

October 2, 2018

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Docket 4872 - 2018 Gas Cost Recovery Filing
Responses to Division Data Requests – Set 1**

Dear Ms. Massaro:

Enclosed please find 10 copies of National Grid's¹ responses to Division 1-1, Division 1-2, and Division 1-4 through Division 1-7 in response to the Division of Public Utilities and Carriers' (Division) First Set of Data Requests (Division Set 1) in the above-referenced docket. These responses complete National Grid's responses to Division Set 1 in this matter.

This filing also contains a Motion for Protective Treatment of Confidential Information in accordance with Rule 1.2(g) of the Public Utilities Commission's (PUC) Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B). National Grid seeks protection from public disclosure of confidential and privileged information contained in its response to Division 1-7. In compliance with Rule 1.2(g), National Grid has provided the PUC with one complete, unredacted copy of the confidential response in a sealed envelope marked "**Contains Privileged and Confidential Materials – Do Not Release,**" and has included redacted copies of the response for the public filing.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-7415.

Very truly yours,



Robert J. Humm

Enclosures

cc: Docket 4872 Service List
Leo Wold, Esq.
Al Mancini, Division
John Bell, Division
Bruce Oliver, Division

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

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

RHODE ISLAND PUBLIC UTILITIES COMMISSION

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)	
Annual Gas Cost Recovery Filing)	Docket No. 4872
2018)	
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**MOTION OF THE NARRAGANSETT ELECTRIC
COMPANY D/B/A NATIONAL GRID FOR PROTECTIVE
TREATMENT OF CONFIDENTIAL INFORMATION**

National Grid¹ hereby requests that the Rhode Island Public Utilities Commission (PUC) 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). National Grid also hereby requests that, pending entry of that finding, the PUC preliminarily grant National Grid's request for confidential treatment pursuant to Rule 1.2 (g)(2).

I. BACKGROUND

On October 2, 2018, National Grid submitted responses to the First Set of Data Requests from the Division of Public Utilities and Carriers in this docket (Division Set 1). Division Set 1 includes Data Request Division 1-7 (seeking to identify certain customers that use gas during the winter, but do not use Company assets). The Company's response to Division 1-7 contains the identities and usage information of the requested customers, which the Company ordinarily does

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

not make public and which historically has been maintained as confidential when provided in PUC filings. As such, the Company has redacted the customer names from its public response.

Therefore, the Company requests that, pursuant to Rule 1.2(g), the PUC afford confidential treatment to the customer names contained in the Company's response to Division 1-7.

II. LEGAL STANDARD

Rule 1.2(g) of the PUC's Rules of Practice and Procedure 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 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). 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 APRA to deem such information as 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 the disclosure of information would be likely either (1) to impair the government's ability to obtain necessary information in the future; or (2) to 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 customer names contained in the Company's response to Division 1-7 should be protected from public disclosure. The Company's response to Division 1-7 identifies specific customers and includes their usage information. To protect the privacy of its customers, the Company treats such customer-related information as confidential and privileged information, especially when customer names and usage information are presented together. This information is of the type that the Company does not ordinarily make public. Accordingly, the Company is providing its response to Division 1-7 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 the customer names contained in the response.

IV. CONCLUSION

For the foregoing reasons, National Grid respectfully requests that the PUC grant its Motion for Protective Treatment of Confidential Information.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY d/b/a NATIONAL GRID**

By its attorney,



Robert J. Humm, Esq. (#7920)

National Grid

280 Melrose Street

Providence, RI 02907

(401) 784-7415

Dated: October 2, 2018

Division 1-1

Request:

Re: the Direct Testimony of Witnesses Culliford and Arangio at page 7, lines 6-7, please:

- a. Explain the relationship of the Company's forecasted design day load requirement for November 2018 through October 2019 of 390,227 Dth to the forecasted design day requirements for 2018-19 under Base Design Day and High Design Day Scenarios as presented in the Company's March 30, 2018 Long-Range Plan (LRP) that were 374,000 Dth and 376,000 Dth respectively;
- b. Document the changes in input data, changes in assumptions, and changes in estimation methodology that contribute to the increase in Design Peak Day sendout requirements between the Company's March 30, 2018 LRP and the Company's filing in this proceeding;
- c. Provide updated pages for Chart IV-C-1 in the Company's March 30, 2018 LRP that reflect the Company's new forecasts of supply requirements.

Response:

- a. On Bates page 65 of the Company's Long-Range Resource and Requirements Plan for the Forecast Period 2017/18 to 2026/27 (Long-Range Plan), Docket No. 4816, the Company's Total Requirements were listed as 374 billion British thermal units (BBtu) (or 374,000 dekatherms (Dth)) for its Base Case Design Day for 2018/19. This was composed of 369,000 Dth of Firm Sendout and 5,000 Dth of fuel reimbursement.

On Bates page 72 of the Company's Long-Range Plan, the Company's Total Requirements were listed as 376 BBtu (or 376,000 Dth) for its High Case Design Day for 2018-19. This was composed of 372,000 Dth of Firm Sendout and 5,000 Dth of fuel reimbursement.

On page 9 of 28 of the joint direct testimony of Nancy G. Culliford and Elizabeth D. Arangio in the Company's 2018 Gas Cost Recovery (GCR) filing, Docket No. 4872, the Company presented its firm design day sendout forecast of 390,227 Dth.

The design day forecasts in the Company's Long-Range Plan and GCR filings all represent forecasted utilization of volumes for which the Company performs capacity planning (its Sales, FT-2, and FT-1 (pipeline) requirements).

Division 1-1, page 2

The principal difference to which the change in design peak day requirements can be attributed is that the Long-Range Plan forecast was developed by the Company in 2017 with actual data through February 2017, while the GCR forecast was developed by the Company in 2018 with actual data through February 2018. Hence, the GCR forecast incorporates the observations of customer requirements of the winter of 2017-18, including the cold snap period of December 25, 2017 through January 7, 2018. During that cold snap, the Company observed demand that, when extrapolated to design day weather, increased its design day forecast for the upcoming winter of 2018-19.

- b. As documented in Section III of its Long-Range Plan filing, the Company annually prepares its gas load forecast beginning as soon as the winter season is considered over (April 1). The principal driver of the increase in forecasted design day customer requirements is the Company's annual regression of actual gas sendout vs. actual weather in heating degree days (HDD) over the prior 12 months (April 1 through March 31). By relying on its most recent observations of customer requirements as the starting point for its gas load forecast, the Company incorporates the most recent behavior of its customers. There were no changes in assumptions (other than updating its economic forecast data) or in estimation methodology between its Long-Range Plan and GCR forecasts.
- c. Please refer to Attachment DIV-1-1.

National Grid Rhode Island
Comparison of Resources and Requirements
Design Year
(BBtu)

		Design Day									
		2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
<u>REQUIREMENTS</u>											
Firm Sendout	Valley	67	67	68	67	68	68	69	69	69	70
	Providence	304	307	310	311	313	321	323	325	324	328
	Warren	13	13	13	13	13	13	13	13	13	13
	Westerly	7	7	7	7	7	7	7	7	7	7
Fuel Reimbursement		5	6	6	6	6	6	6	6	6	6
Underground Storage Refill		0	0	0	0	0	0	0	0	0	0
LNG Storage Refill		0	0	0	0	0	0	0	0	0	0
TOTAL		396	400	404	404	406	416	418	421	419	424
<u>RESOURCES</u>											
TGP	Dawn	12	27	31	31	31	31	31	31	31	31
	Niagara	1	1	1	1	1	1	1	1	1	1
	Zone 4	41	41	41	41	41	41	41	41	41	41
	Dracut	18	3	0	0	0	0	0	0	0	0
	TGP Citygate	0	0	0	0	0	0	0	0	0	0
	ENGIE Everett	25	25	25	25	25	30	30	30	30	30
	Storage	11	11	11	11	11	11	11	11	11	11
TET/AGT	M2	48	48	48	48	48	48	48	48	48	48
	TCO	48	48	48	48	48	48	48	48	48	48
	Transco	1	1	1	1	1	1	1	1	1	1
	AIM (Ramapo)	9	9	9	9	9	9	9	9	9	9
	AIM (Millennium)	9	9	9	9	9	9	9	9	9	9
	M3	12	12	12	12	12	12	12	12	12	26
	AGT Citygate	14	0	0	0	0	0	0	0	0	0
	Storage	28	28	28	28	28	28	28	28	28	14
Liquid Refill		0	0	0	0	0	0	0	0	0	0
LNG From Storage		116	119	86	119	110	119	119	119	119	119
Unserved	Valley	0	3	4	3	4	4	5	5	5	6
	Providence	0	10	46	14	25	20	21	23	22	26
	Warren	0	2	2	2	2	2	2	2	2	2
	Westerly	0	0	0	0	0	0	0	0	0	0
		0	15	51	19	31	26	28	31	29	34
TOTAL		396	400	404	404	406	416	418	421	419	424

National Grid Rhode Island
Comparison of Resources and Requirements
Design Year
(BBtu)

Design Heating Season (Nov-Mar)

		2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
REQUIREMENTS											
Firm Sendout	Valley	5,077	5,156	5,142	5,118	5,152	5,245	5,223	5,251	5,231	5,334
	Providence	23,115	23,546	23,631	23,681	23,882	24,672	24,851	24,996	24,904	25,396
	Warren	982	997	994	990	996	1,014	1,010	1,016	1,012	1,032
	Westerly	504	512	510	508	511	521	518	521	519	529
Fuel Reimbursement		634	660	659	658	656	666	665	667	666	674
Underground Storage Refill		0	0	0	0	0	0	0	0	0	0
LNG Storage Refill		300	0	0	0	0	0	0	0	0	0
TOTAL		30,611	30,871	30,937	30,956	31,198	32,118	32,268	32,451	32,332	32,965
RESOURCES											
TGP	Dawn	1,130	1,690	1,720	1,708	1,736	1,799	1,797	1,819	1,804	1,870
	Niagara	153	164	163	104	100	105	103	104	103	106
	Zone 4	5,452	5,628	5,325	5,534	5,544	5,668	5,692	5,712	5,699	5,793
	Dracut	540	17	0	0	0	0	0	0	0	0
	TGP Citygate	0	0	0	0	0	0	0	0	0	0
	ENGIE Everett	821	632	651	651	651	651	651	651	651	651
	Storage	1,305	1,318	1,334	1,323	1,302	1,301	1,301	1,301	1,300	1,303
TET/AGT	M2	7,137	7,113	7,100	7,111	7,117	7,165	7,117	7,117	7,117	7,166
	TCO	5,906	6,342	6,408	6,306	6,033	6,139	6,153	6,168	6,159	6,237
	Transco	146	188	183	187	188	189	188	188	188	189
	AIM (Ramapo)	569	551	572	563	587	614	618	629	619	642
	AIM (Millennium)	1,367	1,376	1,367	1,367	1,367	1,376	1,367	1,367	1,367	1,376
	M3	1,561	1,286	1,462	1,431	1,804	1,941	1,981	2,004	1,992	2,061
	AGT Citygate	508	0	0	0	0	0	0	0	0	0
	Storage	2,661	2,665	2,660	2,660	2,656	2,662	2,660	2,660	2,660	2,665
Liquid Refill		300	0	0	0	0	0	0	0	0	0
LNG From Storage		1,053	753	753	753	753	753	753	753	753	753
Unserved	Valley	0	3	4	3	4	4	5	5	5	6
	Providence	1	1,142	1,233	1,253	1,356	1,748	1,879	1,972	1,913	2,144
	Warren	0	2	2	2	2	2	2	2	2	2
	Westerly	0	0	0	0	0	0	0	0	0	0
		1	1,147	1,239	1,258	1,362	1,755	1,886	1,979	1,920	2,153
TOTAL		30,611	30,871	30,937	30,956	31,198	32,118	32,268	32,451	32,332	32,965

National Grid Rhode Island
Comparison of Resources and Requirements
Design Year
(BBtu)

		Design Non-Heating Season (Apr-Oct)									
		2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
REQUIREMENTS											
Firm Sendout	Valley	2,025	2,034	2,025	2,036	2,053	2,060	2,069	2,061	2,083	2,085
	Providence	9,227	9,519	9,482	9,820	9,898	10,763	10,905	10,867	10,974	10,992
	Warren	392	393	392	394	397	398	400	399	403	403
	Westerly	201	202	201	202	204	204	205	205	207	207
Fuel Reimbursement		339	420	435	445	446	461	463	462	465	465
Underground Storage Refill		4,102	4,061	4,114	4,190	4,158	4,095	4,092	4,090	4,093	4,101
LNG Storage Refill		887	887	887	887	887	888	888	888	888	888
TOTAL		17,174	17,516	17,535	17,974	18,043	18,870	19,023	18,972	19,112	19,142
RESOURCES											
TGP	Dawn	490	265	119	83	97	123	131	128	138	141
	Niagara	230	230	200	164	131	132	132	132	132	132
	Zone 4	2,527	3,232	3,441	3,539	3,567	3,592	3,603	3,594	3,615	3,619
	Dracut	0	0	0	0	0	0	0	0	0	0
	TGP Citygate	0	0	0	0	0	0	0	0	0	0
	ENGIE Everett	0	0	0	0	0	0	0	0	0	0
	Storage	0	0	0	42	34	33	32	32	33	33
TET/AGT	M2	7,686	7,976	8,872	9,114	9,140	9,434	9,458	9,451	9,471	9,472
	TCO	796	1,825	1,147	1,143	1,170	1,359	1,381	1,373	1,395	1,400
	Transco	16	62	33	41	33	55	60	60	60	60
	AIM (Ramapo)	96	51	154	166	169	235	249	245	251	250
	AIM (Millennium)	1,840	1,841	1,937	1,937	1,937	1,938	1,938	1,938	1,938	1,938
	M3	2,335	1,314	1,379	1,445	1,464	1,735	1,805	1,787	1,841	1,859
	AGT Citygate	0	0	0	0	0	0	0	0	0	0
	Storage	136	78	120	166	166	99	98	98	100	100
Liquid Refill		887	508	0	0	0	0	0	0	0	0
LNG From Storage		134	134	134	134	134	135	135	135	135	135
Unserved	Valley	0	0	0	0	0	0	0	0	0	0
	Providence	0	0	0	0	0	0	1	0	2	2
	Warren	0	0	0	0	0	0	0	0	0	0
	Westerly	0	0	0	0	0	0	0	0	0	0
		0	0	0	0	0	0	1	0	2	2
TOTAL		17,174	17,516	17,535	17,974	18,043	18,870	19,023	18,972	19,112	19,142

National Grid Rhode Island
Comparison of Resources and Requirements
Design Year
(BBtu)

		Design Annual									
		2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28
REQUIREMENTS											
Firm Sendout	Valley	7,101	7,190	7,166	7,154	7,205	7,305	7,292	7,312	7,313	7,419
	Providence	32,342	33,065	33,113	33,501	33,780	35,435	35,756	35,863	35,878	36,388
	Warren	1,373	1,390	1,386	1,384	1,393	1,413	1,410	1,414	1,414	1,435
	Westerly	705	714	711	710	715	725	724	726	726	736
Fuel Reimbursement		973	1,080	1,094	1,103	1,102	1,127	1,128	1,129	1,130	1,139
Underground Storage Refill		4,102	4,061	4,114	4,190	4,158	4,095	4,092	4,090	4,093	4,101
LNG Storage Refill		1,187	887	887	887	887	888	888	888	888	888
TOTAL		47,784	48,387	48,472	48,930	49,241	50,987	51,291	51,423	51,444	52,107
RESOURCES											
TGP	Dawn	1,620	1,955	1,839	1,791	1,833	1,923	1,929	1,946	1,942	2,011
	Niagara	383	394	362	268	232	236	235	235	235	238
	Zone 4	7,979	8,860	8,766	9,073	9,111	9,259	9,295	9,306	9,314	9,412
	Dracut	540	17	0	0	0	0	0	0	0	0
	TGP Citygate	0	0	0	0	0	0	0	0	0	0
	ENGIE Everett	821	632	651	651	651	651	651	651	651	651
	Storage	1,305	1,318	1,334	1,365	1,336	1,334	1,334	1,333	1,333	1,335
TET/AGT	M2	14,824	15,089	15,972	16,224	16,256	16,598	16,575	16,568	16,588	16,638
	TCO	6,703	8,167	7,555	7,449	7,203	7,498	7,534	7,541	7,554	7,637
	Transco	162	250	216	228	221	244	248	247	248	249
	AIM (Ramapo)	665	603	726	728	756	849	867	874	870	891
	AIM (Millennium)	3,207	3,217	3,305	3,305	3,305	3,314	3,305	3,305	3,305	3,314
	M3	3,895	2,600	2,841	2,876	3,268	3,676	3,786	3,790	3,833	3,921
	AGT Citygate Storage	508	0	0	0	0	0	0	0	0	0
Liquid Refill		1,187	508	0	0	0	0	0	0	0	0
LNG From Storage		1,187	887	887	887	887	888	888	888	888	888
Unserved	Valley	0	3	4	3	4	4	5	5	5	6
	Providence	1	1,142	1,233	1,253	1,356	1,748	1,880	1,972	1,915	2,147
	Warren	0	2	2	2	2	2	2	2	2	2
	Westerly	0	0	0	0	0	0	0	0	0	0
TOTAL		47,784	48,387	48,472	48,930	49,241	50,987	51,291	51,423	51,444	52,107

Division 1-2

Request:

Re: the Direct Testimony of Witnesses Culliford and Arangio at page 8, lines 1-4, please:

- a. Document the source of the referenced 37,745,531Dth design year volume for November 2017 through October 2018 and the specific page or pages within the Company's filings in Docket No. 4719 where that number can be found;
- b. Reconcile the referenced 37,745,531Dth design year volume for November 2017 through October 2018 discussed in the testimony of Witnesses Culliford and Arangio in this proceeding with the 42,268,808 Dth of Design Sales shown in Attachment AEL-1, page 15 of 15.

Response:

- a. The referenced 37,754,531 dekatherms (Dth) represents the design year forecasted wholesale (citygate) volume for 2017-18 from the Company's 2017 forecast of all capacity planning volumes. That forecast for normal year supported the Company's 2017 Gas Cost Recovery filing (Docket No. 4719). There is no exhibit in Docket No. 4719 where wholesale design year volumes are listed.
- b. The referenced 42,268,808 Dth represents the design year forecasted retail (burner tip) volume for 2017-18 based on the Company's 2018 forecast of total throughput. Total throughput exceeds capacity planning volumes by the amount of FT-1 storage and supplementals requirements plus capacity-exempt requirements.

Division 1-4

Request:

Re: the Direct Testimony of Witnesses Culliford and Arangio at page 9, lines 6-7, please document, including the provision of supporting workpapers, assumptions and analyses, the Company's estimates of:

- a. Sales Service requirements for 2017-18 and 2018-19 under:
 - i. Design Day conditions,
 - ii. Design Heating Season conditions, and
 - iii. Design Year Sales conditions;
- b. Transportation Service requirements for 2017-18 and for 2018-19 under:
 - i. Design Day conditions,
 - ii. Design Heating Season conditions, and
 - iii. Design Year Sales conditions.

Response:

Below in Figure 1, the Company has reproduced the table found in the joint direct testimony of Nancy G. Culliford and Elizabeth D. Arangio, page 9 of 28, which lists the requested components for the Company's 2017 and 2018 forecasts. The volumes represent volumes associated with Company capacity planning, and it excludes FT-1 non-pipeline, Capacity-Exempt, and Non-Firm customers. Attachment DIV 1-4 also contains this table along with the supporting data for the Company's 2018 forecast.

Inserted in between the 2017 forecast and 2018 forecast columns is the 2018 lookback of the 2017/18 split year performed along with its 2018 forecast. As demonstrated by the table, reviewing the actual data for the split year 2017/18 in its lookback analysis, the Company's 2017/18 forecast underpredicted the Sales volumes.

The Narragansett Electric Company
d/b/a National Grid
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Division 1-4, page 2

	2017/18 Forecast	2017/18 Lookback	2018/19 Forecast
Design Day			
Total Design Day (Sales + Transportation)	358,008	389,966	390,227
Design Day - Sales	295,421	335,631	336,289
Design Day - Transportation	62,587	54,335	53,938
Design Heating Season (November - March)			
Total Design Heating Season (Sales + Transportation)	26,723,437	29,693,016	29,676,936
Design Heating Season - Sales	21,492,629	24,734,238	24,782,750
Design Heating Season - Transportation	5,230,808	4,958,779	4,894,186
Design Year			
Total Design Year (Sales + Transportation)	37,754,531	41,456,572	41,521,561
Design Year - Sales	29,325,948	33,429,171	33,532,200
Design Year - Transportation	8,428,583	8,027,402	7,989,361

Figure 1 (in Dth)

The increase in the 2018/19 forecast, over the 2017/18 forecast, can be attributed to the observations of customer requirements at cold temperatures that the Company witnessed during the December 2017 through January 2018 cold spell, as well as to the improved forecasting of the various end-uses of the Company's Rhode Island customers by incorporating daily sendout data for its FT-1, Capacity-Exempt, and Non-Firm customers beginning after the 2017 forecast period, as discussed in the Company's response to Data Request Division 2-9. This improved methodology was documented in the Company's 2018 Long-Range Resource and Requirements Plan for the Forecast Period 2017/18 to 2026/27 in Docket 4816.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4872
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Issued September 4, 2018

Attachment DIV 1-4

Please see the Excel version of Attachment DIV 1-4

Division 1-5

Request:

Re: the Direct Testimony of Witnesses Culliford and Arangio at page 9, lines 6-7, please document:

- a. The Company's assessment of the numbers of customers and Dth of sendout requirements that have actually migrated from Transportation Service to Sales Service by month in each of the last two years;
- b. The Company's assessment of the numbers of customers and Dth of sendout requirements that are projected to migrate from Transportation Service to Sales Service before or during the November 2018 – March 2019 Winter period.

Response:

- a. According to Company data, the Company had the meter count set forth in the table below. The Company tracks net meter count and cannot attribute changes in Transportation meter count to conversion to Sales meter count.

	Sales	Transportation	Non-Firm Sales	Non-Firm Transportation
Jul-2016	260,835	2,754	2	8
Aug-2016	260,191	2,771	2	8
Sep-2016	259,898	2,772	2	8
Oct-2016	259,145	2,806	2	8
Nov-2016	260,936	2,816	2	8
Dec-2016	262,448	2,932	2	8
Jan-2017	264,275	2,916	2	8
Feb-2017	265,165	2,914	2	8
Mar-2017	265,319	2,913	2	8
Apr-2017	265,470	2,906	2	9
May-2017	265,260	2,917	2	9
Jun-2017	264,270	2,926	2	9
Jul-2017	262,853	2,931	2	9
Aug-2017	262,387	2,930	2	9
Sep-2017	262,189	2,931	2	9
Oct-2017	262,278	2,942	2	9

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Nov-2017	262,700	2,960	2	9
Dec-2017	263,996	2,973	2	9
Jan-2018	265,720	2,964	2	9
Feb-2018	266,539	2,960	2	9
Mar-2018	266,701	2,959	2	9
Apr-2018	266,451	2,966	2	9
May-2018	265,986	2,972	2	9
Jun-2018	265,206	2,978	2	9

- b. The projected meter counts for the period November 2018 through March 2019 are listed below. The Company measures net meter count and cannot attribute changes in Transportation meter count to conversion to Sales meter count.

	Sales	Transportation	Non-Firm Sales	Non-Firm Transportation
Nov-2018	264,449	2,985	2	9
Dec-2018	265,847	2,987	2	9
Jan-2019	267,303	2,996	2	9
Feb-2019	268,569	3,011	2	9
Mar-2019	268,625	3,034	2	9

Division 1-6

Request:

Re: the comparison of Design Forecasts presented at the top of page 9 of the Direct Testimony of Witnesses Culliford and Arangio, please:

- a. Verify that the projected Peak Day volumes include total system sendout requirements and are not limited to the requirements of Firm Sales Service and Firm Non-Capacity Exempt Transportation Service Requirements;
- b. Breakdown the Company's projected 2018/2019 Design Day Send Out requirement of 390,227 Dth between:
 - i. Firm Sales Service Requirements,
 - ii. Firm FT-2 Transportation Service requirements,
 - iii. Firm FT-1 Non-Capacity Exempt Transportation Service requirements,
 - iv. Firm FT-1 Capacity Exempt Transportation Service requirements,
 - v. Non-Firm Service Requirements due to the failure or inability of non-firm customers to fully curtail their gas use when requested,
 - vi. Company Use,
 - vii. On-system losses,
 - viii. Electric Generation Load (e.g., Manchester Street),
 - ix. Other (please specify).

Response:

- a. As stated in the Company's response to Data Request Division 1-1, on page 9 of 28 of the joint direct testimony of Nancy G. Culliford and Elizabeth D. Arangio in the Company's 2018 Gas Cost Recovery (GCR) filing (Docket No. 4872), the Company presented its firm design day sendout forecast of 390,227 dekatherms (Dth). That figure does not represent total system sendout requirements. The design day forecasts in the Company's Long-Range Resource and Requirements Plan for the Forecast Period 2017/18 to 2026/27 (Long-Range Plan) and its GCR filing all represent forecasted utilization of volumes for which the Company performs capacity planning (its Sales, FT-2, and FT-1 (pipeline) requirements).
- b. As stated in part (a) above, the design day forecasts in the Company's 2018 GCR filing represents forecasted utilization of volumes for which the Company performs capacity planning only (its Sales, FT-2, and FT-1 (pipeline) requirements), inclusive of Company use and on-system losses. No Capacity Exempt, Non-Firm, or Electric Generation

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volumes are included in the projected 2018/19 design day sendout of 390,227 Dth. The requested breakout is listed in the table below.

	2018/19 Design Day Requirement (Dth)
Firm Sales Service	336,289
Firm FT-2 Transportation Service	42,717
Firm FT-1 Non-Capacity Exempt Transportation Service	11,221
Firm FT-1 Capacity Exempt Transportation Service	0
Non-Firm Service	0
Company Use (*)	0
On-system losses (*)	0
Electric Generation Load	0
Other	0
TOTAL	390,227

(*) Included within Design Day Requirement

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Division 1-7

Request:

Re: the comparison of Design Forecasts presented at the top of page 9 of the Direct Testimony of Witnesses Culliford and Arangio. One of the notes at the bottom of the table states, "Volumes include only customers utilizing Company assets," with respect to that note, please:

- a. Identify each customer expected to use gas during the winter of 2018-19 that does not utilize Company assets;
- b. Identify the gas use of customers that do not utilize Company assets on the day of the Company Peak Sendout for the Winter of 2017-18.

Response:

- a. The table below lists the Company's 103 capacity-exempt customers who are expected to use natural gas supply without utilizing Company assets during the winter of 2018-2019.
- b. The table below lists the daily gas consumption of the Company's 103 capacity-exempt customers on January 6, 2018, the day of highest sendout for the winter of 2017-2018.

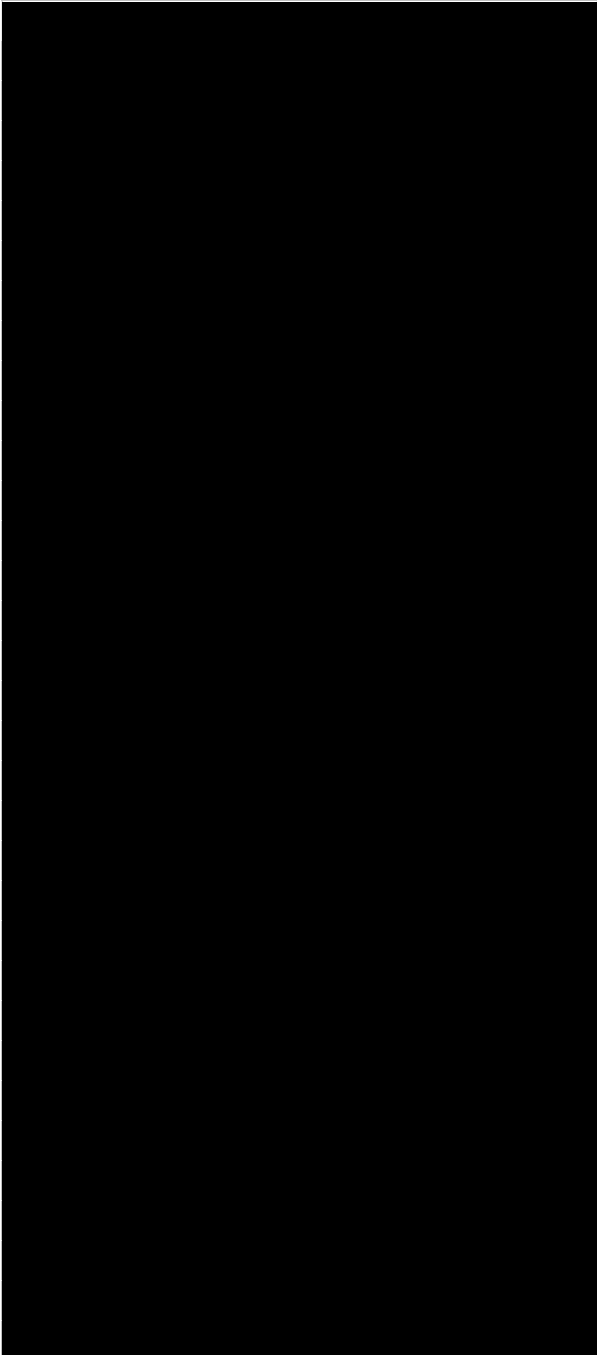
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Capacity-Exempt Customers	Dth
	94
	218
	312
	104
	48
	52
	29
	73
	0
	37
	205
	16
	3142
	0
	606
	112
	215
	218
	192
	131
	28
	224
	94
	59
	36
	90
	0
	41
	0
	146
	65
	177
	75

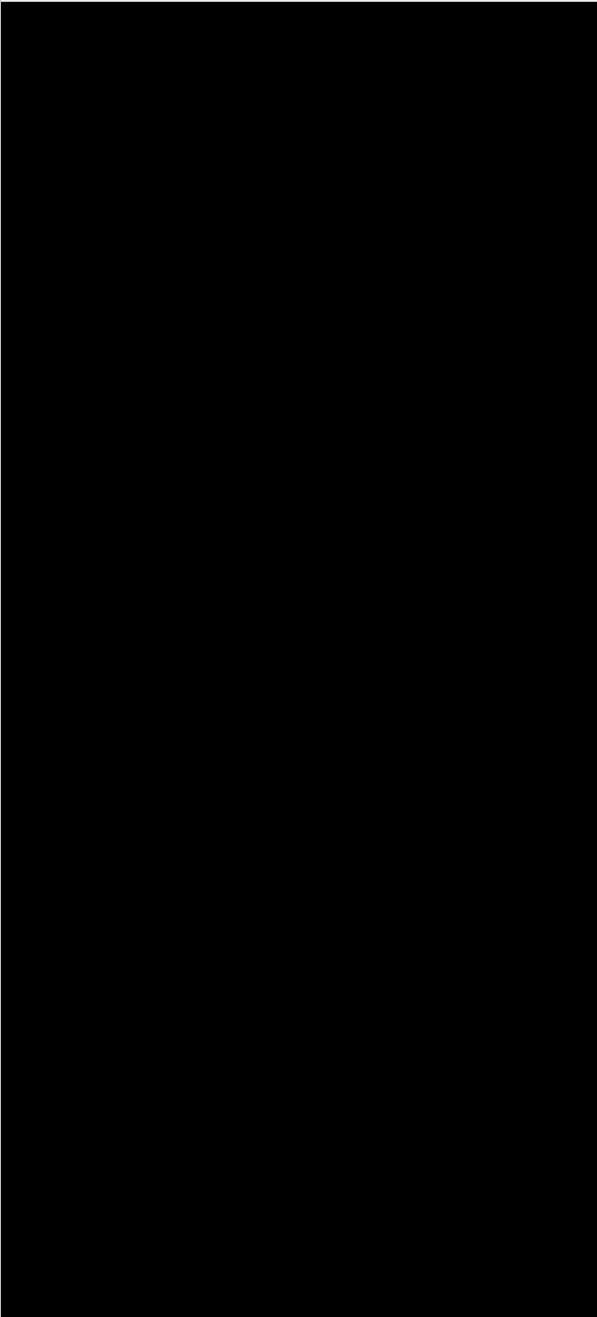
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	0
	71
	61
	351
	131
	64
	0
	1758
	92
	167
	66
	369
	6
	156
	61
	107
	161
	337
	166
	34
	159
	76
	311
	182
	41
	56
	67
	497
	84
	49
	105
	313
	45
	489

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	23
	236
	183
	84
	36
	0
	77
	409
	87
	72
	101
	90
	0
	1767
	1889
	164
	205
	124
	127
	244
	482
	2091
	382
	2605
	95
	41
	139
	196
	206
	465
	163
	109
	92

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	9
	71
	72
Capacity-Exempt TOTAL	26,603