

Docket No. 4770
Twenty Sixth Set of Data Requests of the
Division of Public Utilities and Carriers to National Grid
February 21, 2018

Gas Business Enablement – Allocation Factors

- 26-1. Please refer to Attachment DPU-NG 1-10-1 submitted in response to discovery in Massachusetts docket D.P.U. 17-170 and provide an updated version of this attachment in this Docket No. 4770 and answer the following:
- a. Please provide your response in native electronic spreadsheet format, including the same level of detail for line items and categories of investment, as well as by operating affiliate, state jurisdiction, NGUSA Parent Co. and total.
 - b. If there is no change in the values shown in Attachment DPU-NG 1-10-1, please submit an electronic spreadsheet version of Attachment DPU-NG 1-10-1 in this docket and affirm in your response that there is no change.
 - c. If there is any change, please provide an updated spreadsheet as requested and include a detailed explanation for the change in your response.

Response can be found on Bates page(s) 1-14.

- 26-2. Please refer to the version of Attachment DPU-NG 1-10-1 included in your response to 25-1 above and answer the following:
- a. Why does the Company use each of the allocation factors identified in the footnote entitled “Fiscal Year 2018 Bill Pool Allocators”?
 - b. Why and when does the Company use a “General 3-Point Allocator” versus another allocator.
 - c. What is the difference between the allocator corresponding to G-210 shown on page 6 of 6, and the allocator corresponding to G-012, shown on pages 1-5, of Attachment DPU-NG 1-10-1?
 - d. Why does only page 4 of 6 include cost allocation of only Non-Cap Ex Investment to NGUSA Parent Co.?
 - e. How is the cost allocation to NGUSA Parent Co. calculated? Include in your response more detail beyond restating the title of the allocator, as well as a description of the activities and personnel expense supported by this cost.
 - f. Confirm how many line items in Attachment DPU-NG 1-10-1 have allocated cost to NGUSA Parent Co., and explain why only those line items apply to NGUSA Parent Co.

Response can be found on Bates page(s) 15-16.

- 26-3. Please explain how many other unregulated affiliates of the Company besides NGUSA Parent Co. benefit from the planned investment in GBE?

Response can be found on Bates page(s) 17-18.

- 26-4. Refer to RI DPUC Docket No. 4770, Attachment PUC 9-18-1 and answer the following:
- Please provide the allocation factors used to assign total benefits forecasted in this table by line item and operating affiliate company. Include with your response an additional page that shows the total benefits for Gas Business Enablement for all affiliates.
 - How are these benefits allocation factors determined? By compliance requirements, state regulations, or by contractual commitments to third parties or inter-company affiliates?
 - Please provide a cross reference listing for the information in each line item in of Attachment PUC 9-18-1, defined by the values in the first four columns “Initiative Description”, “Benefit Description”, “Detail and “Benefit Type”, to the Line Items 1 through 25 shown in D.P.U. 17-170, Attachment DPU-NG 1-10-1.
 - Confirm whether the response to a. above requires the assignment of more than one of line items 1-25 to each benefit line item and provide the sub-allocation factors for each of these Investment line items.

Response can be found on Bates page(s) 19-27.

- 26-5. Refer to Massachusetts D.P.U. 17-170, Attachment DPU-NG 1-10-1, page 5 of 6, which presents a table entitled “Key Project Implementation Dates”, and answer the following:
- Have any of these Key Project Implementation Dates changed? If so, please explain the reasons for the changes.
 - Please provide an amended version of this table that retains the separate columns for each state jurisdiction and operating affiliate but also shows these dates grouped by 12-month ending period as shown in RI PUC Docket No. 4770, Attachment PUC 9-18-1.

Response can be found on Bates page(s) 28-36.

- 26-6. Based on the proposed implementation of GBE, please provide for the Company’s average Rhode Island residential electric and gas customers:
- The first-year bill impact due exclusively to the implementation of GBE as proposed.
 - The bill impact for the remaining unrecovered cost amortization.
 - The first-year bill impact if the Company’s proposed cost recovery for GBE is denied.

Response can be found on Bates page(s) 37-57.

Division 26-1

Request:

Please refer to Attachment DPU-NG 1-10-1 submitted in response to discovery in Massachusetts docket D.P.U. 17-170 and provide an updated version of this attachment in this Docket No. 4770 and answer the following:

- a. Please provide your response in native electronic spreadsheet format, including the same level of detail for line items and categories of investment, as well as by operating affiliate, state jurisdiction, NGUSA Parent Co. and total.
- b. If there is no change in the values shown in Attachment DPU-NG 1-10-1, please submit an electronic spreadsheet version of Attachment DPU-NG 1-10-1 in this docket and affirm in your response that there is no change.
- c. If there is any change, please provide an updated spreadsheet as requested and include a detailed explanation for the change in your response.

Response:

- a. The Company is providing an updated version of Attachment DPU-NG 1-10-1 submitted in response to discovery in Massachusetts docket D.P.U. 17-170 with this response as Attachment DIV 26-1-1. Attachment DIV 26-1-1 has been provided in Excel spreadsheet format.
- b. The Company has changed the values shown in Attachment DPU-NG 1-10-1; please refer to part a. above.
- c. An explanation of the changes made to Attachment DPU-NG 1-10-1 is provided in the table below. The rationale behind the various allocators used to charge each affiliate company its share of Gas Business Enablement capital and non-capital costs was discussed in the Company's response to Division 17-3, provided with this response as Attachment DIV 26-1-3.

Revisions to DPU-NG 1-10-1 made in Attachment DIV 26-1-1:

Pages 1 through 4

- | | |
|---------|---|
| Line 34 | Changed allocation code to G-012 (Three-point General Allocator All Companies) |
| Line 42 | Changed allocation code to C-175 (Number of Customers Allocator All Retail Companies) |
| Line 43 | Divided into two sets of Portfolio Anchors (PA). PA 1-3 changed allocation code to C-175 (Number of Customers Allocator All Retail Companies) |
| Line 45 | Corrected MA Gas and RI allocations; consistent with the Company's response to Division 24-3 |

(included as Attachment DIV 26-1-2).

Page 5

- Line 3 Narragansett Electric & Narragansett Gas implementation dates changed to April 2018, from March 2018 per the Company's response to Division 26-5.
- Line 15 Narragansett Electric & Narragansett Gas implementation dates changed to April 2018, from October 2018 per the Company's response to Division 26-5.