

July 18, 2019

BY HAND DELIVERY AND ELECTRONIC MAIL

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

**RE: Docket 4888 – The Narragansett Electric Company d/b/a National Grid
2019 Energy Efficiency Program Plan
Responses to Energy Efficiency Post-decisional Information Request**

Dear Ms. Massaro:

I have enclosed National Grid's¹ responses to the Rhode Island Public Utilities Commission's (PUC) post-decisional information requests in the above-referenced matter. Please note that, as explained in the enclosed responses, the Company is in the process of working with our internal commercial sales representative, together with our partners at Rhode Island Infrastructure Bank (RIIB) and the Office of Energy Resources (OER) to obtain the information for the following requests: 1-4, 1-5, 1-6, 1-7, and 1-8 (c). The Company expects to receive this information July 25, 2019 and will supplement the responses accordingly.

Thank you for your attention to this filing. If you have any questions, please contact me at 781-907-2121.

Sincerely,



Raquel J. Webster

Enclosures

cc: Docket 4888/4889 Service List
Jon Hagopian, Esq.
John Bell, Division

¹ 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.



Raquel J. Webster, Esq.

July 18, 2019
Date

Docket No. 4888 - National Grid – 2019 Energy Efficiency Plan (EEP)
Docket No. 4889 - National Grid – 2019 System Reliability Procurement Report (SRP)
Service list updated 2/22/2019

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Post-Decision PUC 1-1

Request:

Regarding National Grid's response to Record Request 9, how were the numbers "Estimated kWh" and "Estimated Therms" columns developed? Please make specific reference to any supporting information in the Technical Reference Manual. Please also explain if the electric energy savings have been rounded to the nearest 100,000 kWh and the gas energy savings rounded to the nearest 5,000 therms?

Response:

The estimated kWh and estimated therms for the anticipated projects in the table in Record Request No. 9 were developed by the Rhode Island Infrastructure Bank (RIIB) Managing Director and the National Grid commercial sales representative responsible for public sector customers. The information relied on estimates by the Partnership for Rhode Island Streetlight Management (PRISM), past audits by engineering firms (in some cases several for each municipality), and the Jacobs Engineering report completed for the Rhode Island Department of Education (RIDE). Some of the information on projects that were anticipated to apply for Efficient Building Fund (EBF) was also provided by town officials in several of the municipalities. This allowed them to understand issues surrounding timing of applications to EBF, town concerns, and unique barriers in each town.

The Technical Reference Manual (TRM) provides savings calculations, methodologies and sources for measures. The estimates for projects done by vendors like PRISM and studies are typically consistent with the calculations and methods available in the TRM. When customers apply for incentives, that is when the actual data is collected and screened either for prescriptive or customer projects, consistent with the TRM.

National Grid would like to clarify the term "Borrower," which was used in column 1 of the table shown in Record Request No. 9, page 2. This term was used imprecisely. Many municipalities expressed interest or had ongoing conversations regarding borrowing from EBF at the time the estimates in the table were created. The more appropriate term should be "Municipality." At the time that this table was created most of the municipalities had not started the EBF application process or borrowed money from the Rhode Island Infrastructure Bank, so they were not, in fact, borrowers.

Savings were rounded to the nearest 100,000 kWh and nearest 5,000 therms.

Post-Decision PUC 1-2

Request:

Regarding National Grid's response to Record Request 9, why are there no demand savings (e.g., kilowatts) associated with the projects in the table on page 2?

Response:

The lack of demand savings was an error. Please see a revised table below. For the purposes of this question the Company has assumed the Public Utilities Commission (PUC) is interested in summer kW saved. This means that streetlighting values were zero. Lines in which the customer may install different combinations of measures, such as line 7, had kW numbers that reflected achieved kW per kWh achieved in the commercial portfolio in 2017, the last complete year of data when these estimates were developed.

It is important to note that exact combinations of measures were not known at the time that these sample improvement types were listed, and with the exception of Municipality 1's streetlights, are still not known.

Municipality	Amount	Improvement Type	kWh	kW
1	1,200,000	Streetlights	400,000	0.00
2	5,000,000	HVAC, Insulation, indoor LEDs at Town Hall	100,000	13.35
3	2,000,000	LED lights, HVAC, insulation, other at new firestation	1,000,000	133.48
4	300,000	Streetlights	200,000	0.00
5	1,000,000	Lights, heating and cooling at town buildings	100,000	13.35
6	2,000,000	Streetlights	1,500,000	0.00
7	2,000,000	Various EE improvements at municipal buildings	200,000	26.70
8	1,700,000	School Building and Town Building Improvements	500,000	66.74

Post-Decision PUC 1-3

Request:

The last paragraph on Bate page 126 of the filing says describes gas energy savings of “no less than... 50,000 Annual therms.” Please reconcile this number with the 35,000 therms in the table on page 2 of Record Request 9.

Response:

The 35,000 annual therms shown in the table on page 2 of Record Request 9 is the more up-to-date estimate. 50,000 therms was the previous year's estimate and was not updated in the final text of the the 2019 Energy Efficiency Plan.

Post-Decision PUC 1-4

Request:

Please resubmit Table (b) in Record Request 1 and highlight all the subprogram line items that will be implemented using the Efficient Buildings Fund (EBF) and thus will be supported by the \$5 million transfer requested in the 2019 budget. If there are multiple instances of a line item expected in the plan budget (e.g., more than one "Street Lighting" project in Large Commercial Retrofit), please indicate what percentage of the line item budget and savings will be supported by the EBF and the \$5 million transfer. Please make sure to do this for both electric and gas subprograms.

Response:

The Company is in the process of working with our internal commercial sales representative, together with our partners at Rhode Island Infrastructure Bank (RIIB) and the Office of Energy Resources (OER) to obtain the information necessary to complete this response and the responses to PUC 1-5, PUC 1-6, and PUC 1-7. At this time, the Company has received the latest Project Priority List (PPL) from OER. The PPL includes municipalities and projects that have successfully passed OER's screening to move on to borrow money from RIIB. The Company has requested data from RIIB necessary to understand the status of projects on the PPL, whether the projects have borrowed from RIIB, and if so, to be able to tie the funding for those projects to a specific Energy Efficiency Annual Plan year (*i.e.* \$5 million transfers made in each of 2017, 2018, and 2019). This data will inform the Company of which customer projects relate to the \$5 million transfer to RIIB in 2019, and enable the Company to complete the tables requested in PUC 1-4 and PUC 1-5, and inform the responses to PUC 1-6 and PUC 1-7.

The Company anticipates receiving this data by July 25, 2019, and will supplement this response and the responses to PUC 1-5, PUC 1-6, and PUC 1-7 accordingly.

Post-Decision PUC 1-5

Request:

Please resubmit the “Commercial & Industrial” sections of Tables E-5 and G-5 of the 2019 Energy Efficiency Plan, but please break each line item up into two subtotals with one subtotal representing projects supported by the EBF and one representing projects not supported by the EBF (to be clear, please do this for all columns in Tables E-5 and G-5).

Response:

The Company does not have the information necessary to complete this response at this time. Please see the response to PUC 1-4.

Post-Decision PUC 1-6

Request:

Using the broken-out information provided in 1-5, please show how the customer contribution for EBF-supported projects substantiate \$15.2 million in customer costs as indicated in the response to Record Request 9.

Response:

The Company does not have the information necessary to complete this response at this time. Please see the response to PUC 1-4.

Post-Decision PUC 1-7

Request:

On November 26, 2018, National Grid filed its third quarter report for the 2018 Energy Efficiency Plan. Table 1 indicates that the \$5 million transfer to the RI Infrastructure Bank approved by the PUC in the 2018 Plan had not yet occurred. Table 1 in the Year End report indicates that the full transfer did occur. Please explain how the \$5 million transfer in 2018 could support the 2018 projects and the loan funds raised for those projects if the transfer did not occur until after November 2018.

Response:

The Company does not have the information necessary to complete this response at this time. Please see the response to PUC 1-4.

Post-Decision PUC 1-8

Request:

On Bates pages 128 to 129 of the 2018 Energy Efficiency Plan, National Grid describes the same energy savings targets associated with a \$5 million transfer to the EBF as was expected for the 2019 projects (no less than 4,000 Annual MWh and 50,000 therms). Furthermore, on Bates page 128 of the 2018 Energy Efficiency Plan, Grid indicated expected savings of “4,000 in annual MWh energy savings and 90,535 annual gas therms will be enabled through the EBF financing” related to the 2017 EBF transfer. Regarding this information:

- a. Please explain why the electric energy savings targets did not change for three years.
- b. Please explain why the gas energy targets did not change from 2018 to 2019.
- c. Please explain how the gas energy savings target in 2017 had five significant figures, but all other energy targets for EBF projects appear to have only one significant figure.

Response:

- a. National Grid, OER, and RIIB co-developed the 2018 EBF transfer request. When the Company asked RIIB why the annual expected MWh stays the same year after year, RIIB represented to us that the estimated savings per year is related to the basket of improvements that were financed in the first round, a mix of lighting and other items, and extrapolated further on the dollar amount financed.
- b. The numbers did change. Please see the Company's response to PUC 1-3.
- c. The Company requested clarification of the request in subpart (c) and received the following revised request: In Docket No. 4755, Attachment 2, pp. 30-31, the last sentence of the third paragraph states that “From the second and third rounds, RIIB projects that 4,000 in annual MWh energy savings and 90,535 annual gas therms will be enabled through EBF financing.” In the next paragraph, the 2018 spending is projected to “return energy savings of no less than 4,000 annual MWh and 50,000 annual therms.” How was the more specific 90,535 derived? How was there such precision in the first projection for gas when the electric and preliminary gas savings are more round estimates in the other projections? The Company responds as follows:

The Company is in the process of working with our internal commercial sales representative, together with our partners at RIIB and OER to obtain information regarding these gas estimates to determine how the 90,535 annual gas therms was derived. The Company expects to receive this information to supplement this response by July 25, 2019.