

Date of Request: April 9, 2018
Due Date: April 30, 2018

Request No. NG-001 (Pace)

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

Docket No. 4780

In Re: Review of the Narragansett Electric Company Proposed
Power Sector Transformation Plan Pursuant to R.I. Gen. Law § 39-1-1 et seq.

Request for Information

FROM: National Grid

TO: New Energy Rhode Island

SUBJECT: Testimony of Karl R. Rábago in Docket 4770—Historical Trends

Requests:

1. Provide Figure 1, Figure 2, and Figure 3, each contained within the testimony of Witness Karl A. Rabago [*sic*], in native format and, where applicable, in Excel format with formulae intact.
2. Provide all workpapers and other documents that support Figure 1, Figure 2, and Figure 3, each contained within the testimony of Witness Karl A. Rabago [*sic*], and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Responses:

1. Please see Attachment 1 to NERI Response to NG-001.
2. The source data was obtained from the Company's response to NERI 2-9, Attachment NERI 2-9.

Date of Request: April 9, 2018
Due Date: April 30, 2018

Request No. NG-002 (Pace)

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

Docket No. 4780

In Re: Review of the Narragansett Electric Company Proposed
Power Sector Transformation Plan Pursuant to R.I. Gen. Law § 39-1-1 et seq.

Request for Information

FROM: National Grid

TO: New Energy Rhode Island

SUBJECT: Testimony of Karl R. Rábago in Docket 4770—Return on Equity

Requests:

1. Provide Figure 4, contained within the testimony of Witness Karl A. Rabago [*sic*], in native format and, where applicable, in Excel format with formulae intact.
2. Provide all workpapers and other documents that support Figure 4, contained within the testimony of Witness Karl A. Rabago [*sic*], and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Responses:

1. Per p. 17, ll. 7-9, and footnote 7 of Witness Rábago's testimony, the source material is the testimony of Company witness Melissa A. Little, Sched. MAL-1-ELEC. As such, the Company is in possession of all source data.
2. *See* response to question 1 above.

Date of Request: April 9, 2018
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Request No. NG-003 (Pace)

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

Docket No. 4780

In Re: Review of the Narragansett Electric Company Proposed
Power Sector Transformation Plan Pursuant to R.I. Gen. Law § 39-1-1 et seq.

Request for Information

FROM: National Grid

TO: New Energy Rhode Island

SUBJECT: Testimony of Karl R. Rábago in Docket 4770—Low-Income Customers

Requests:

1. Provide Figure 5 and Figure 6, each contained within the testimony of Witness Karl A. Rabago [*sic*], in native format and, where applicable, in Excel format with formulae intact.
2. Provide all workpapers and other documents that support Figure 5 and Figure 6, each contained within the testimony of Witness Karl A. Rabago [*sic*], and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Responses:

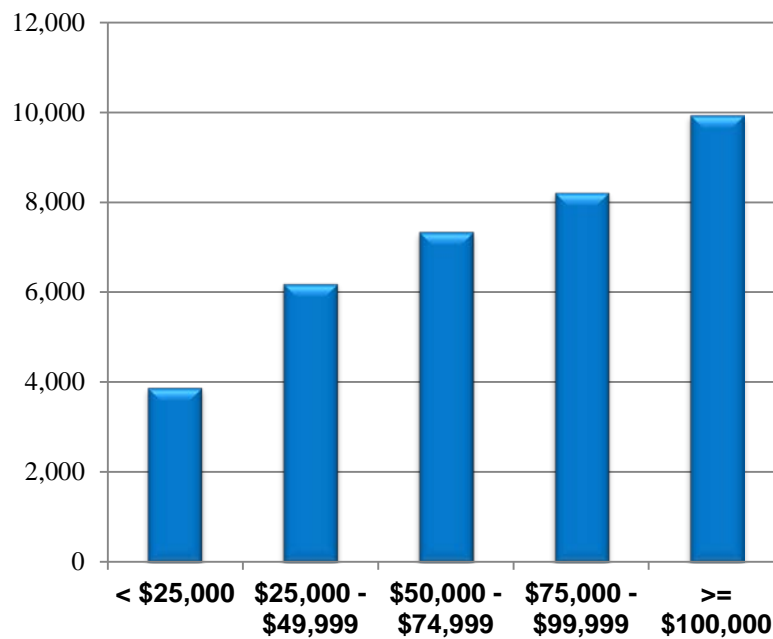
1. Per p. 30, ll. 5-9 and footnote 36 of Witness Rábago's testimony, the source cited is "Utility Rate Design: How Mandatory Monthly Customer Fees Cause Disproportionate Harm," available at http://www.nclc.org/images/pdf/energy_utility_telecom/rate_design/CT-FINAL2.pdf. A copy is attached hereto as Attachment 1 to NERI Response to NG-003.
2. *See* response to question 1 above.

UTILITY RATE DESIGN: HOW MANDATORY MONTHLY CUSTOMER FEES CAUSE DISPROPORTIONATE HARM

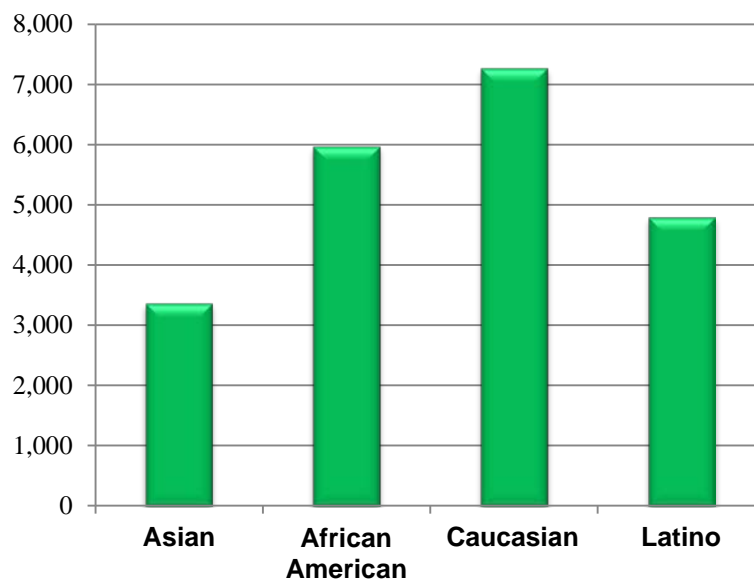
U.S. REGION: CT, ME, NH, RI, VT

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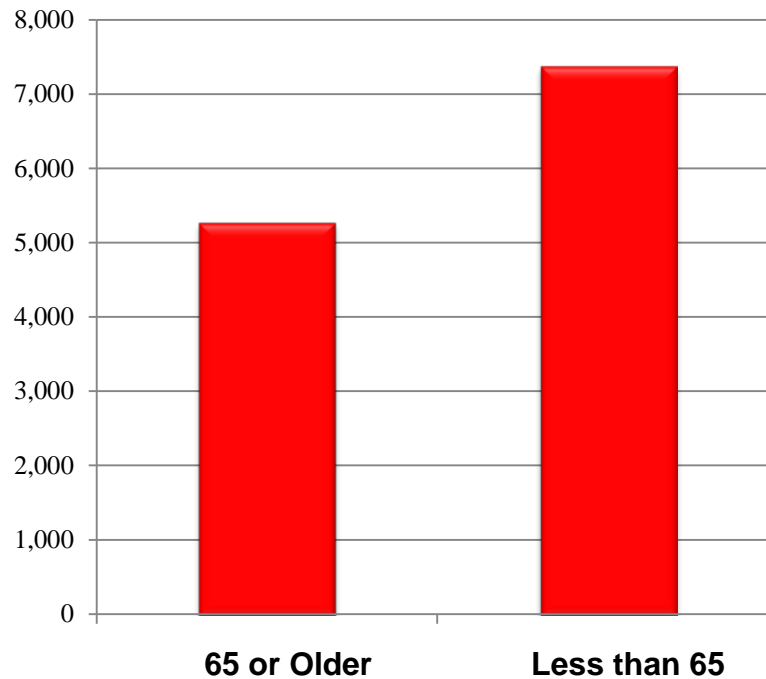
Median 2009 Residential Electricity Usage (KWH), by Income



Median 2009 Residential Electricity Usage (KWH), by Race/Ethnicity



Median 2009 Residential Electricity Usage (KWH), by Age



2009 Residential Energy Consumption by Income, Race/Ethnicity, & Age

| HOUSEHOLD INCOME | MEDIAN ELECTRICITY USAGE (KWH) |
|---------------------|--------------------------------|
| < \$25,000 | 3,904 |
| \$25,000 - \$49,999 | 6,198 |
| \$50,000 - \$74,999 | 7,358 |
| \$75,000 - \$99,999 | 8,235 |
| >=\$100,000 | 9,957 |

| HOUSEHOLD RACE | MEDIAN ELECTRICITY USAGE (KWH) |
|------------------|--------------------------------|
| Asian | 3,369 |
| African American | 5,967 |
| Caucasian | 7,266 |
| Latino | 4,794 |

| HOUSEHOLD AGE | MEDIAN ELECTRICITY USAGE (KWH) |
|--------------------|--------------------------------|
| 65 years or older | 5,275 |
| Less than 65 years | 7,376 |

Source: U.S. Energy Information Administration's Residential Energy Consumption Survey, 2009 (most recent data available)

For questions, contact John Howat: jhowat@nclc.org | 617-542-8010

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Request No. NG-004 (Pace)

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

Docket No. 4780

In Re: Review of the Narragansett Electric Company Proposed
Power Sector Transformation Plan Pursuant to R.I. Gen. Law § 39-1-1 et seq.

Request for Information

FROM: National Grid

TO: New Energy Rhode Island

SUBJECT: Testimony of Karl R. Rábago in Docket 4770—Gas Business Enablement

Requests:

1. Provide Figure 7, contained within the testimony of Witness Karl A. Rabago [*sic*], in native format and, where applicable, in Excel format with formulae intact.
2. Provide all workpapers and other documents that support Figure 7, contained within the testimony of Witness Karl A. Rabago [*sic*], and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Responses:

1. The source Witness Rábago relied upon is the Company pre-filed direct testimony of witnesses Johnston and Connolly, at p. 9.
2. *See* response to question 1 above. Note that Witness Rábago's testimony has an error in footnote 76. It incorrectly states: "*Id.* at 9." It should read "Prefiled testimony of Company witnesses Johnston & Connolly, at 9."

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Request No. NG-005 (Pace)

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

Docket No. 4780

In Re: Review of the Narragansett Electric Company Proposed
Power Sector Transformation Plan Pursuant to R.I. Gen. Law § 39-1-1 et seq.

Request for Information

FROM: National Grid

TO: New Energy Rhode Island

SUBJECT: Testimony of Karl R. Rábago in Docket 4770—Miscellaneous

Requests:

1. Provide all workpapers and other documents that support the conclusions in the testimony of Witness Karl A. Rabago [*sic*], and, where applicable, provide such workpapers and other documents electronically in Excel format with formulae intact.

Responses:

1. Witness Rábago has provided citations to all documents relied upon in his testimony, which include publicly available documents from prior Commission proceedings, federal regulations, Rhode Island statutes, and Company testimony, exhibits, and responses to discovery. Where a document is not referenced, Witness Rábago relies upon his 27 years of experience in the utility industry. As such, the Company is already in possession of many of the documents relied upon in Witness Rábago's testimony. To avoid unnecessary duplication of documents already in the Company's possession, NERI provides links below to the documents referenced in Witness Rábago's, except for cited rules, laws, regulations, documents from prior Commission proceedings, and documents in the Company's possession:

FN12: Mark Kolakowski, "Finance and Investing: Reaching for Yield," thebalance.com, available at <https://www.thebalance.com/reaching-for-yield-1286671>.

FN 26: Power Online, "National Grid Group is Acquiring New England Electric System," (Dec. 14, 1998), available at: <https://www.poweronline.com/doc/national-grid-group-is-acquiring-new-england-0001>.

FN36: National Consumer Law Center, “Utility Rate Design: How Mandatory Monthly Customer Fees Cause Disproportionate Harm,” available at: http://www.nclc.org/images/pdf/energy_utility_telecom/rate_design/CT-FINAL2.pdf.

FN52: Peter Kind, “Pathway to a 21st Century Utility,” CERES (Nov. 9, 2015), available at <https://appsrv.pace.edu/VOSCOE/?do=DownloadFile&res=D7A5DE040816113759>.

FN55: M. Whited, T. Woolf, J. Daniel, “Caught in a Fix: The Problem with Fixed Charges for Electricity,” prepared for Consumers Union (Feb. 9, 2016), available at: <http://www.synapse-energy.com/sites/default/files/Caught-in-a-Fix.pdf>.

FN94: David Anderson et al., Energy & Policy Inst. (“EPI”), *Paying for Utility Politics* 4 (2017) (“EPI, *Paying for Utility Politics*”), available at <http://www.energyandpolicy.org/wp-content/uploads/2017/05/Ratepayers-funding-Edison-Electric-Institute-and-other-organizations.pdf>.

FN95: EEI, *About EEI*, <http://www.eei.org/about/Pages/default.aspx>.

FN96: EEI, *Mutual Assistance*, <http://www.eei.org/issuesandpolicy/electricreliability/mutualassistance/>.

FN98: AGA, *Our Mission*, <https://www.aga.org/about/our-mission>.

FN99: AGA, 2017 Playbook, *Natural Gas: Moving Our National Forward*, <http://playbook.aga.org>.

FN100: Jeff Share, *Dave McCurdy Brings Strong Credentials to AGA* (Dec. 2011), <https://pgjonline.com/2011/12/01/dave-mccurdy-brings-strong-credentials-to-aga/>.

FN109: Governor’s 1000 by ’20 Clean Energy Goal, <http://www.energy.ri.gov/renewable-energy/governor-clean-energy-goal.php>.

FN111: Suzanne Goldenberg & Ed Pilkington, *ALEC Calls for Penalties on ‘Freerider’ Homeowners in Assault on Clean Energy*, *The Guardian*, Dec. 4, 2013, <https://www.theguardian.com/world/2013/dec/04/alec-freerider-homeowners-assault-clean-energy>.

FN112: EPI, *Utilities Knew: Documenting Electric Utilities’ Early Knowledge and Ongoing Deception on Climate Change from 1968–2017* at 7 (2017) (“EPI, *Utilities Knew*”), available at www.energyandpolicy.org.

FN113: Verified Direct Testimony of Derric J. Isensee, Att. 6-B, Cause No. 44688 (IURC Oct. 1, 2015), <https://assets.documentcloud.org/documents/3111258/Northern-Indiana-Public-Service-Company-Dues.pdf>.

FN114: Letter from Andrea B. Field, Counsel, UARG, to Samantha K. Dravis, EPA, (May 12, 2017), *submitted in* EPA, Docket ID EPA-HQ-OA-2017-0190-0042, available at <https://www.regulations.gov/contentStreamer?documentId=EPA-HQ-OA-2017-0190-40140&attachmentNumber=1&contentType=pdf>.

FN115: Press Release, New York State Attorney General Eric T. Schniederman, A.G. Schneiderman Leads Coalition of States and Localities in Opposing Pres. Trump's Efforts to Dismantle the Clean Power Plan (Mar. 28, 2017), <https://ag.ny.gov/press-release/ag-schneiderman-leads-coalition-states-and-localities-opposing-pres-trumps-efforts>.

FN116: "Three New England States Join R.I. in Pledge to Combat Climate Change," at <http://www.providencejournal.com/news/20170602/three-new-england-states-join-ri-in-pledge-to-combat-climate-change>.

FN117: Comments of the Edison Electric Institute, *Value & Cost of Distributed Generation (Including Net Metering)*, Docket No. E-00000J-14-0023 (Ariz. Corp. Comm'n Feb. 14, 2014), available at <http://docket.images.azcc.gov/0000151239.pdf>.

FN119:

Adam Browning, *Edison Electric Institute Really Does Not Want You to Go Solar*, Greentech Media, Feb. 28, 2014, <https://www.greentechmedia.com/articles/read/in-rare-public-filing-edison-institute-downplays-value-of-solar-for-arizon>.

EEITV, *We All Rely on the Electric Grid*, YouTube (Nov. 3, 2013), https://www.youtube.com/watch?v=Ut1_PosSLtk.

FN120: Jennifer Yachnin, *American Gas Association Seeking to Spread Its Influence Well Beyond the Beltway*, E&E Daily, Dec. 9, 2011, <https://www.eenews.net/stories/1059957439>.

FN121: Alexander C. Kaufman, *Natural Gas Industry Brings a Fake Grassroots Movement Group to Eastern Pipeline Fights*, HuffPost, June 19 2017 (updated), https://www.huffingtonpost.com/entry/natural-gas-pipeline-your-energy-virginia_us_593afeb1e4b0240268793e8d.

FN123: Lyndsey Gilpin, *As Coal Ash Rules are Challenged, Activists Worry About Long-Term Monitoring*, Southeast Energy News, June 13, 2017, <http://southeastenergynews.com/2017/06/13/as-coal-ash-rules-are-challenged-activists-worry-about-long-term-monitoring/>.

FN124: NARUC Bd. of Directors, Resolution Regarding Discontinuation of the Committee on Utility Oversight (adopted Mar. 8, 2000), available at <http://pubs.naruc.org/pub/5398B543-2354-D714-51D3-90ACAB1DA952>.

FN128: Responsive Test’y of Sharhonda Dodoo, *In re Okla. Gas & Elec. Co.*, No. PUD 201500273 (Corp. Comm’n Okla. Mar. 21, 2016), available at <https://www.documentcloud.org/documents/3111578-Sharhonda-Dodoo-PUD-Testimony-OGE-%20Dues.html#document/p6/a318911>.

FN130: William B. Marcus, Electric Generation and Other Results of Operations Issues for Pacific Gas & Electric Co., Prepared Testimony on behalf of TURN, *In re Pacific Gas & Elec. Co.*, Appl’n No. 12-11-009 (Cal. Pub. Utils. Comm’n May 17, 2013), available at <https://assets.documentcloud.org/documents/3382426/TURN-PGE-Testimony-2014-Rate-Request.pdf>.

FN131: Proposed Decision Granting Compensation to The Utility Reform Network for Substantial Contribution to Decision 14-08-032 at 8, *In re Pacific Gas & Elec. Co.*, Appl’n No. 12-11-009 (Cal. Pub. Utils. Comm’n undated), available at <https://www.documentcloud.org/documents/%203239245-COMPENSATION-to-TURN-for-SUBSTANTIAL.html#document/p8/a331970>.

FN135: Surrebuttal Testimony of Jason Kunst at 2, *In re Union Elec. Co. d/b/a Ameren Missouri*, Case No. ER-2014-0258 (MO-PSC Feb. 6, 2015) (citation omitted), available at <https://assets.documentcloud.org/documents/3320628/MO-PSC-Surrebuttal-Testimony-Dues.pdf>.