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March 22, 2018

Ms. Luly Massaro  
Rhode Island Public Utilities Commission  
89 Jefferson Blvd.  
Warwick, RI 02888

Re: Docket No. 4770 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)

Dear Luly,

I have enclosed the original and four copies of the following:

- New Energy Rhode Island Twenty-Eighth Set of Data Requests.
- New Energy Rhode Island Twenty-Ninth Set of Data Requests.

Thank you for your help with this filing.

Sincerely,

  
Seth Handy

Enc.

Certificate of Service by Electronic Mail or Otherwise Requested

I hereby certify that a copy of the cover letter and accompanying materials were served on the service list by electronic mail or otherwise as requested.

  
Seth H. Handy

March 22, 2018  
Date

**RHODE ISLAND  
PUBLIC UTILITIES 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-EIGHTH SET OF DATA REQUESTS**

**(NERI 28-1 through NERI 28-21)**

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 28-1 through 28-21  
**Date of Request:** 3.22.18  
**Response Due Date:** Rolling  
**Subject/Panel:** Street Lights; Book 12 -- Gorman

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- 28-1. Does the Company currently rely, or has the Company ever relied, on customer-owned metering devices for billing purposes for customers taking service under the S-05 rate (RIPUC No. 2179)? Have any of National Grid's other service territories (New York, Massachusetts, UK) relied on customer-owned metering devices for billing street light customers? If the answer to either question is "no," please explain why not.
- 28-2. Assume a 25 watt LED light that operates from dusk until dawn and is dimmed in accordance with the RIPUC No. 2179 tariff provisions by 30% to 18 watts during the dimmed state for four hours per night 1460 hours per year.
- 28-3. Please explain in detail how the Company would calculate the energy savings attributable to the dimming of that luminaire.
- 28-4. Please also indicate how the Company applies the tiered billing structure to LED lights that are operated on dimmers.
- 28-5. How does the Company determine which nominal wattage tiers to apply to SSL Sources under RIPUC No. 2179?
- 28-6. What baseline year did Mr. Gorman use in developing his testimony and work papers?
- 28-7. Did Mr. Gorman's testimony and work papers account for fact that over half of Rhode Island's communities have now purchased the streetlights within their territories and have taken responsibility of the maintenance of those streetlights? What adjustments to the base year were made to account for the change in company administrative and general costs and other expenses that transfer to the communities with customer ownership under the S-05 tariff?
- 28-8. Reference Work Paper HSG-5-F. Please describe how the table accounts for the tiered billing structure of Light Emitting Diodes (RIPUC No. 2179, Sheet 2).
- 28-9. Please describe the costs that create the distribution charge that applies to S-05 streetlights.
- 28-10. Reference HSG-4, which shows labor and equipment to install a High Pressure Sodium luminaire as being \$403.68, while the same cost for an LED fixture is shown to be

- \$147.66. Please explain in detail the difference in costs between these essentially similar tasks.
- 28-11. Reference HSG-4, p. 31, which shows a police detail as a \$44.64 component of installing streetlights. Please describe:
- When a police detail is actually used in a “single fixture” installation.
  - How many single-fixture installations were performed in the past year.
  - How many used police details.
- 28-12. Reference HSG-5, p. 21, which shows streetlights in the S-05, S-06, S-10, and S-14 rates as using \$2.68 million in Operations and Maintenance Expenses. Please itemize and explain these expenses, and how the Company distributes these expenses between S-05 (Customer-owned) and all others (Company-owned). Please ensure that sufficient detail on line items is included to illustrate what services are provided, and what expenses are allocated to each streetlight customer class.
- 28-13. Reference HSG-5. Please explain the aggregation of S-05 Customer-owned streetlights with all other (Company-owned) streetlight classes for purposes of capital reconciliation factors. Please show the capital reconciliation for the S-05 service class disaggregated from other streetlight rates.
- 28-14. Reference HSG-5, p. 9. Please explain why the base distribution energy charge is increased by 43.3% from \$0.02654 to \$0.03804.
- 28-15. Reference HSG-4F. Please explain the contents of the column headed “S-14 Units.”
- Does row 66 of the “S-14 Units” column represent the number of lights or poles that remain in S-14, totaled to 55,113? Does row 92 represent the kWh used by S-05 streetlights (30,303,659)?
  - If the 30,303,659 “S-14 Units” in row 92 represents the kWh used by S-05 streetlights, why does the next column in row 92 read “MWh”? If this column is correct, why is a kWh rate applied to the 30,303,659 number?
- 28-16. Reference HSG-4F. Please justify in detail the 30,303,659 cited above. If it represents kWh for S-05 streetlights, please describe:
- How this number is derived.
  - What are the assumptions of light characteristics, controls, operations and dimming schedules, outage estimates, or any other explicit or implicit assumptions that the Company relied upon in calculating the number?
- 28-17. Please provide a tangible property accounting for each town, with line items identified by FERC codes and with any items that are taxed at the floor rate identified.
- 28-18. Reference the statement on p. 22, ll. 5-9, that “I applied the concept of gradualism by limiting increases to twice the system average (which did not affect any class, Line 34) and by removing decreases for any class (which affected Street and Area Lighting Rates S-05, S-06, S-10, and S-14, and Propulsion X-01, Line 35). This produced a surplus of \$850,000 which was allocated among the rate classes on the basis of allocated revenue requirement (Line 37).” Please explain the rationale for charging the \$850,000 to streetlight customers

and then allocating the surplus to other rate classes.

- 28-19. Reference HSG-1B, Sheet 2. Please explain in detail the Street Light & Signal Depreciation Reserve of \$37,190,000.
- 28-20. Reference HSG-1A. Please itemize the Expense line of \$7,595,000 for Lighting and further break it down into S-05, S-06, S-10, and S-14 rates. Please ensure that you take the lights sold to municipalities into account.
- 28-21. Reference HSG-1A. Please justify the rate of return on lighting (10.5%, 2.68x average).

**RHODE ISLAND  
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Docket 4770

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

**(NERI 29-1 through NERI 29-5)**

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 29-1 through 29-5  
**Date of Request:** 3.22.18  
**Response Due Date:** Rolling  
**Subject/Panel:** Book 12—Gorman—COSS

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- 29-1. Please refer to NERI 7-2, referencing p. 15, ll. 7-8 of Mr. Gorman’s testimony, and the Company’s response. For questions (a) through (c) below, please provide data in spreadsheet form.
- a. Please confirm that the testimony refers only to costs properly classified in 586, 587, and 597 as costs to “maintain customer-related distribution assets” are classified solely as customer costs.
  - b. Please confirm whether and the extent to which costs associated with distribution and distribution maintenance costs in accounts 588-595, and 598 are classified as customer costs.
  - c. Exhibit HSG-1D indicates that costs in accounts 588, 589, and 590 are functionalized as “Billing” costs. Please explain the rationale for this functionalization and the specific kinds of costs in these categories that are functionalized as Billing costs.
- 29-2. Please refer to NERI 7-4 and 7-5, referencing p. 15 of Mr. Gorman’s testimony, and the Company’s response. In response to NERI 7-4 (a), for example, Mr. Gorman states that: “Plainly, these assets and costs are *primarily* a function of the number of customers served, and *bear no relation* to demand or usage.” (emphasis added) Are there any customer costs that are (1) classified or functionalized as customer costs do not vary exclusively with number of customers (that is are only “primarily a function of the number of customers served”), and (2) that do not vary with usage or profile (bear “no relation to demand or usage”)? What drives those costs? In other words, the witness describes costs “primarily” driven by customer count, but does not explain what the secondary or tertiary drivers of these costs would be. If yes, please list and describe these costs and their drivers.
- 29-3. Please refer to the Company response to NERI 7-6. Please list, describe, and quantify the costs relating to “customer service, field services, billing, and accounting” that the Company would incur for customers who do not use electric service after they have set up their customer account. In other words, aside from account establishment, billing setup, new service drop (if required), and meter installation, what costs within the categories of “customer service, field services, billing, and accounting” are incurred for a connected

customer that does not use any electric service?

29-4. Please refer to HSG-1C-1.

- a. Please describe how the Company calculated the per customer kW cost on line 10.
- b. Please provide HSG-1C-1 in Excel format, with formulas enabled.

29-5. Has Standard & Poor's or any other rating agency published a more recent ratings report/analysis than the one attached to NERI 2-25? Please provide copies of such or similar reports.