

May 9, 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
Supplemental Filing of Company Direct Testimony Filed in Docket 4780**

Dear Ms. Massaro:

As requested at the procedural conference on April 20, 2018 in the above-referenced docket, on behalf of the Company,¹ I enclose the following Power Sector Transformation (PST) Plan documents filed by the Company in Docket No. 4780 for filing with the Public Utilities Commission (PUC) in Docket No. 4770:

From the Company's November 27, 2017 Filing
(originally filed in Docket No. 4770, then subsequently moved by the PUC to Docket No. 4780)

1. PST Book 1 of 3 – (Chapter 1, Introduction), Bates Pages 25-30.
2. PST Book 1 of 3 – (Chapter 2, 4600 Goals/Framework), Bates Pages 31-37.
3. PST Book 1 of 3 – (Chapter 3, Modern Grid), Bates Pages 38-67.
4. PST Book 1 of 3 – (Chapter 4, AMF), Bates Pages 68-99.
5. PST Book 1 of 3 – (Chapter 9, Performance), Bates Pages 161-183.
6. PST Book 1 of 3 – (Chapter 10, Revenue Requirement), Bates Pages 184-191.
7. PST Book 1 of 3 – (Appendices 2.1 and 2.2), Bates Pages 192-277.
8. PST Book 2 of 3 [REDACTED] – (Appendices 4.1 and 4.2), Bates Pages 1-128.
9. PST Book 2 of 3 [REDACTED] – (Appendices 10.1 through 10.11), Bates Pages 129-300.
10. PST Book 3 of 3 [REDACTED] – (Workpapers 3.1 and 3.2), Bates Pages 1-34.
11. PST Book 3 of 3 [REDACTED] – (Workpaper 4.1), Bates Pages 35-44.
12. PST Book 3 of 3 [REDACTED] – (Workpapers 9.1 through 9.4), Bates Pages 71-91.
13. PST Book 2 of 3 [CONFIDENTIAL] – (Appendix 4.1 and Workpaper 4.1), Bates Pages 1-41.

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

Luly E. Massaro, Commission Clerk
Docket 4770 – Company Direct Testimony, Docket 4780
May 9, 2018
Page 2 of 2

From the Company's January 12, 2018 Filing
(originally filed in Docket No. 4780)

14. Book 1 of 1 - (PST- Joint Pre-Filed Testimony), Bates Pages 1 – 102. –
15. Book 1 of 1 - (Schedule PST-1, Chapter 2, 4600 Goals/Framework, Page 3 of 6), Bates Page 1.
16. Book 1 of 1 - (Schedule PST-1, Chapter 3, Modern Grid, Page 27 of 29), Bates Page 2.
17. Book 1 of 1 - (Schedule PST-1, Chapter 10, Funding the Transformation, Page 1 of 7), Bates Pages 3-27.
18. Book 1 of 1 - (Appendices 10.1 through 10.9), Bates Pages 28-172.

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 enclosed excerpt from PST Book 2 of 3 [CONFIDENTIAL] - Bates Pages 1-41. The Company seeks protection from public disclosure of certain confidential information contained in PST Book 2 of 3 [CONFIDENTIAL] - Bates Pages 1-41. 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.

Thank you for your attention to this transmittal. If you have any questions, please contact me at 401-784-7288.

Very truly yours,



Jennifer Brooks Hutchinson

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**

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 May 9, 2018, as requested at the April 20, 2018 procedural conference, the Company filed with the PUC certain Power Sector Transformation (PST) Plan documents previously filed by the Company in Docket No. 4780 (the Supplemental PST Filing). The Supplemental PST Filing includes PST Book 2 of 3 [CONFIDENTIAL]. PST Book 2 of 3 [CONFIDENTIAL] contains confidential and proprietary Company information. Specifically, PST Book 2 of 3 [CONFIDENTIAL] contains unredacted copies of Appendix 4.1 and Workpaper 4.1 of the PST Panel, which include confidential vendor pricing information regarding advanced metering functionality (AMF) costs that is competitively sensitive and customarily not released to the public by the Company. The Company has provided redacted public versions of these

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

documents with its May 9, 2018 filing, as well as an unredacted, confidential version. Therefore, the Company requests that, pursuant to Rule 1.2(g), the PUC afford confidential treatment to the confidential vendor pricing information contained in PST Book 2 of 3 [CONFIDENTIAL].

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 to either (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). Disclosure of information would impair the Government’s ability to obtain such information in the future when: (a) information is provided voluntarily to the governmental agency, and (b) that information is of a

kind that customarily would 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 PST Book 2 of 3 [CONFIDENTIAL] is confidential and proprietary information relating to the Company's business operations. Specifically, PST Book 2 of 3 [CONFIDENTIAL] contains competitively sensitive vendor pricing terms associated with the Company's AMF costs. The estimates associated with its Company's AMF costs were provided through confidential discussions with leading AMF vendors through confidential means. Public disclosure of this information would negatively impact the Company's negotiating position in the market and thus jeopardize the ability of the Company to ensure that its customers are being served by the lowest cost option. Protection of PST Book 2 of 3 [CONFIDENTIAL] allows the Company to procure the most cost-efficient resources to support its customers. Accordingly, the Company requests that the PUC not require the Company to disclose its vendor pricing information, which would provide potential vendors with a negotiating advantage that may lead to higher prices for the Company's customers. Further, the competitively sensitive vendor pricing terms in PST Book 2 of 3 [CONFIDENTIAL] are information the Company customarily would not release to the public both because of the harmful impact on the Company's negotiating position and because of the confidential means through which the Company received the information.

Therefore, the Company is providing PST Book 2 of 3 [CONFIDENTIAL] 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 PST Book 2 of 3 [CONFIDENTIAL].

IV. CONCLUSION

Accordingly, the Company respectfully requests that the PUC grant protective treatment to PST Book 2 of 3 [CONFIDENTIAL].

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

Respectfully submitted,

THE NARRAGANSETT ELECTRIC COMPANY

By its attorneys,



Jennifer Brooks Hutchinson. (RI #6176)
National Grid
280 Melrose Street
Providence, RI 02907
(401) 784-7288



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

Dated: May 9, 2018

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.



Joanne M. Scanlon

May 9, 2018

Date

Docket No. 4770 - National Grid – Rate Application
Service list updated 4/19/2018

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 ;	
	kayte.o'neill2@nationalgrid.com ;	
	kate.grant2@nationalgrid.com ;	
	Mary.coleman@nationalgrid.com ;	
	Timothy.roughan@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 ;	
Jonathan Schrag, Deputy Administrator Division of Public Utilities and Carriers 89 Jefferson Blvd.	Jonathan.Schrag@dpuc.ri.gov ;	401-780-2140
	Macky.McCleary@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	

Warwick, RI 02888	Al.mancini@dpuc.ri.gov ; Thomas.kogut@dpuc.ri.gov ;	
Tim Woolf Jennifer Kallay Synapse Energy Economics 22 Pearl Street Cambridge, MA 02139	twolf@synapse-energy.com ; jkallay@synapse-energy.com ; mwhited@synapse-energy.com ; jhall@synapse-energy.com ;	617-661-3248
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 ; tim.b.oliver@gmail.com ;	703-569-6480
Matt Kahal 1108 Pheasant Crossing Charlottesville, VA 22901	mkahal@exeterassociates.com ;	434-964-0604
Ronald Gerwatowski Nicole Rohr	gerwat@verizon.net ; Ronald.Gerwatowski@dpuc.ri.gov ; nrohr443@g.rwu.edu ;	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 ; RoxieMcCullar@consultant.com ;	217-626-1934
Gregory L. Booth, PE, PLS Linda Kushner PowerServices, Inc. 1616 East Millbrook Rd. Suite 210 Raleigh, NC 27609	gbooth@powerservices.com ; lkushner@powerservices.com ;	919-256-5900
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 ; Christopher.Kearns@energy.ri.gov ; Danny.Musher@energy.ri.gov ; Nicholas.Ucci@energy.ri.gov ; Becca.Trietch@energy.ri.gov ; Carrie.Gill@energy.ri.gov ;	401-574-9100

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 ;	
Ali Al-Jabir Brubaker and Associates 5106 Cavendish Dr. Corpus Christi, TX 78413 Maurice Brubaker Brubaker and Associates P.O. Box 412000 St Louis, Missouri 63141-2000	aaljabir@consultbai.com ;	
	mbrubaker@consultbai.com ;	
New Energy Rhode Island (NERI) Seth H. Handy, Esq. Handy Law, LLC 42 Weybosset St. Providence, RI 02903 The RI League of Cities and Towns c/o Brian Daniels, Executive Director PRISM & WCRPC c/o Jeff Broadhead, Executive Director Newport Solar c/o Doug Sabetti Green Development, LLC c/o Michelle Carpenter Clean Economy Development, LLC c/o Julian Dash	seth@handylawllc.com ;	401-626-4839
	helen@handylawllc.com ;	
	randelle@handylawllc.com ;	
	bdaniels@rileague.org ;	401 272-3434
	jb@wcrpc.org ;	401-792-9900
	doug@newportsolarri.com ;	401.787.5682
	mc@green-ri.com ;	401.295.4998
	jdash@cleaneconomydevelopment.com ;	

ISM Solar Development, LLC c/o Michael Lucini	mlucini@ismgroup.com ;	401.435.7900
Heartwood Group, Inc. c/o Fred Unger	unger@hrtwd.com ;	401.861.1650
Energy Consumers Alliance of NE James Rhodes Rhodes Consulting 860 West Shore Rd. Warwick, RI 02889	jamie.rhodes@gmail.com ;	401-225-3441
Kat Burnham, PPL	Kat@ripower.org ;	
Acadia Center Robert D. Fine, Esq. Chace, Ruttenberg & Freedman, LLP One Park Row, Suite 300 Providence, RI 02903	rfine@crflp.com ;	401-453-6400 Ext. 115
Amy Boyd, Esq. Acadia Center 31 Milk St., Suite 501 Boston MA 02109-5128	aboyd@acadiacenter.org ;	617-472-0054 Ext. 102
	ENiedowski@acadiacenter.org ;	
	Mlebel@acadiacenter.org ;	
Northeast Clean Energy Council Joseph A. Keough, Jr., Esq. Keough & Sweeney 41 Mendon Ave. Pawtucket, RI 02861	jkeoughjr@keoughsweeney.com ;	401-724-3600
Jannet Besser, NECEC	jbesser@necec.org ;	
	jdickerson@necec.org ;	
The George Wiley Center John Willumsen-Friedman, Esq. Deputy Director Rhode Island Center for Justice 1 Empire Plaza, Suite 410 Providence, RI 02903	jwillumsen@centerforjustice.org ;	401-491-1101 Ext. 810
Camilo Viveros, Wiley Center	georgewileycenterri@gmail.com ;	
	Camiloviveiros@gmail.com ;	
	chloechassaing@hotmail.com ;	
Wal-Mart Stores East & Sam's East, Inc. Melissa M. Horne, Esq. Higgins, Cavanagh & Cooney, LLC 10 Dorrance St., Suite 400 Providence, RI 02903	mhorne@hcc-law.com ;	401-272-3500
Gregory W. Tillman, Sr. Mgr./ERA Walmart	Greg.tillman@walmart.com ;	479-204-1594
Original & 9 copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission	Luly.massaro@puc.ri.gov ;	401-780-2107
	Cynthia.WilsonFrias@puc.ri.gov ;	
	Alan.nault@puc.ri.gov ;	

89 Jefferson Blvd. Warwick, RI 02888	Todd.bianco@puc.ri.gov ; Margaret.hogan@puc.ri.gov ;	
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 ;	
Jesse Reyes	JReyes@brownrudnick.com ;	
Nathan Phelps	nathan@votesolar.org ;	
Douglas W. Gablinske, TEC-RI	doug@tec.ri.org ;	
Karl Rabago	krabago@law.pace.edu ;	
Radina Valova, Pace Energy & Climate Ctr.	rvalova@law.pace.edu ;	
Marc Hanks, Sr. Mgr./GRA Direct Energy Services	Marc.hanks@directenergy.com ; cwaksler@eckertseamans.com ;	413-642-3575