

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 Commission Data Requests – Set 5**

Dear Ms. Massaro:

Enclosed is an original and one copy of the Company's<sup>1</sup> responses to the fifth set of data requests issued by the Public Utilities Commission (PUC) in the above-referenced docket. At the request of the PUC, the Company is also enclosing a USB Flash Drive of this 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 PUC 5-33. The Company seeks protection from public disclosure of certain confidential information contained in Attachment PUC 5-33 provided with the response to data request PUC 5-33. Accordingly, the Company has provided the PUC with one complete, unredacted copy of the confidential document in a sealed envelope marked "**Contains Privileged and Confidential Information – Do Not Release,**" and has included redacted copies of this document for the public filing.

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

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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 Commission Data Requests – Set 5  
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.

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**

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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 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 January 26, 2018, the Company filed responses to the Rhode Island Public Utilities Commission’s (PUC) Fifth Set of Data Requests Directed to National Grid dated January 5, 2018 (PUC Set 5). PUC Set 5 includes Data Request PUC 5-33 (seeking “reference to any documentation that supports the National Grid USA’s proposed Gas Business Enablement program being identified as a ‘best practice’ to pipeline safety practices”). The Company’s response to Division 5-33 includes Attachment PUC 5-33. This attachment contains confidential and proprietary commercial and financial

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

information that it ordinarily would not share with the public. Specifically, this attachment contains commercially sensitive information concerning its business.

National Grid retained an independent consultant to produce the document contained in Attachment PUC 5-33. Such information is not available to the public at large and requires a substantial investment of resources to compile. Replication of the document contained in Attachment PUC 5-33 by an outside party would not be possible without substantial effort. Further, the consultant who prepared Attachment PUC 5-33 offers recommendations in the document based on its proprietary knowledge of best practices. Public disclosure of such proprietary information would unfairly benefit outside parties and place the Company and its outside consultant at a competitive disadvantage. Furthermore, the Attachment PUC 5-33 consists of non-public information concerning the Companies' systems and policies and procedures concerning its gas operations. Therefore, the Company requests that, pursuant to Rule 1.2(g), the PUC afford confidential treatment to the information contained in the confidential Attachment PUC 5-33.

## **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 PUC 5-33 should be protected from public disclosure. As described herein, this attachment contains confidential and proprietary commercial and financial information relating to the Company's business operations. It is the type of information that the Company ordinarily would not disclose to the public. Therefore, the Company is providing confidential Attachment PUC 5-33 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 PUC 5-33.

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



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

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 26, 2018  
Date

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

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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS  
PUBLIC UTILITIES COMMISSION

IN RE: THE NARRAGANSETT ELECTRIC COMPANY :  
d/b/a NATIONAL GRID – ELECTRIC AND GAS : DOCKET NO. 4770  
DISTRIBUTION RATE FILING :

COMMISSION'S FIFTH SET OF DATA REQUESTS  
DIRECTED TO NATIONAL GRID  
(Issued January 5, 2018)

All page numbers refer to the page number at the bottom right hand corner of the page rather than the page number in the header.

Allocation Service Company Costs

- 5-1. Please explain how Service Company costs are allocated to each of the distribution companies, specifically identifying each cost category, and explaining how each of these cost categories is quantified, allocated, charged, and paid.

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

- 5-2. Which year or years are used to set the Rate Year allocation of Service Company costs to Narragansett Gas and Narragansett Electric? Are any normalizing adjustments made? If not, why not?

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

Organization Structure

- 5-3. Referencing PUC-1-81 and referring to the naming conventions contained in the Company's prefiled direct testimony, please show on the organizational chart each entity that corresponds to one of the identified entities in the prefiled testimony.

**Response can be found in Book 1 on Bates page(s) 53-55.**

- 5-4. Please color code PUC-1-81 to show each entity regulated by a state regulatory authority, a United States federal regulatory authority, some other regulatory authority, or unregulated (one color for each type) (please make sure the copy is in color in both hard and electronic).

**Response can be found in Book 1 on Bates page(s) 56-58.**

## Geographic Information System (GIS)

- 5-5. Referencing Johnston and Connolly direct testimony, page 98, lines 20-22 and page 99, lines 7-9, please explain the funding source for the GIS plans for each Narragansett Gas and Narragansett Electric. Please provide the total estimated cost and timeline for implementation.

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

- 5-6. For each updated GIS, once implemented, please indicate how the Company will ensure timely updates to maintain the accuracy of land-based maps and conversion of gas-service records and sketches, available with mobile functionality. Please provide the same information for electric, referencing electric-service records in place of gas.

**Response can be found in Book 1 on Bates page(s) 60-61.**

## Gas Business Enablement

- 5-7. Please explain each of the options that were considered in deciding to move forward with the Gas Business Enablement proposal and for each proposal not chosen, explain why. What were the incremental costs and benefits of each option?

**Response can be found in Book 1 on Bates page(s) 62-67.**

- 5-8. Please provide a clear definition of Gas Business Enablement.

**Response can be found in Book 1 on Bates page(s) 68-69.**

- 5-9. Please provide three examples of work functions, how they are currently managed, and how they will be managed at each phase of the Gas Business Enablement rollout.

**Response can be found in Book 1 on Bates page(s) 70-75.**

- 5-10. Please explain whether Gas Business Enablement is comprised of software packages or software as a service. Please explain how software as a service is utilized by the Gas Business Enablement program and the benefits of its use.

**Response can be found in Book 1 on Bates page(s) 76-77.**

- 5-11. How does the Gas Business Enablement program address cybersecurity? Is the cybersecurity officer part of the Gas Business Enablement program? If not, why not? Are there cybersecurity experts dedicated to Gas Business Enablement program in RI and/or how is cybersecurity being considered in Gas Business Enablement program? For whom do the cybersecurity employees work?

**Response can be found in Book 1 on Bates page(s) 78-79.**

- 5-12. How would the overall project be affected if cost recovery or any part of the Gas Business Enablement program cost recovery proposals were denied by either the New York Public Service Commission (NYPSC) or the Massachusetts Department of Public Utilities (MADPU)?

**Response can be found in Book 1 on Bates page(s) 80-82.**

- 5-13. Referencing Johnston and Connolly direct testimony at page 121, lines 14-18, please explain how the expected cost allocation among the jurisdictions was developed for Gas Business Enablement. Please explain why this allocation methodology is appropriate to Gas Business Enablement.

**Response can be found in Book 1 on Bates page(s) 83-84.**

- 5-14. Please provide the percentage of gas volumes delivered for each of the jurisdictions.

**Response can be found in Book 1 on Bates page(s) 85.**

- 5-15. What would be the effect on the proposed cost recovery of Gas Business Enablement program in Rhode Island if any portion of the proposed cost recovery provisions were denied by either the NYPSC or the MADPU in their review of each of their respective distribution companies?

**Response can be found in Book 1 on Bates page(s) 86-87.**

- 5-16. Please explain how the pre Rate Year expenditures have been allocated to each of the distribution companies.

**Response can be found in Book 1 on Bates page(s) 88-94.**

- 5-17. It does not appear that the Niagara Mohawk Company in New York has requested cost recovery of pre-rate year expenditures, whereas it has in Rhode Island (referencing NYPSC Cases 17-E-0238 and 17-E-0239 Testimony of Staff Gas Business Enablement Panel, page 13, lines 18-24). Please explain why the Company has requested recovery of these expenses in the instant docket.

**Response can be found in Book 1 on Bates page(s) 95-96.**

- 5-18. If the NYPSC imposes caps on the limit of cost recovery that may be recovered by the Service Company from the distribution company(ies) in New York, how would that affect the cost allocation to Massachusetts and Rhode Island, if at all?

**Response can be found in Book 1 on Bates page(s) 97.**

- 5-19. Please explain what metrics have been recommended by the NYPSC staff and whether Niagara Mohawk has accepted any of them. Please provide details of any agreement on this issue.

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

- 5-20. Referencing, Johnston and Connolly direct testimony page 84, lines 5-9, please provide more detail how the Gas Business Enablement program will improve electric operations related to Customer Meter Service, Dispatch and Scheduling, and Customer Contact Center. How will these measures result in quantifiable savings to customers?

**Response can be found in Book 1 on Bates page(s) 99-100.**

- 5-21. Please provide a savings estimate of capital and O&M and Narragansett Electric and Narragansett Gas allocated savings estimates identified in connection with the Gas Business Enablement program analysis similar to that contained in GIOP-12, Schedule 1 of the Johnston Testimony in NYPSC Cases 17-E-0238 and 17-G-0239.

**Response can be found in Book 1 on Bates page(s) 101-103.**

- 5-22. Please explain what qualitative costs and benefits were considered by the Service Company and/or the distribution companies other than direct cost savings.

**Response can be found in Book 1 on Bates page(s) 104-106.**

- 5-23. Please provide a copy of the NorthStar Report (analyzing the rollout of US Foundation Program aka SAP) referenced in NYPSC Cases 17-E-0238 and 17-E-0239 Testimony of Staff Gas Business Enablement Panel, on page 19. For each conclusion and recommendation listed in the Report, please explain how the Gas Business Enablement program as proposed has addressed those conclusions and incorporated any recommendations.

**Response can be found in Book 2 on Bates page(s) 1-273.**

- 5-24. How will the Company ensure that if there are problems encountered during the rollout of each module in Rhode Island, the work will still be completed on schedule and on budget in Rhode Island during the rollout?

**Response can be found in Book 2 on Bates page(s) 274-278.**

- 5-25. Please confirm that the fixed-cost RFPs have resulted in fixed cost contracts.

**Response can be found in Book 2 on Bates page(s) 279.**

- 5-26. Is the Who has accountability against scope creep? What is the Service Company's incentive to manage scope creep? What is the distribution company's leverage to avoid increased costs related to scope creep where the distribution company may believe the addition and associated cost is unnecessary to the Narragansett Gas functionality?

**Response can be found in Book 2 on Bates page(s) 280-282.**

- 5-27. Were any independent reviews of the Gas Business Enablement program costs conducted? If so, please provide the results of such reviews.

**Response can be found in Book 2 on Bates page(s) 283-288.**

- 5-28. Please explain the difference between Operating Expenses versus Run the Business Expenses.

**Response can be found in Book 2 on Bates page(s) 289.**

- 5-29. (a) For each of the previous five calendar years, 2012 through 2016, identify each safety metric violation and, if applicable, each Information System (IS) program used to manage the task to ensure compliance.  
(b) For each of the IS programs listed in response to the preceding question, identify the converted IS program included in Gas Business Enablement that will either (i) supersede the currently utilized IS program, or (ii) be newly developed to manage the task to ensure compliance.  
(c) When will each converted IS program included in Gas Business Enablement and identified in response to subsection (b) be placed into service?

**Response can be found in Book 2 on Bates page(s) 290-291.**

- 5-30. Has the RI Gas Infrastructure, Safety and Reliability program resulted in a reduction in pipeline safety violations in Rhode Island?

**Response can be found in Book 2 on Bates page(s) 292.**

- 5-31. Will Gas Business Enablement program improve gas pipeline safety in Rhode Island? Why or why not?

**Response can be found in Book 2 on Bates page(s) 293.**

- 5-32. How will Gas Business Enablement program impact leak detection practices, if at all? Will the implementation of Gas Business Enablement program improve prioritization of leak calls?

**Response can be found in Book 2 on Bates page(s) 294.**

- 5-33. Please provide reference to any documentation that supports the National Grid USA's proposed Gas Business Enablement program being identified as a "best practice" to pipeline safety practices.

**Response can be found in Book 2 on Bates page(s) 295-296.**