# <u>Division 7-48 (Supplemental)</u>

# Request:

Referring to the pending rate case of the Company's electric and gas distribution affiliate in upstate New York, Niagara Mohawk Power Corporation (Niagara Mohawk), in New York Public Service Commission Cases 17-E-0238 and 17-G-0239, please provide copies of

- a. all pre-filed testimony filed by Niagara Mohawk and any other parties in that case relating to the subject matter of the Gas Business Enablement Program,
- b. all information request responses of Niagara Mohawk and any other parties in that case relating to the subject matter of the Gas Business Enablement Program, and
- c. any transcripts of live testimony relating to the subject matter of the Gas Business Enablement Program.

### Response:

- a. Please see the following attached documents:
  - Attachment DIV 7-48-1: Niagara Mohawk Power Corporation (NMPC) Direct Testimony and Exhibits of Gas Infrastructure and Operations Panel excerpts relating to the subject matter of the Gas Business Enablement Program.
  - Attachments DIV 7-48-2, DIV 7-48-6, DIV 7-48-7, and DIV 7-48-19: NMPC Direct
    Testimony of the Revenue Requirements Panel excerpts relating
    to the subject matter of the Gas Business Enablement Program
  - Attachment DIV 7-48-3: NMPC Direct Testimony of Gas Safety Panel excerpts relating to the subject matter of the Gas Business Enablement Program
  - Attachment DIV 7-48-4: NMPC Direct Testimony and Exhibits of Information Services
    Panel excerpts relating to the subject matter of the Gas Business
    Enablement Program
  - Attachment DIV 7-48-5: Staff Gas Infrastructure and Operations Panel Testimony and Exhibits excerpts relating to the subject matter of the Gas Business Enablement Program

- Attachments DIV 7-48-8, DIV 7-48-9, and DIV 7-48-10: Staff Information Services Panel Exhibits excerpts relating to the subject matter of the Gas Business Enablement Program
- Attachment DIV 7-48-11: Staff Gas Rates Panel excerpts relating to the subject matter of the Gas Business Enablement Program
- Attachment DIV 7-48-12: Testimony and Attachments of Simi Rose George (Environmental Defense Fund) excerpts relating to the subject matter of the Gas Business Enablement Program
- Attachments DIV 7-48-13 and DIV 7-48-14: Staff Gas Business Enablement Panel Testimony and Exhibits
- Attachment DIV 7-48-15: Testimony of John Holst (Staff) excerpts relating to the subject matter of the Gas Business Enablement Program
- Attachment DIV 7-48-16: Staff Information Services Panel Testimony
- Attachment DIV 7-48-17: Staff Policy Panel excerpts relating to the subject matter of the Gas Business Enablement Program
- Attachment DIV 7-48-18: Testimony of Kenneth D. Daly (NMPC) excerpts relating to the subject matter of the Gas Business Enablement Program
- Attachment DIV 7-48-20: Staff Gas Safety Panel excerpts relating to the subject matter of the Gas Business Enablement Program
- Attachment DIV 7-48-21: NMPC Revenue Requirements Panel Rebuttal Testimony and Exhibits excerpts relating to the subject matter of the Gas Business Enablement Program
- Attachment DIV 7-48-22: NMPC Corrections and Updates Testimony of the Revenue Requirements Panel excerpts relating to the subject matter of the Gas Business Enablement Program
- Attachment DIV 7-48-23: Direct Testimony of Utility Intervention Unit Rates Panel excerpts relating to the subject matter of the Gas Business Enablement Program
- Attachment DIV 7-48-24: NMPC Rebuttal Testimony of the Gas Safety Panel excerpts

relating to the subject matter of the Gas Business Enablement Program

Attachment DIV 7-48-25: NMPC Rebuttal Testimony and Exhibits of Information Services Panel - excerpts relating to the subject matter of the Gas Business Enablement Program

Attachment DIV 7-48-26: NMPC Corrections and Updates Testimony of the Gas
Infrastructure and Operations Panel – excerpts relating to the subject matter of the Gas Business Enablement Program

Attachment DIV 7-48-28: NMPC Rebuttal Testimony and Exhibits of Johnny Johnston

- b. Please see Attachments DIV 7-48-30 through DIV 7-48-103 for information request responses and their respective attachments relating to the subject matter of the Gas Business Enablement Program, as listed on the table beginning on the next page of this response.
- c. There are no transcripts of live testimony relating to the subject matter of the Gas Business Enablement Program.

[The table referenced in part b. above follows on the next page]

NY Rate Case			
Information			
Request	Response	PDF Attachment	XLS Attachment
DPS-732 AT-18	Attachment DIV 7-48-76	Attachment DIV 7-48-77	Attachment DIV 7-48-100
		Attachment DIV 7-48-78	Attachment DIV 7-48-101
		Attachment DIV 7-48-79	Attachment DIV 7-48-102
		Attachment DIV 7-48-80	Attachment DIV 7-48-103
DDG 660 AT 14	A., 1 , DIVI 7 40 70	A., 1 , DN/7 40 70	A., 1 , DIV.7 40.07
DPS-660 AT-14	Attachment DIV 7-48-72	Attachment DIV 7-48-70	Attachment DIV 7-48-97
	Response and PDF Attachment(s) included	Attachment DIV 7-48-71	Attachment DIV 7-48-98
DPS-688 AAM-39	Attachment DIV 7-48-73	Attachment DIV 7-48-74	Attachment DIV 7-48-99
	Response and PDF		
	Attachment(s) included		
DPS-654 AT-8	Attachment DIV 7-48-61	Attachment DIV 7-48-62	Attachment DIV 7-48-93
	Response and PDF		
	Attachment(s) included		
DPS-633 AAM-34	Attachment DIV 7-48-57	Attachment DIV 7-48-58	Attachment DIV 7-48-91
	Response and PDF		
	Attachment(s) included		
DPS-658 AT-12	Attachment DIV 7-48-68	Attachment DIV 7-48-67	Attachment DIV 7-48-96
	Response and PDF		
	Attachment(s) included		
DPS-657 AT-11	Attachment DIV 7-48-66		Attachment DIV 7-48-95
	Response and PDF		
	Attachment(s) included		

NY Rate Case			
Information			
Request	Response	PDF Attachment	XLS Attachment
DPS-656 AT-10	Attachment DIV 7-48-65	Attachment DIV 7-48-64	
	Response and PDF		Attachment DIV 7-48-94
	Attachment(s) included		
DPS-602 MA-6	Attachment DIV 7-48-53	Attachment DIV 7-48-54	Attachment DIV 7-48-88
		Attachment DIV 7-48-55	Attachment DIV 7-48-89
		Attachment DIV 7-48-56	Attachment DIV 7-48-90
DPS-643 MP-20	Attachment DIV 7-48-59	Attachment DIV 7-48-60	Attachment DIV 7-48-92
	Response and PDF		
	Attachment(s) included		
DPS-278 IS-7	Attachment DIV 7-48-42	Attachment DIV 7-48-41	Attachment DIV 7-48-84
DPS-447 AAM-21	Attachment DIV 7-48-51	Attachment DIV 7-48-49	Attachment DIV 7-48-86
	Response and PDF	Attachment DIV 7-48-50	Attachment DIV 7-48-87
	Attachment(s) included		
DPS-430 AT-3	Attachment DIV 7-48-45	Attachment DIV 7-48-44	Attachment DIV 7-48-85
	Response and PDF		
	Attachment(s) included		
EDF-1 NK-5	Attachment DIV 7-48-82		
EDF-1 NK-6	Attachment DIV 7-48-83		
	Response and PDF		
	Attachment(s) included		
EDF-1 NK-4	Attachment DIV 7-48-81		

NY Rate Case			
Information			
Request	Response	PDF Attachment	XLS Attachment
DPS-689 AT-15	Attachment DIV 7-48-75		
DPS-659 AT-13	Attachment DIV 7-48-69		
DPS-655 AT-9	Attachment DIV 7-48-63		
DPS-566 MP-11	Attachment DIV 7-48-52		
DPS-433 AT-6	Attachment DIV 7-48-48 Response and PDF Attachment(s) included		
DPS-432 AT-5	Attachment DIV 7-48-47 Response and PDF Attachment(s) included		
DPS-431 AT-4	Attachment DIV 7-48-46 Response and PDF Attachment(s) included		
DPS-329 MP-4	Attachment DIV 7-48-43		
DPS-275 IS-4	Attachment DIV 7-48-36	Attachment DIV 7-48-32 Attachment DIV 7-48-33 Attachment DIV 7-48-34 Attachment DIV 7-48-35	

NY Rate Case Information			
Request	Response	PDF Attachment	XLS Attachment
DPS-275 IS-4 SUPPLEMENTAL	Attachment DIV 7-48-37 Response and PDF Attachment(s) included		
DPS-276 IS-5	Attachment DIV 7-48-40	Attachment DIV 7-48-38 Attachment DIV 7-48-39	
DPS-094 MOA-1	Attachment DIV 7-48-31		

## **Supplemental Response:**

When the Company submitted its initial response to this data request, it inadvertently omitted reference to the redacted and confidential versions of certain attachments.

The version of Attachment DIV 7-48-32 provided with the Company's initial response to this data request is a redacted version of the Company's Attachment 5a to DPS 275 IS-4 submitted to the New York Public Service Commission (PSC). The Company is providing the unredacted confidential version of that attachment as Confidential Attachment DIV 7-48-32 with this supplemental response.

Pages 7 through 91 of the version of Attachment DIV 7-48-61 provided with the Company's initial response to this data request contain redacted versions of Attachments 6, 7, and 8 to DPS-654 AT-8 submitted to the PSC. The Company is providing the unredacted confidential versions of those attachments at pages 142 through 226 of Confidential Attachment DIV 7-48-107 with this supplemental response.

Additionally, the Company is providing the following confidential attachments, which it inadvertently omitted in their entirety from its initial response to this data request:

- Confidential Attachment DIV 7-48-104: Attachment 5b to DPS-275 IS-4 CONFIDENTIAL;
- Confidential Attachment DIV 7-48-105: Attachment 1 to DPS-602 MA-6;
- Confidential Attachment DIV 7-48-106: Attachment 1 to DPS-654 AT-8 (in both PDF and Excel format); and
- Confidential Attachment DIV 7-48-107: Pages 1-141 of this attachment contain Attachments 3, 4, and 5 to DPS-654 AT-8.

## Confidential Attachment DIV 7-48-104 – REDACTED INFORMATION

Confidential Attachment DIV 7-48-104 contains a Company PowerPoint presentation on the Gas Business Enablement Program given at a Steering Group Meeting, for which the Company's affiliate, Niagara Mohawk Power Corporation, sought and obtained confidential treatment before the New York Public Service Commission. The Company has requested protective treatment of this 157-page document in its entirety.

## Confidential Attachment DIV 7-48-105 – REDACTED INFORMATION

Confidential Attachment DIV 7-48-105 contains a Company PowerPoint presentation on the Gas Business Enablement Program given at a Steering Group Meeting, for which the Company's affiliate, Niagara Mohawk Power Corporation, sought and obtained confidential treatment before the New York Public Service Commission. The Company has requested protective treatment of this 48-page document in its entirety.

#### Confidential Attachment DIV 7-48-106 – REDACTED INFORMATION

Confidential Attachment DIV 7-48-106 is the Gas Business Enablement Costs Model in both PDF and Excel format, which was Attachment 1 to DPS-654 AT-8 in Cases 17-E-0238 and 17-G-0239 before the New York Public Service Commission. The Company's affiliate, Niagara Mohawk Power Corporation, sought and obtained confidential treatment of this attachment from the New York Public Service Commission. The Company has requested protective treatment of this five-page attachment in its entirety.

The Narragansett Electric Company d/b/a National Grid RIPUC Docket No. 4770 Confidential Attachment DIV 7-48-107

#### Confidential Attachment DIV 7-48-107 – REDACTED INFORMATION

Confidential Attachment DIV 48-107 contains: (1) the National Grid Engagement Statement of Work from Accenture dated July 29, 2016, which was Attachment 3 to DPS-654 AT-8 CONFIDENTIAL in Cases 17-E-0238 and 17-G-0239 before the New York Public Service Commission (the NY Rate Case); (2) the Engagement Letter Agreement between National Grid USA Service Company, Inc. and PriceWaterhouseCoopers Advisory Services LLC date July 25, 2016, which was Attachment 4 to DPS-654 AT-8 CONFIDENTIAL in the NY Rate Case; (3) a National Grid Project Statement for AT Kearney dated February 28, 2017, which was Attachment 5 to DPS-654 AT-8 CONFIDENTIAL in the NY Rate Case; (4) unredacted copies of the Attachments 6, 7, and 8 to DPS-654 AT-8 CONFIDENTIAL in the NY Rate Case, which were provided in redacted form at Attachment 7-48-61. The Company's affiliate, Niagara Mohawk Power Corporation, sought and obtained confidential treatment of these attachments from the New York Public Service Commission. The Company has requested protective treatment of this 226-page attachment in its entirety.