

March 13, 2019

VIA HAND DELIVERY & ELECTRONIC MAIL

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

RE: Docket 4916 - National Grid's Proposed FY 2020 Gas Infrastructure, Safety, and Reliability Plan
Responses to PUC Post-Hearing Data Requests – Set 1

Dear Ms. Massaro:

Enclosed please find 10 copies of National Grid's¹ responses to the Rhode Island Public Utilities Commission's (PUC) First Set of Post-Hearing Data Requests in the above-referenced matter.

This filing also contains a Motion for Protective Treatment of Confidential Information in accordance with Rule 1.3(H) of the PUC's 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 response to Post-Hearing PUC 1-2 and in Attachment Post-Hearing PUC 1-2-1, Attachment Post-Hearing PUC 1-2-2, Attachment Post-Hearing PUC 1-2-3, and Attachment Post-Hearing PUC 1-3. In compliance with Rule 1.3(H), 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 4916 Service List
Leo Wold, Esq.
Al Mancini, Division
John Bell, Division
Rod Walker, Division

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

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

RHODE ISLAND PUBLIC UTILITIES COMMISSION

Fiscal Year 2020 Gas Infrastructure,)	Docket No. 4916
Safety and Reliability Plan)	

**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 810-RICR-00-00-1-1.3(H)(3) (Rule 1.3(H)) 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 1.3(H)(2).

I. BACKGROUND

On March 7, 2019, the PUC held an evidentiary hearing regarding National Grid’s Fiscal Year (FY) 2020 Gas Infrastructure, Safety, and Reliability (ISR) Plan filing in the above-captioned docket. Thereafter, on March 8, 2019, the PUC issued its First Set of Post-Hearing Data Requests to National Grid (the Post-Hearing Data Requests). On March 13, 2019, National Grid submitted responses to the Post-Hearing Data Requests. The Post-Hearing Data Requests include Post-Hearing PUC 1-2, which seeks updated estimates of the Southern Rhode Island Project based on confidential bids submitted in response to a Request for Proposals; and Post-Hearing PUC 1-3, which seeks customer-related information. In response to these requests, the

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

Company is producing confidential bid-related information in response to Post-Hearing PUC 1-2 and in Attachment Post-Hearing PUC 1-2-1, Attachment Post-Hearing PUC 1-2-2, in Attachment Post-Hearing PUC 1-2-3; and customer names and usage information in Attachment Post-Hearing PUC 1-3. Attachment Post-Hearing PUC 1-3 is also responsive to Post-Hearing PUC 1-4 and PUC 1-7.

Therefore, the Company requests that, pursuant to Rule 1.3(H), the PUC afford confidential treatment to the confidential and proprietary information contained in the Company's response to Post-Hearing PUC 1-2 and in Attachment Post-Hearing PUC 1-2-1, Attachment Post-Hearing PUC 1-2-2, Attachment Post-Hearing PUC 1-2-3, and Attachment Post-Hearing PUC 1-3.

II. LEGAL STANDARD

Rule 1.3(H) 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 the Company's response to Post-Hearing 1-2 and in Attachment Post-Hearing PUC 1-2-1, Attachment Post-Hearing PUC 1-2-2, Attachment Post-Hearing PUC 1-2-3, and Attachment Post-Hearing PUC 1-3 should be protected from public disclosure. The information provided in these attachments and response is confidential and privileged information of the type that National Grid does not ordinarily make public. The confidential information in the Company's response to Post-Hearing 1-2 and Attachment Post-Hearing PUC 1-2-1, Attachment Post-Hearing PUC 1-2-2, and Attachment Post-Hearing PUC 1-2-3 includes information provided as part of a confidential bidding process in response to a RFP, which National Grid is in the process of reviewing. Public disclosure of the information in these attachments and response could impair National Grid's ability to obtain advantageous pricing or other terms in the future, thereby causing substantial competitive harm. The confidential information in Attachment Post-Hearing PUC 1-3 includes customer names and usage

information, which is customer-specific information that the Company ordinarily does not make public to protect the privacy of its customers. Accordingly, National Grid is providing its response to Post-Hearing PUC 1-2 and Attachment Post-Hearing PUC 1-2-1, Attachment Post-Hearing PUC 1-2-2, Attachment Post-Hearing PUC 1-2-3, and Attachment Post-Hearing PUC 1-3 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,



Robert J. Humm, Esq. (#7920)
National Grid
280 Melrose Street
Providence, RI 02907
(401) 784-7415
Dated: March 13, 2019

Post-Hearing PUC 1-1

Request:

Please provide evidence to support Mr. Currie's statement at the March 7, 2019 hearing that it will be necessary to perform the work on the Southern RI project at night and that work during the day will be prohibited.

Response:

The Southern Rhode Island Project estimate includes assumptions that a portion of the main installation work will be performed at night. See footnote 1) in Attachment PUC 1-8-1, which states "Estimate for Phase 1 assumes night work for approximately 50% of the route due to the highly commercialized nature of the starting point of the project."

Pursuant to the Company's engineered traffic plan, as required by the Rhode Island Department of Transportation, lane closures will not be allowed during normal business hours for certain portions of the project. This includes the following:

- Phase 1 – South of Greenwich Way, West Warwick to south of East Greenwich Pediatrics, East Greenwich (approximately 7,700 feet); and
- Phase 2 – Intersection of Middle Road, East Greenwich to just south of South Lane, East Greenwich (approximately 4,200 feet).

Discussions with the contractors have indicated that they will need to close the far right travel lane for these phases of construction. This results in working hour restrictions of 7:00 p.m. to 5:00 a.m. from Sunday to Thursday.

Redacted
Post-Hearing PUC 1-2

Request:

Please update the estimates in the table on Bates page 50 of the company's December 20, 2018 filing to reflect the bids received from vendors.

Response:

Please see confidential Attachment Post-Hearing PUC 1-2-1 for the updated estimates to reflect the bids received from vendors. The Company invited eight vendors to submit bids and received [REDACTED] proposals. The Company is in the final stages of awarding the main installation contract for the Southern Rhode Island Gas Expansion Project (Project [REDACTED]). In conjunction with awarding the contract, the Company is undertaking a comprehensive review and update of the estimate for items that include the awarded contract, updated risk assessment, environmental, dewatering, among other items. At this time, based on the bids received for the main installation, the Company anticipates the final estimate for the main installation portion of the Project will result in lower costs in Fiscal Year (FY) 2020, but increased costs in FY 2021 and FY 2022.

Confidential Attachment Post-Hearing PUC 1-2-1 includes a schedule that demonstrates how the contractor bids compare to the main installation vendor direct cost that were assumed in the original estimate referenced on Bates Page 50 of the Company's December 20, 2018 filing. This schedule provides a detailed breakdown of the main installation cost components for FY 2020 to FY 2022, similar to the schedule provided in confidential Attachment PUC 1-8-1. The "vendor" line item is reported in two lines to differentiate between (a) vendor costs that were part of the bid process; and (b) other vendor costs, largely consisting of police detail, non-destructive examination, environmental, design, survey, and legal costs. The bid process vendor costs are then aligned by fiscal year with the comparable amounts provided by the contractors as part of the vendor bid sheets. [REDACTED] confidential Attachment Post-Hearing PUC 1-2-2 and confidential Attachment Post-Hearing PUC 1-2-3.

The Narragansett Electric Company

d/b/a National Grid

RIPUC Docket No. 4916

In Re: Gas Infrastructure, Safety, and Reliability Plan FY2020

Responses to the Commission's First Set of Post-Hearing Data Requests

Issued on March 8, 2019

Attachments Post-Hearing PUC 1-2-1 through PUC 1-2-3

REDACTED

The Narragansett Electric Company

d/b/a National Grid

RIPUC Docket No. 4916

In Re: Gas Infrastructure, Safety, and Reliability Plan FY2020
Responses to the Commission's First Set of Post-Hearing Data Requests
Issued on March 8, 2019

Post-Hearing PUC 1-3

Request:

Please identify the customers in the Quonset Industrial Park who are currently taking gas service and have notified Grid that they wish to increase their gas usage. Provide expected incremental volumes of gas and timeframes.

Response:

Please see confidential Attachment Post-Hearing PUC 1-3 for a list of existing Firm Rate customers within Quonset Industrial Park that have notified the Company that they wish to increase their gas usage. Attachment Post-Hearing PUC 1-3 also includes the expected incremental natural gas capacity and desired activation timeframes for these customers. These customers, along with their corresponding gas capacity requests (loads), are indicated in the fields highlighted in green. The customer highlighted in yellow is a new customer within Quonset Industrial Park that is requesting new gas capacity.

New/Anticipated Load at Quonset Industrial Park								
Total								
Yr. End								
Cumm.								
Load	Load CFH	Load dth/hr	Customer Name	Town	Desired In-Service Date	Capacity Delivery Date	Load Request (Confirmed or Not)	Details
				Quonset	October 1, 2019	Nov-19	Confirmed Loads	New Construction
				Quonset	October 1, 2019	Nov-19	Confirmed Loads	Existing Firm Customer adding new gas loads at Quonset
				Quonset	October 1, 2019	Nov-19	Confirmed Loads	Existing Firm Customer adding new gas loads at Quonset
				Quonset	December 31, 2019	Nov-19	Confirmed Loads	Existing Firm Customer adding new gas loads at Quonset
				Quonset	April 1, 2020	Nov-20	Confirmed Loads	Existing Firm Customer adding new gas loads at Quonset
				Quonset	April 1, 2020	Nov-20	Confirmed Loads	Existing Firm Customer adding new gas loads at Quonset
				Quonset	May 1, 2020	Nov-20	Confirmed Loads	Existing Firm Customer adding new gas loads at Quonset
				Quonset	June 1, 2020	Nov-20	Confirmed Loads	Existing Firm Customer adding new gas loads at Quonset
				Quonset	November 1, 2020	Nov-20	Confirmed Loads	Existing Firm Customer adding new gas loads at Quonset
				N. Kingstown	May 1, 2021	Nov-20	Confirmed Loads	Existing Interruptible Customer, would like to be added as Firm
				Quonset	June 1, 2021	Nov-20	Speculative Loads	Existing Firm Customer speculative, non confirmed loads
				Quonset	December 1, 2021	Nov-20	Speculative Loads	Existing Firm Customer speculative, non confirmed loads
				Quonset	January 1, 2022	Nov-20	Speculative Loads	Existing Firm Customer speculative, non confirmed loads
				N. Kingstown	May 1, 2022	Nov-20	Confirmed Loads	Added Load
				Quonset	August 1, 2023	Nov-20	Speculative Loads	Existing Firm Customer speculative, non confirmed loads
				Quonset	December 31, 2023	Nov-20	Confirmed Loads	New Construction
				Quonset	November 1, 2024	Nov-21	Speculative Loads	Existing Firm Customer speculative, non confirmed loads
				Quonset	February 1, 2025	Nov-21	Speculative Loads	Existing Firm Customer speculative, non confirmed loads
				Quonset	July 1, 2027	Nov-21	Speculative Loads	Existing Firm Customer speculative, non confirmed loads
TOTAL	0	0						

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Post-Hearing PUC 1-4

Request:

Please identify potential new customers in the Quonset Industrial Park who have expressed an interest to the company in taking gas service. Provide expected incremental volumes of gas and timeframes.

Response:

Please see confidential Attachment Post-Hearing PUC 1-3 for a new customer within Quonset Industrial Park who has expressed an interest to the Company to obtain natural gas service for identified loads. Attachment Post-Hearing PUC 1-3 also includes the expected incremental natural gas capacity and desired activation timeframes for this customer. This customer's load request, along with its desired date of service, are indicated in the fields highlighted in yellow in Attachment Post-Hearing PUC 1-3.

Post-Hearing PUC 1-5

Request:

What is the approximate distance from the Southern terminus of the Southern RI project to the center of the Quonset Industrial Park?

Response:

The Southern terminus of the Southern Rhode Island Project is located at the intersection of South County Trail (Route 2) and South Road in East Greenwich. The approximate center of the Quonset Industrial Park is located at the intersection of Roger Williams Way and Mainsail Drive in North Kingstown. The approximate distance between the Southern terminus of the Southern Rhode Island Project to the center of the Quonset Industrial Park is five miles.

Post-Hearing PUC 1-6

Request:

Please identify:

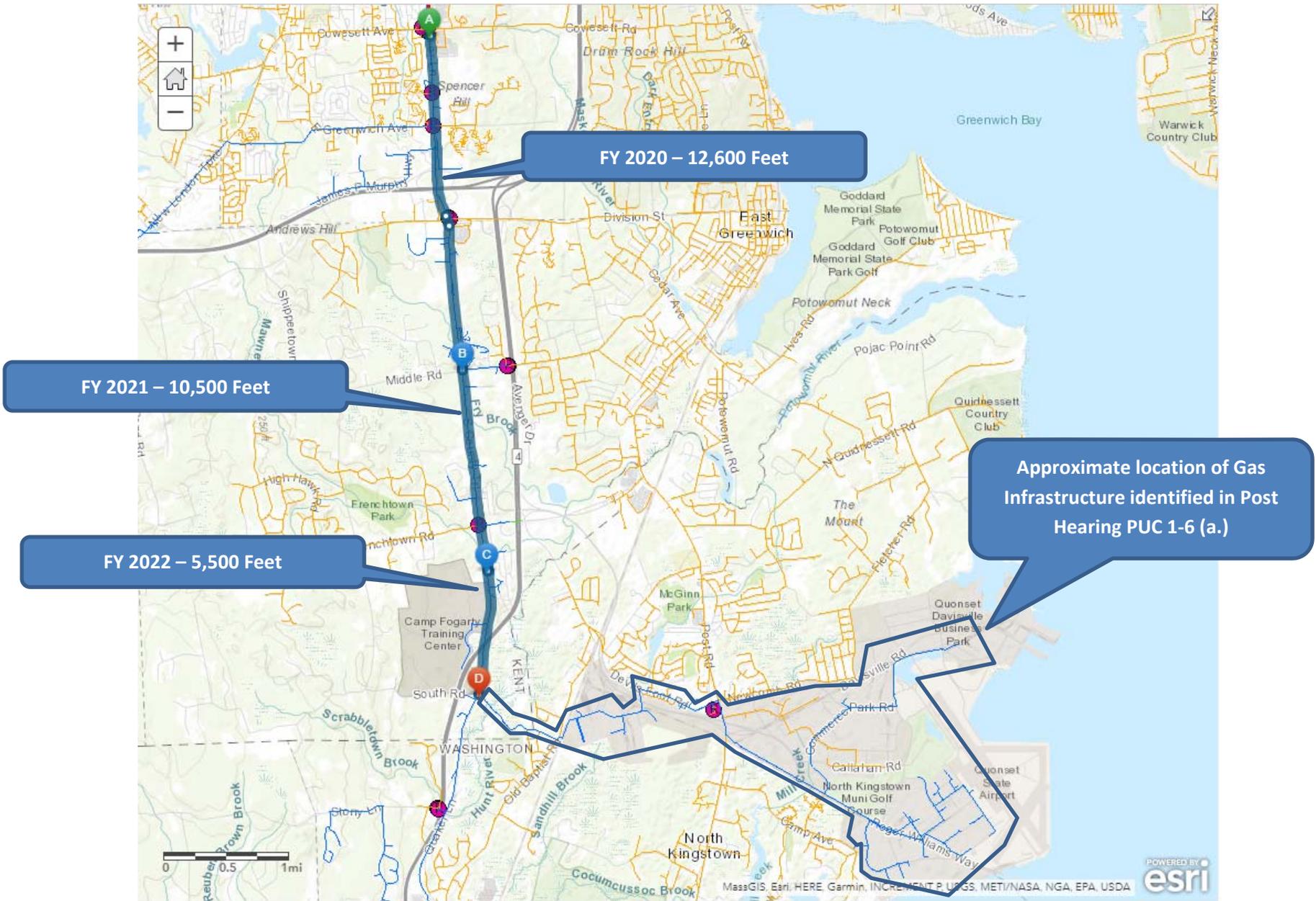
- a. The current gas infrastructure in service that is available to deliver gas from the Southern RI project to the Quonset Industrial Park.
- b. The volumes of gas the infrastructure in (a.) above can currently deliver.
- c. The volumes of gas the infrastructure in (a.) above actually delivers.
- d. The additional volumes of gas that will be delivered in the event that projects identified in (3) & (4) above come online.
- e. Please update the map provided in response to PUC 1-1-a (Attachment DIV 1-10) to show the existing infrastructure as requested in subsection a of this data request.

Response:

- a. The current gas infrastructure in service that is available to deliver gas from the Southern Rhode Island Project to the Quonset Industrial Park is comprised of approximately 1 mile of 20-inch steel, 99 pounds per square inch gauge (psig) distribution system. In addition, the Company has available to deliver gas within the Quonset Industrial Park a 99 psig distribution system and a 35 psig distribution system. The 99 psig distribution system is comprised of approximately 12 miles of various pipe diameter sizes and material, with a majority of 16-inch steel, 12-inch steel, 8-inch steel, 6-inch steel, 6-inch plastic, 4-inch plastic, and 2-inch plastic. The 35 psig distribution system is comprised of approximately 4 miles of various pipe diameter sizes and material, with a majority of 8-inch steel, 8-inch plastic, 6-inch steel, 6-inch plastic, 4-inch plastic, 3-inch steel, and 2-inch plastic.
- b. For design day growth capacity planning purposes, the Company reviews the distribution system using the maximum Exeter LNG facility vaporization level of 750 dekatherms (Dth) per hour, where vaporizer redundancy still exists. Based on the current design day forecast for the 2018-19 winter season, the flow required is above 750 Dth per hour because system pressures are projected to be below the system minimum without the peak hourly flow increase. Therefore, the volume of gas the infrastructure in response to part a. above can only deliver the current forecast load of approximately 380 Dth per hour from the 99 psig distribution system and approximately 20 Dth per hour delivered from the 35 psig distribution system.

Post-Hearing PUC 1-6, page 2

- c. As indicated above, the current design day forecast requires hourly flow above the maximum Exeter LNG facility vaporization level of 750 Dth per hour. The increase in hourly flow is required to maintain minimum system pressure. Therefore, the volume of gas the infrastructure described in response to part a. above is forecast to actually deliver approximately 380 Dth per hour from the 99 psig distribution system and approximately 20 Dth per hour delivered from the 35 psig distribution system.
- d. The additional volumes that will be delivered in the event that projects identified in Post-Hearing PUC 1-3 and PUC 1-4 come online is approximately 40 percent of the additional capacity of approximately 1,100 Dth per hour expected from completing the following portions of the Southern Rhode Island Project: (1) main installation; (2) Maximum Operating Pressure increase from 150 to 200 psig for the distribution main between the Cranston Take Station and Cowesett Road Regulator Station; (3) Cranston Take Station upgrades; and (4) Cowesett Regulator Station upgrades. After installation of new regulator station upgrades, an additional capacity of approximately 345 Dth per hour will be delivered. These capacities are based on the current forecast. Please see the table in Attachment PUC 1-1-2(a), at page 7 of 7, in this docket for descriptions of the different items referenced in this response.
- e. Please see Attachment Post Hearing PUC 1-6 for the updated map. A polygon is drawn around the existing infrastructure identified in response to part a. above.



Post-Hearing PUC 1-7

Request:

Please identify any incremental costs (infrastructure upgrades, additions, etc.) that will be incurred to supply increased volumes of gas from the Southern RI into the Quonset Industrial Park. Please explain how these costs will be recovered.

Response:

The Company has not identified any additional infrastructure upgrades that will be required to supply increased volumes of gas from the Southern Rhode Island Project into Quonset Industrial Park, other than what has already been identified in this proceeding. The Company expects that, as a customer's plans and engineering advance closer to the desired need dates, the loads within Quonset Industrial Park will be confirmed such that the services and on-site work can be designed to accommodate those loads at such time. Customer-specific capital investment that is required for the on-site work will be funded from that customer's revenues or, to the extent not entirely revenue justified, a contribution in aid of construction.

Please refer to confidential Attachment Post-Hearing PUC 1-3 for details on the existing customers requesting additional capacity (loads) (indicated in the fields highlighted in green); the new customer requesting additional capacity (highlighted in yellow); and existing customers with speculative, but unconfirmed, loads for future build-out within Quonset Industrial Park (highlighted in blue).

Post-Hearing PUC 1-8

Request:

Bates page 40 states growth forecasts indicate maximum vaporization capacity at the Exeter LNG facility will be exceeded in CY2019. What other methods to alleviate this condition were evaluated and when were the methods evaluated?

Response:

The maximum Exeter LNG facility vaporization level, where vaporizer redundancy still exists, is 750 dekatherms (Dth) per hour. The current design day forecast calls for a peak hourly flow above 750 Dth per hour, at 875 Dth per hour, for average daily temperatures of 5 degrees Fahrenheit and colder. By temporarily eliminating the redundancy at the plant, the Company has supported flows up to 1,000 Dth per hour to meet peak hourly requirements as recently as 2017.

As indicated in the Company's response to data request PUC 2-3, the Southern Rhode Island Project, once constructed, is expected to alleviate the need to exceed the 750 Dth per hour maximum vaporization capacity with redundancy under design conditions.

The Narragansett Electric Company
d/b/a National Grid
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Post-Hearing PUC 1-9

Request:

Did actual load growth exceed redundant vaporization capacity at the Exeter LNG facility during the 2017-2018 winter period?

Response:

Yes. As part of the Company's forecast methodology, the Company produces a corrected forecast for the previous winter period, which is based on the actual observed sendout during the previous winter. Based on the corrected forecast for the 2017-18 winter period, sendout for a design hour of a design day would have exceeded the redundant vaporization capacity at the Exeter LNG facility.

The Narragansett Electric Company

d/b/a National Grid

RIPUC Docket No. 4916

In Re: Gas Infrastructure, Safety, and Reliability Plan FY2020

Responses to the Commission's First Set of Post-Hearing Data Requests

Issued on March 8, 2019

Post-Hearing PUC 1-10

Request:

With current infrastructure, what weather / temperature conditions would cause below minimum pressure conditions for the 3,750 customers referenced on Bates 46.

Response:

The 3,750 customers referenced on Bates Page 46 were determined at 68 Heating Degree Day conditions (i.e., average daily temperature of -3°F).

Post-Hearing PUC 1-11

Request:

What portion of the Southern RI project is required to meet forecasted growth? What portion of the project is required to improve overall pressure/reliability?

Response:

The portions of the Southern Rhode Island Project required to meet current forecasted growth are: (1) Southern Rhode Island Project main installation; (2) Maximum Operating Pressure increase from 150 to 200 pounds per square inch gauge (psig) for the existing distribution main between the Cranston Take Station and Cowesett Road Regulator Station; (3) Cranston Take Station upgrades; and (4) Cowesett Regulator Station upgrades. The portions of the Southern Rhode Island Project required to improve overall pressure/reliability are: (1) new regulator station installation with the increase of the new main installation system from an operating pressure of 99 psig to 200 psig; (2) launcher installation when the new main installation operating pressure is increased; and (3) Installation of a remote operated valve when the new main installation operating pressure is increased.

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Post-Hearing PUC 1-12

Request:

Did the company consider an alternative to the Southern RI project designed only to provide pressure support and not new or expanded gas service? If yes, please provide details If no, why not?

Response:

Yes, the Company did consider an alternative to the Southern Rhode Island Project to provide pressure support before expanded gas service was needed per the current forecast. In calendar year 2013, the Company identified a future year project to reduce dependence on Exeter LNG for pressure support. The proposed project scope was the installation of approximately 1.2 miles of 20-inch steel pipe on Quaker Lane, West Warwick, starting at the same location of the Southern Rhode Island Project, just south of the intersection with Cowesett Road, and extending to South County Trail, East Greenwich to the intersection with Division Street.