

January 24, 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 6

Dear Ms. Massaro:

Enclosed are an original and one copy of the Company's¹ responses to the sixth 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 6-19. The Company seeks protection from public disclosure of certain confidential information contained in Attachment DIV 6-19-2 and Attachment DIV 6-19-3 provided with data request Division 6-19. 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 sixth 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

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

Luly E. Massaro, Commission Clerk
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Enclosures

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

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

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

Docket No. 4770

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

The Company¹ 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 January 24, 2018, the Company filed responses to the Rhode Island Division of Public Utilities and Carriers’ (the Division) Sixth Set of Data Requests of the Division of Public Utilities and Carriers to National Grid dated January 3, 2018 (Division Set 6). Division Set 6 includes Data Request Division 6-19 (seeking “copies of any studies that have been conducted by National Grid . . . in which the deployment of AMF was evaluated”). The Company’s response to Division 6-19 includes Attachment DIV 6-19-2 and Attachment DIV 6-19-3. These attachments contain confidential and proprietary commercial and financial information that it ordinarily would not share with the public.

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

Specifically, these attachments contain confidential vendor-specific pricing information that the Company ordinarily would not make public. Therefore, the Company requests that, pursuant to Rule 1.2(g), the PUC afford confidential treatment to the information contained in the confidential Attachment DIV 6-19-2 and Attachment DIV 6-19-3.

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 confidential Attachment DIV 6-19-2 and Attachment DIV 6-19-3 should be protected from public disclosure. These attachments contain confidential and proprietary commercial and financial information relating to the Company's business operations. Specifically, these attachments contain confidentially submitted vendor pricing information that, if publicly revealed, would harm the Company's competitive position. It is the type of information that the Company ordinarily would not disclose to the public. Therefore, the Company is providing confidential Attachment DIV 6-19-2 and Attachment 6-19-3 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 this attachment.

IV. CONCLUSION

Accordingly, the Company respectfully requests that the PUC grant protective treatment to confidential Attachment DIV 6-19-2 and Attachment DIV 6-19-3.

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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Dated: January 24, 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.



Najat Coye

January 24, 2018

Date

Docket No. 4770 - National Grid – Rate Application
Service list updated 1/3/2018

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DOCKET NO. 4770
SIXTH SET OF DATA REQUESTS OF THE
DIVISION OF PUBLIC UTILITIES AND CARRIERS TO
NATIONAL GRID

January 3, 2018

Meters

- 6-1. Please provide a count of the number of electric meters currently in service. Of the electric meters currently in service, please provide:
- a. The number of meters by rate class.
 - b. The number of meters by rate class that utilize automated meter reading (AMR) technology.
 - c. The number of meters by rate class that do not utilize AMR technology, specifying the meter type.
 - d. The number of meters by rate class, if any, that are capable of recording time-of-use consumption readings if the Commission approved hourly time-of-use kilowatt-hour rate design.
 - e. The number of meters by rate class, if any, that are capable of recording “real time” time-of-use consumption readings.
 - f. If the number of meters currently in service materially differs from the number of meters in service during the historical test year, please also provide the number of meters in service during the test year as requested in (a) through (e) above.

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

- 6-2. Of the electric meters currently in service, please identify the number of meters by year of installation, by rate class.

Response can be found in Book 1 part 1 on Bates page(s) 11-24.

- 6-3. Please state the average cost per electric meter by vintage year, by rate class.

Response can be found in Book 1 part 1 on Bates page(s) 25-29.

- 6-4. Of the electric meters currently in service, please identify the number of meters, if any, by rate class that are fully depreciated.

Response can be found in Book 1 part 1 on Bates page(s) 30-34.

- 6-5. Please state the dollar amount reflected in rate base, as of the end of the historical test year, for all electric meters, by rate class.

Response can be found in Book 1 part 1 on Bates page(s) 35-36.

6-6. Please describe the Company's policy for replacing electric meters.

Response can be found in Book 1 part 1 on Bates page(s) 37.

6-7. Please state how many electric meters the Company is forecasting will be replaced during the rate year.

Response can be found in Book 1 part 1 on Bates page(s) 38.

6-8. Please state the number of electric meters that have been replaced during the last five years, by year. Of those meters replaced, please indicate (i) the number that were replaced because they no longer were functional and (ii) the number that were replaced that were still functional but replaced in accordance with governing Company policy or other reasons.

Response can be found in Book 1 part 1 on Bates page(s) 39.

6-9. Has the Company considered purchasing so-called hybrid electric meters that are capable of both utilizing AMR technology and being utilized with advanced metering if and when the Company installed advanced meter infrastructure (AMF)? If so, please explain the Company's decisions with respect to this option. If not, please explain why not.

Response can be found in Book 1 part 1 on Bates page(s) 40.

6-10. Please provide a count of the number of gas meters currently in service. If the number of meters currently in service differs from the number of meters in service during the historical test year, please also provide the number of meters in service during the test year. Of the gas meters currently in service, please provide:

- a. The number of meters by rate class.
- b. The number of meters by rate class that utilize automated meter reading (AMR) technology.
- c. The number of meters by rate class that do not utilize AMR technology, specifying the meter type.
- d. The number of meters by rate class, if any, that are capable of recording time-of-use consumption readings.
- e. The number of meters by rate class, if any, that are capable of recording real time time-of-use consumption readings.
- f. If the number of meters currently in service materially differs from the number of meters in service during the historical test year, please also provide the number of meters in service during the test year as requested in (a) through (e) above.

Response can be found in Book 1 part 1 on Bates page(s) 41-45.

- 6-11. Of the gas meters currently in service, please identify the number of meters by year of installation, by rate class.

Response can be found in Book 1 part 1 on Bates page(s) 46-66.

- 6-12. Please state the average cost per electric meter by vintage year, by rate class.

Response can be found in Book 1 part 1 on Bates page(s) 67-70.

- 6-13. Of the gas meters currently in service, please identify the number of meters, if any, by rate class that are fully depreciated.

Response can be found in Book 1 part 1 on Bates page(s) 71-74.

- 6-14. Please state the dollar amount reflected in rate base, as of the end of the historical test year, for all gas meters, by rate class.

Response can be found in Book 1 part 1 on Bates page(s) 75-76.

- 6-15. Please describe the Company's policy for replacing gas meters.

Response can be found in Book 1 part 1 on Bates page(s) 77.

- 6-16. Please state how many gas meters the Company is forecasting will be replaced during the rate year.

Response can be found in Book 1 part 1 on Bates page(s) 78.

- 6-17. Please state the number of gas meters that have been replaced during the last five years, by year. Of those meters replaced, please indicate (i) the number that were replaced because they no longer were functional and (ii) the number that were replaced that were still functional but replaced in accordance with governing Company policy or other reasons.

Response can be found in Book 1 part 1 on Bates page(s) 79.

- 6-18. Please state whether AMF is being considered for deployment in any of the other jurisdictions in which National Grid has electric distribution affiliates. If so, please explain the status of any proceedings or discussions taking place in which AMF is being considered.

Response can be found in Book 1 part 1 on Bates page(s) 80.

- 6-19. Please provide copies of any studies that have been conducted by National Grid, if any, in which the deployment of AMF was evaluated.

Response can be found in Book 1 part 1 on Bates page(s) 81 to Book 1 part 2 on Bates page(s) 300.