

PUC 8-3

Request:

The Company has a number of reporting requirements that address earnings potential: Service Quality Plan Annual Report, Energy Efficiency Plan and Annual Report, System Reliability Plan, Renewable Energy Growth Program, Long-Term Contracting for Renewable Energy Recovery Factor, and Earnings Reports.

- (a) Please provide the dates when these reports are filed with the PUC and the rationale therefore (if the rationale references a PUC Order, please explain why the time frame is reasonable for the Company).
- (b) Please indicate, for those reports whose filing dates are not aligned, whether they could be aligned and what impact that would have on the PUC's review or the Company's operations or other reporting requirements (whether internal, state, or federal).

Response:

Please see Attachment PUC 8-3 for the requested information.

ELECTRIC					
Filing	Filing Due Date	Rationale for Filing Date	Explanation of Why Time Frame is Reasonable	Realignment of Filing Date Possible	Impact of Realignment of Filing Date
Electric Earnings Annual Report	May 1	PUC Order No. 21011 (Docket No. 4323)	Calendar year data	N/A	N/A
Electric Service Quality Annual Report	May 1	PUC Order No. 18294 (Docket No. 3628); modified by PUC Order Nos. 19020 and 22456	Calendar year data	N/A	N/A
Energy Efficiency (EE) Annual Report (Gas and Electric)	May 1	May 1 is specified in the Company's Annual Plan.	Calendar year data. The date was chosen, in part, to align with the statutory requirement for the EERMC's annual EE report because the Company provides the EERMC all of the data on year-end performance for that report. R.I. Gen. Laws § 39-2-1.2(k) requires the EERMC to submit an annual report of EE/SRP performance to the legislature by April 15th. In addition, the May 1 provides the Company the time to review spend and savings between year-end data being final (mid-Feb.) and the report being due May.	N/A	N/A

ELECTRIC					
Filing	Filing Due Date	Rationale for Filing Date	Explanation of Why Time Frame is Reasonable	Realignment of Filing Date Possible	Impact of Realignment of Filing Date
EE Procurement Plan (Gas and Electric)	Oct. 15; Nov. 1 in year of filing a new 3-year plan	R.I. Gen. Laws § 39-1-27.7 Least Cost Procurement (LCP) Standards (approved by the PUC in Docket No. 4684) RIPUC No. 2172	Cost recovery for EE expense is timed to coincide with the EE program year.	No ¹	See footnote 1.
System Reliability Procurement (SRP) Plan	Oct. 15; Nov. 1 in year of filing a new 3-year plan	R.I. Gen. Laws § 39-1-27.7 LCP Standards (approved by the PUC in Docket No. 4684) RIPUC No. 2172	See above.	No	See footnote 1.

¹ The three-year plan filings for EE and SRP on September 1 are pursuant to statute: R.I. Gen. Laws § 39-1-27.7(c)(4). The annual plan filing dates are set forth in the Standards, which are required by the statute and subject to periodic review not less than every three years (see R.I. Gen. Laws § 39-1-27.7(b)), but have historically been submitted/ revised in conjunction with the annual targets filing. See Order No. 21767, Docket No. 4443, December 31, 2014 (approving 2014 revisions to the Standards, which, among other things, changed the filing date for the annual EE/SRP Plans from November 1 to October 15, except in years in which a three-year plan is filed). The annual report, which is filed on May 1, is part of the EE Plan and could be adjusted as part of the next annual plan filing.

ELECTRIC					
Filing	Filing Due Date	Rationale for Filing Date	Explanation of Why Time Frame is Reasonable	Realignment of Filing Date Possible	Impact of Realignment of Filing Date
Renewable Energy Growth Program – Annual Cost Recovery and Reconciliation Filing	June 30	R.I. Gen. Laws § 39-26.6-25(b) RIPUC No. 2208	The annual reconciliation filing is due within three months after the end of the March 31 program year. The June 30 filing date is intended to allow the Company time to complete analysis of estimated enrollment, and ensuring DG output, as well as time to fully vet program expenses to include only incremental costs for estimating the amount proposed for concurrent cost recovery.	No	<p>The reconciliation filing requires actual cost and revenue data through March. Based on how the Company bills on a cycle basis, revenue for March usage is billed during March and April. Therefore, April billing must be completed in order to include 12 months of revenue.</p> <p>Actual cost data through March often requires additional time to gather and review for accuracy. This data is then used to estimate the upcoming program year’s costs to determine the RE Growth factors which provide concurrent recovery.</p>

ELECTRIC					
Filing	Filing Due Date	Rationale for Filing Date	Explanation of Why Time Frame is Reasonable	Realignment of Filing Date Possible	Impact of Realignment of Filing Date
Renewable Energy Growth Program – Annual Tariff and Rules Filing	Nov. 15	R.I. Gen. Laws Ch. 39-26.6 RIPUC No. 2151-E RIPUC No. 2152-D	Statutory	No	Statutory filing date.
LTCRER Factor Filing	May 15 and Nov. 15	RIPUC No. 2174	45 days prior to the July 1 and January 1 effective dates of the revised factors. ²	Yes	Although there is no impact to the existing filing process and tariff, the tariff could be clarified to restate the date of the filing to be at least 60 days prior to the effective date, or in the alternative, May 1 and November 1.

² The rationale behind the semi-annually filings is that the Company is estimating the annual above-market cost associated with Long-term Contracts and Distributed Generation Standard Contracts, which is calculated as the sum of the estimated payments expected to be made during the 6-month pricing period less the expected proceeds to be received during said period from the sale of the energy, capacity, RECs and other attributes. If the LTCRER Factors were determined annually rather than semi-annually, the estimated above/below market costs would reflect a longer period and it is likely that any under/over-recovery of these costs will be larger.

ELECTRIC					
Filing	Filing Due Date	Rationale for Filing Date	Explanation of Why Time Frame is Reasonable	Realignment of Filing Date Possible	Impact of Realignment of Filing Date
LTCRER Reconciliation Annual Filing	Feb. 15	RIPUC No. 2175	45 days prior to the April 1 effective date of the factor.	Yes	Although there is no impact to the existing filing process and tariff, the tariff could be clarified to restate the date of the filing to be at least 60 days prior to the effective date, or in the alternative, May 1.

GAS					
Filing	Filing Due Date	Rationale for Filing Date	Explanation of Why Time Frame is Reasonable	Realignment of Filing Date Possible	Impact of Realignment of Filing Date
Gas Earnings Annual Report	Sept. 1	PUC Order No. 22844 (Docket No. 4634) RIPUC NG-Gas No. 101, Section 3, Schedule A, Sheet 13, subpart 5.0.	Fiscal year data Contains the same information as the annual Form 2, which is due August 28.	Yes	In its initial filing in this docket, the Company proposed to change the timing of the filing of its gas earnings sharing mechanism report from September 1 to May 1 to align with the timing of the Company's ESM report from Narragansett Electric.
Gas Service Quality - Annual Report	July 31	PUC Order No. 20864 (Docket No. 3476)	Currently, the SQ plan covers the period July 1 through June 30.	Yes	SQ metrics results come out monthly and are compiled quarterly so it is possible to change the reporting period.
Gas Service Quality - Quarterly Report	Target filing dates: Oct. 31 (July – Sept.) Jan. 31 (Oct. – Dec.) April 30 (Jan. – March)	PUC Order No. 20864 (Docket No. 3476)	Currently, the SQ plan covers the period July 1 through June 30.	Yes	Same as above.

GAS					
Filing	Filing Due Date	Rationale for Filing Date	Explanation of Why Time Frame is Reasonable	Realignment of Filing Date Possible	Impact of Realignment of Filing Date
NGPMP – Annual Report	First business day following June 1 each year.	NGPMP Section VII.B PUC Order No. 19627 (Docket No. 4038)	NGPMP incentive year has an April to March reporting period. ³	Yes	See footnote 3. Moving the filing date to May 1 may be slightly aggressive for National Grid’s Accounting Dept. because invoicing for March is due Apr. 25; however, Accounting provides the Q4 filing by May 1, so it is possible to file the annual filing on May 1.
NGPMP – Quarterly Report	First business day of the second month following the end of the quarter.	NGPMP Section VII.A PUC Order No. 19627 (Docket No. 4038) Modified by PUC Order No. 22418 (Docket No. 4038)	NGPMP incentive year has an April to March reporting period. ³	Yes	See footnote 3. Same as above.

³ As stated on Page 5 of the pre-filed direct testimony of Company Witness Stephen A. McCauley in Docket No. 4647, “the NGPMP reporting year is better suited to end on March 31 than on June 30, because March 31 is the typical transition from a withdrawal season to the injection season for storage and, therefore, is the more natural date to begin and end a reporting period.” The GPIIP incentive is calculated for each month separately and then aggregated for a 12 month period [so] it does not matter which 12 month period is used in the GPIIP report.”

GAS					
Filing	Filing Due Date	Rationale for Filing Date	Explanation of Why Time Frame is Reasonable	Realignment of Filing Date Possible	Impact of Realignment of Filing Date
GPIP - Semi-Annual Report	April 25 (Oct. 1 - March 31) October 25 (April 1 – Sept. 30)	PUC Order No. 17444 (Docket No. 3436) Modified by PUC Order No. 22717 (Docket No. 4647)	GPIP incentive year was changed recently to an April to March reporting period to better align the incentive periods for the GPIP with the NGPMP. ⁴	Yes	GPIP semi-annual report filing dates were recently changed to align with the NGPMP reporting period.

⁴ As stated on Page 4 of the pre-filed direct testimony of Company Witness Stephen A. McCauley in Docket No. 4647, “the GPIP incentive is calculated for each month separately and then aggregated for a 12 month period, [so] it does not matter which 12 month period is used in the GPIP report.”