

October 5, 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 4**

Dear Ms. Massaro:

Enclosed please find 10 copies of National Grid's<sup>1</sup> responses to the Fourth Set of Data Requests issued by the Division of Public Utilities and Carriers (Division) in the above-referenced docket.

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 certain confidential and privileged information, which is contained in its responses to Division 4-1 and Division 4-2, as well as in Attachment DIV 4-1. In compliance with Rule 1.2(g), National Grid has provided the PUC with one complete, unredacted copy of the confidential materials in a sealed envelope marked "**Contains Privileged and Confidential Materials – Do Not Release,**" and has included redacted copies of the materials 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

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

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate was electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

\_\_\_\_\_  
Joanne M. Scanlon

October 5, 2018  
Date

**Docket No. 4872 – National Grid – 2018 Annual Gas Cost Recovery Filing (GCR) - Service List as of 10/3/18**

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
Robert Humm, Esq. National Grid 280 Melrose St. Providence, RI 02907	<a href="mailto:Robert.Humm@nationalgrid.com">Robert.Humm@nationalgrid.com</a> ;	401-784-7415
	<a href="mailto:Celia.obrien@nationalgrid.com">Celia.obrien@nationalgrid.com</a> ;	
	<a href="mailto:Joanne.scanlon@nationalgrid.com">Joanne.scanlon@nationalgrid.com</a> ;	
	<a href="mailto:Theresa.Burns@nationalgrid.com">Theresa.Burns@nationalgrid.com</a> ;	
Ann Leary Nancy Culliford Stephen A. McCauley John Protano Theodore Poe National Grid 40 Sylvan Road Waltham, MA 02541	<a href="mailto:Ann.Leary@nationalgrid.com">Ann.Leary@nationalgrid.com</a> ;	
	<a href="mailto:Nancy.culliford@nationalgrid.com">Nancy.culliford@nationalgrid.com</a> ;	
	<a href="mailto:Elizabeth.Arangio@nationalgrid.com">Elizabeth.Arangio@nationalgrid.com</a> ;	
	<a href="mailto:Stephen.Mccauley@nationalgrid.com">Stephen.Mccauley@nationalgrid.com</a> ;	
	<a href="mailto:John.protano@nationalgrid.com">John.protano@nationalgrid.com</a> ;	
	<a href="mailto:Theodore.poe@nationalgrid.com">Theodore.poe@nationalgrid.com</a> ;	
Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	<a href="mailto:Lwold@riag.ri.gov">Lwold@riag.ri.gov</a> ;	401-222-2424
	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ;	
	<a href="mailto:Al.mancini@dpuc.ri.gov">Al.mancini@dpuc.ri.gov</a> ;	
	<a href="mailto:Jonathan.schrag@dpuc.ri.gov">Jonathan.schrag@dpuc.ri.gov</a> ;	
	<a href="mailto:Ronald.Gerwatowski@dpuc.ri.gov">Ronald.Gerwatowski@dpuc.ri.gov</a> ;	
	<a href="mailto:dmacrae@riag.ri.gov">dmacrae@riag.ri.gov</a> ;	
	<a href="mailto:Jmunoz@riag.ri.gov">Jmunoz@riag.ri.gov</a> ;	
Bruce Oliver Revalo Hill Associates 7103 Laketree Drive Fairfax Station, VA 22039	<a href="mailto:Revilohill@verizon.net">Revilohill@verizon.net</a> ;	703-569-6480
Tim Oliver	<a href="mailto:tim.b.oliver@gmail.com">tim.b.oliver@gmail.com</a> ;	

<b>File an original &amp; nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk Margaret Hogan, Commission Counsel Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Margaret.hogan@puc.ri.gov">Margaret.hogan@puc.ri.gov</a> ;	
	<a href="mailto:Patricia.lucarelli@puc.ri.gov">Patricia.lucarelli@puc.ri.gov</a> ;	
	<a href="mailto:Sharon.ColbyCamara@puc.ri.gov">Sharon.ColbyCamara@puc.ri.gov</a> ;	
	<a href="mailto:Todd.bianco@puc.ri.gov">Todd.bianco@puc.ri.gov</a> ;	
Office of Energy Resources Christopher Kearns Nicholas Ucci	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
	<a href="mailto:Nicholas.ucci@energy.ri.gov">Nicholas.ucci@energy.ri.gov</a> ;	

**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 Grid<sup>1</sup> 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 August 31, 2018, National Grid submitted its 2018 Annual Gas Cost Recovery filing in the above-captioned docket. Thereafter, on October 5, 2018, National Grid submitted responses to the Confidential-Redacted Fourth Set of Data Requests from the Division of Public Utilities and Carriers in this docket (Division Set 4). Division Set 4 includes Data Requests Division 4-1 and Division 4-2, both seeking information regarding the acceleration of an increase in the Company’s maximum daily quantity (MDQ) from Tennessee Gas Pipeline. The Company’s responses to Division 4-1 and Division 4-2, and Attachment DIV 4-1, include

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

confidential gas cost pricing information and other information provided in response to a request for proposals (RFP). In accordance with Rule 1.2(g)(3), National Grid has provided a redacted public version of Attachment DIV 4-1 and its responses to Division 4-1 and Division 4-2, as well as unredacted, confidential versions. Attachment DIV 4-1 also includes attorney-client privileged communications and/or work product information, which has been redacted from the confidential version.

Therefore, the Company requests that, pursuant to Rule 1.2(g), the PUC afford confidential treatment to the gas cost pricing information and other information contained in Attachment DIV 4-1 and the Company's responses to Division 4-1 and Division 4-2.

## **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 information contained in Attachment DIV 4-1 and the Company's responses to Division 4-1 and Division 4-2 should be protected from public disclosure. Attachment DIV 4-1 and the Company's responses to Division 4-1 and Division 4-2 include confidential gas cost pricing information and other information provided in response to a RFP. The information provided in response to the RFP is confidential and privileged information of the type that the Company does not ordinarily make public. Public disclosure of the information in Attachment DIV 4-1 and the Company's responses to Division 4-1 and Division 4-2 could impair the Company's ability to obtain advantageous pricing or other terms in the future, thereby causing substantial competitive harm. Additionally, Attachment DIV 4-1 includes attorney-client privileged communications and/or work product information, which has been redacted from the confidential version. Accordingly, the Company is providing Attachment DIV 4-1 and its

responses to Division 4-1 and Division 4-2 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 information.

#### **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,



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Robert J. Humm, Esq. (#7920)  
National Grid  
280 Melrose Street  
Providence, RI 02907  
(401) 784-7415  
Dated: October 5, 2018

**Redacted**  
Division 4-1

Request:

The Confidential portion of the August 31, 2018 Testimony of National Grid Witnesses Culliford-Arangio at page 15, line 16, through page 16, line 5, references [REDACTED] and the Company's [REDACTED] efforts to seek an acceleration of an increase in its Maximum Daily Quantity (MDQ) from Tennessee Gas Pipeline. With respect to this portion of the Company's testimony, please:

- a. [REDACTED]
- b. [REDACTED]
- c. [REDACTED]
- d. [REDACTED]
- e. [REDACTED]
- f. [REDACTED]
- g. [REDACTED]

Response:

- a. The Company issued the request for proposal (RFP) for citygate supply on July 26, 2018. The bids for citygate supply were due on August 3, 2018 by 5:00 p.m.

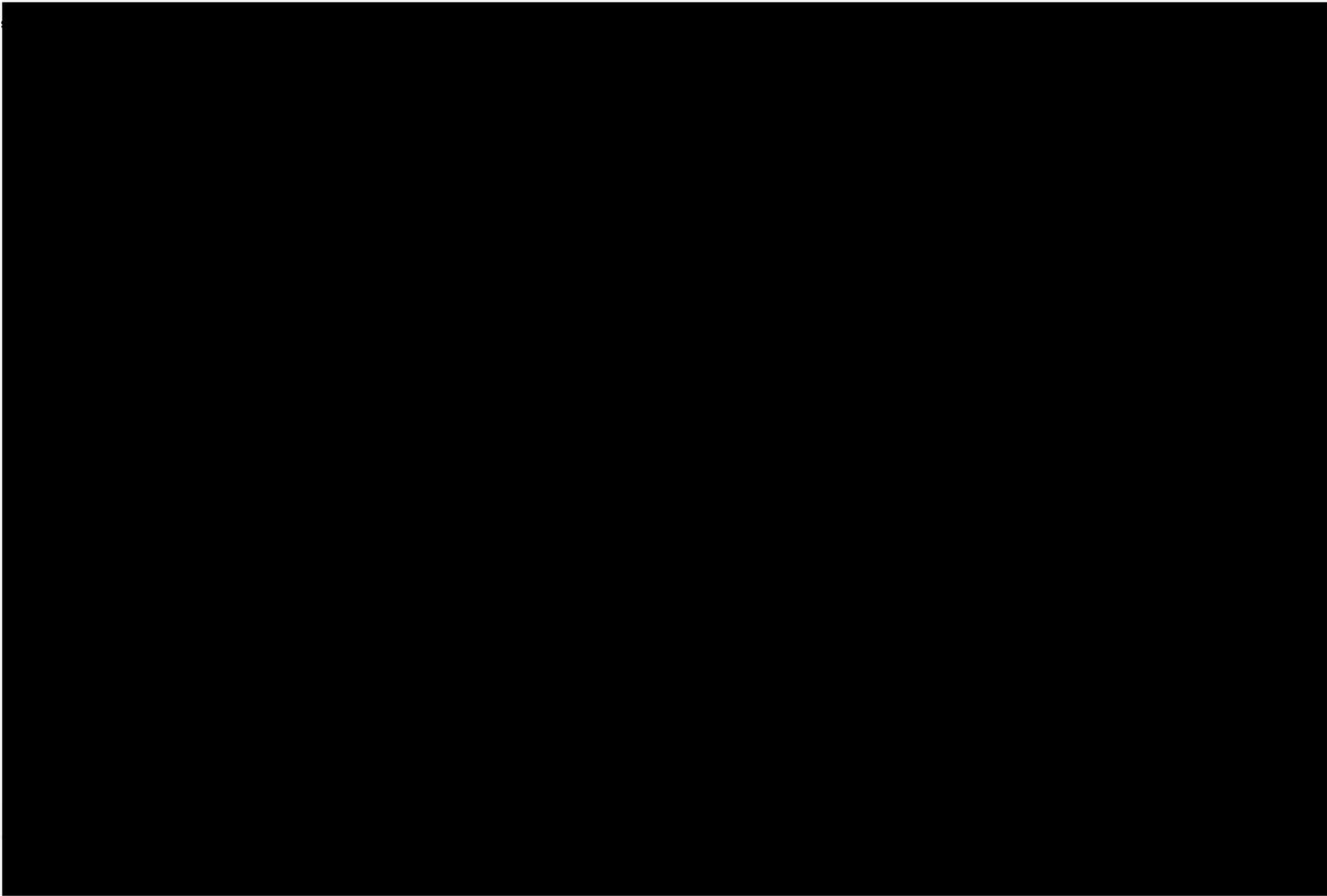
**Redacted**

Division 4-1, page 2

- b. The Company sent the RFP for citygate supply to 73 prospective bidders.
- c. [REDACTED]
- d. The RFP for citygate supply requested a term of December 1, 2018 through March 31, 2019. The RFP requested a maximum daily quantity (MDQ) of 33,000 dekatherms (Dth) with a maximum seasonal quantity (MSQ) of 1,118,000 Dth.
- e. Below are the MDQs and MSQs for the amounts of gas requested and offered and the shortfall when comparing the two amounts:

	<u>Requested</u>	<u>Offered</u>	<u>Shortfall</u>
Maximum Daily Quantity (Dth)	33,000	[REDACTED]	[REDACTED]
Maximum Seasonal Quantity (Dth)	1,188,000	[REDACTED]	[REDACTED]

- f. The Company successfully acquired a total MDQ of [REDACTED] Dth and a total MSQ of [REDACTED] Dth. This supply was estimated to have a fixed cost of [REDACTED] and the estimated potential variable cost totaled [REDACTED].
- g. When the Company received the bids on August 3, 2018 it realized that the responses [REDACTED] [REDACTED] for 2018-19. Please see Attachment DIV 4-1 for copies of all internal National Grid communications regarding [REDACTED].



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**From:** Prag, Janet A. (Marketing)  
**Sent:** Friday, August 03, 2018 5:14 PM  
**To:** Gas RFP  
**Subject:** RE: National Grid - RFP - Boston Gas Company & Narragansett Electric Company - Delivered Gas Supplies - TGP Zone 6 or AGT City-Gate - Dec 2018-Mar 2019

All,

Attached is a check list of bids received at this time. 

Thx, Janet



Checklist-NEW  
ENGLAND-Deliv...

**Janet A. Prag**  
Senior Contract Specialist  
nationalgrid

100 E. Old Country Road  
Hicksville, NY 11801  
T: (516) 545-5463  
F: (516) 806-4449  
[janet.prag@nationalgrid.com](mailto:janet.prag@nationalgrid.com)

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**From:** Prag, Janet A. (Marketing)

**Sent:** Thursday, July 26, 2018 10:54 AM

**Cc:** Allocca, John E; 'Brolly, Mary'; Clark, Cynthia R.; 'Derivative Group'; Derivative Group US; Falanga, Lynn A.; 'Gamarra, Tatiana'; Gas Supply Planning; 'Jaffe, Samara'; 'Kruchten, Dale'; Leippert, Mark J. (Marketing); Mc Cauley, Stephen A.; Metress, John C. (Marketing); ng; Protano, John M. (Marketing); Soule, Richard J.; Stateman, Maria E.; 'Superty, Robert'; Sutton, Kenneth G.; 'Troupe, Eboni'; Zhukovsky, Alexander

**Subject:** National Grid - RFP - Boston Gas Company & Narragansett Electric Company - Delivered Gas Supplies - TGP Zone 6 - City-Gate - Dec 2018-Mar 2019

To All Prospective Bidders:

National Grid is seeking proposals for delivered gas supplies as set forth in the attached RFP.

Proposals must be received by 5:00 PM on Friday, August 3.

*As part of their bid, Bidders must demonstrate they have primary firm capacity to each of Buyer's Delivery Point(s) for which they are submitting an offer using Exhibit A included with the RFP and/or an explanation of the priority of service to be used in meeting Buyer's Gas Supply Requirements if selected.*

*Please direct all correspondence to the following email address as listed in the RFP:*

[GasRFP@nationalgrid.com](mailto:GasRFP@nationalgrid.com).

Thank you for your interest in National Grid. We look forward to receiving your proposal.

Best regards,  
Janet

<< File: MA and RI City Gate 2018-2019 RFP FINAL.doc >>

Janet A. Prag  
Senior Contract Specialist  
nationalgrid  
100 E. Old Country Road  
Hicksville, NY 11801  
T: (516) 545-5463  
F: (516) 806-4449  
[janet.prag@nationalgrid.com](mailto:janet.prag@nationalgrid.com)

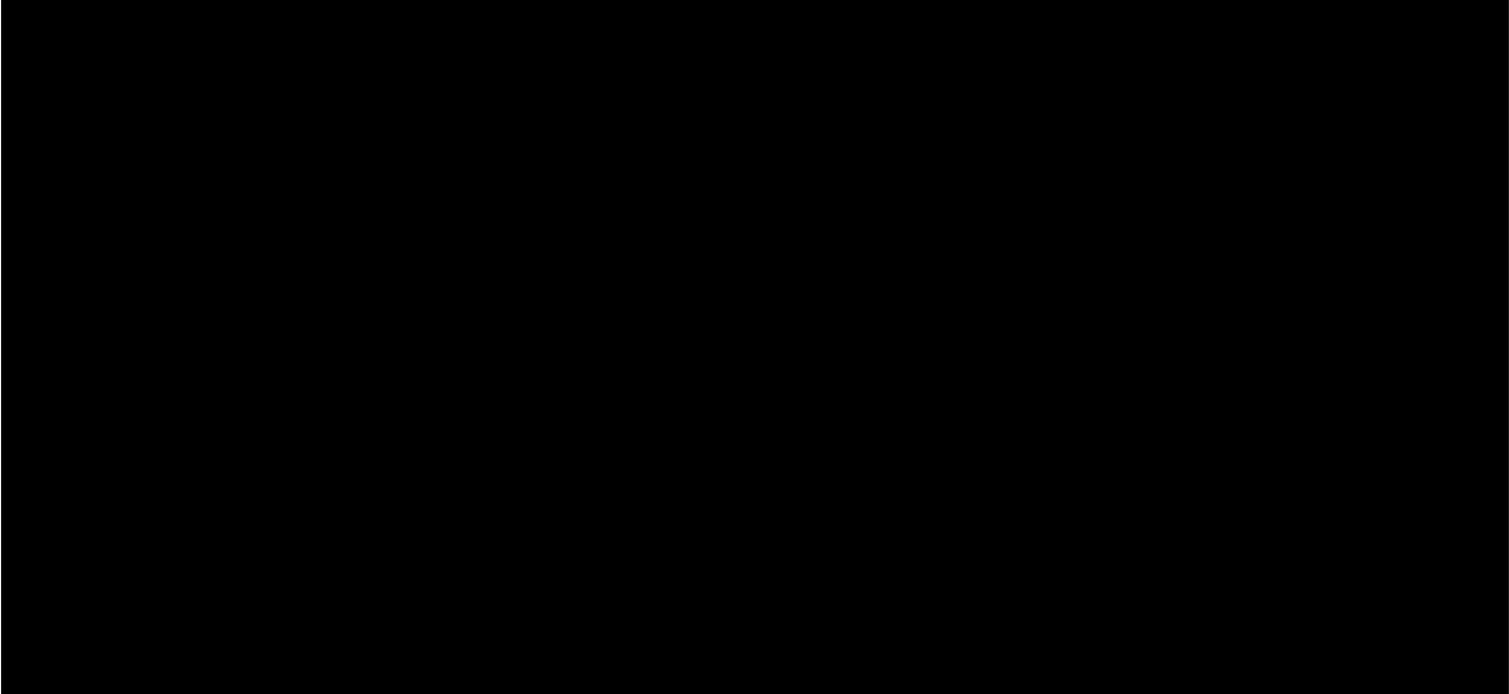
RFP – Boston & Narragansett

Delivered Gas Supply–City-Gate-TGP CDP 267/268 & AGT Everett, Braintree, Waltham-Polaroid, Bourne, Ponkapoag & Sandwich

Issued – July 26, 2018 – Term: December 1, 2018-March 31, 2019

Recipient Checklist – Bids Due 5 PM – August 3, 2018 – Award 5 PM August 8, 2018

<b>Counterparty</b>	<b>Bidder's Contact Information</b>	<b>NAESB or ISDA Gas Annex</b>	<b>Package 1 – BOSTON: TGP CDP 267 &amp; 268 &amp; AGT Everett; Braintree; Waltham-Polaroid; Bourne; Ponkapoag &amp; Sandwich</b>  <b>MDQ up to 30,000 D/D MSQ: 600,000 Dth</b>  <b>*Affidavit of Firm Delivery Required.</b>	<b>Package 2 – Narragansett: City Gate and TGP or AGT</b>  <b>MDQ up to 33,000 D/D MSQ: 1,188,000</b>  <b>*Affidavit of Firm Delivery Required.</b>	<b>Comments/Exceptions</b>



**From:** Culliford, Nancy G. (Marketing)  
**Sent:** Wednesday, October 03, 2018 11:15 AM  
**To:** Spencer, Brian D. (Marketing)  
**Subject:** FW: Rhode Island RFP Analysis

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**From:** Spencer, Brian D. (Marketing)  
**Sent:** Tuesday, August 07, 2018 9:15 AM  
**To:** Arangio, Elizabeth C.; Culliford, Nancy G. (Marketing); Whitney, Deborah M. (Marketing)  
**Cc:** Papetti, Dino C. (Marketing)  
**Subject:** RE: Rhode Island RFP Analysis

I added the total cost to take the additional ENGIE at Everett at 100% load factor plus the cost for zn 6-6 capacity for the whole year 

Brian Spencer  
Gas Supply Planning  
National Grid  
40 Sylvan Rd, E1.657  
Waltham, MA 02451  
Phone: 781.907.1642

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**From:** Spencer, Brian D. (Marketing)  
**Sent:** Monday, August 06, 2018 5:24 PM  
**To:** Arangio, Elizabeth C.; Culliford, Nancy G. (Marketing); Whitney, Deborah M. (Marketing)  
**Cc:** Papetti, Dino C. (Marketing)  
**Subject:** Rhode Island RFP Analysis

Hi All,

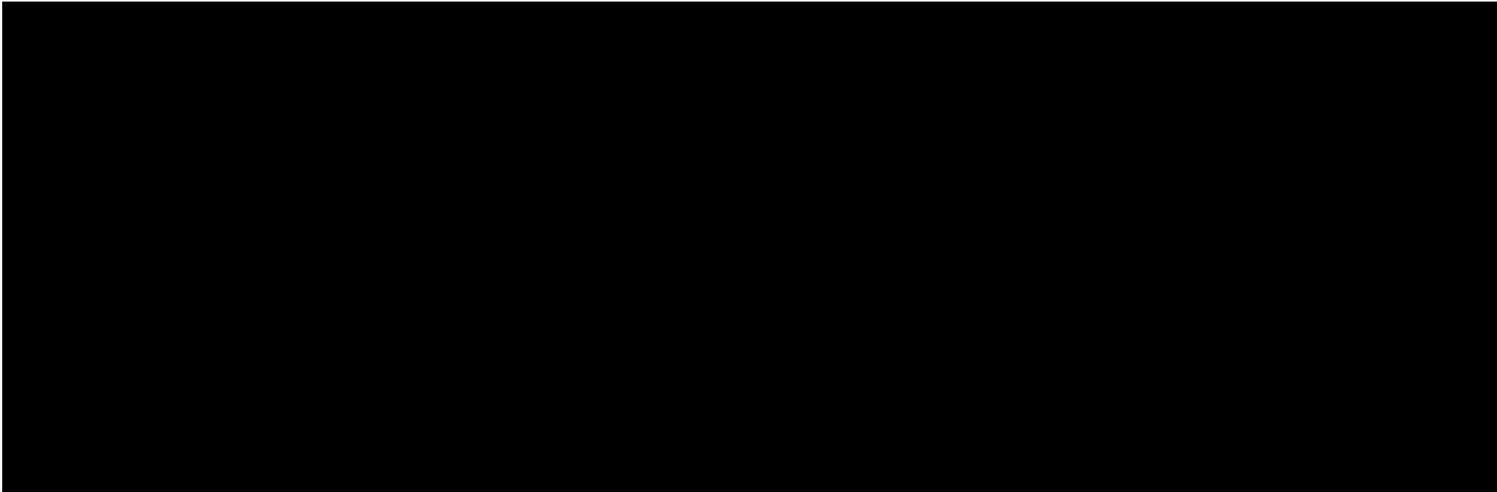
Here are the Rhode Island bids we got.   


If we accelerated the additional 15,000 of Zn 6-6 capacity on TGP from Everett, we could technically accept [REDACTED] the bids [REDACTED]

Brian

Brian Spencer  
Gas Supply Planning  
National Grid  
40 Sylvan Rd, E1.657  
Waltham, MA 02451  
Phone: 781.907.1642





**From:** Jaffe, Samara A. (Marketing)  
**Sent:** Wednesday, September 26, 2018 1:28 PM  
**To:** Culliford, Nancy G. (Marketing)  
**Subject:** FW: RI Winter Supply  
**Importance:** High

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**From:** Spencer, Brian D. (Marketing)  
**Sent:** Tuesday, August 14, 2018 9:52 AM  
**To:** Jaffe, Samara A. (Marketing)  
**Cc:** Culliford, Nancy G. (Marketing); Whitney, Deborah M. (Marketing); Arangio, Elizabeth C.  
**Subject:** RI Winter Supply

RI Supply	MDQ	MSQ	Per ACQ	Demand	Commodity	Remix MDQ
	DTH	DTH				Results



Hi Samara,

To summarize what we need for RI:

We can accept Repsol's revised 30 day bid for Dracut

We can accept ENGIE's bid for citygate on AGT

We need to ask ENGIE to revise two other offers:

We need 300,000 MSQ for liquid refill and if they could to increase it from 6,000 to 8,000 per day.

We need 500,000 MSQ at Everett at 10,000 per day (accelerated capacity)

We need to confirm with TENNESSEE that we can accelerate 10,000 dts for November 2018. This is on top of the 15,000 dts we already have in place for Nov 1 so we would have 25,000 dts total from the Everett meter on TGP for Nov 1, 2018.

Feel free to call me with any questions.

Thanks,  
Brian

Brian Spencer  
Gas Supply Planning  
National Grid  
40 Sylvan Rd, E1.657  
Waltham, MA 02451  
Phone: 781.907.1642



**From:** Sculley, Coralie Carter [mailto:Coralie\_Sculley@kindermorgan.com]  
**Sent:** Monday, August 20, 2018 6:40 PM  
**To:** Culliford, Nancy G. (Marketing)  
**Cc:** Jaffe, Samara A. (Marketing); Arangio, Elizabeth C.; Carroll, MaryBeth (Marketing); Allocca, John E; Prag, Janet A. (Marketing); Troutman, H Preston (Preston); Stringer, Alison G  
**Subject:** RE: EXT || RE: Shipper Approvals

I am still working through the NIMO 50MM/d request. We are fleshing that out.

**From:** Culliford, Nancy G. (Marketing) [mailto:Nancy.Culliford@nationalgrid.com]  
**Sent:** Monday, August 20, 2018 5:28 PM  
**To:** Sculley, Coralie Carter  
**Cc:** Jaffe, Samara A. (Marketing); Arangio, Elizabeth C.; Carroll, MaryBeth (Marketing); Allocca, John E; Prag, Janet A. (Marketing); Troutman, H Preston (Preston); Stringer, Alison G  
**Subject:** Re: EXT || RE: Shipper Approvals

[This email message was received from the Internet and came from outside of Kinder Morgan]

Thank you Coralie. Nancy

Sent from my iPhone

On Aug 20, 2018, at 5:17 PM, Sculley, Coralie Carter <[Coralie\\_Sculley@kindermorgan.com](mailto:Coralie_Sculley@kindermorgan.com)> wrote:

Samara, We have determined that capacity is available to accelerate 10,000 dth/d receipt at Distrigas/delivery at Cranston on K#330581 from 11/01/2019 to 11/01/2018 such that K#330581 would be amended as follows. Please let me know when Grid has received final internal approval to proceed with contracting. Thanks.

Grid Requests are Max Rate w/ ROFR

Grid - Narragansett Requested Re-Contracting K#330581

Total TQ Dth/d	Receipt	Delivery	Start Date	End Date
15,000	Distrigas (#412513)	Cranston (#420750)	11/1/2018	10/31/2023
20,000	Distrigas (#412513)	Cranston (#420750)	11/1/2023	10/31/2038

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**From:** Jaffe, Samara A. (Marketing) [<mailto:Samara.Jaffe@nationalgrid.com>]  
**Sent:** Monday, August 13, 2018 3:00 PM  
**To:** Stringer, Alison G; Sculley, Coralie Carter  
**Cc:** Arangio, Elizabeth C.; Carroll, MaryBeth (Marketing); Allocca, John E; Prag, Janet A. (Marketing); Culliford, Nancy G. (Marketing); Troutman, H Preston (Preston)  
**Subject:** RE: Shipper Approvals

[This email message was received from the Internet and came from outside of Kinder Morgan]

Alison and Coralie:

In reference to Gas Transportation Agreement Dated May 23, 2017 between Tennessee Gas Pipeline Company, LLC and The Narragansett Electric Company d/b/a National Grid for 20,000 dth/day (phased in incrementally pursuant to Exhibit A) effective 11/1/2018, I believe Liz and Nancy had both recently inquired about the possibility of accelerating the phased in portion of the MDQ. At this time, we would like to know whether Tennessee would be able to accelerate an additional 10,000 dth/day on the referenced contract effective November 1, 2018.

We are currently in the process of determining whether the "accelerated" component will require additional approvals by our Board and expect to have an answer on this issue shortly. Please advise as soon as possible whether this volume is available for this winter season so we can move quickly on any approvals that may be needed.

Thank you and please feel free to reach out to me with any questions!

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**From:** Jaffe, Samara A. (Marketing)  
**Sent:** Friday, June 08, 2018 1:35 PM  
**To:** Stringer, Alison G ([Alison.Stringer@kindermorgan.com](mailto:Alison.Stringer@kindermorgan.com))  
**Cc:** Arangio, Elizabeth C.; Carroll, MaryBeth (Marketing); Allocca, John E; Prag, Janet A. (Marketing); Culliford, Nancy G. (Marketing); Sculley, Coralie ([Coralie.Sculley@kindermorgan.com](mailto:Coralie.Sculley@kindermorgan.com)); Troutman, H Preston (Preston)  
**Subject:** RE: Shipper Approvals  
**Importance:** High

Good afternoon Alison!

As a follow-up to my July 12, 2017 email, this email notification is being sent to you with respect to the Shipper Authorizations for the following agreements:

- Gas Transportation Agreement Dated May 23, 2017 between Tennessee Gas Pipeline Company, LLC and Niagara Mohawk Power Corporation d/b/a National Grid for 20,000 dth/day effective 11/1/2018
- Gas Transportation Agreement Dated May 23, 2017 between Tennessee Gas Pipeline Company, LLC and Boston Gas Company d/b/a National Grid for 13,868 dth/day effective 11/1/2018
- Gas Transportation Agreement Dated May 23, 2017 between Tennessee Gas Pipeline Company, LLC and The Narragansett Electric Company d/b/a National Grid for 24,000 dth/day effective 11/1/2018
- Gas Transportation Agreement Dated May 23, 2017 between Tennessee Gas Pipeline Company, LLC and The Narragansett Electric Company d/b/a National Grid for 20,000 dth/day (phased in incrementally pursuant to Exhibit A) effective 11/1/2018

In accordance with Section 16.2 of each of the aforementioned agreements between Tennessee Gas Pipeline Company, L.L.C. and Niagara Mohawk Power Corporation d/b/a National Grid, Boston Gas Company d/b/a National Grid and The Narragansett Electric Company d/b/a National Grid, National Grid is hereby providing notice that it has determined in its commercially reasonable discretion that it has obtained the necessary authorizations from its respective Regulators to proceed with these agreements and recover the costs incurred thereunder.

For recording keeping purposes, notice of satisfaction of Shipper Authorizations related to Gas Transportation Agreement Dated June 28, 2017 between Tennessee Gas Pipeline Company, LLC and Niagara Mohawk Power Corporation d/b/a National Grid for 30,000 dth/day effective 11/1/2017 was previously provided on August 11, 2017 and is therefore not included above.

Thank you and have a fabulous weekend!

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**From:** Jaffe, Samara A. (Marketing)  
**Sent:** Wednesday, July 12, 2017 3:17 PM  
**To:** Stringer, Alison G ([Alison.Stringer@kindermorgan.com](mailto:Alison.Stringer@kindermorgan.com)); Sculley, Coralie ([Coralie.Sculley@kindermorgan.com](mailto:Coralie.Sculley@kindermorgan.com))  
**Cc:** Arangio, Elizabeth C. (Marketing); Carroll, MaryBeth (Marketing); Allocca, John E. (Marketing); Prag, Janet A. (Marketing); Culliford, Nancy G. (Marketing)  
**Subject:** Shipper Approvals

Good afternoon Alison and Coralie!

This email notification is being sent to you with respect to the following agreements:

- Gas Transportation Agreement Dated June 28, 2017 between Tennessee Gas Pipeline Company, LLC and Niagara Mohawk Power Corporation d/b/a National Grid for 30,000 dth/day effective 11/1/2017
- Gas Transportation Agreement Dated May 23, 2017 between Tennessee Gas Pipeline Company, LLC and Niagara Mohawk Power Corporation d/b/a National Grid for 20,000 dth/day effective 11/1/2018
- Gas Transportation Agreement Dated May 23, 2017 between Tennessee Gas Pipeline Company, LLC and Boston Gas Company d/b/a National Grid for 13,868 dth/day effective 11/1/2018
- Gas Transportation Agreement Dated May 23, 2017 between Tennessee Gas Pipeline Company, LLC and The Narragansett Electric Company d/b/a National Grid for 24,000 dth/day effective 11/1/2018
- Gas Transportation Agreement Dated May 23, 2017 between Tennessee Gas Pipeline Company, LLC and The Narragansett Electric Company d/b/a National Grid for 20,000 dth/day (phased in incrementally pursuant to Exhibit A) effective 11/1/2018

In accordance with Section 16.1 of the aforementioned agreements between Tennessee Gas Pipeline Company, L.L.C. and the National Grid LDC party to such agreement, National Grid is hereby providing notice that it has obtained all necessary approvals from its executive management and/or board of directors for the execution of such agreements.

Thank you!

*Samara Jaffe*

**nationalgrid**

Program Manager- FERC Compliance & Contracting  
100 E. Old Country Road  
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**Rhode Island Citygate Peaking Supply**

**RFP Details:**

**Term:** December 1, 2018 - March 31, 2019

**Delivery Point:** TGP or AGT Citygate

**MDQ:** 33,000 dt per day

**MSQ:** 1,188,000 dt (36 days of call)

**Price:** Tennessee, Zone 6 City Gate Gas Daily

**Nominations:** Must be done by 10:00 am and bidder must indicate whether nomination must be ratable

**Damages:** On day buyer nominates gas and seller fails to deliver then seller shall reimburse buyer for each undelivered dt an amount equal to the greater of buyer's cover costs or 150% of the greater of AGT/TGP CG Gas Daily Midpoint for applicable day

**Affidavit of Primary Firm Delivery:** Bidder must demonstrate that it has primary firm capacity to each delivery point and must provide and affidavit and/or a written explanation of the priority of service it will utilize

<p><b>MDQ:</b></p> <p><b>MSQ:</b></p> <p><b>Commodity:</b></p> <p><b>Total Demand (Dec - Mar):</b></p> <p><b>Demand price per dt:</b></p> <p><b>Delivery Point:</b></p> <p><b>Ratable:</b></p> <p><b>Notification time:</b></p> <p><b>Notes:</b></p>	
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**Rhode Island Peaking Supply at Dracut**

**RFP Details:**

Term: December 1, 2018 - March 31, 2019

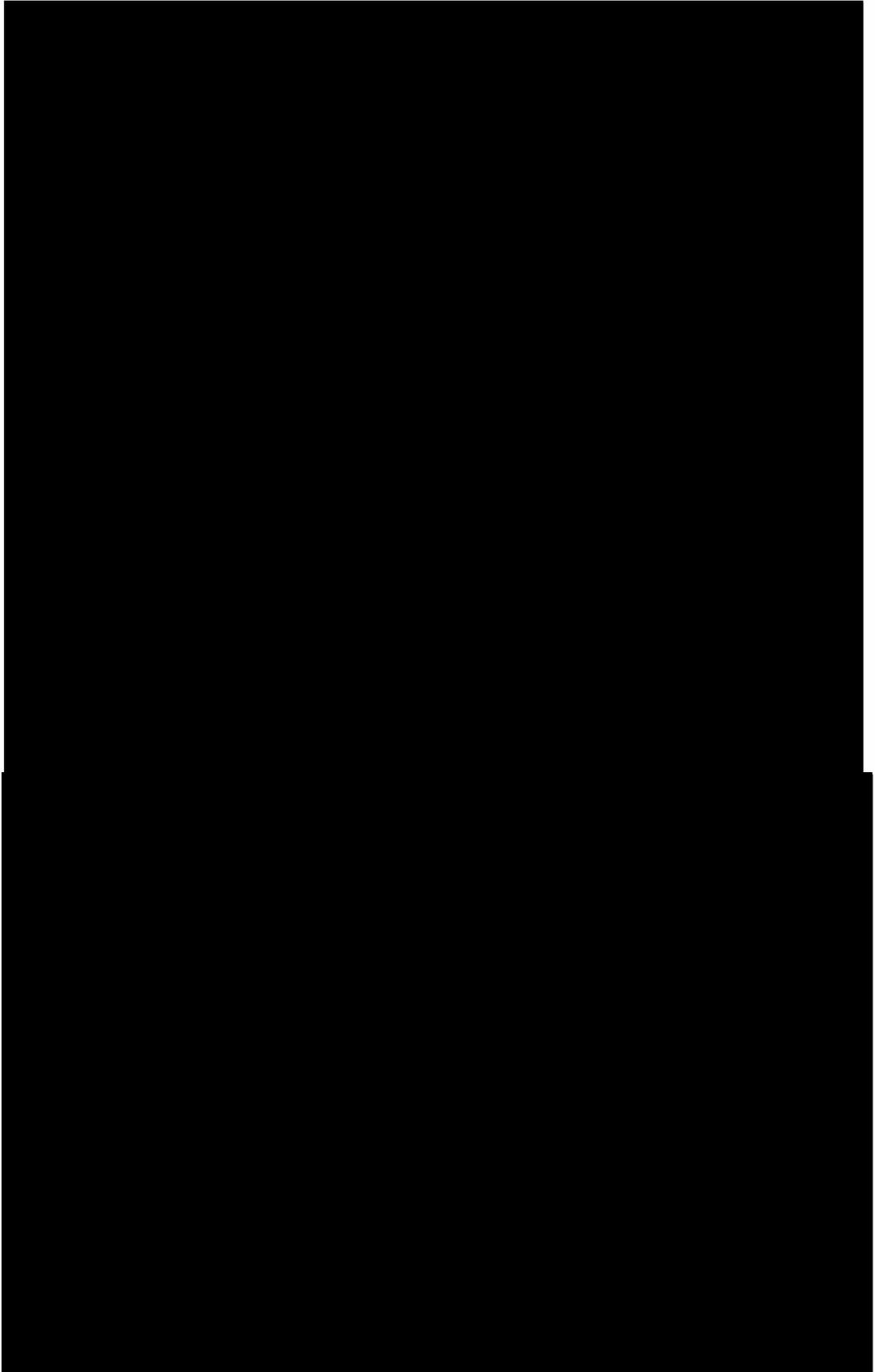
Delivery Point: TGP Meter #412538 located in Dracut, MA

MDQ: 17,700 dt per day

MSQ: 477,900 dt (27 days of call)

Price: Platts Gas Daily Midpoint for the Delivery Point (i.e., Tennessee Zone 6 - CDP 267)

Nominations: Must be done by 10:00 am



<p>MDQ:</p> <p>MSQ:</p> <p>Commodity:</p> <p>Total Demand (Dec - Mar):</p> <p>Demand price per dt:</p> <p>Ratable:</p> <p>Notification time:</p> <p>Delivery Point:</p> <p>Notes:</p>
---

**Redacted**  
Division 4-2

Request:

The Confidential portion of the August 31, 2018 Testimony of National Grid Witnesses Culliford-Arangio at page 15, line 16, through page 16, line 5, references [REDACTED] and the Company's [REDACTED] efforts to seek an acceleration of an increase in its Maximum Daily Quantity (MDQ) from Tennessee Gas Pipeline. With respect to this portion of the Company's testimony, please:

- a. [REDACTED]
- b. [REDACTED]
- c. [REDACTED]
- d. Identify when the Company first contacted Tennessee regarding acceleration of its MDQ;
- e. Identify any alternatives for the considered with respect to the receipt and/or delivery points for the referenced accelerated Tennessee MDQ;
- f. Indicate when National Grid first contacted Tennessee regarding acceleration of its MDQ;
- g. Document the date on which Tennessee confirmed the feasibility of accelerating the discussed increase in National Grid's MDQ;

Response:

- a. The Company's initial request for proposals (RFP) requested a supply agreement with a term of December 1, 2018 through March 31, 2019 seeking a maximum daily quantity (MDQ) of 33,000 dekatherms (Dth) per day and an annual contract quantity (ACQ) of 1,118,000 Dth. [REDACTED]  
[REDACTED] In order to meet the shortfall for the

**Redacted**  
Division 4-2, page 2

- b. peak day and peak season, the Company increased its peak season liquefied natural gas (LNG) requirement to a maximum seasonal quantity (MSQ) of 300,000 Dth with up to eight trucks per day.
- c. Please see the table below for the expected fixed and variable costs for the citygate supplies.

<b>Fixed Price</b>					
PEAKING SUPPLY AT AGT CITYGATE	Dth				
<b>SUPPLIER FIXED COST UNIT PRICES</b>					
DEMAND COSTS					
<b>Variable Cost</b>					
ENGIE - AGT					
Delivered MMBtu	Dth				
Delivered Price					
Total Delivered Cost					
<b>Total Cost</b>					

- d. Please see the response to part (b) above for monthly and yearly costs for citygate supplies.
- e. The Company contacted Tennessee Gas Pipeline (Tennessee) on August 13, 2018 about the potential to accelerate the Tennessee MDQ.
- f. Tennessee's System Planning group reviewed its system models and confirmed to the Company that it would have volumes available from Tennessee's receipt point at Everett, Massachusetts to the Company's delivery point of Cranston, Rhode Island.
- g. See the response to part (d) above.
- h. Tennessee contacted the Company on August 14, 2018 to inform the Company that Tennessee had the ability to accelerate the firm transportation agreement between the Company and Tennessee for 20,000 Dth per day to phase-in a portion of the MDQ from 5,000 Dth per day to 10,000 Dth per day effective November 1, 2018.

Division 4-3

Request:

Provide the analyses, workpapers and assumptions upon which the Company relies to demonstrate that its contracted owned and gas supply resources for each month of its November 2018 through October 2019 GCR period are adequate to meet its planning requirements.

Response:

Please see Attachment DIV 4-3 for the Company's gas supply resources by month for November 2018 through October 2019. Please see Attachment DIV 1-1 in response to Data Request Division 1-1, part (c), in this docket, which demonstrates that the Company's gas supply resources for November 2018 through October 2019 are adequate to meet its planning requirements. The Company has no unserved volumes for the peak day and peak season for November 2018 through October 2019.

	NOV 2018	DEC 2018	JAN 2019	FEB 2019	MAR 2019	APR 2019	MAY 2019	JUN 2019	JUL 2019	AUG 2019	SEP 2019	OCT 2019	Total
=====													
Served Demand													
Firm	0	0	0	0	0	0	0	0	0	0	0	0	0
PROVIDENCE	3194.5	4940.5	5800	4941.5	4236.7	2505.7	1368.6	899.3	729.9	772.7	949.7	2001.3	32340.5
VALLEY	701.9	1085.1	1273.8	1085.3	930.5	550.3	300.6	197.5	160.3	169.7	208.6	437.9	7101.4
WESTERLY	69.7	107.7	126.4	107.7	92.4	54.6	29.8	19.6	15.9	16.8	20.7	43.5	704.9
WARREN	135.7	209.8	246.3	209.9	179.9	106.4	58.1	38.2	31	32.8	40.3	84.7	1373.4
PROV CE	0	0	0	0	0	0	0	0	0	0	0	0	0
VALLEY CE	0	0	0	0	0	0	0	0	0	0	0	0	0
WESTERLY CE	0	0	0	0	0	0	0	0	0	0	0	0	0
WARREN CE	0	0	0	0	0	0	0	0	0	0	0	0	0
Total Served	4101.8	6343.2	7446.6	6344.4	5439.6	3217	1757.1	1154.6	937.2	992.1	1219.3	2567.3	41520.2
Fuel Consumed													
Transport	80.2	135.6	148.6	126.9	120.5	61.9	46.2	35.9	30.3	29.3	22.2	57.2	894.9
Injection	0	0	0	0	0	0.8	10.1	8.4	9.1	7.4	10.1	10.4	56.2
Withdrawal	0	5.9	5.9	5.5	4.8	0	0	0	0	0	0	0	22
Total Fuel	80.2	141.5	154.4	132.4	125.3	62.7	56.3	44.3	39.4	36.7	32.3	67.6	973.2
Storage Injections													
RI FSMA501	0	0	0	0	0	0	123.2	0	16.5	123.2	119.3	123.2	505.5
RI DTIGSS170	0	0	0	0	0	0	82.8	79.8	77.7	69.5	67.3	69.5	446.7
RI DTIGSS168	0	0	0	0	0	8.6	26	25.2	24.4	21.9	21.2	21.9	149
RI FSMA62918	0	0	0	0	0	0	42.7	0	34.1	42.7	41.4	42.7	203.7
RI DTIGSS171	0	0	0	0	0	11	31.9	30.9	29.9	26.8	25.9	26.8	183.1
RI DTI600045	0	0	0	0	0	0	143.8	195.9	195.2	35.9	188.9	195.2	955.1
RI TET400515	0	0	0	0	0	1.6	9	8.7	9	9	8.7	9	54.9
RI TET400221	0	0	0	0	0	33.9	188.4	182.4	188.4	188.4	182.4	188.4	1152.4
RI TET400185	0	0	0	0	0	1.5	8.2	8	8.2	8.2	8	8.2	50.4
RI DTIGSS169	0	0	0	0	0	12	34.8	33.7	32.6	29.2	28.3	29.2	199.9
RI TCO9630	0	0	0	0	0	3.8	40.8	34.7	40.8	40.8	26.5	14.3	201.7
RI KLNG	0	130	0	50.1	25.9	128.4	155	104.9	98	0	75	110.1	877.5
RI ExeterLNG	0	52.5	0	22.3	19.2	21.6	0	45.1	57	0	75	17	309.6
Total Inj	0	182.5	0	72.5	45	222.5	886.7	749.2	812	595.8	867.8	855.7	5289.6



RI DTI600045	163.4	168.8	168.8	152.5	168.8	132.7	0	0	0	0	0	0	955.1
RI TET400515	0	14.2	14.2	14.2	12.5	0	0	0	0	0	0	0	54.9
RI TET400221	0	297	297	297	261.4	0	0	0	0	0	0	0	1152.4
RI TET400185	0	13	13	13	11.4	0	0	0	0	0	0	0	50.4
RI DTIGSS169	0	49.5	55.6	53.7	41.1	0	0	0	0	0	0	0	199.9
RI TCO9630	9.2	35.6	71.4	54.5	27.1	3.8	0	0	0	0	0	0	201.7
RI KLNG	51.7	120.3	493.9	94.2	25.9	12.8	13.3	12.8	13.3	13.3	12.8	13.3	877.5
RI ExeterLNG	16	36.5	114.8	77	22.7	6	6.2	6	6.2	6.2	6	6.2	309.6
Total With	334.3	1109.7	1641.6	1124.5	809	155.3	19.4	18.8	19.4	19.4	18.8	19.4	5289.6
Total Supply	4182	6667.1	7601	6549.4	5609.9	3502.2	2700.2	1948	1788.6	1624.6	2119.4	3490.6	47783

Division 4-4

Request:

Provide the analyses, workpapers and assumptions upon which the Company relies to demonstrate that its contracted and owned gas supply resources for the November 2018 through October 2019 GCR period can reasonably be expected to minimize the costs of gas supply for the Company's Rhode Island gas customers over that period.

Response:

The Company uses the SENDOUT® model as its primary analytical tool in the gas portfolio design process. The SENDOUT® model is a linear-programming optimization software tool used that assists in evaluating, selecting, and explaining long-term portfolio strategies. The Company utilizes the SENDOUT® model to determine the best use of a given portfolio of supply, capacity, and storage contracts to meet a specified demand. That is, it can solve for the dispatch of resources that minimizes the cost of serving the specified demand given the existing resource and system-operating constraints. The model dispatches resources based on the lowest variable cost to meet demand.

Please see the Company's response to Division 1-1, part (c), in this docket for the Company's comparison of resources and requirements for least-cost dispatch volumes. Please see the Company's response to Division 4-3 for monthly detail for November 2018 through October 2019.