

February 1, 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 the Department of Navy Data Requests – Set 1**

Dear Ms. Massaro:

Enclosed are an original and one copy of the Company's¹ responses to the first set of data requests issued by the Department of the Navy (DON) 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 DON 1-1. The Company seeks protection from public disclosure of certain confidential information contained in Attachment DON 1-1-3 and Attachment DON 1-1-18 provided with the response to data request DON 1-1. Accordingly, the Company has provided the PUC with one complete, unredacted copy of the confidential documents in a sealed envelope marked "**Contains Privileged and Confidential Information – Do Not Release,**" and has included redacted copies of this documents for the public filing.

The enclosed responses complete the DON's first 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.
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’s Proposed Power Sector Transformation) Docket No. 4780
(PST) Vision and Implementation Plan)
_____)

**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 1, 2018, the Company filed responses to the Department of the Navy’s (Navy) First Set of Data Requests to National Grid dated January 11, 2018 (Navy Set 1). Navy Set 1 includes Data Request DON 1-1 (seeking “a copy of all workpapers supporting the Schedules contained in the Testimony in native format” for the Company’s Power Sector Transformation Plan filing). The Company’s response to DON 1-1 includes Attachment DON 1-1-3 and Attachment DON 1-1-18, each of which is an Excel file containing confidential and proprietary commercial and financial information that the Company ordinarily would not share with the public. Specifically, these

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

attachments contain confidential pricing information received from third parties for the Company's AMF proposal in this docket.

Therefore, the Company requests that, pursuant to Rule 1.2(g), the PUC afford confidential treatment to the information contained in: (1) Attachment DON 1-1-4, and (2) Attachment DON 1-1-18.

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 DON 1-1-3 and Attachment DON 1-1-18 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, each of these attachments contain confidential pricing information obtained from third parties. It is the type of information that the Company ordinarily would not disclose to the public. Therefore, the Company is providing Attachment DON 1-1-3 and Attachment DON 1-1-18 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 Attachment DON 1-1-3 and Attachment DON 1-1-18.

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: February 1, 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 1, 2018
Date

**Docket No. 4780 - National Grid – Power Sector Transformation Filing
Service list updated 1/12/2018**

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'neil2@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
	CHetherington@riag.ri.gov ;	
	Jmunoz@riag.ri.gov ;	
	Dmacrae@riag.ri.gov ;	
Jonathan Schrag, Deputy Administrator Division of Public Utilities and Carriers 89 Jefferson Blvd. Warwick, RI 02888	Jonathan.Schrag@dpuc.ri.gov ;	401-780-2140
	Macky.McCleary@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	Thomas.kogut@dpuc.ri.gov ;	
	Ronald.gerwatowski@dpuc.ri.gov ;	
Tim Woolf Jennifer Kallay	twoolf@synapse-energy.com ;	617-661-3248

Synapse Energy Economics 22 Pearl Street Cambridge, MA 02139	jkallay@synapse-energy.com ;	
	mwhited@synapse-energy.com ;	
	jhall@synapse-energy.com ;	
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 ;	703-569-6480
	tim.b.oliver@gmail.com ;	
Matt Kahal 1108 Pheasant Crossing Charlottesville, VA 22901	mkahal@exeterassociates.com ;	434-964-0604
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 ;	217-626-1934
	RoxieMcCullar@consultant.com ;	
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 ;	401-574-9100
	Christopher.Kearns@energy.ri.gov ;	
	Danny.Musher@energy.ri.gov ;	
	Nicholas.Ucci@energy.ri.gov ;	
	Becca.Trietch@energy.ri.gov ;	
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 ;	
Original & 9 copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ; Cynthia.WilsonFrias@puc.ri.gov ; Alan.nault@puc.ri.gov ; Todd.bianco@puc.ri.gov ; Margaret.hogan@puc.ri.gov ;	401-780-2107
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 ;	
NECEC Janet Besser Jamie Dickerson	jbesser@necec.org ; jdickerson@necec.org ;	
John DiTomasso, AARP	jditomasso@aarp.org ;	401-248-2655
Jesse Reyes	JReyes@brownrudnick.com ;	
Larry Allen, Dept. of Navy	Larry.r.allen@navy.mil ;	
George Wiley Center Camilo Viveiros Chloe Chassaing	georgewileycenterri@gmail.com ; Camiloviveiros@gmail.com ; chloechassaing@hotmail.com ;	
Acadia Center Erika Niedowski Mark Lebel Amy Boyd	ENiedowski@acadiacenter.org ; Mlebel@acadiacenter.org ; Aboyd@acadiacenter.org ;	401-276-0600
Kat Burnham, PPL	kat@ripower.org ;	401-861-6111
Nathan Phelps	nathan@votesolar.org ;	
Seth H. Handy, Esq. Handy Law, LLC	seth@handylawllc.com ;	401-626-4839
John Willumsen-Friedman, Esq. Center for Justice	jwillumsen@centerforjustice.org ;	
Douglas W. Gablinske, The Energy Council of RI (TEC-RI)	doug@tecri.org ;	
Karl Rabago	krabago@law.pace.edu ;	

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: THE NARRAGANSETT ELECTRIC COMPANY :
d/b/a NATIONAL GRID –PROPOSED POWER SECTOR : DOCKET NO. 4780
TRANSFORMATION (PST) VISION AND :
IMPLEMENTATION PLAN :

**DEPARTMENT OF THE NAVY'S FIRST SET OF
DATA REQUESTS TO NATIONAL GRID**

Through counsel, the Department of the Navy (DON) makes the following data requests to National Grid.

DON 1-1 Please provide a copy of all workpapers supporting the Schedules contained in the Testimony in native format (i.e., WORD and EXCEL or a compatible format). EXCEL workbooks should be provided with all formulas and links intact.

**Response can be found in Book 1 part 1 on Bates page(s) 1-
Book 1 part 2 on Bates page(s) 229.**

DON 1-2 Please explain what effect, if any, the instant filing proposals will have on distributed generation programs.

Response can be found in Book 1 part 2 on Bates page(s) 230.

DON 1-3 Please explain what effect, if any, the instant filing proposals will have on Combined Heat and Power incentives.

Response can be found in Book 1 part 2 on Bates page(s) 231.