

February 8, 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 4780 – The Narragansett Electric Company d/b/a National Grid
Proposed Power Sector Transformation Vision and Implementation Plan
Responses to Division Data Requests – Set 4**

Dear Ms. Massaro:

Enclosed are an original and one copy of the Company's¹ responses to the fourth 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 request Division 4-9. The Company seeks protection from public disclosure of certain confidential information contained in Attachments DIV 4-9-1 through DIV 4-9-14 provided with the response to data request Division 4-9. Accordingly, the Company has provided the PUC with one complete, unredacted copy of the confidential files in a sealed envelope marked "**Contains Privileged and Confidential Information – Do Not Release.**" Because the Company is seeking protective treatment of the files in the entirety, the Company is not including redacted copies of these files for the public filing.

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

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

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

Luly E. Massaro, Commission Clerk
Docket No. 4780 – Responses to Division Set 1
January 24, 2018
Page 2 of 2

Enclosures

cc: Docket 4780 Service List
Macky McCleary, Division
Jonathan Schrag, Division
John Bell, Division
Ron Gerwatowski, Division
Christy Hetherington, Esq.
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**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
BEFORE THE PUBLIC UTILITIES COMMISSION**

IN RE: The Narragansett Electric Company d/b/a National Grid's Proposed Power Sector Transformation (PST) Vision and Implementation Plan)
Docket No. 4780)

**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 February 8, 2018, the Company filed responses to the Rhode Island Division of Public Utilities and Carriers' (Division) Fourth Set of Data Requests of the Division of Public Utilities and Carriers to National Grid dated January 18, 2018 (Division Set 4). Division Set 4 includes Data Request Division 4-9 (seeking "the short- term and long- term transmission planning power flow base cases (PSS/E .raw files) and auxiliary files (contingency files, subsystem files, exclusion files, monitored element files) used for the LSP studies"). The Company's response to Division 4-9 includes Attachment DIV 4-9-1 through Attachment DIV 4-9-14, inclusive, which are the electronic files requested by the data request. These attachments contain confidential and competitively sensitive information. In particular, they contain

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

proprietary computer functions and models that the Company uses when performing Local System Plan studies. The Company ordinarily would not share these files with the public.

Therefore, the Company requests that, pursuant to Rule 1.2(g), the PUC afford confidential treatment to Attachment DIV 4-9-1 through Attachment DIV 4-9-14, inclusive, in their entirety.

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 Attachment DIV 4-9-1 through Attachment DIV 4-9-14, inclusive, should be protected from public disclosure. As described herein, these attachments contain confidential and proprietary commercial and financial information relating to the Company's business operations. Specifically, these attachments contain competitively sensitive data about the Company's software and modeling for which public disclosure could interfere with the Company's ability to provide safe and reliable service to its customers. It is the type of information that the Company ordinarily would not disclose to the public. Therefore, the Company is providing confidential Attachment DIV 4-9-1 through Attachment DIV 4-9-14, inclusive, 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 in its entirety.

IV. CONCLUSION

Accordingly, the Company respectfully requests that the PUC grant protective treatment to confidential Attachment DIV 4-9-1 through Attachment DIV 4-9-14, inclusive, in their entirety.

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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Dated: February 8, 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

February 8, 2018
Date

**Docket No. 4780 - National Grid – Power Sector Transformation Filing
Service list updated 2/6/2018**

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Docket No. 4780
Fourth Set of Data Requests of the
Division of Public Utilities and Carriers to National Grid
January 18, 2018

Peak Demand Reduction

4-1. Refer to National Grid's (the Company's) responses to PST Book 3 – Workpaper 9.1 (Peak Demand Reduction Targets):

- a) Please provide any additional relevant data that might have been redacted in reference to the demand reduction values.
- b) Referring to Page 2 of 9, please provide additional classification of "PV" considered under "PV reduction" (classification as behind-the-meter and grid-connected).
- c) Please provide any additional information on potential locations in Rhode Island (RI) for behind-the-meter solar additions, along with the expected MW potential at each of these locations.

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

4-2. Please list all Regional System Plan (RSP) projects that RI is obligated for, over the next 10 years.

Response can be found on Bates page(s) 4.

4-3. From the list of projects identified under DIV 4-2, above, please identify those reliability projects that are specifically driven by load growth.

Response can be found on Bates page(s) 5.

4-4. Please list out all transmission costs associated with the list of projects answered under DIV 4-2.

Response can be found on Bates page(s) 6.

4-5. Please list all Local System Plan (LSP) projects that RI is obligated for, over the next 10 years.

Response can be found on Bates page(s) 7-8.

4-6. From the list of projects identified for DIV 4-5, please identify those reliability projects that are specifically driven by load growth.

Response can be found on Bates page(s) 9.

4-7. Please list out all transmission costs associated with the list of projects answered under DIV 4-5.

Response can be found on Bates page(s) 10.

4-8. Has the Company performed Non-Wire Alternatives (NWA) or Non-Transmission Alternatives (NTA) studies for the LSP projects listed in DIV 4-5 response?

- a) If yes, please provide relevant study reports with cost estimates comparing costs of transmission upgrades and costs associated with NWAs.

Response can be found on Bates page(s) 11-14.

4-9. Please provide the short-term and long-term transmission planning power flow base cases (PSS/E .raw files) and auxiliary files (contingency files, subsystem files, exclusion files, monitored element files) used for the LSP studies.

Response can be found on Bates page(s) 15-31.