

February 12, 2018

**VIA HAND DELIVERY AND ELECTRONIC MAIL**

Luly E. Massaro, Commission Clerk  
Rhode Island Public Utilities Commission  
89 Jefferson Boulevard  
Warwick, RI 02888

**RE: Docket 4770 – Application of The Narragansett Electric Company d/b/a National Grid for Approval of a Change in Electric and Gas Base Distribution Rates  
Responses to Division Data Requests – Set 14**

Dear Ms. Massaro:

Enclosed is an original of the Company's<sup>1</sup> responses to the fourteenth set of data requests issued by the Division of Public Utilities and Carriers (Division) in the above-referenced docket. At the request of the Public Utilities Commission (PUC), the Company is also enclosing a USB Flash Drive containing the public version of the filing and a table of contents indicating where each response can be found in the set.

This filing includes a Motion for Protective Treatment of Confidential Information in accordance with Rule 1.2(g) of the PUC's Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B) for the Company's response to data request Division 14-29. The Company seeks protection from public disclosure of certain confidential information contained in Attachment DIV 14-29-3 CONFIDENTIAL through Attachment DIV 14-29-6 CONFIDENTIAL provided with the response to data request Division 14-29. Accordingly, the Company has provided the PUC with one complete, unredacted copy of the confidential documents in a sealed envelope marked "**Contains Privileged and Confidential Information – Do Not Release,**" and has included redacted copies of these documents for the public filing.

The enclosed responses complete the Division's fourteenth set of data requests, as indicated in the enclosed discovery log.

Thank you for your attention to this transmittal. If you have any questions, please contact me at 781-907-2153.

Very truly yours,



Celia B. O'Brien

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (the Company).

Luly E. Massaro, Commission Clerk  
Docket No. 4770 – Responses to Division Set 14  
February X, 2018  
Page 2 of 2

Enclosures

cc:     Docket 4770 Service List  
         Macky McCleary, Division  
         Jonathan Schrag, Division  
         John Bell, Division  
         Al Mancini, Division  
         Ron Gerwatowski, Division  
         Leo Wold, Esq.

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
BEFORE THE PUBLIC UTILITIES COMMISSION**

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IN RE: THE NARRAGANSETT ELECTRIC COMPANY )  
d/b/a NATIONAL GRID – ELECTRIC AND GAS )  
DISTRIBUTION RATE FILING )

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Docket No. 4770

**THE COMPANY’S MOTION  
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

The Company<sup>1</sup> respectfully requests that the Rhode Island Public Utilities Commission (PUC) provide confidential treatment and grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by PUC Rule 1.2(g) and R.I. Gen. Laws. § 38-2-2(4)(B). The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to Rule 1.2 (g)(2).

**I. BACKGROUND**

On February 12, 2018, the Company filed responses to the Rhode Island Division of Public Utilities and Carriers’ (Division) Fourteenth Set of Data Requests of the Division of Public Utilities and Carriers to National Grid dated January 22, 2018 (Division Set 14). Division Set 14 includes Data Request Division 14-29 (seeking “a copy of all reports, evaluations, memos, analyses or other written documents of any nature prepared since January 2013 establishing performance indicator targets to be met within the next year after publication of the performance targets; within the next two years after publication of the performance targets; or within the next three years after publication of the performance targets, with respect to: a. Debt prevention; b. Debt management; c. The treatment of vulnerable customers; d. Customer

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<sup>1</sup> The Narragansett Electric Company d/b/a National Grid (the Company).

satisfaction.”). The Company’s response to Division 14-29 includes redacted and confidential versions of Attachment DIV 14-29-3 through Attachment DIV 14-29-6, inclusive. These attachments contain confidential and competitively sensitive information. In particular, they contain specific customer information and information about the Company’s legal strategy in connection with pending or potential litigation. The Company ordinarily would not share these files with the public.

Therefore, the Company requests that, pursuant to Rule 1.2(g), the PUC afford confidential treatment to the confidential versions of Attachment DIV 14-29-3 through Attachment DIV 14-29-6, inclusive.

## **II. LEGAL STANDARD**

PUC Rule 1.2(g) provides that access to public records shall be granted in accordance with the Access to Public Records Act (APRA), R.I. Gen. Laws § 38-2-1, *et seq.* Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a “public record,” unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I. Gen. Laws § 38-2-2(4). Therefore, to the extent that information provided to the PUC falls within one of the designated exceptions to the public records law, the PUC has the authority under the terms of the APRA to deem such information to be confidential and to protect that information from public disclosure.

In that regard, R.I. Gen. Laws § 38-2-2(4)(B) provides that the following types of records shall not be deemed public:

Trade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature.

The Rhode Island Supreme Court has held that this confidential information exemption applies where disclosure of information would be likely either to (1) impair the Government's ability to obtain necessary information in the future; or (2) cause substantial harm to the competitive position of the person from whom the information was obtained. Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I. 2001).

The first prong of the test is satisfied when information is voluntarily provided to the governmental agency and that information is of a kind that would customarily not be released to the public by the person from whom it was obtained. Providence Journal, 774 A.2d at 47.

### **III. BASIS FOR CONFIDENTIALITY**

The information contained in the confidential versions of Attachment DIV 14-29-3 through Attachment DIV 14-29-6, inclusive, should be protected from public disclosure. As described herein, these attachments contain confidential and proprietary commercial and financial information relating to the Company's customers and the Company's legal strategies. Specifically, the confidential versions of these attachments contain confidential data about specific, identifiable Company customers, as well as descriptions of the Company's legal strategies in connection with specific litigation. The legal strategy information contained with the confidential versions of these attachments also is protected by the attorney-client privilege and the work product doctrine. It is the type of information that the Company ordinarily would not disclose to the public. Therefore, the Company is providing the PUC with both a redacted version of Attachment DIV 14-29-3 through Attachment DIV 14-29-6 for the public file and a confidential version of Attachment DIV 14-29-3 through Attachment DIV 14-29-6, inclusive. The Company is providing the confidential version to the PUC on a voluntary basis to assist the

PUC with its decision-making in this proceeding, but respectfully requests that the PUC provide confidential treatment to these versions.

**IV. CONCLUSION**

Accordingly, the Company respectfully requests that the PUC grant protective treatment to confidential Attachment DIV 14-29-3 through Attachment DIV 14-29-6, inclusive.

**WHEREFORE**, the Company respectfully requests that the PUC grant this Motion for Protective Treatment.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC COMPANY**

By its attorneys,



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Adam M. Ramos, Esq. (RI #7591)  
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Dated: February 12, 2018

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically transmitted and/or hand delivered to the individuals listed below.



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Najat Coye

February 12, 2018

Date

**Docket No. 4770 - National Grid – Rate Application**  
**Service list updated 2/8/2018**

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**Docket No. 4770**  
**Fourteenth Set of Data Requests of the**  
**Division of Public Utilities and Carriers to National Grid**  
**January 22, 2018**

Two general instructions:

1. When data is requested for “residential” customers, it should be construed as asking for data disaggregated into three groups: (1) low-income; (2) non-low-income; and (3) all residential.
2. When data is requested for “low-income” customers, if data on low-income customers is not generally available, provide data for the population that includes the largest known group of low-income customers (e.g., LIHEAP recipients), specifying the indicator used for low-income status.
3. If the question does not specify gas or electric service, then please provide information for both.

**Data Requests**

**Customer Disconnections**

- 14-1. Please provide by month since October 2015 the number of:
- a. Final notices of disconnection for nonpayment (disaggregating by and explaining if different “final” notices are provided) for residential customers; and
  - b. Residential disconnections for nonpayment.

**Response can be found in Book 1 on Bates page(s) 1-2.**

- 14-2. Please provide by month since October 2015:
- a. The number of accounts reconnected subsequent to a disconnection for nonpayment;
  - b. The average time between disconnection and reconnection;
  - c. A distribution in reasonable bands of how long a customer was “off” the system (suggested bands; less than 1 day, 1-3 days, 3-7 days, 7-30 days, more than 30 days).

**Response can be found in Book 1 on Bates page(s) 3-4.**

- 14-3. By month since October 2015, of the residential accounts receiving a notice of an impending disconnection for nonpayment, please provide:
- a. The total number of accounts that did not have their service disconnected by the date specified in the disconnect notice;
  - b. The total number of accounts that did not have their service disconnected for nonpayment after receiving a disconnect notice for nonpayment that voluntarily terminated their accounts;

- c. The total number of accounts that did not have their service disconnected because the customer paid their bills in full prior to their scheduled disconnection;
- d. The total number of accounts that did not have their service disconnected because the customer paid their bills less than in full but sufficient to avoid their scheduled disconnection;
- e. The total number of accounts that did not have their service disconnected even though they retained an arrears that was sufficient large (or sufficiently old) to trigger a disconnection);
- f. The total number of accounts on which account no payments were made prior to the issuance of the next bill after issuance of the disconnect notice.

**Response can be found in Book 1 on Bates page(s) 5-6.**

### **Levelized Billing**

- 14-4. By month since October 2015, please provide the total number of customers taking service under levelized budget billing.

**Response can be found in Book 1 on Bates page(s) 7-8.**

- 14-5. By month since October 2015, please provide the number of budget billing customers who entered the levelized budget billing plan with a pre-existing arrearage.

**Response can be found in Book 1 on Bates page(s) 9-10.**

- 14-6. By month since October 2015, please provide the number of budget billing customers who were removed from levelized budget billing due to a failure to pay.

**Response can be found in Book 1 on Bates page(s) 11-12.**

- 14-7. Does the Company track residential heating versus non-heating electric accounts. If so, please provide, disaggregated by heating and non-heating residential accounts, in ranges of 100 kWh, a monthly usage distribution, by month since October 2015 to present, for:

- a. All residential customers;
- b. All residential customers in arrears.

If usage ranges of 100 kWh are not available, provide data in usage ranges reasonably available.

**Response can be found in Book 1 on Bates page(s) 13-51.**

- 14-8. Disaggregated by heating and non-heating, for each usage range provided in the immediately preceding data request, provide:
- a. The average consumption within that range; and
  - b. The monthly bill for that range at current residential rates.

**Response can be found in Book 1 on Bates page(s) 52-96.**

## Arrearages

- 14-9. Please provide by month for each month since October 2015, the dollars of arrears by aging bucket for residential customers using the following aging bands: 0-30 days; 31-60 days; 61-90 days; 91-180 days; and more than 180 days. If aging bands other than those identified are used by the company, provide those bands that the Company uses.

**Response can be found in Book 2 on Bates page(s) 1-220.**

- 14-10. Please provide by month for each month since October 2015, the number of accounts by arrearage aging bucket for residential customers using the following aging bands: 0-30 days; 31-60 days; 61-90 days; 91-180 days; and more than 180 days. If aging bands other than those identified are used by the company, provide those bands that the Company uses.

**Response can be found in Book 2 on Bates page(s) 221.**

- 14-11. Please provide by month for each month October 2015 to present, a distribution of the number of residential accounts in arrears by the size of arrears by the following bands: (1) \$0; (2) \$1 - \$100; (3) \$101 - \$200; (4) \$201 - \$300; (5) \$301 - \$500; (6) \$501 - \$750; (7) \$751 - \$1,000; (8) \$1,001 - \$2,000; and (9) \$2,001 and above. If these bands are not available, please provide the numbers of accounts by which bands are available.

**Response can be found in Book 2 on Bates page(s) 222-224.**

- 14-12. For the most recent twelve month period available, please provide the monthly rate at which residential billings are translated into collected receipts. One possible way in which this might be portrayed is by completing the table below:

Mo nth	\$s of Bill ed Rev enu e	Collected Receipts in Dollars													
		JA N	FE B	M AR	AP R	M AY	JU N	JU L	AU G	SE P	OC T	NO V	DE C	Aft er De c	Tot al
JA N															
FE B		---													
MA R		---	---												
AP R		---	---	---											
MA		---	---	---	---										

Y															
JU N		---	---	---	---	---									
JUL		---	---	---	---	---	---								
AU G		---	---	---	---	---	---	---							
SEP		---	---	---	---	---	---	---	---						
OC T		---	---	---	---	---	---	---	---	---					
NO V		---	---	---	---	---	---	---	---	---	---				
DE C		---	---	---	---	---	---	---	---	---	---	---			
Etc.															

Notwithstanding this possible means of presentation, provide the rate at which billings are translated into actual collected receipts in any form available.

**Response can be found in Book 2 on Bates page(s) 225-231.**

- 14-13. Assume for purposes of this Information Request that a residential bill is rendered on Day 1. Assume further the bill remains unpaid. Provide the timeline of each collection step until the bill is final-billed for nonpayment. Identify the Day on which each step of the collection process can be expected to occur.

**Response can be found in Book 2 on Bates page(s) 232-234.**

- 14-14. In a typical month, with Day 1 being the day a bill is issued, please provide the percentage of residential accounts making payments by day through Day 60. If reporting of such data is only by a time period other than a day (e.g., weekly), provide by the reporting by that time period.

**Response can be found in Book 2 on Bates page(s) 235-237.**

- 14-15. Disaggregated by heating and non-heating residential customers, please provide by month for each month October 2015 to the present:
- The average bill for current service for all residential accounts;
  - The average arrears of residential accounts in arrears;
  - The average bill for current service of residential accounts in arrears;
  - The total dollars of residential arrears;
  - The percentage of total residential billed dollars constituting arrears;
  - The percentage of billed residential accounts having arrears; and
  - The average arrears of all residential accounts disconnected for nonpayment in that month.

**Response can be found in Book 2 on Bates page(s) 238-246.**

- 14-16. Please provide a copy of all reports, evaluations, memos, analyses or other written documents of any nature containing the Company methodology, procedure or process designed to systematically review, study or assess the Company residential billing and/or payment records in an effort to:
- a. Characterize patterns of nonpayment;
  - b. Identify the characteristics of nonpayers;
  - c. Identify predictors of nonpayment;
  - d. Identify strategies to reduce nonpayment;
  - e. Identify early indicators of nonpayment.

**Response can be found in Book 2 on Bates page(s) 247-276.**

- 14-17. Please provide a copy of a typical residential notice of disconnection for nonpayment printed in each of the following months:
- a. August 2017.
  - b. November 2017;
  - c. January 2018;
  - d. April 2017.

If more than one type of residential disconnection notice is issued, provide a copy of each.

**Response can be found in Book 2 on Bates page(s) 277-285.**

- 14-18. By month for each month since October 2015, please provide:
- a. The number of new deferred payment arrangements entered into;
  - b. The average downpayment (in dollars) of deferred payment; arrangements entered into disaggregated by the arrearages at the time the deferred payment arrangement is sought;
  - c. The average term (in months) of deferred payment arrangements entered into;
  - d. The average dollar amount of arrears made subject to the deferred payment arrangement disaggregated by their term (in months) of the payment arrangement agreement;
  - e. The average monthly installment of deferred payment arrangements disaggregated by their term (in months) of the payment arrangement agreement;
  - f. The distribution of new deferred payment arrangements by their term (in months);
  - g. The number of defaulted deferred payment arrangements;
  - h. The number of defaulted deferred payment arrangements disaggregated by their term (in months) of the payment arrangement agreement;
  - i. The number of completed (or “successful”) deferred payment arrangements; disaggregated by their term (in months) of the payment arrangement agreement;
  - j. The number of renegotiated DPAs newly entered into.

**Response can be found in Book 3 on Bates page(s) 1-56.**



## **Customer Studies & Collections**

- 14-19. Please provide each customer segmentation study that has been prepared for the Company of its residential customers since January 2013. If no such study has been prepared since January 2013, please provide the most recent study.

**Response can be found in Book 3 on Bates page(s) 57-59.**

- 14-20. Please provide each customer demographic survey that has been prepared for residential customers since January 2013. If no survey has been prepared since January 2013, please provide the most recent survey.

**Response can be found in Book 3 on Bates page(s) 60.**

- 14-21. By month for the months since October 2015, please provide for residential customers:
- The number of customers;
  - The dollars billed;
  - The dollars received in payment;
  - The number of customers billed a late payment charge;
  - The dollars of late payment charges billed.

**Response can be found in Book 3 on Bates page(s) 61-71.**

- 14-22. For each month for the most recent twelve months available, disaggregated by heating and non-heating residential accounts, please provide:
- The average bill for residential accounts at existing rates provided in sufficient detail (including all input variables) to permit replication;
  - The same bill information using the Company's proposed rates rather than the Company's existing rates.

**Response can be found in Book 3 on Bates page(s) 72-80.**

- 14-23. Please provide all written studies currently within the Company's custody or control, whether or not prepared by or for the Company, that explicitly assess the extent to which the following activities reduce residential bad debt:
- Cash security deposits;
  - Deferred payment agreements;
  - Disconnections for nonpayment;
  - Field collections;
  - Call center collection calls;
  - Budget billing plans;
  - Late payment charges.

**Response can be found in Book 3 on Bates page(s) 81.**

- 14-24. Please provide all written studies currently within the Company's custody or control, whether or not prepared by or for the Company, that explicitly assess the extent to which the following activities reduce residential arrears:
- a. Cash security deposits;
  - b. Deferred payment agreements;
  - c. Disconnections for nonpayment;
  - d. Field collections;
  - e. Call center collection calls;
  - f. Budget billing plans;
  - g. Late payment charges.

**Response can be found in Book 3 on Bates page(s) 82-107.**

- 14-25. Please provide a copy of:
- a. All written documents that explain, assess or otherwise discuss the criteria the Company uses to assess on an ongoing basis the effectiveness of its current credit and collection activities;
  - b. Any written assessment, evaluation, report or other written document of any nature prepared since January 1, 2013 which discusses the effectiveness of the Company's current credit and collection activities.

**Response can be found in Book 3 on Bates page(s) 108.**

- 14-26. Please list all the programs and initiatives the Company has undertaken since January 2013 to reduce the number of residential disconnections for nonpayment; if available, the metrics the Company uses to determine if these programs are successful; and the results of any evaluation explicitly using those metrics.

**Response can be found in Book 3 on Bates page(s) 109.**

- 14-27. Please list all the programs and initiatives the Company has undertaken since January 2013 to reduce the number of delinquent residential accounts; if available, the metrics the Company uses to determine if these programs are successful; and the results of any evaluation explicitly using those metrics.

**Response can be found in Book 3 on Bates page(s) 110-131.**

- 14-28. Please provide a copy of all reports, evaluations, memos, analyses or other written documents of any nature containing a list and/or discussion of specific performance indicators on which empirical data has been collected for the Company with respect to:
- a. Debt prevention;
  - b. Debt management;
  - c. The treatment of vulnerable residential customers.

**Response can be found in Book 3 on Bates page(s) 132.**

- 14-29. Please provide a copy of all reports, evaluations, memos, analyses or other written documents of any nature prepared since January 2013 establishing performance indicator targets to be met within the next year after publication of the performance targets; within the next two years after publication of the performance targets; or within the next three years after publication of the performance targets, with respect to:
- a. Debt prevention;
  - b. Debt management;
  - c. The treatment of vulnerable customers;
  - d. Customer satisfaction.

**Response can be found in Book 3 on Bates page(s) 133-260.**

- 14-30. Please provide a single copy of any report, evaluation, study or other written document of any nature, within the custody or control of the Company, whether or not prepared by or for the Company, dated within the past five years, identifying, evaluating or otherwise discussing why nonpaying residential customers do not make contact with the utility when, in response to bill nonpayment, those nonpaying customers receive a request or notice to contact a utility to avoid the disconnection of service.

**Response can be found in Book 3 on Bates page(s) 261.**

- 14-31. Please provide a single copy of any report, evaluation, study or other written document of any nature, within the custody or control of the Company, whether or not prepared by or for the Company, dated within the past five years, identifying, evaluating or otherwise discussing why residential customers do not successfully complete deferred payment plans (sometimes known as payment agreements or other similar terms) in order to avoid the disconnection of service for nonpayment.

**Response can be found in Book 3 on Bates page(s) 262.**

- 14-32. Please provide a list of each:
- a. Community served by the Company, along with the number of residential customers served in that community;
  - b. Zip code served by the Company, along with the number of residential customers served in that zip code.

**Response can be found in Book 3 on Bates page(s) 263-271.**

- 14-33. For the most recent 12 month period available, please provide any information that is available that is broken down geographically (e.g., zip code, community) regarding:
- a. Billings;
  - b. Payments;
  - c. Arrears;
  - d. Disconnections, reconnections;
  - e. Payment plans;
  - f. Other credit and collection activities.

If information is broken down by more than one geographic area, provide that information which is available on the most geographically disaggregated basis (e.g., community rather than town; Census Tract rather than zip code).

**Response can be found in Book 3 on Bates page(s) 272.**

### **Customer Classification**

14-34. Please provide a detailed description of all circumstances under which the Company would obtain the income information of a residential customer.

**Response can be found in Book 3 on Bates page(s) 273-274.**

14-35. Please provide a detailed description of all procedures used by the Company for:

- Recording the income of residential customers;
- Accessing the income of residential customers.

**Response can be found in Book 3 on Bates page(s) 275-289.**

14-36. Please identify:

- All criteria used to categorize customers as low-income customers;
- Each specific Company procedure in which these criteria are used to identify and categorize low-income customers and provide a copy of all sections of any operations manual or other written document that details the processes.

**Response can be found in Book 3 on Bates page(s) 290-291.**

14-37. Please provide the total number of customers receiving bill assistance grants from the federal Low-Income Home Energy Assistance Program (LIHEAP) in the:

- 2014 – 2015 LIHEAP program year;
- 2015 – 2016 LIHEAP program year; and
- 2016 – 2017 LIHEAP program year.

**Response can be found in Book 3 on Bates page(s) 292.**

14-38. Please provide the total dollars of bill assistance grants received from the Low-Income Home Energy Assistance Program (LIHEAP) in the:

- 2014 – 2015 LIHEAP program year;
- 2015 – 2016 LIHEAP year; and
- 2016 – 2017 LIHEAP program year.

**Response can be found in Book 3 on Bates page(s) 293.**

14-39. Please provide the total number of customers receiving a Crisis assistance grant from the federal Low-Income Home Energy Assistance Program (LIHEAP) in the:

- 2014 – 2015 LIHEAP program year;
- 2015 – 2016 LIHEAP program year; and

- c. 2016 – 2017 LIHEAP program year.

**Response can be found in Book 3 on Bates page(s) 294.**

- 14-40. Please provide the total dollars of Crisis assistance grants received from the Low-Income Home Energy Assistance Program (LIHEAP) in the:
- a. 2014 – 2015 LIHEAP program year;
  - b. 2015 – 2016 LIHEAP year; and
  - c. 2016 – 2017 LIHEAP program year.

**Response can be found in Book 3 on Bates page(s) 295.**

- 14-41. Please provide the total number of customers receiving bill assistance grants from a state or local program other than LIHEAP in the:
- a. 2014 – 2015 program year;
  - b. 2015 – 2016 program year; and
  - c. 2016 – 2017 program year.

**Response can be found in Book 3 on Bates page(s) 296.**

- 14-42. Please provide the total dollars of bill assistance grants received from a state or local program other than LHEAP in the:
- a. 2014 – 2015 program year;
  - b. 2015 – 2016 year; and
  - c. 2016 – 2017 program year.

**Response can be found in Book 3 on Bates page(s) 297.**

- 14-43. Please provide the total number of customers receiving a public or private crisis assistance grant other than LIHEAP Crisis in the:
- a. 2014 – 2015 program year;
  - b. 2015 – 2016 program year; and
  - c. 2016 – 2017 program year.

**Response can be found in Book 3 on Bates page(s) 298.**

- 14-44. Please provide the total dollars of public or private crisis assistance grants received from a public or private program other than LIHEAP Crisis in the:
- a. 2014 – 2015 program year;
  - b. 2015 – 2016 program year; and
  - c. 2016 – 2017 program year.

**Response can be found in Book 3 on Bates page(s) 299.**

- 14-45. Please provide all empirical third party evaluations of ratepayer-funded low-income bill affordability assistance offered by the Company in Rhode Island prepared since January 1, 2013.

**Response can be found in Book 3 on Bates page(s) 300.**

- 14-46. Please provide all empirical third party evaluations of ratepayer-funded low-income bill affordability assistance offered by the Company, or any affiliated utility, in a state other than Rhode Island since January 1, 2013.

**Response can be found in Book 4 on Bates page(s) 1.**

- 14-47. Please provide a copy of all empirical third party evaluations of ratepayer-funded low-income bill affordability assistance offered by a natural gas and/or electric utility other than the Company which evaluation was reviewed in the development of the proposed bill affordability proposal set forth in this proceeding.

**Response can be found in Book 4 on Bates page(s) 2.**

- 14-48. Please provide a final copy of the 4600 Stakeholder Working Group Process report (April 5, 2017) along with any submission that National Grid made to that Working Group in its deliberations.

**Response can be found in Book 4 on Bates page(s) 3-69.**

#### **A-60 Rate Class**

- 14-49. Please provide a copy of:
- All assessments of the impact of the transition to the full residential customer charge to A60 customers;
  - Separately provide a detailed description of how, in Year 4 and beyond, the three-year phase-in of the transition assists A60 customers.

**Response can be found in Book 4 on Bates page(s) 70-76.**

- 14-50. For the following five usage levels, provide an illustration of the existing A60 discount (without LIHEAP or LIHEAP matching grants) in sufficient detail to allow replication:
- 50% of average (mean) residential usage;
  - 75% of average (mean) residential usage;
  - 125% of average (mean) residential usage;
  - 100% of average (mean) residential usage;
  - 100% of median residential usage.

**Response can be found in Book 4 on Bates page(s) 77-83.**

- 14-51. For each year 2013 through 2017 inclusive, please provide:
- The sum of the cost of the A60 discount;

- b. All workpapers used to derive the response to “a”;
- c. The average per kWh charge to ratepayers through which those costs were recovered;
- d. All workpapers used to derive the response to “c”;
- e. The average monthly bill impact to ratepayers in recovering those costs;
- f. All workpapers used to derive the response to “d”.

**Response can be found in Book 4 on Bates page(s) 84-116.**

- 14-52. By month since October 2015 to present inclusive, provide:
- a. The number of A60 participants;
  - b. The average bill to A60 participants at standard residential rates;
  - c. The average bill to A60 participants given the A60 discount (not including LIHEAP or a LIHEAP matching grant);
  - d. The average dollar amount of the A60 discount;
  - e. A detailed explanation of why there is a difference, if any, if the response to “d” is not the response to “b” minus the response to “c”;
  - f. The aggregate dollar amount of the A60 discount (not including LIHEAP matching grants).

**Response can be found in Book 4 on Bates page(s) 117-123.**

- 14-53. By month since October 2015 to present inclusive, provide:
- a. The number of new entrants into the A60 program;
  - b. The total number of residential customers exiting the A60 program.

**Response can be found in Book 4 on Bates page(s) 124-126.**

- 14-54. By month since October 2015 to present inclusive, provide:
- a. The number of residential customers exiting the A60 program who remain customers of National Grid;
  - b. The number of residential customers exiting the A60 program by reason of the exit; and
  - c. The number of residential customers exiting the A60 program by whether the exit was voluntary or involuntary.

**Response can be found in Book 4 on Bates page(s) 127-128.**

- 14-55. By year since 2013 to present inclusive, provide the number of A60 entrants by whether their enrollment in A60 came through:
- a. A company staff person or office;
  - b. A community-based organization;
  - c. The federal LIHEAP program through receipt of a LIHEAP basic grant;
  - d. The federal LIHEAP program through receipt of a LIHEAP crisis grant;
  - e. Some other (non-LIHEAP) federal or state agency program or staff.

**Response can be found in Book 4 on Bates page(s) 129-130.**

- 14-56. By month since October 2015 to present inclusive, provide:
- The number of A60 participants who received a final notice of disconnection of service for nonpayment;
  - The number of A60 participants who had their service disconnected for nonpayment;
  - The number of A60 participants who had their service reconnected after a disconnection for nonpayment.

**Response can be found in Book 4 on Bates page(s) 131.**

- 14-57. By month since October 2015 to present inclusive, provide:
- The number of A60 accounts in arrears;
  - The dollars of arrears for A60 accounts in arrears;
  - The number of A60 accounts in arrears by aging bucket (e.g., 0-30 days; 31-60 days; 61-90 days, etc.);
  - The dollars of arrears for A60 accounts in arrears by aging bucket.

**Response can be found in Book 4 on Bates page(s) 132.**

- 14-58. By month since October 2015 to present inclusive, provide:
- The number of A60 participants receiving LIHEAP in that LIHEAP program year;
  - The number of A60 participants who had NOT received LIHEAP in that LIHEAP program year;
  - The number of residential customers who had received a LIHEAP grant but not enrolled in the A60 discount program.

**Response can be found in Book 4 on Bates page(s) 133-134.**

- 14-59. By year since 2013 to present inclusive, provide:
- The total number of residential customers receiving a LIHEAP basic grant;
  - The dollars of LIHEAP basic grants received;
  - The total number of residential customers receiving a LIHEAP crisis grant;
  - The dollars of LIHEAP crisis grants received;
  - The extent to which there is a duplication between the numbers provided in response to “a” and “c” (i.e., those who received both a basic grant and a crisis grant).

**Response can be found in Book 4 on Bates page(s) 135-136.**

- 14-60. By year since 2013 to present inclusive, provide:
- The number of A60 participants receiving LIHEAP matching grants;
  - The average LIHEAP matching grant (of those receiving grants);
  - The average bill at standard residential rates of customers receiving a LIHEAP matching grant;
  - The total dollar cost of providing LIHEAP matching grants;



- e. The average per kWh charge to ratepayers through which those costs were recovered;
- f. The average monthly bill impact to ratepayers in recovering those costs;
- g. All worksheets used to derive the response to “e” and “f”.

**Response can be found in Book 4 on Bates page(s) 137.**

14-61. By rate schedule, provide:

- a. The projected Year 1 and Year 2 costs of providing the proposed 15% total bill discount;
- b. The projected Year 1 and Year 2 per kWh charge to ratepayers through which those costs will be recovered;
- c. The projected average month bill impact to ratepayers in recovering those costs.

**Response can be found in Book 4 on Bates page(s) 138-152.**

14-62. By month since October 2015 to present inclusive, provide the bills that:

- a. Were received at standard residential rates at average residential consumption;
- b. Would have been received at A60 rates (without considering LIHEAP or LIHEAP matching grants);
- c. That would have been received had the proposed 15% total discount been in effect in those time periods rather than the existing A60 discount.

**Response can be found in Book 4 on Bates page(s) 153-156.**

14-63. For the following five usage levels, provide an illustration of the proposed 15% total bill discount in sufficient detail to allow replication:

- a. 50% of average (mean) residential usage;
- b. 75% of average (mean) residential usage;
- c. 125% of average (mean) residential usage;
- d. 100% of average (mean) residential usage;
- e. 100% of median residential usage.

**Response can be found in Book 4 on Bates page(s) 157-163.**

14-64. Please provide a detailed description of the enrollment process for the existing A60 discount. Separately provide a detailed description of how, if at all, the enrollment process will change for the proposed 15% discount.

**Response can be found in Book 4 on Bates page(s) 164.**

14-65. Please provide a detailed description of the periodic re-enrollment (or recertification) process for the existing A60 discount. Separately provide a detailed description of how, if at all, that re-enrollment (or recertification) process will change for the proposed 15% discount.

**Response can be found in Book 4 on Bates page(s) 165.**

- 14-66. For the following five usage levels, provide an illustration of the effective discount provided under the existing A60 discount in sufficient detail to allow replication:
- a. 50% of average (mean) residential usage;
  - b. 75% of average (mean) residential usage;
  - c. 125% of average (mean) residential usage;
  - d. 100% of average (mean) residential usage;
  - e. 100% of median residential usage.

**Response can be found in Book 4 on Bates page(s) 166.**

- 14-67. For the following five usage levels, provide an illustration of the effective discount provided under the proposed 15% total bill discount in sufficient detail to allow replication:
- a. 50% of average (mean) residential usage;
  - b. 75% of average (mean) residential usage;
  - c. 125% of average (mean) residential usage;
  - d. 100% of average (mean) residential usage;
  - e. 100% of median residential usage.

**Response can be found in Book 4 on Bates page(s) 167.**

- 14-68. Please provide a detailed description of the expected impact on LIHEAP enrollment arising from the elimination of the Company's explicit LIHEAP matching grant. Provide all written documents, of any nature, prepared assessing this impact.

**Response can be found in Book 4 on Bates page(s) 168.**

- 14-69. Please provide the percent discount off of the total bills for the Company's Massachusetts affiliate. If that discount has changed since 2009, please so indicate and describe the nature and level of the change.

**Response can be found in Book 4 on Bates page(s) 169-178.**

- 14-70. By year since 2003 to present inclusive, provide:
- a. The total aggregate cost of the Massachusetts discount;
  - b. The per kWh charge to ratepayers through which those costs were recovered;
  - c. The average monthly bill impact to ratepayers in recovering those costs.

**Response can be found in Book 4 on Bates page(s) 179-180.**

- 14-71. Please provide a detailed description of the low-income discount, if any, provided by the Company's New Hampshire affiliate.

**Response can be found in Book 4 on Bates page(s) 181-192.**

- 14-72. By year since 2003 to present inclusive, provide:
- a. The total aggregate cost of the New Hampshire discount;

- b. The per kWh charge to ratepayers through which those costs were recovered;
- c. The average monthly bill impact to ratepayers in recovering those costs.

**Response can be found in Book 4 on Bates page(s) 193-211.**

- 14-73. Please explain whether the reference to “low-income customers” on page 23, lines 19-20 of Leary/McCabe’s pre-filed direct testimony includes customers other than customers receiving the A60 discount.

**Response can be found in Book 4 on Bates page(s) 212.**

- 14-74. To the extent the response to the immediately preceding request indicates that there are low-income customers who do not receive the A60 discount, please explain in detail all circumstances in which a known low-income customers does not receive the A60 discount.

**Response can be found in Book 4 on Bates page(s) 213.**

- 14-75. Please provide:
- a. The uncollectible (i.e., bad debt) rate for residential customers;
  - b. The uncollectible (i.e., bad debt) rate for low-income customers if available.

**Response can be found in Book 4 on Bates page(s) 214-216.**

- 14-76. Please provide all written analyses, or evaluations, prepared by or for the Company, or that are otherwise within the custody or control of the Company, that assess or otherwise discuss the affordability of low-income bills given:
- a. The existing A60 discount;
  - b. The proposed 15% total bill discount.

**Response can be found in Book 4 on Bates page(s) 217.**

- 14-77. Please provide all written evaluations within the custody or control of the Company, prepared since January 2007, of a low-income discount program offered by an affiliated non-Rhode Island utility.

**Response can be found in Book 5 on Bates page(s) 1-313.**