

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 EIGHTH SET OF DATA REQUESTS  
DIRECTED TO NATIONAL GRID  
(Issued April 18, 2018)

Periodic Filings

- 8-1. Please update the Company's response to PUC-2-1 in Docket No. 4315 (date of each periodic rate filing; effective date of each periodic rate filing; nature of periodic rate filing; rationale for the proposed effective date) to include any legislative or regulatory changes since December 3, 2012.
- 8-2. Please explain why electric earnings reports cover a calendar year while gas earnings reports cover a fiscal year.
- 8-3. The Company has a number of reporting requirements that address earnings potential: Service Quality Plan Annual Report, Energy Efficiency Plan and Annual Report, System Reliability Plan, Renewable Energy Growth Program, Long-Term Contracting for Renewable Energy Recovery Factor, and Earnings Reports.
  - (a) Please provide the dates when these reports are filed with the PUC and the rationale therefore (if the rationale references a PUC Order, please explain why the time frame is reasonable for the Company).
  - (b) Please indicate, for those reports whose filing dates are not aligned, whether they could be aligned and what impact that would have on the PUC's review or the Company's operations or other reporting requirements (whether internal, state, or federal).

Revenue Requirement/Collections/Litigation

- 8-4. Referencing the case pending at the RI Superior Court captioned *Laura Bennett et al. vs. Thomas F. Ahern*, C.A. No. PC 2015-4214:
  - (a) Please explain the terms under which National Grid was dismissed from the case, including any written settlement.
  - (b) Please provide the number of accounts where collections are not being pursued because of serious illness.
  - (c) For each account, please provide the date when the account was protected from the collections process, the balance on that date, any payments on the account, and the current balance.
  - (d) Please provide any analysis performed by the Division regarding the impact of Judge Vogel's orders on receivables.
  - (e) Please indicate how, if at all, the *Bennett* case has affected the Company's proposed revenue requirement.

## Gas Business Enablement

- 8-5. Please explain why the benefits of Gas Business Enablement to Niagara Mohawk Electric and Gas are higher than those for Narragansett Electric and Gas.
- 8-6. Please provide any cost benefit analysis Boston Gas provided to the Massachusetts Department of Public Utilities as part of its justification for Gas Business Enablement. If the benefits are higher than those accruing to Narragansett Electric and Gas, please explain why. If they are lower, please also explain why.

## Low Income/Competitive Supply

- 8-7. Referencing PUC-4-16, please provide a live excel spreadsheet and include the two additional years prior.
- 8-8. Please provide the average energy rate for A-16 and A-60 customers taking competitive supply over the same time period represented in the response to PUC-8-8. Please also provide the average standard offer service rate over the same period. For competitive supplier the calculation should be all pass-through charges divided by all pass-through kWh usage for that period and the calculation for standard offer should be all standard offer supply charges divided by all standard offer kWh usage for that period.

## Revenue Requirement

- 8-9. Referencing PUC-4-6, the question was intended to get an overall revenue requirement for the proposals in Docket No. 4770 and Docket No. 4780 as if they were still one filing. Please provide one revenue requirement for the Rate Year, Data Year 1, and Data Year 2 that accounts for all proposals in both dockets. This response may be filed as part of the Company's rebuttal testimony in Docket No. 4770.

## Depreciation

- 8-10. Based on future load projections or operational changes in both electric and as, are there any asset classes or asset types where you would see their expected useful life to expand or reduce? If so, please explain.
- 8-11. Has the Company accounted for early retirements resulting from changes to regulations in the Depreciation Study? If so, how?
- 8-12. Are early retirements considered in the Company's internal and proposed business case and cost benefit analyses?

## Customer Service

- 8-13. A number of public commenters suggested the need for RI-based customer service centers they could visit for customer service issues and to make payment.

- (a) Where will the Consumer Advocates be based?
- (b) Can customers meet with the Consumer Advocates on-site to address their specific concerns? If not, why not?
- (c) Can customers make payments to the Consumer Advocate? If not, why not?
- (d) Has the Company conducted any analysis of the benefits and costs of a live customer service presence in Rhode Island? If not, why not? If so, please provide the results of the analysis and all assumptions contained therein.
- (e) What would be the additional cost of locating the Consumer Advocates around the state on a fixed schedule where customers could resolve the same types of issues they call into the customer service call center for and also make payments? Please provide all assumptions. Please also provide the Company's opinion on related benefits.

8-14. Has the Company considered a customer service performance incentive mechanism or service quality metric that focuses on accuracy of customer service responses to customers? If so, what would the proposal look like? If not, why not?

8-15. For what customer/Company activities and/or communications does the Company provide translation services and in what languages?