-referenced dockets for review and approval by the Rhode Island Public Utilities Commission (PUC). The Settlement Agreement presented herewith is the product of extensive investigation, review, and discussion among the Company and the following parties representing a wide range of interests for Rhode Island: Rhode Island Division of Public Utilities and Carriers; Rhode Island Office of Energy Resources; U.S. Department of the Navy and Federal Executive Agencies; Conservation Law Foundation; Energy Consumers Alliance of New England, Inc. d/b/a People's Power and Light (PPL)¹; Sierra Club (SC); Natural Resources Defense Council (NRDC)²; Acadia Center; Northeast Clean Energy Council; George Wiley Center; New Energy Rhode Island; Wal-Mart Stores East, LP and Sam's East, Inc.; Direct Energy Business, LLC, Direct Energy Services, LLC, and Direct Energy Solar; ChargePoint, Inc.; and National Railroad Passenger Corporation (Amtrak).³

The Settlement Agreement establishes a Multi-Year Rate Plan (Rate Plan) with a three-year term commencing September 1, 2018. The Settlement Agreement is crafted based on the deliberation and consensus of a wide range of stakeholder interests working to address the long-term policy goals of the State of Rhode Island, and serving the best interest of the Company's electric and gas customers. In addition to setting base distribution rates, the Settlement Agreement institutes a Power Sector Transformation (PST) Vision and Implementation Plan (PST Plan) within the Rate Plan to modernize the electric distribution system and enable technologies that will reduce greenhouse gas emissions and help to control costs for customers.

¹ PPL intervened in Docket No. 4770 individually.

² SC and NRDC intervened in Docket No. 4780 jointly with PPL.

³ Amtrak filed a motion to intervene out of time, to which none of the other Settling Parties objected; however, until the PUC rules on Amtrak's motion, Amtrak is not yet a party to this proceeding.

As noted above, the Settlement Agreement is designed to resolve all outstanding issues among the parties in Docket No. 4770 and Docket No. 4780. As a comprehensive resolution of the issues in these two dockets, the Settlement Agreement is carefully constructed to balance competing interests, which are: (1) the interests of customers in having access to reasonable cost gas and electric service, on a safe and reliable basis; (2) the interests of the Company in recovering the actual costs required to provide gas and electric service on a safe and reliable basis to customers; and (3) the broader interests of Rhode Island in securing an energy future that provides for gas and electric service on a safe and reliable basis, with a strong commitment to the reduction of greenhouse gas emissions.

Background

On November 27, 2017, in Docket No. 4770, the Company filed with the PUC its Application for Approval of a Change in Electric and Gas Base Distribution Rates Pursuant to R.I. Gen. Laws §§ 39-3-10 and 39-3-11 (the Application) proposing a one-year rate case (with two additional years of data for informational purposes) and the Company's PST Plan.

The Company's initial proposal encompassed two principal requests, which were for the PUC to: (1) set new base distribution rates effective September 1, 2018 based on revenue requirements for Narragansett Electric and Narragansett Gas calculated through the twelve-month period ending August 31, 2019 (the Rate Year); and (2) institute a new mechanism to recover costs associated with foundational grid modernization investments to the Company's electric distribution system, as described in the PST Plan.

With regard to the first request, the Company's initial filing demonstrated an existing revenue deficiency of approximately \$41.3 million for Narragansett Electric and \$30.3 million for Narragansett Gas to be addressed through a base distribution rate increase effective September 1, 2018, subject to later adjustments filed on March 2, 2018 and May 9, 2018 to account for the federal Tax Cuts and Jobs Act, ultimately resulting in a revenue deficiency of approximately \$18.9 for Narragansett Electric and \$15.4 for Narragansett Gas.

With respect to the second request, in December 2017, the PUC separated the PST Plan from the Application and created Docket No. 4780 to assess the PST Plan. After the PUC initiated Docket No. 4780, the Company revised its request related to the PST Plan and requested: (1) approval of the Company's proposed PST Provision, which included the methodology for the recovery of PST Plan costs on a fully reconciling basis; (2) approval of its proposed annual PST Plan process, whereby the Company would submit annual PST Plans for the PUC and Division to review and approve PST investments; (3) approval of \$2 million in Rate Year funding to begin design work on the Company's proposed Advanced Metering Functionality (AMF) investments; (4) approval of new performance incentive mechanisms; and (5) findings by the PUC on the categories of proposed PST investments outlined in the Company's PST Plan filing.

Multi-Year Rate Plan

Under the Rate Plan described in the Settlement Agreement, base distribution rates would be set annually over a three-year period, providing an aggregate base revenue increase of approximately \$31.3 million for Narragansett Electric and approximately \$16.8 million for Narragansett Gas, including cost recovery for authorized PST initiatives. Importantly, these agreed upon amounts represent a significant reduction from the Company's filed rate request.

Specifically, the Settlement Agreement provides for the changes in base distribution rate annual revenue requirements for Narragansett Electric and Narragansett Gas for each of the Rate Years of the Rate Plan as shown on Attachment A, Page 1 to provide funding for the Company's electric and gas operations and PST Plan initiatives, including: (1) Grid Modernization foundational investments, consisting of Geographic Information System (GIS) Investments, System Data Portal, Distribution Supervisory Control and Data Acquisition Distribution (DSCADA), and other Grid Modernization investments relating to Information Services and cybersecurity (collectively, Grid Modernization Foundational Investments); (2) Grid Modernization Plan; (3) an updated AMF Business Case; (4) an Electric Transportation program; (5) an Electric Heat program; (6) a Strategic Electrification Marketing Fund; (7) an Electric Storage program; and (8) revised performance incentive mechanisms focused on areas that advance state energy policy goals and drive benefits for Rhode Island customers. The Settlement Agreement also provides for a capital efficiency mechanism associated with capital investments.

Under the Settlement, for Narragansett Electric, the proposed rates would increase the Company's operating revenue by approximately \$31.3 million over the three years of the Rate Plan, with an increase of \$19.4 million in Rate Year 1; \$8.0 million in Rate Year 2; and \$3.9 million in Rate Year 3, resulting in varying impacts on individual customer bills. The monthly bill impacts for each of the three years of the Rate Plan will vary as shown on Attachment A, Page 2.

Under the Settlement, for Narragansett Gas, the proposed rates will increase the Company's annual operating revenue by approximately \$16.8 million with an increase of \$6.9 million in Rate Year 1; \$6.0 million, or 2.7 percent, in Rate Year 2; and \$3.9 million in Rate Year 3,⁴ resulting in varying impacts on individual customer bills. The annual bill impact for each of the three years of the Rate Plan will vary as shown on Attachment A, Page 3.

With respect to the PST Plan, the Settlement Agreement establishes a path forward for PST, without the creation of a new separate ratemaking mechanism operating outside of base distribution rates. Instead, the Settlement Agreement creates a three-year ratemaking plan to recover base revenue requirements for Narragansett Electric and Narragansett Gas, including the costs of authorized PST initiatives, with rate changes occurring in Rate Year 1, Rate Year 2, and Rate Year 3. The Settlement Agreement addresses cost allocation and rate design issues, and

⁴ Rate Year 1 is the period September 1, 2018 through August 31, 2019. Rate Year 2 is the period September 1, 2019 through August 31, 2020, and Rate Year 3 is the period September 1, 2020 through August 31, 2021.

encompasses a series of customer protections and sets provisions for rate changes at the end of the three-year term of the Rate Plan.

If approved by the PUC, the Rate Plan would allow a reasonable and timely recovery path for the Company's reasonably and prudently incurred costs of operation, including PST-related investments, while balancing the interests of customers in terms of instituting customer protections, smoothing bill impacts, and enabling the achievement of overarching policy goals for safe and reliable service.

The Company appreciates the opportunity to demonstrate its commitment to its Rhode Island customers in terms of achieving a level of rate stability over time. The Rate Plan accomplishes this objective, and is carefully and purposely designed to address the fact that the business environment in which the Company is currently operating is highly dynamic, with radical changes occurring in many facets of the gas and electric distribution business. Changes in the Company's operating environment have an inevitable impact on the Company's cost structure and detract from the Company's ability to achieve rate stability for customers. The Settlement Agreement encompasses a creative, balanced approach to serve the different interests factoring into the operation of the distribution system, including the need to recover reasonable and prudent operating costs, while maintaining a level of rate stability for customers and achieving long-term policy goals important to the State of Rhode Island.

The Company acknowledges that the enclosed Settlement Agreement is complex. In the interest of providing a complete filing for review by the PUC, this filing includes the text of the agreement among the Settling Parties, and also more granular detail in support of the terms of the agreement in the form of 30 attachments. These attachments – consisting of schedules, workpapers, calculations, tariff terms, and other documents – are listed in Schedule A to the Settlement Agreement. The distribution revenue requirements that result in the rate increase calculations have undergone significant review by the Division. To meet the time schedule of this proceeding, some attachments were received by the Settling Parties for the first time shortly prior to filing the Settlement Agreement with the PUC. For that reason, it is possible that some supporting attachments to the Settlement Agreement may need to be amended prior to the commencement of the hearings, to the extent any inadvertent errors or other discrepancies (clerical or otherwise) are discovered, following more thorough review this week by the Settling Parties. Although the Company does not anticipate any material changes to the Settlement Agreement resulting from this post-filing review, it is important to provide the Division and the Settling Parties the opportunity to review these attachments and address any inaccuracies or discrepancies discovered post-filing.

Also enclosed with this Settlement Agreement is a Docket 4770 and 4780 Issues Matrix listing the issues in the combined docket, the agreement/resolution of those issues among the Settling Parties, and rationale for such agreement/resolution. We will also be filing with the PUC a Joint Motion for Approval of the Settlement Agreement and to Consolidate Docket No. 4770 and Docket No. 4780 under separate cover. To support the PUC's review and approval of the Settlement Agreement, the Company also is submitting supplemental settlement testimony in

Luly E. Massaro, Commission Clerk
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support of the Settlement Agreement on this date under separate cover. The Company is prepared to make its subject matter experts available to the PUC to provide additional detail, as needed, to the PUC.

Based on this information, and on the merits of the consensus-based Rate Plan encompassed in the Settlement Agreement, the Company respectfully requests that the PUC approve the Settlement Agreement in its entirety, and make findings that the balancing of interests reflected in the Settlement Agreement properly allows a path for recovery of reasonable and prudent utility costs, and establishes a stable ratemaking framework to further the long-term policy objectives of Rhode Island, without imposing overly burdensome bill impacts on Rhode Island customers.

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
Macky McCleary, Division
Jonathan Schrag, Division
John Bell, Division
Al Mancini, Division
Ron Gerwatowski, Division
Leo Wold, Esq.

Attachment A

Multi-Year Rate Plan
Changes in Revenue Requirements for Three Rate Years

The Settlement Agreement provides for the following changes in base distribution rate annual revenue requirements for Narragansett Electric and Narragansett Gas for each of the Rate Years of the Rate Plan (i.e., Rate Year 1, Rate Year 2, and Rate Year 3) to provide funding for the Company’s electric and gas operations and PST Plan initiatives as follows:

	<u>Narragansett Electric (\$M)</u>	<u>Narragansett Gas (\$M)</u>	<u>Total (\$M)</u>
<u>Base Case</u>			
Rate Year 1	\$14.1	\$5.5	\$19.6
Rate Year 2	\$3.9	\$5.5	\$9.4
Rate Year 3	<u>\$2.0</u>	<u>\$3.3</u>	<u>\$5.3</u>
Subtotal – Base Case	\$20.0	\$14.3	\$34.3
<u>PST</u>			
Rate Year 1	\$5.3	\$1.4	\$6.7
Rate Year 2	\$4.1	\$0.5	\$4.6
Rate Year 3	<u>\$1.9</u>	<u>\$0.6</u>	<u>\$2.5</u>
Subtotal – PST	\$11.3	\$2.5	\$13.8
<u>Base Case plus PST</u>			
Rate Year 1	\$19.4	\$6.9	\$26.3
Rate Year 2	\$8.0	\$6.0	\$14.0
Rate Year 3	<u>\$3.9</u>	<u>\$3.9</u>	<u>\$7.8</u>
TOTAL	<u>\$31.3</u>	<u>\$16.8</u>	<u>\$48.1</u>

Attachment A

Narragansett Electric – Bill Impacts
Residential and Low Income Residential

During the term of the Rate Plan, the monthly bill impact on an electric residential customer and residential low income customer, each using 500 kWh per month, is shown below:

	Residential		Low Income Residential	
	Increase	Percent	Increase (Decrease)	Percent
RY1	\$4.27	4.1%	(\$14.60)	(15.7%)
RY2 v. RY1	\$0.80	0.7%	\$2.16	2.8%
RY3 v. RY2	\$0.39	0.4%	\$1.85	2.3%

Narragansett Electric – Bill Impacts
Commercial and Industrial

During the term of the Rate Plan, the monthly bill impact on electric commercial and industrial customers will range as shown below:

	Commercial & Industrial Bill Increases	
	From	To
RY1	1.4%	5.0%
RY2 v. RY1	0.1%	0.8%
RY3 v. RY2	0.1%	0.4%

Attachment A

Narragansett Gas – Bill Impacts
Residential Heating and Low Income Residential Heating

During the term of the Rate Plan, the annual bill impact on a residential gas heating customer and residential low income gas heating customer, each consuming 845 therms annually, is shown below:

	Residential Heating		Low Income Residential Heating	
	Increase (Decrease)	Percent	Increase (Decrease)	Percent
RY1	(\$2.01)	(0.2%)	(\$260.73)	(22.3%)
RY2 v. RY1	\$18.13	1.5%	\$13.60	1.5%
RY3 v. RY2	\$10.91	0.9%	\$8.18	0.9%

Narragansett Gas – Bill Impacts
Commercial and Industrial Heating


During the term of the Rate Plan, the annual bill impact on gas commercial and industrial customers will range as shown below:

	Commercial & Industrial Bill Increases	
	From	To
RY1	(7.2%)	2.1%
RY2 v. RY1	0.5%	1.5%
RY3 v. RY2	0.3%	0.8%

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

June 6, 2018
Date

Docket No. 4770 - National Grid – Rate Application
Service list updated 5/9/2018

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Certificate of Service

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Joanne M. Scanlon

June 6, 2018
Date

**Docket No. 4780 - National Grid – Power Sector Transformation Filing
Service list updated 5/9/2018**

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