

January 26, 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 7

Dear Ms. Massaro:

Enclosed are an original and one copy of the Company's¹ responses to the seventh 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 requests Division 7-1 and Division 7-31. The Company seeks protection from public disclosure of certain confidential information contained in (1) Attachment DIV 7-1 provided with data request Division 7-1 and (2) the response to Division 7-31 and Attachment DIV 7-31. 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 seventh set of data requests, as indicated in the enclosed discovery log.

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

Luly E. Massaro, Commission Clerk
Docket No. 4770 – Responses to Division Set 7
January 26, 2018
Page 2 of 2

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

Very truly yours,

A handwritten signature in blue ink that reads "Celia B. O'Brien". The signature is written in a cursive style with a clear, legible font.

Celia B. O'Brien

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)	Docket No. 4770
d/b/a NATIONAL GRID – ELECTRIC AND GAS)	
DISTRIBUTION RATE FILING)	
_____)	

**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 to, 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 26, 2018, the Company filed responses to the Rhode Island Division of Public Utilities and Carriers’ (the Division) Seventh Set of Data Requests of the Division of Public Utilities and Carriers to National Grid dated January 5, 2018 (Division Set 7). Division Set 7 includes Data Request Division 7-1 (seeking “electronic copies of workpapers relied upon by Witness Normand to generate his Class Cost of Service and rate design analyses presented in Schedules PMN-2 through PMN-9” in Excel format) and Data Request Division 7-31 (seeking, among other things, a copy of the Company’s

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

contract with its IP wireless service provider and information about the terms of that contract).

The Company's response to Division 7-1 includes Attachment DIV 7-1, which includes all the requested Excel spreadsheets. Several of the spreadsheets contained within Attachment DIV 7-1, specifically those related to Schedule PMN-2, Schedule PMN-3, Schedule PMN-4, Schedule PMN-5, and Schedule PMN-9, contain confidential and proprietary commercial and financial information that it ordinarily would not share with the public. Specifically, these attachments contain confidential and proprietary models and formulas developed and owned by third parties.

The Company's contract with its IP wireless service provider contains a confidentiality provision that requires, among other things, that the parties to the contract keep the contract and the terms of the contract confidential. The Company's response to Division 7-31 includes Attachment DIV 7-31, which is a copy of that contract. Additionally part b. and part d. of the written response to Division 7-31 contain terms of the confidential contract. The written response to Division 7-31 and Attachment DIV 7-31 contain sensitive confidential commercial information that the Company has a legal obligation to protect from public disclosure.

Therefore, the Company requests that, pursuant to Rule 1.2(g), the PUC afford confidential treatment to the information contained in: (1) the confidential portions of Attachment DIV 7-1; (2) the unredacted written response to Division 7-31; and (3) confidential Attachment DIV 7-31.

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 portions Attachment DIV 7-1 should be protected from public disclosure. This attachment contains confidential and proprietary Excel models and formulas that were created and are owned by third parties. Further, the redacted portions of the written response to Division 7-31 and Attachment DIV 7-31 contain confidential pricing information in a contract, the terms of which the Company has a binding contractual legal obligation to keep confidential under the terms of the contract.

The Company has a legal obligation to protect this information from public disclosure. If the Company was to be required to make the formulas in Attachment DIV 7-1 or the confidential contract terms in the response to Division 7-31 and Attachment DIV 7-31 public in contravention of its legal obligations, the Company's competitive position would be harmed. Further, it would place the Company at legal risk. Accordingly, it is the type of information that the Company ordinarily would not disclose to the public. Therefore, the Company is providing (1) the confidential portions of Attachment DIV 7-1; (2) the unredacted written response to Division 7-31; and (3) confidential Attachment DIV 7-31 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 (1) the confidential portions of Attachment DIV 7-1; (2) the unredacted written response to Division 7-31; and (3) confidential Attachment DIV 7-31.

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

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY**

By its attorneys,



Celia B. O'Brien, Esq. (RI #4484)
National Grid
280 Melrose Street
Providence, RI 02907
(781) 907-2153



Adam M. Ramos, Esq. (RI #7591)
Hinckley, Allen & Snyder LLP
100 Westminster Street, Suite 1500
Providence, RI 02903-2319
(401) 457-5164

Dated: January 26, 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 26, 2018
Date

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

Name/Address	E-mail Distribution List	Phone
National Grid Celia O'Brien, Esq. Jennifer Hutchinson, Esq. National Grid 280 Melrose St. Providence, RI 02907	Celia.obrien@nationalgrid.com ;	781-907-2153 401-784-7288
	Jennifer.hutchinson@nationalgrid.com ;	
	Najat.coye@nationalgrid.com ;	
	Joanne.scanlon@nationalgrid.com ;	
	Bill.Malee@nationalgrid.com ;	
	Melissa.little@nationalgrid.com ;	
	William.richer@nationalgrid.com ;	
	Theresa.burns@nationalgrid.com ;	
	Ann.leary@nationalgrid.com ;	
	Scott.mccabe@nationalgrid.com ;	
	Najat.coye@nationalgrid.com ;	
Adam Ramos, Esq. Hinckley Allen Hinckley Allen 100 Westminster Street, Suite 1500 Providence, RI 02903-2319	aramos@hinckleyallen.com ;	401-457-5164
Division of Public Utilities (Division) Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Lwold@riag.ri.gov ;	404-274-4400
	Jmunoz@riag.ri.gov ;	
	Dmacrae@riag.ri.gov ;	
Steve Scialabba, Chief Accountant Division of Public Utilities 89 Jefferson Blvd. Warwick, RI 02888	Steve.scialabba@dpuc.ri.gov ;	401-780-2140
	Macky.McCleary@dpuc.ri.gov ;	
	Jonathan.Schrag@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	Thomas.kogut@dpuc.ri.gov ;	
	Aliza.wasserman@dpuc.ri.gov ;	
Tim Woolf Jennifer Kallay	twoolf@synapse-energy.com ;	617-661-3248

Synapse Energy Economics 22 Pearl Street Cambridge, MA 02139	jkallay@synapse-energy.com ;	
	mwhited@synapse-energy.com ;	
	jhall@synapse-energy.com ;	
David Effron Berkshire Consulting 12 Pond Path North Hampton, NH 03862-2243	Djeffron@aol.com ;	603-964-6526
Bruce Oliver Tim Oliver Revilo Hill Associates 7103 Laketree Drive Fairfax Station, VA 22039	Boliver.rha@verizon.net ;	703-569-6480
	tim.b.oliver@gmail.com ;	
Matt Kahal 1108 Pheasant Crossing Charlottesville, VA 22901	mkahal@exeterassociates.com ;	434-964-0604
Ronald Gerwatowski	gerwat@verizon.net ;	508-259-7963
M. Ballaban LaCapra Associates	mballaban@daymarkea.com ;	
T. Bennett S. Bobo Daymark Energy Advisors	tbennett@daymarkea.com ;	
	sbobo@daymarkea.com ;	
William Dunkel and Associates 8625 Farmington Cemetery Road Pleasant Plains, IL 62677	WilliamDunkel@consultant.com ;	217-626-1934
	RoxieMcCullar@consultant.com ;	
Office of Energy Resources (OER) Andrew Marcaccio, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4 th Floor Providence, RI 02908	Andrew.Marcaccio@doa.ri.gov ;	401-222-8880
Carol Grant, Commissioner Office of Energy Resources	Carol.grant@energy.ri.gov ;	401-574-9100
	Christopher.Kearns@energy.ri.gov ;	
	Danny.Musher@energy.ri.gov ;	
	Nicholas.Ucci@energy.ri.gov ;	
	Becca.Trietch@energy.ri.gov ;	
Conservation Law Foundation (CLF) Jerry Elmer, Esq. Max Greene, Esq. Conservation Law Foundation 235 Promenade Street Suite 560, Mailbox 28 Providence, RI 02908	jelmer@clf.org ;	401-228-1904
	mgreene@clf.org ;	
Dept. of Navy (DON) Kelsey A. Harrer, Esq. Office of Counsel NAVFAC Atlantic, Department of the Navy 6506 Hampton Blvd. Norfolk, VA 23508-1278	kelsey.a.harrer@navy.mil ;	757-322-4119

Kay Davoodi, Director Larry R. Allen, Public Utilities Specialist Utilities Rates and Studies Office NAVFAC HQ, Department of the Navy 1322 Patterson Avenue SE Suite 1000 Washington Navy Yard, D.C. 20374	khojasteh.davoodi@navy.mil ; larry.r.allen@navy.mil ;	
Original & 9 copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ; Cynthia.WilsonFrias@puc.ri.gov ; Alan.nault@puc.ri.gov ; Todd.bianco@puc.ri.gov ; Margaret.hogan@puc.ri.gov ;	401-780-2107
Interested Persons		
EERMC Marisa Desautel, Esq . Kate Desrochers	marisa@desautelesq.com ; guerard@optenergy.com ; kdesrochers@veic.org ; loiter@optenergy.com ;	401-477-0023
Bob Chatham	bchatham@vcharge-energy.com ;	401-742-8264
John DiTomasso, AARP	jditomasso@aarp.org ;	401-248-2655
Frank Epps, EDP	Frank@edp-energy.com ;	
Matt Davey	mdavey@ssni.com ;	
NECEC Janet Besser Jamie Dickerson	jbesser@necec.org ; jdickerson@necec.org ;	
John DiTomasso, AARP	jditomasso@aarp.org ;	401-248-2655
Jesse Reyes	JReyes@brownrudnick.com ;	
Larry Allen, Dept. of Navy	Larry.r.allen@navy.mil ;	
George Wiley Center Camilo Viveiros Chloe Chassaing	georgewileycenterri@gmail.com ; Camiloviveiros@gmail.com ; chloechassaing@hotmail.com ;	
Acadia Center Erika Niedowski Mark Lebel Amy Boyd	ENiedowski@acadiacenter.org ; Mlebel@acadiacenter.org ; Aboyd@acadiacenter.org ;	401-276-0600
Kat Burnham, PPL	kat@ripower.org ;	401-861-6111
Nathan Phelps	nathan@votesolar.org ;	
Seth H. Handy, Esq. Handy Law, LLC	seth@handylawllc.com ;	401-626-4839
John Willumsen-Friedman, Esq. Center for Justice	jwillumsen@centerforjustice.org ;	
Douglas W. Gablinske, The Energy Council of RI (TEC-RI)	doug@tecri.org ;	
Karl Rabago	krabago@law.pace.edu ;	

Docket No. 4770
Seventh Set of Data Requests of the
Division of Public Utilities and Carriers to National Grid
January 5, 2018

Instruction: Each request for workpapers should be understood to include a request for all electronic spreadsheet files with all cell formulas and cell references in tact.

Regarding Gas Costs of Service and Rates

7-1. Re: the Direct Testimony of Witness Normand. Please provide electronic copies of workpapers relied upon by Witness Normand to generate his Class Cost of Service and rate design analyses presented in Schedules PMN-2 through PMN-9 including all supporting workpapers and electronic spreadsheet files used in the development of input data and allocation factors for the analyses presented in those exhibits.

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

7-2. Re: the Direct Testimony of Witness Normand at page 9 of 31, lines 8-11. Please provide full documentation of each "special study" undertaken to replicate the intended use of specific plant or expenses.

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

7-3. Re: the Direct Testimony of Witness Normand at page 9 of 31, lines 12-13. Please:

- a. Provide the workpapers, data, analyses, studies, and assumptions relied upon as the basis for his assertion that "the cost of processing a computer generated bill is the same for all classes."
- b. Provide an example of the current format for each gas service rate classification.
- c. Detail all changes in billing format that will be required to implement the proposed rates for each gas rate classification.
- d. Identify each element of billing information that must be processed to generate a bill for a customer in each rate classification.
- e. Identify each element of billing information that is stored by the Company for bills rendered to customers in each rate class.

Response can be found in Book 1 on Bates page(s) 3-34.

- 7-4. Re: the Direct Testimony of Witness Normand at page 9 of 31, line 19, through page 10, line 3. Please provide an explanation of the ratemaking principal that supports the use of “**some rational basis**” as a substitute for a more cost causative relationship.

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

- 7-5. Re: the Direct Testimony of Witness Normand at page 10 of 31. Please:
- a. Identify the components of the costs that comprise Narragansett Gas’ Intangible Plant.
 - b. Explain how the incurrence of costs for each component of Narragansett Gas’ Intangible Plant costs is cost-causatively related to:
 1. The Company’s incurrence of its “total plant” costs;
 2. The Company’s incurrence of “total labor” costs.

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

- 7-6. Re: the Direct Testimony of Witness Normand at page 11 of 31, lines 5-16; Schedule PMN-3, Rate Design, pages 43 and 44 of 74; and Schedule PMN-9, pages 1-8. Please provide the electronic spreadsheet files, data, analyses, and assumptions used to compute the Distribution RSUM allocator for each rate class that Witness Normand has used in this proceeding.

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

- 7-7. Re: the Direct Testimony of Witness Normand at page 12 of 31, lines 8-10. Please identify and document each “factor” taken from:
- a. Narragansett Gas’ continuing property records;
 - b. Narragansett Gas’ general accounting records;
 - c. Other available sources.

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

- 7-8. Re: the Direct Testimony of Witness Normand at page 12 of 31, lines 13-15. Please provide the workpapers, data, analyses, and assumptions relied by to assess the “total number of services” for each rate class. Please include in the response to this request any and all information developed by or for the Company with respect to:

- a. The numbers instances in which more than one account is served through a single service line;
- b. The number accounts for each rate class that are served through shared service lines.

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

- 7-9. Re: the Direct Testimony of Witness Normand at page 12 of 31, lines 15-17. Please provide the workpapers, data, analyses, and assumptions relied upon to assess “typical replacement costs for meters used to serve each rate class.”

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

- 7-10. Re: the Direct Testimony of Witness Normand at page 13 of 31, lines 8-10. Please identify and quantify the “capitalized labor” costs by FERC account that are included in the development of Witness Normand’s LABOR allocator.

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

- 7-11. Re: the Direct Testimony of Witness Normand at page 14 of 31, lines 8-10. Please:

- a. Verify that non-firm margins are no longer subject to sharing for the Company’s Rhode Island operations.
- b. Explain why Non-Firm Service is not shown as a separate class within the Company’s class cost of service allocation study.
- c. Specific all criteria that the witness believes would need to be met to Non-Firm Service to be treated in the same manner as firm service rate classifications within the Company’s class cost of service allocations.

Response can be found in Book 1 on Bates page(s) 42-43.

- 7-12. Re: the Direct Testimony of Witness Normand at page 14 of 31, lines 8-10. Please:

- a. Identify and quantify all elements of non-firm revenue that the Company includes within the “non-firm revenue margins” that are allocated among rate classes on the distribution DISTR allocator.
- b. Provide the workpapers, data, analyses, and assumptions relied upon to support the appropriateness of allocating non-firm revenue margins among the Company’s firm gas service rate classifications.

Response can be found in Book 1 on Bates page(s) 44.

- 7-13. Re: the Direct Testimony of Witness Normand at page 15 of 31, lines 3-5. Please identify and quantify each element of Operation and Maintenance expenses that the witness classifies as “plant-related capacity expenses.

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

- 7-14. Re: the Direct Testimony of Witness Normand at page 16 of 31, lines 5-7. Please explain the meaning of the phrase “existing and equalized revenue requirement levels” as it is used by the witness. If “equalized revenue requirement levels” are intended to reference revenue requirements at equalized class rates of return, so state. If a different meaning is intended, please explain the intended meaning and document the witness’ determination of “equalized revenue requirement levels.”

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

- 7-15. Re: the Direct Testimony of Witness Normand at page 16 of 31, lines 15-19. Please:
- a. Provide the witness’ quantification of the rates of return that the residential low-income classes would generate if shown separately in the Company’s Allocated Cost of Service Study.
 - b. Document and quantify the subsidies to low income residential classes (R11 and R13) that the witness has included in his cost studies.

Response can be found in Book 1 on Bates page(s) 47.

- 7-16. Re: the Direct Testimony of Witness Normand at page 20 of 31, lines 1-3 where reference is made to “some rather large increases.” Please:
- a. Identify all criteria used by Witness Normand to assess the acceptability of above average revenue increase percentages for each rate class.
 - b. Document and explain the witness’ rationale for when in the context of the Company’s overall revenue increase request in this proceeding an increase for an individual rate class becomes “rather large.”

Response can be found in Book 1 on Bates page(s) 48.

- 7-17. Re: the Direct Testimony of Witness Normand at page 21 of 31, line 1. Please document and explain the derivation of the 1.15 multiplier used to establish the proposed cap for percentage increases in revenue requirements by class.

Response can be found in Book 1 on Bates page(s) 49.

- 7-18. Re: the Direct Testimony of Witness Normand at page 22 of 31. Please explain why the Proposed “Total Narragansett Gas” increase shown on the last line of Table 1 is less than the “Total Narragansett Gas” Increase to Uniform ROR shown on the same line.

Response can be found in Book 1 on Bates page(s) 50.

- 7-19. Re: the Direct Testimony of Witness Normand at page 22 of 31. Please:
- a. Provide citation to, and the specific language of, the portion of the Commission’s order in Narragansett Gas’ 2012 Rate Case that approved the elimination of “all existing block structure” for gas service rate classes.
 - b. Verify that Narragansett Gas’ current rates include blocked distribution charges for Residential Heat and Small C&I customers served under Rates 12, 13, and 21.

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

- 7-20. Re: the Direct Testimony of Witness Normand at page 23 of 31, determination of proposed customer charges for gas service customers. Please:
- a. Provide all actual cost data and analyses relied upon to assess the reasonableness and appropriateness of the \$735 per month customer charge for Non-Firm customers.
 - b. Verify that the Company’s current Gas Tariff includes three different levels of customer charges for Non-Firm Transportation (NFT) Service customers, and demonstrate the relationship between those current tariff charges and the \$625 per month “Current” customer charge for Non-Firm shown in Table 2.
 - c. Explain how the proposed customer charge for Non-Firm customers considers the provisions of the Company’s tariff that require that customers who take Non-Firm Transportation Service must have telemetering equipment in-place.
 - d. Explain how the proposed customer charge for Non-Firm customers the proposed requirement in Section 6, Transportation Terms and Conditions, Schedule C, Sheet 15, Item 2.02.0, Telemetering, that may require NFT customers to pay an “*initial lump sum fee*” for a meter equipped with a wireless module and pay an annual fee for a “data plan.”

Response can be found in Book 1 on Bates page(s) 52-53.

7-21. Re: Schedule PMN-7, Rate Design, page 3 of 6. Please:

- a. Provide the price elasticity analyses or other analyses relied upon by the Company to assess the expected impacts of the proposed changes in distribution charges on gas use for each rate class.
- b. Provide the Company's assessment of the expected impacts of its proposed rates and charges on gas use by rate class, as well as all supporting workpapers for that assessment.
- c. For C&I Small Sales and Transportation (FT-2) services, explain the rationale for the comparatively large percentage increases shown in Column (AA) for Off-Peak service and the comparatively small increases computed for On-Peak service.

Response can be found in Book 1 on Bates page(s) 54.

7-22. Re: Schedule PMN-9, page 2 of 136. Please:

- a. Provide the full supporting detail for the witness' determination of the "billing days" by month shown in the second column from the left in the lower portion of the presentation on page 2 of 136 in Schedule PMN-9.
- b. Document and explain the relationship between the "Normalized Sales (dth) Cycle Billed" shown in page 2 of 136 in Schedule PMN-9 and the "Normalized Sales (dth) Monthly Billed" shown on page 3 of 136.
- c. Verify that the RSUM Allocation Factor development is premised on average daily use within each "billing" or "cycle" month and does not address fluctuations in daily use (e.g., daily peak requirements) with a "billing" or "cycle" month.
- d. Please identify and explain the cost-causative relationship between normal weather daily average gas use by "billing month" and/or "cycle month" and the factors that determine the Company's sizing and costs for distribution mains.

Response can be found in Book 1 on Bates page(s) 55-57.

7-23. Re: the Direct Testimony of the Pricing Panel (Witnesses Leary and McCabe) at page 14 of 36, lines 15-16. For each of the last three years, please:

- a. Provide the number of Account Restoration Charges billed to customers served under each gas rate classification.
- b. Detail the Company's actual costs for Account Restoration activities.

- c. Provide the number of Returned Check Charges billed to customers served under each gas rate classification.
- d. Detail the Company's actual costs for processing Returned Checks.

Response can be found in Book 1 on Bates page(s) 58-59.

- 7-24. Re: the Direct Testimony of the Pricing Panel (Witnesses Leary and McCabe) at page 15 of 36, lines 14-18. For each of the last three years, please verify that the Company will have adequate AGT funding in the Rate Year to meet existing and anticipated AGT program commitments if the \$300,000 currently embedded in its base distribution rates is eliminated, and if not, provide the Company's current best estimate of the amount of additional funding through the DAC that will be required to make existing and anticipated funding requirements.

Response can be found in Book 1 on Bates page(s) 60.

- 7-25. Re: the Direct Testimony of the Pricing Panel (Witnesses Leary and McCabe) at page 20 of 36, lines 7-11. Please provide the workpapers, data, and assumptions relied upon to assess the extent to which "[c]easing the recovery of the discount through base distribution rates and eliminating the LIHEAP matching grant and Low Income Weatherization programs will **partially offset** the estimated annual discount during the Rate Year.

Response can be found in Book 1 on Bates page(s) 61-63.

- 7-26. Re: the Direct Testimony of the Pricing Panel (Witnesses Leary and McCabe) at page 21 of 36, line 16, through page 22 of 36, line 5. For Narragansett Gas, please:
- a. Verify that the proposed discount for low income gas service customers will apply equally to all months of the year.
 - b. Provide a comparison of the monthly distribution of benefits for a typical low income gas customer under the present low income programs and under the proposed rate discount.

Response can be found in Book 1 on Bates page(s) 64-70.

- 7-27. Re: the Direct Testimony of the Pricing Panel (Witnesses Leary and McCabe) at page 22 of 36, lines 3-5. Please provide the Company's assessment of the needs of Low Income gas customers in Rhode Island for gas service rate assistance and the extent to which the rate discount proposed (i.e., 15%) will address those needs.

Response can be found in Book 1 on Bates page(s) 71-72.

7-28. Re: the Direct Testimony of the Pricing Panel (Witnesses Leary and McCabe) at page 22 of 31, line 7. The table for Narragansett Gas shows an Estimated Annual Discount at 10% of \$2,126,195. Footnote 5 at the bottom of the page indicates that a 10% discount in the 2012 Rate Case represented only \$959,194. Please:

- a. Reconcile these amounts and explain in detail the factors that have caused the costs of a 10% discount to more than double in roughly five years.
- b. Provide the workpapers, data, analyses and assumptions that underlie the values for “Estimated Annual Discount” presented in the referenced table.
- c. Provide the workpapers, data, analyses and assumptions relied upon to compute the value of a 10% discount in the 2012 rate case.

Response can be found in Book 1 on Bates page(s) 73-75.

7-29. Re: the Direct Testimony of the Pricing Panel (Witnesses Leary and McCabe) at page 22 of 36, the table for Narragansett Gas at line 7. Please explain why the low income weatherization funding is not included in the “Low Income Value Provided in 2012 Rate Case.”

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

7-30. Re: the Direct Testimony of The Pricing Panel (Witnesses Leary and McCabe) at page 23 of 36, lines 3-13. Please:

- a. Provide the percentage discount approved in Massachusetts for National Grid’s Low Income gas service customers.
- b. Indicate whether the “percentage off of the total bill at full residential rates” for National Grid’s Low Income customers in Massachusetts applies the discount to Gas Costs, and if so, whether gas cost discounts are recovered through a Distribution Adjustment Charge (DAC) or through a Gas Cost Recovery (GCR) mechanism.
- c. Describe any and all changes in the Low Income rate discount program for National Grid customers in Massachusetts since its initial approval by the DPU in 2009.

Response can be found in Book 1 on Bates page(s) 77-78.

7-31. Re: the Direct Testimony of the Pricing Panel at page 35 of 36, lines 9-12. Please:

- a. Provide documentation of the Company's costs for installation of an IP wireless service.
- b. Provide documentation of the Company's costs for the "associated data plan for FT-1 transportation customers.
- c. Identify the IP wireless service provider and provide a copy of the contract under which the referenced IP wireless services will be provided.
- d. Indicate the term (in years and/or months) of the data plan that the Company will use for FT-1 customers.
- e. Indicate whether a FT-1 Transportation customer will have the options of:
 1. Purchasing and installing their own IP wireless device;
 2. Establishing IP wireless data service plans separate from the plan offered by the Company.
- f. If FT-1 customers will not be provided the options of purchasing and installing their own IP wireless device and/or obtaining their own wireless data plans, please explain why the provision of such options is not reasonable and appropriate.

Response can be found in Book 1 on Bates page(s) 79-81.

7-32. Re: the Direct Testimony of the Pricing Panel (Witnesses Leary and McCabe) at page 36 of 36, lines 4-5. Please explain why the Company proposes to place its line extension policies in a separate section (Section 8) of its tariff rather than including those provisions in Section 1 General Rules and Regulations.

Response can be found in Book 1 on Bates page(s) 82.

7-33. Re: Schedule PP-1(a)-GAS, Development of Narragansett Gas Rate Year Distribution Revenue, page 2 of 2, line (25). Please:

- a. Provide actual Non-Firm Margin revenue by month for each month of calendar year 2017 and each month of each of the three preceding calendar years on a customer-by-customer basis using a format comparable to that provided in Schedule SLN-6, pages 4 of 5 and 5 of 5, in Docket No. 4634.
- b. Document the development of the "Normal" revenue amount for Non-Firm Transportation shown on line (25), Column (f), and explain in detail all factors considered in the development of the "Normal" Non-Firm Margin shown.

- c. If Test Year and/or Rate Year volumes (Dth) for Non-Firm Service customers are weather-normalized, provide the workpapers, data, analyses, and assumptions used to compute weather-normalized throughput volumes for the Company's non-firm gas service customers. If Test Year and/or Rate Year volumes (Dth) for Non-Firm Service customers are NOT weather-normalized, explain why the presentation of weather-normalize non-firm service volumes and revenues is not necessary or appropriate in the context of this proceeding.

Response can be found in Book 1 on Bates page(s) 83-98.

7-34. Re: Schedule PP-5-GAS, Section 1, Schedule A, Sheet 7, Item 12.0, Schedule of Administrative Fees and Charges, Schedules PP-3(a)-Gas, PP-3(b)-Gas and PP-3(c)-Gas. Please:

- a. Provide the workpapers, data, assumptions, analyses, studies and other documents relied upon to support the development of input data used in the determination of:
 1. The Account Restoration Charge of \$96.00;
 2. The "Paperless Billing Credit" for gas service customers of \$0.37 per bill per month;
 3. The Return Check Charge of \$7.00;
 4. The Daily Metered Equipment Fee of \$1,239.00;
 5. The Daily Metered Data Plan Fee of \$17.00;
 6. The AMR Opt-Out Fees
 - i. \$74.00 for Removal of AMR Meter/Installation of Non-AMR Meter,
 - ii. \$13.00 for Monthly Meter Reading Fee, and
 - iii. \$74.00 for Reinstallation of AMR Meter.
 7. The Residential and Non-Residential Credit Card Payment Fees including:
 - i. Explanation and justification for the application of higher fees to Non-Residential Customers comparable size transactions;
 - ii. The basis for the \$600 threshold for application of additional fees to Residential customers;
 - iii. The basis for the \$1,000 threshold for application of additional fees to Non-Residential customers.
- b. Document and explain why the Labor Overhead rate associated with Labor used for Account Restoration is 69.44% and the Labor Overhead rate associated with the installation of an IP Wireless Device is 95.88%.

Response can be found in Book 1 on Bates page(s) 99-116.

7-35. Re: Workpaper Schedule PP-1(a)-Gas. Please:

- a. Provide the electronic spreadsheet files used to generate the referenced

workpapers.

- b. Provide a proof of revenue for each gas rate class (including the Company's Non-Firm Service rate classifications) for the Rate Year:
 1. At present rates
 2. At the Company's proposed rates.

Response can be found in Book 1 on Bates page(s) 117-118.

7-36. Re: Schedule PP-3(a), Account Restoration Fee, page 1 of 2. Please:

- a. Document and explain the derivation of the "labor time" required for:
 1. Meter Off Due to Non Payment;
 2. Meter On Due to Customer Payment.
- b. Provide the actual numbers of Account Restoration Fees billed by rate class by month for each month of the calendar year 2017 and each month of the three preceding calendar years.
- c. Document the determination of the \$8.22 average hourly rate that is used in the determination of Transportation Costs.

Response can be found in Book 1 on Bates page(s) 119-122.

7-37. Re: Schedule PP-3(b), page 1 of 2, Proposed Fee for IP Wireless Device. Please:

- a. Document and explain the derivation of the "Incremental Cost of Meter Equipped with a Wireless Module.
- b. Explain why it is necessary and appropriate for the Company to collect the proposed \$1,285 incremental cost for a Meter Equipped with a Wireless Module and the costs associated with installation of such a meter through a "Lump Sum Fee."
- c. Explain in detail how the capabilities of the referenced meter equipped with a wireless module differ from the capabilities of the Telemetry equipment required for Non-Firm Transportation Service customers.
- d. With respect to the Cost of the Data Plan:
 1. Provide the usage parameters for:
 - i. The Low End plan
 - ii. The High End plan

2. Indicate the factors that would determine whether a customer requires a Low End plan, a High End plan, or a plan which is between the Low End plan and the High End plan.
3. Provide the workpapers, data, analyses and assumptions relied upon to compute:
 - i. Average Travel Time
 - ii. Average Install Time.
4. Indicate whether a customer with multiple gas and/or electric service accounts that require meters with wireless modules and data plans will require a separate data plan for each account, and if so, explain why separate data plans are necessary.
5. Document the development of the \$39.62 Hourly Rate used and the cost components included in that rate. Also, explain why a separate hourly Transportation Cost is not shown.
6. Provide the workpapers, data, analyses, and assumptions relied upon to develop the "Weighting" factors used to compute the Weighted Average Monthly Cost.

Response can be found in Book 1 on Bates page(s) 123-126.

- 7-38. Re: Schedule PP-3(c)-Gas, page 1 of 2, Proposed Fee Returned Checks. Please:
- a. Explain the acronym "JPCM."
 - b. Explain the roles of "JPCM" and "TransCentra" in the Company's processing of returned checks.
 - c. For calendar year 2017 and for each of the three immediately preceding calendar years, provide by rate class by month the numbers of returned checks processed by or for the Company.
 - d. Document the development of the Company Estimates for:
 1. Base Labor
 2. Labor Overheads.
 - e. Verify that the Total Cost on line (21) divided by the Test Year Returned Items on line (22) yields a result of \$7.95 per item and explain why it is appropriate to truncate that result to a proposed Return Check Fee of \$7.00.
 - f. Explain why the Internal Costs for processing Returned Checks for Narragansett Gas include Labor Overheads but the Internal Costs for Narragansett Electric do not include Labor Overheads.

Response can be found in Book 1 on Bates page(s) 127-131.

7-39. Re: Schedule PP-5-GAS, Section 1, Schedule A, Sheet 3, Item 3.1, System Pressure Factor. Please:

- a. Indicate how, when, and in what forum the referenced “forecast of gas supply costs that are required to maintain pressure on the Company’s distribution system” will be determined.
- b. Explain why the methods for determining forecasted gas supply costs required to maintain pressure on the Company’s distribution system” are not, and should not be, included in the Company’s tariff.

Response can be found in Book 1 on Bates page(s) 132-133.

7-40. Re: Schedule PP-5-GAS, Section 1, Schedule A, Sheet 3, Item 3.1, System Pressure Factor, definition of “GCSP.” Please identify the manner in which the Company identifies and determines the dollar amounts for:

- a. Demand costs to be included in the GCSP;
- b. Commodity costs to be included in the GCSP.

Response can be found in Book 1 on Bates page(s) 134.

7-41. Re: Schedule PP-5-GAS, Section 1, Schedule A, Sheets 4 and 5, Item 5.0 Service Supplied. Please explain why this section includes no reference to the Company’s line extension policies and why at least a reference to those policies in this paragraph is not necessary and appropriate or at least helpful to customers trying to understand CIAC for main and service extensions.

Response can be found in Book 1 on Bates page(s) 135.

7-42. Re: Schedule PP-5-GAS, Section 1, Schedule B, Sheets 4 and 5. Please provide the monthly rates applicable for each of month of the last three calendar years for:

- a. The “monthly short term borrowing rate defined as the Company’s money pool rate” as part of the definition of “Hedge Collateral Carrying Costs;”
- b. The Bank of America Prime Rate less 200 basis points as referenced in the definition of “Balance.”

Response can be found in Book 1 on Bates page(s) 136-137.

7-43. Re: Schedule PP-5-GAS, Section 2, Gas Charge, Schedule A, Sheet 4, Total Fixed Costs, TC_{FC} . Please:

- a. Explain why it is necessary and appropriate that the level of supply-related local production and storage costs be determined in the Company's most recent general rate case, as opposed to have those costs determined in annual GCR proceedings.
- b. Provide detailed documentation of the supply-related local production and storage costs for which the Company seeks approval in this proceeding.
- c. Given outstanding considerations regarding long-term plans for replacement of supplies from the Cumberland LNG tank, explain the manner in which changes in the Company's current supply-related local production and storage costs will be addressed in future GCR and/or base rate proceedings.

Response can be found in Book 1 on Bates page(s) 138-139.

7-44. Re: Schedule PP-5-GAS, Section 2, Gas Charge, Schedule A, Sheet 4, Credits to Fixed Costs, TR_{FC} . Please identify all "gas costs relating to supplies required to maintain system pressures on the Company's distribution system":

- a. As its distribution system and its gas supply portfolio are presently configured;
- b. As may be changed by any currently planned or proposed changes in its distribution system or portfolio of gas supply resources.

Response can be found in Book 1 on Bates page(s) 140.

7-45. Re: Schedule PP-5-GAS, Section 3, Distribution Adjustment Charge, Schedule A, Sheet 4, Item 3.2, AGT Factor. Please:

- a. Explain in what forum the "Approved AGT budget" will be determined.
- b. To the extent that the "Approved AGT budget" will be determined outside of a base rate case, does the Company accept an expansion of the language of the AGT Factor to address possible changes in future AGT budget amounts.

Response can be found in Book 1 on Bates page(s) 141-142.

7-46. Re: Schedule PP-5-GAS, Section 3, Distribution Adjustment Charge, Schedule B, Sheet 7, Target Revenue per Customer. Please:

- a. Explain how the Target Revenue per Customer for the period beginning January 2018 will be determined prior to the conclusion of this proceeding (i.e., Docket No. 4770).
- b. Noting that no change in this tariff provision would be effective prior to a final order in this proceeding, would the Company accept an alternative the definition for “*Target Revenue Per Customer*” that reads, “*The target revenue per customer for each rate class will be the Target Revenue per Customer established based on the Commission’s Final Order in the Company’s most recently decided base rate case.*”

Response can be found in Book 1 on Bates page(s) 143.

7-47. Re: Schedule PP-5-GAS, Section 6, Non-Firm Transportation, Schedule A, Sheet 2, Distribution Charge. Please:

- a. Provide the numbers of NFT customers billed in each usage category in each month of calendar year 2017 and in each month of each of the three immediately preceding calendar years.
- b. Provide the results of the annual reviews of NFT customer usage performed after the August billing period in 2017 and in each of the three immediately preceding years indicating the numbers of customers that were moved from one usage category to another specifying the customers’ former usage category and the usage category to which the customer was moved.
- c. In the Company’s annual review of NFT customer usage for 2017, identify any and all adjustments to customer usage that were made to reflect periods of service interruption or curtailment.

Response can be found in Book 1 on Bates page(s) 144-146.

Gas Business Enablement Program

7-48. 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 can be found in Book 2 part 1 on Bates page(s) 1-Book 2 part 6 on Bates pages(s) 200.

7-49. Referring to the pending rate case of the Company's gas distribution affiliates in Massachusetts, Boston Gas Company and Colonial Gas Company (Gas Companies), in Department of Public Utilities docket 17-170, please provide copies of

- a. all pre-filed testimony filed by the Gas Companies and any other parties in that case relating to the subject matter of the Gas Business Enablement Program,
- b. all information request responses of the Gas Companies 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 can be found in Book 2 part 6 on Bates page(s) 201-288.