

**RHODE ISLAND  
PUBLIC UTILITY COMMISSION**

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**The Narragansett Electric Co. d/b/a National Grid –  
Application for Approval of a Change in Electric and  
Gas Base Distribution Rates  
(filed on November 27, 2017)**

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Docket 4770

**NEW ENERGY RHODE ISLAND  
TWENTY-SECOND SET OF DATA REQUESTS**

**(NERI 22-1 through NERI 22-9)**

1. Unless otherwise specified below, “the Company” and “Narragansett” refers to the Narragansett Electric Co. d/b/a/ National Grid.
2. Where work papers are requested, please provide work papers in Excel format.

**The Narragansett Electric Co. d/b/a National Grid—Application for Approval of a Change in Electric and Gas Base Distribution Rates (filed on November 27, 2017)**

Docket 4770

**Request for Information**

**Requesting Party:** New Energy Rhode Island (NERI)  
**To:** National Grid  
**Request No.:** NERI 22-1 through 22-9  
**Date of Request:** 3.16.2018  
**Response Due Date:** Rolling  
**Subject/Panel:** Book 15—Pricing Panel—Leary, McCabe

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22-1. Reference pp. 16-18. Please explain the reasoning behind the Company's proposal to begin imposing the full residential customer charge on income-eligible customers.

22-2. Reference pp. 20-21.

- a. Please identify the bill impacts of the Company's proposal to eliminate the LIHEAP matching grant program on the average income-eligible customer.
- b. Please explain the impact on Rate 13 customers of the Company's proposal to eliminate the Low Income Weatherization program.

22-3. Reference p. 21.

- a. Electric Customers
  - i. Please identify and explain the bill impact of a 15 percent fixed total bill discount compared to the current income-eligible rate for the following electric customer classes:
    1. Average energy user, income-eligible customer
    2. Low energy user, income-eligible customer
    3. High energy user, income-eligible customer
  - ii. Please identify and explain the combined bill impact on income-eligible electric customers in the classes referenced in 3a of imposing the full residential customer charge and the 15 percent fixed total bill discount compared to the current low income program.
- b. Gas Customers
  - i. Please identify and explain the bill impact of a 15 percent fixed total bill discount compared to the current income-eligible rates for the following customer classes:
    1. Average energy user, income-eligible customer

2. Low energy user, income-eligible customer

3. High energy user, income-eligible customer

22-4. Reference p. 21. Please describe why the Company believes the discount level should be the same for both electric and gas low income customers.

22-5. Reference pp. 21-22 and p. 22 tables.

a. Electric customers:

i. Please provide the annual discount for an average income-eligible electric customer under each of the percent discount scenarios provided in the tables on page 22.

ii. Please provide the average annual electricity bill for income-eligible electric customers for the years 2012, 2013, 2014, 2015, 2016, and 2017.

iii. Please provide the average annual electricity usage for income-eligible electric customers for the years 2012, 2013, 2014, 2015, 2016, and 2017

b. Gas customers:

i. Please provide the annual discount for an average income-eligible gas customer under each of the percent discount scenarios provided in the tables on page 22.

ii. Please provide the average annual gas bill for income-eligible gas customers for the years 2012, 2013, 2014, 2015, 2016, and 2017.

iii. Please provide the average annual gas usage for income-eligible gas customers on the Rate A-60 for the years 2012, 2013, 2014, 2015, 2016, and 2017.

c. Please explain the reasoning behind the selection of a 15% discount level? In answering this question, please include the following:

i. All considerations taken into account in setting the discount at 15%, as opposed to a higher or lower fixed discount.

ii. Whether the impact of imposing the customer charge on income-eligible customers was taken into account in setting the proposed discount level.

iii. Whether the Company considered the impact of the change from the current program to the fixed 15 percent discount on arrearages, collections, and disconnection rates? If so, what are those considerations and anticipated impacts? If not, why not?

22-6. Reference p. 22.

a. How have the number of low-income customers served by Narragansett changed since 2012?

b. Does the proposed spending level reflect this change?

c. How has electricity usage changed per low-income customer since 2012?

d. Does the proposed spending level reflect this change?

- 22-7. Reference p. 22 and schedule PP-2. Please provide a bill frequency analysis for low-income customers and for non-low-income customers.
- a. Please provide the data broken down by 50 kWh/month increments, from 0-50 kWh/month up to 1,500 kWh/month
  - b. Please include and identify the total bills and separate charges, and also show values for all residential customers as a whole.
- 22-8. Reference p. 26.
- a. Please explain the reasoning and methodology for the \$8.50 customer charge on Rate A-60 customers.
  - b. Please identify the impact of the \$8.50 customer charge on the following Rate A-60 customers:
    - i. Average energy use customer
    - ii. Low energy use customer
    - iii. High energy use customer
  - c. How does the \$8.50 customer charge impact the 15 percent fixed total bill discount for Rate A-60 customers?
  - d. Please explain how the \$8.50 customer charge will affect Rate A-60 customer's energy usage.
  - e. Please explain how the phasing-in of the fixed charge will effectively mitigate the bill impact on a Rate A-60 customer.
- 22-9. Please provide estimates of elasticity of demand for residential customers and low-income customers.
- a. Please further identify how the following two program changes will affect elasticity of demand for low-income customers:
    - i. 15 percent fixed total bill discount
    - ii. Fixed customer charge of \$8.45 for Rate A-60 customers

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Docket 4770

**NEW ENERGY RHODE ISLAND  
TWENTY-THIRD SET OF DATA REQUESTS**

**(NERI 23-1)**

1. Unless otherwise specified below, “the Company” and “Narragansett” refers to the Narragansett Electric Co. d/b/a/ National Grid.
2. Where work papers are requested, please provide work papers in Excel format.

**The Narragansett Electric Co. d/b/a National Grid—Application for Approval of a Change  
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Docket 4770

**Request for Information**

**Requesting Party:** New Energy Rhode Island (NERI)  
**To:** National Grid  
**Request No.:** NERI 23-1  
**Date of Request:** 3.16.2018  
**Response Due Date:** Rolling  
**Subject/Panel:** Book 3—Gredder

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- 23-1. Reference p. 24, ll. 1-18. Do the Company's econometric forecast of streetlighting deliveries or econometric forecast of streetlighting customer counts take into consideration the passage and impact of the Municipal Streetlight Investment Act (Rhode Island General Laws 39-30)? What is the impact of municipal acquisition and management of streetlights on the Company's conclusions, including widespread conversion to LEDs?

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Docket 4770

**NEW ENERGY RHODE ISLAND  
TWENTY-FOURTH SET OF DATA REQUESTS**

**(NERI 24-1)**

1. Unless otherwise specified below, “the Company” and “Narragansett” refers to the Narragansett Electric Co. d/b/a/ National Grid.
2. Where work papers are requested, please provide work papers in Excel format.

**The Narragansett Electric Co. d/b/a National Grid—Application for Approval of a Change  
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Docket 4770

**Request for Information**

**Requesting Party:** New Energy Rhode Island (NERI)  
**To:** National Grid  
**Request No.:** NERI 24-1  
**Date of Request:** 3.16.2018  
**Response Due Date:** Rolling  
**Subject/Panel:** Book 4—Rosario, Jr., Amaral III, and Constable

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- 24-1. Please reference p. 60, ll. 6-8. Please describe how the Company derived the 54 percent expected success rate, including any reports relied upon.

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Docket 4770

**NEW ENERGY RHODE ISLAND  
TWENTY-FIFTH SET OF DATA REQUESTS**

**(NERI 25-1)**

1. Unless otherwise specified below, “the Company” and “Narragansett” refers to the Narragansett Electric Co. d/b/a/ National Grid.
2. Where work papers are requested, please provide work papers in Excel format.

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Docket 4770

**NEW ENERGY RHODE ISLAND  
TWENTY-FIFTH SET OF DATA REQUESTS**

**(NERI 25-1)**

1. Unless otherwise specified below, “the Company” and “Narragansett” refers to the Narragansett Electric Co. d/b/a/ National Grid.
2. Where work papers are requested, please provide work papers in Excel format.

**The Narragansett Electric Co. d/b/a National Grid—Application for Approval of a Change  
in Electric and Gas Base Distribution Rates (filed on November 27, 2017)**

Docket 4770

**Request for Information**

**Requesting Party:** New Energy Rhode Island (NERI)  
**To:** National Grid  
**Request No.:** NERI 25-1  
**Date of Request:** 3.18.2018  
**Response Due Date:** ROLLING  
**Subject/Panel:** Revenue Requirement / Tax

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- 25-1. Reference the Company's response to PUC 4-1. In addition to the tables provided, please provide a narrative description of each adjustment resulting from the changes in the tax law, and why it was made. Please cite the accounting principle or other authority for each of the adjustment decisions reflected in the tables, which alternative adjustment methods were rejected, and why the alternative adjustment methods were rejected.

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Docket 4770

**NEW ENERGY RHODE ISLAND  
TWENTY-SIXTH SET OF DATA REQUESTS**

**(NERI 26-1)**

1. Unless otherwise specified below, “the Company” and “Narragansett” refers to the Narragansett Electric Co. d/b/a/ National Grid.
2. Where work papers are requested, please provide work papers in Excel format.

**The Narragansett Electric Co. d/b/a National Grid—Application for Approval of a Change  
in Electric and Gas Base Distribution Rates (filed on November 27, 2017)**

Docket 4770

**Request for Information**

**Requesting Party:** New Energy Rhode Island (NERI)  
**To:** National Grid  
**Request No.:** NERI 26-1  
**Date of Request:** 3.16.20918  
**Response Due Date:** Rolling  
**Subject/Panel:** Street Lighting

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- 26-1. Reference the Company's response to PUC 3-40. Does the response address poles purchased and owned by a municipality? If not, please describe how the Company bills small cells or other minor attachments (*e.g.*, weather or traffic monitors, controls, cameras, etc.) that are mounted on municipal customer-owned poles.

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Docket 4770

**NEW ENERGY RHODE ISLAND  
TWENTY-SEVENTH SET OF DATA REQUESTS**

**(NERI 27-1 through NERI 27-15)**

1. Unless otherwise specified below, “the Company” and “Narragansett” refers to the Narragansett Electric Co. d/b/a/ National Grid.
2. Where work papers are requested, please provide work papers in Excel format.

**The Narragansett Electric Co. d/b/a National Grid's Proposed  
Power Sector Transformation (PST) Vision and Implementation Plan**

Docket 4770

**Request for Information**

**Requesting Party:** New Energy Rhode Island (NERI)  
**To:** National Grid  
**Request No.:** NERI 27-1 through 27-15  
**Date of Request:** 3.16.2018  
**Response Due Date:** Rolling  
**Subject/Panel:** Docket 4800 Joint Pre-Filed Testimony of the Power Sector  
Transformation Panel

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- 27-1. Several of the Company's proposals in this proceeding propose Company ownership of facilities, projects, and infrastructure, as opposed to third-party ownership. Please explain in detail, for each PST initiative, the Company's approach and justification for taking an ownership approach.
- 27-2. Reference p. 6, lines 16-18. How does the Company reconcile its stated commitment to (a) customer choice, knowledge, and control; (b) distributed energy resources that are commonplace and accessible; and (3) efficiency as an affordable everyday goal for customers with its proposal to substantially increase fixed customer charges for residential customers, including low-income customers?
- 27-3. Reference p. 7, lines 4 to 11, where the Company states that it has adopted four guiding principles that underlie its vision: (a) Empower all customers by ensuring choice and control over their energy needs; (b) Cultivate an efficient and resilient grid that can adapt to the evolving grid necessity of two-way power flows, and responsive customer driven demand; (c) Support the State of Rhode Island in achieving its clean energy objectives including an 80 percent reduction in greenhouse gas (GHG) emissions by 2050; (d) Maximize the effectiveness of performance incentives in driving these important outcomes for Rhode Island and its citizens.
- a. How does the Company reconcile its stated principles relating to customer empowerment, efficiency, and achievement of clean energy objectives with its proposals to increase fixed customer charges?
- 27-4. Reference p. 11, lines 1-23. Please specifically describe and reference aspects of the rate filing in Docket 4770, and related to proposals in this proceeding, that are designed to:
- a. ensure safe, reliable, affordable, and environmentally responsible electricity service today and in the future;
- b. promote economic efficiency over the short and long term;
- c. provide efficient price signals that reflect long-run marginal cost;

- d. identify future rates and rate structures that appropriately address “externalities” that are not adequately counted in current rate structures;
- e. empower consumers to manage their costs;
- f. enable a fair opportunity for utility cost recovery of prudently incurred costs and revenue stability;
- g. ensure that all parties should provide fair compensation for value and services received and should receive fair compensation for value and benefits delivered;
- h. constitute a rate design that is transparent and understandable to all customers;
- i. ensure that any changes in rate structures are be implemented with due consideration to the principle of gradualism in order to allow ample time for customers (including DER customers) to understand new rates and to lessen immediate bill impacts;
- j. provide opportunities to reduce energy burden, and address low income and vulnerable customers’ needs;
- k. ensure consistency with policy goals (e.g., environmental, climate (Resilient Rhode Island Act), energy diversity, competition, innovation, power/data security, least cost procurement, etc.); and
- l. evaluate rate structures based on whether they encourage or discourage appropriate investments that enable the evolution of the future energy system.

27-5. Reference p. 13, line 6 through p. 14, line 17.

- a. Please provide a specific description of every PST-related cost for which the Company will seek recovery through a per kWh factor, a per customer factor, or a combination of the two.
- b. Please explain why the method of recovery was selected for each type of cost.
- c. Please provide citations to authorities or approved methods supporting the classification decision for each type of cost.
- d. Please provide, in Excel format, schedules for all such costs, how they will be collected, and the impacts on customers, but class and bill frequency.
- e. Please explain each use of terms such as “gradually,” “noticeable [cost shift],” “fair,” “undue burden,” “transparent,” and “value” as used in the cited testimony.
- f. Please provide all quantitative analysis associated with the use of these terms in the testimony.

27-6. Reference p. 19, lines 4-7. Please detail the ways in which National Grid proposals in New York and Massachusetts are consistent with those in this proceeding. Please detail the ways in which National Grid proposals in New York and Massachusetts are *not* consistent with those in this proceeding.

- 27-7. Reference p. 20, lines 1-4. Please confirm whether the National Grid takes the position that business risks and costs are reduced by coordinating and replicating technology deployment approaches across multiple jurisdictions.
- 27-8. Reference p. 22, Table 2-1. Please define the term “advance Docket 4600 goals” as used in the table and accompanying testimony. Does “advancement” mean an improvement over current conditions? Does “advancement” means an improvement over a business as usual approach?
- 27-9. Reference p. 25-26. Please specifically detail all differences between the Company’s proposed BCA and the BCA framework developed in Docket 4600.
- 27-10. Reference p. 25-26. Please explain why the Company developed and relied upon a BCA framework that includes confidential information or methods that cannot be publicly shared. If confidentiality was a condition sought for by contractor(s), please explain why the Company accepted this condition.
- 27-11. Reference p. 29, lines 1-4.
- a. Please define how the term “high penetrations of DER” are used in the Company’s PST proposal.
  - b. Please indicate numerically how much DER penetration constitutes “high” penetration such that the proposed DER-enabling investments are required.
  - c. Please indicate numerically how much DER penetration constitutes “high” penetration such that the proposed DER-enabling investments are beneficial in reducing costs of DER integration, and to what degree such costs are reduced.
  - d. Please indicate how many feeders the Company maintains in its service territory, and how many of these feeders currently meet the definition for high penetration of DER.
  - e. Please indicate what the Company predicts for the timeline over which current feeders that do not have high penetrations of DER interconnected will become high DER feeders.
  - f. Please provide data to support these responses.
- 27-12. Reference p. 29, lines 13-14. Please explain in detail what is meant by the phrase that describes certain PST investments and costs as representing “a combination of capital and O&M expenditures that do not fit well within the requirements and/or restrictions of existing recovery mechanisms.” Why do the proposed investments not fit well?
- 27-13. Reference p. 30, lines 13-15. Please provide a consolidated Gantt chart or similar consolidated table of timelines for proposed PST projects, investments, and spending over time.
- 27-14. Reference p. 31, line 11. Please detail all elements considered in the “least cost” analysis, including a description of the methodology used to identify and quantify costs.
- 27-15. Reference p. 31, lines 14-18. Please describe how the “needs of the system” are reflected in specific performance metrics associated with proposed PST projects, investments, and spending over time.