

October 8, 2020

VIA ELECTRONIC MAIL

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

**RE: Docket 4935 - Standard Offer Service Procurement Plan
Summary of Indicative Bids and Request for Confidential Treatment**

Dear Ms. Massaro:

On behalf of The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”), enclosed, please find a summary of all indicative bids received by the Company as a result of an indicative solicitation that was held on October 7, 2020.¹ This summary is being provided to the Division of Public Utilities and Carriers (“Division”) and the Public Utilities Commission (“Commission”) in accordance with the Company’s Standard Offer Service Procurement Plan for Calendar Year 2020 (“2020 SOS Procurement Plan”).²

The enclosed summary, referenced as “Attachment 1”, contains the following information:

- October 7, 2020 Initial Bid Prices (\$ / MWh) at Wholesale Delivery Point (2 pages)
(Confidential, not contained in public version)
- October 7, 2020 Initial Bid Prices (¢ / kWh) at Retail Customer Meter (2 pages)
(Confidential, not contained in public version)
- SO Procurement Plan Update – Retail Rate Summary as of October 7, 2020 (3 pages)
(Public version is redacted)
- SO Procurement Plan Update – Residential as of October 7, 2020 (3 pages)
(Confidential, not contained in public version)

¹ Per Commission counsel’s update on October 2, 2020, concerning the COVID-19 emergency period (for periodic reporting), the Company is submitting an electronic version of this filing. The Company will provide the Commission Clerk with a hard copy and, if needed, additional hard copies of the enclosures upon request.

² The 2020 SOS Procurement Plan was approved by the Commission in this Docket No. 4935 through Order No. 23648.

² Sent electronically via the Company’s encryption software, Egress Switch.

- SO Procurement Plan Update – Commercial as of October 7, 2020 (3 pages)
(Confidential, not contained in public version)
- SO Procurement Plan Update – Industrial as of October 7, 2020 (2 pages)
(Confidential, not contained in public version)
- SO Procurement Plan Update – Large & Small as of October 7, 2020 (1 page)
(Confidential, not contained in public version)
- SO Procurement Plan Schedule (2 pages)

As identified above, the summary contains confidential and privileged information. As such, the enclosed represents a public redacted version of this filing. An unredacted confidential version of this filing will be provided to the Commission and the Division under separate cover.

Pursuant to 810-RICR-00-00-1.3(H)(3) and R.I. Gen. Laws § 38-2-2(4)(B), the Company respectfully requests that the Commission treat the information redacted in the public version as confidential. In support of this request, the Company has enclosed a Motion for Confidential Treatment. In accordance with 810-RICR-00-00-1.3(H)(2), the Company also respectfully requests that the Commission make a preliminary finding that the information redacted in the public version is exempt from the mandatory public disclosure requirements of the Rhode Island Access to Public Records Act (“APRA”).

Thank you for your attention to this filing. If you have any questions concerning this matter, please do not hesitate to contact me at 401-784-4263.

Sincerely,



Andrew S. Marcaccio

Enclosures

cc: Docket No. 4935 Service List
John Bell, Division (w/confidential attachments)

STATE OF RHODE ISLAND
PUBLIC UTILITIES COMMISSION

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)	
IN RE: 2020 Standard Offer Service Procurement Plan)	Docket No. 4935
)	
)	

**MOTION OF THE NARRAGANSETT ELECTRIC COMPANY D/B/A
NATIONAL GRID FOR PROTECTIVE TREATMENT OF
CONFIDENTIAL INFORMATION**

The Narragansett Electric Company d/b/a National Grid (“National Grid” or the “Company”) hereby respectfully requests that the Public Utilities Commission (“PUC”) grant protection from public disclosure certain confidential information submitted by the Company in the above referenced docket. The reasons for the protective treatment are set forth herein. The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to 810-RICR-00-00-1.3(H)(2).

The records that are the subject of this Motion that require protective treatment from public disclosure are the (i) October 7, 2020 Initial Bid Prices (\$ / MWh) at Wholesale Delivery Point; (ii) October 7, 2020 Initial Bid Prices (¢ / kWh) at Retail Customer Meter; (iii) SO Procurement Plan Update – Retail Rate Summary as of October 7, 2020; (iv) SO Procurement Plan Update – Residential as of October 7, 2020; (v) SO Procurement Plan Update – Commercial as of October 7, 2020; (vi) SO Procurement Plan Update – Industrial as of October 7, 2020; and (vii) SO Procurement Plan Update – Large & Small as of October 7, 2020 (referred to herein as the “Confidential Records”) that were filed by the Company on October 8, 2020 as Attachment 1 to the Company’s summary of all indicative bids received by the Company as a result of an indicative solicitation that was held on October 7, 2020. National Grid requests protective treatment of the

Confidential Records in accordance with 810-RICR-00-00-1.3(H) and R.I. Gen. Laws § 38-2-2-(4)(B).

I. LEGAL STANDARD

For matters before the PUC, a claim for protective treatment of information is governed by the policy underlying the Access to Public Records Act (“APRA”), R.I. Gen. Laws § 38-2-1 et seq. See 810-RICR-00-00-1.3(H)(1). Under APRA, any record received or maintained by a state or local governmental agency in connection with the transaction of official business is considered public unless such record falls into one of the exemptions specifically identified by APRA. See R.I. Gen. Laws §§ 38-2-3(a) and 38-2-2(4). Therefore, if a record provided to the PUC falls within one of the designated APRA exemptions, the PUC is authorized to deem such record confidential and withhold it from public disclosure.

II. BASIS FOR CONFIDENTIALITY

The Confidential Records that are the subject of this Motion are exempt from public disclosure pursuant to R.I. Gen. Laws § 38-2-2(4)(B) as “[t]rade secrets and commercial or financial information obtained from a person, firm, or corporation that is of a privileged or confidential nature.” *The Attorney General’s Guide to Open Government in Rhode Island 6th Edition*¹ provides guidance as to the scope of R.I. Gen. Laws § 38-2-2(4)(B)’s applicability. It states that:

If a request is made for financial or commercial information that a person is obliged to provide to the government, it is exempt from disclosure if the disclosure is likely either: (1) to impair the government’s ability to obtain information in the future, or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained. If a request is made for financial or commercial information that is provided to the government on a voluntary basis, it is exempt from disclosure if the information “is a kind that would customarily not be released to the public by the person from whom it was obtained.” *The Providence Journal Company v. Convention Center Authority*, 774 A.2d 40 (R.I. 2001).

¹ <http://www.riag.ri.gov/Forms/AGguidetoopengovernment.pdf>

The Confidential Records consist of financial and commercial information. National Grid would customarily not release this information to the public and its submission of the Confidential Records to the PUC is needed to comply with the Company's Standard Offer Service Procurement Plan for Calendar Year 2020 which was approved by the PUC in this Docket No. 4935 through Order No. 23648. Accordingly, National Grid is providing the Confidential Records to fulfil its regulatory responsibilities in connection with its energy procurement responsibilities. Therefore, the Confidential Records are exempt from public disclosure "if the disclosure is likely either: (1) to impair the government's ability to obtain information in the future, or (2) to cause substantial harm to the competitive position of the person from whom the information was obtained." See *The Attorney General's Guide to Open Government in Rhode Island 6th Edition*, p. 22.

The release of the Confidential Records is likely to cause substantial harm to the competitive position of National Grid. The Confidential Records contain commercially sensitive market information, the disclosure of which could affect the balance of wholesale markets, as well as National Grid's ability to negotiate competitive terms with its wholesale electric suppliers.

Furthermore, this information is the type of information that the PUC has historically recognized as proprietary information.

III. CONCLUSION

For the foregoing reasons, the Company respectfully requests that the PUC grant this motion for protective treatment of the Confidential Records.

[SIGNATURE ON NEXT PAGE]

Respectfully submitted,

NATIONAL GRID

By its attorney,



Andrew S. Marcaccio (#8168)

National Grid

280 Melrose Street

Providence, RI 02907

(401) 784-4263

Dated: October 8, 2020

CERTIFICATE OF SERVICE

I hereby certify that on October 8, 2020, I delivered a true copy of the foregoing Motion via electronic mail to the parties on the Service List for Docket No. 4935.



Joanne M. Scanlon

REDACTED DOCUMENT

SO Procurement Plan Update - Retail Rate Summary

As of : **October 7, 2020**

cents/kWh

Actual Standard Offer Service Base Price (excluding RES & reconciliations). Includes capacity estimates and spot market estimates (if applicable).
Estimated SOS Base Price from bid awards to date for those rate periods and capacity estimates. Does not include spot market estimates.
Bold dates indicate change in rates for a customer group.

	Large		Small	
	Monthly Rate	Award %	Monthly Rate	Award %
Jan-10	7.890	100%	10.040	100%
Feb-10	8.137	100%	10.277	100%
Mar-10	8.097	100%	9.241	100%
Apr-10	7.692	100%	9.166	100%
May-10	7.549	100%	8.764	100%
Jun-10	7.503	100%	8.815	100%
Jul-10	6.773	100%	8.990	100%
Aug-10	7.126	100%	9.149	100%
Sep-10	6.584	100%	8.819	100%
Oct-10	6.655	100%	8.346	100%
Nov-10	6.902	100%	8.336	100%
Dec-10	7.325	100%	8.671	100%
Jan-11	6.978	100%	9.883	100%
Feb-11	6.843	100%	10.045	100%
Mar-11	6.001	100%	9.024	100%

	Industrial		Residential		Commercial	
	Monthly Rate	Award %	Monthly Rate	Award %	Monthly Rate	Award %
Apr-11	6.211	100%	7.069	100%	7.020	100%
May-11	6.218	100%	6.908	100%	6.856	100%
Jun-11	6.091	100%	6.502	100%	6.576	100%
Jul-11	6.336	100%	6.779	100%	6.965	100%
Aug-11	6.504	100%	6.983	100%	7.019	100%
Sep-11	6.559	100%	6.555	100%	6.633	100%
Oct-11	5.929	100%	6.664	100%	6.754	100%
Nov-11	6.214	100%	6.796	100%	6.854	100%
Dec-11	7.444	100%	7.242	100%	7.188	100%
Jan-12	8.414	100%	8.681	100%	8.549	100%
Feb-12	7.800	100%	8.673	100%	8.279	100%
Mar-12	6.150	100%	6.958	100%	6.867	100%
Apr-12	4.767	100%	6.882	100%	6.643	100%
May-12	4.709	100%	6.743	100%	6.557	100%
Jun-12	4.320	100%	6.490	100%	6.417	100%
Jul-12	4.678	100%	6.453	100%	5.694	100%
Aug-12	4.679	100%	6.555	100%	5.660	100%
Sep-12	4.739	100%	6.124	100%	5.291	100%
Oct-12	4.830	100%	6.407	100%	5.347	100%
Nov-12	4.980	100%	6.506	100%	5.567	100%
Dec-12	6.031	100%	7.196	100%	6.547	100%
Jan-13	8.894	100%	8.266	100%	8.283	100%
Feb-13	8.314	100%	8.021	100%	7.850	100%
Mar-13	6.187	100%	6.339	100%	6.074	100%
Apr-13	5.670	100%	6.021	100%	5.747	100%
May-13	5.203	100%	5.810	100%	5.356	100%
Jun-13	6.008	100%	5.811	100%	5.588	100%
Jul-13	6.920	100%	6.512	100%	6.789	100%
Aug-13	6.596	100%	6.430	100%	6.598	100%
Sep-13	5.844	100%	6.139	100%	5.907	100%
Oct-13	4.862	100%	6.284	100%	6.119	100%
Nov-13	5.730	100%	6.478	100%	6.761	100%
Dec-13	9.342	100%	7.484	100%	8.477	100%

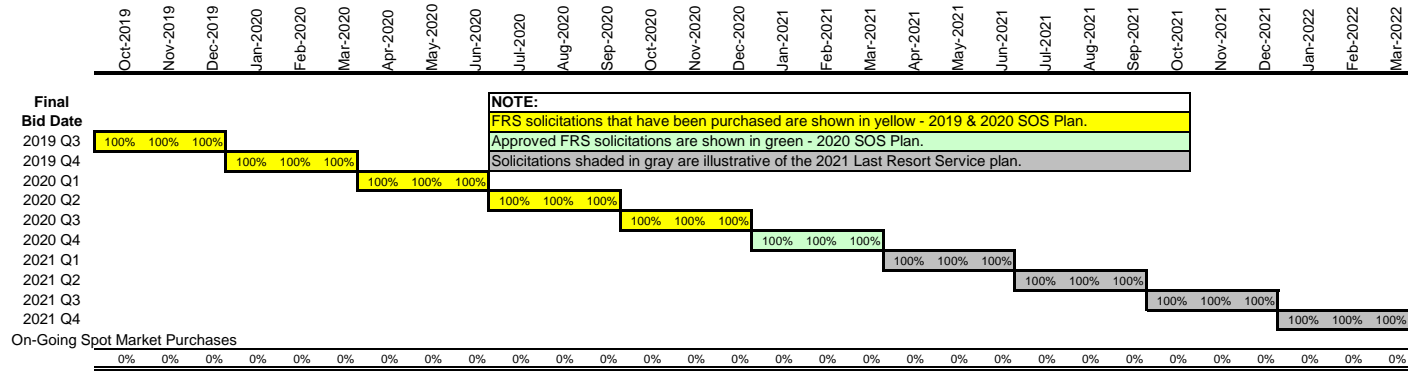
REDACTED DOCUMENT

	Industrial		Residential		Commercial	
	Monthly Rate	Award %	Monthly Rate	Award %	Monthly Rate	Award %
Jan-14	11.865	100%	10.753	100%	11.993	100%
Feb-14	11.633	100%	10.547	100%	11.867	100%
Mar-14	7.186	100%	7.668	100%	7.636	100%
Apr-14	8.235	100%	6.775	100%	6.145	100%
May-14	6.616	100%	6.431	100%	5.687	100%
Jun-14	8.311	100%	6.799	100%	6.191	100%
Jul-14	8.520	100%	7.236	100%	7.994	100%
Aug-14	7.795	100%	7.010	100%	7.597	100%
Sep-14	6.866	100%	6.399	100%	6.517	100%
Oct-14	5.540	100%	6.613	100%	6.553	100%
Nov-14	7.288	100%	7.882	100%	8.797	100%
Dec-14	14.326	100%	10.395	100%	12.602	100%
Jan-15	20.561	100%	18.345	100%	19.815	100%
Feb-15	20.609	100%	18.159	100%	19.277	100%
Mar-15	12.326	100%	10.897	100%	11.890	100%
Apr-15	5.631	100%	7.743	100%	7.531	100%
May-15	4.934	100%	6.598	100%	6.231	100%
Jun-15	5.718	100%	7.438	100%	7.630	100%
Jul-15	6.599	100%	7.221	100%	6.904	100%
Aug-15	5.892	100%	6.812	100%	6.514	100%
Sep-15	5.271	100%	6.123	100%	5.868	100%
Oct-15	5.423	100%	6.297	100%	6.024	100%
Nov-15	7.001	100%	8.119	100%	8.186	100%
Dec-15	10.015	100%	12.178	100%	12.762	100%
Jan-16	10.672	100%	14.263	100%	13.079	100%
Feb-16	10.427	100%	14.173	100%	12.765	100%
Mar-16	7.781	100%	9.258	100%	9.006	100%
Apr-16	5.385	100%	7.000	100%	6.446	100%
May-16	4.835	100%	5.736	100%	5.466	100%
Jun-16	5.040	100%	6.348	100%	5.782	100%
Jul-16	5.402	100%	6.250	100%	5.812	100%
Aug-16	5.098	100%	6.020	100%	5.393	100%
Sep-16	4.368	100%	5.584	100%	5.056	100%
Oct-16	4.314	100%	5.720	100%	5.226	100%
Nov-16	4.993	100%	6.501	100%	5.931	100%
Dec-16	6.783	100%	8.312	100%	7.515	100%
Jan-17	8.841	100%	9.515	100%	9.950	100%
Feb-17	8.712	100%	9.456	100%	9.711	100%
Mar-17	6.044	100%	7.143	100%	7.238	100%
Apr-17	5.159	100%	5.607	100%	5.240	100%
May-17	4.681	100%	5.015	100%	4.654	100%
Jun-17	5.859	100%	7.187	100%	6.782	100%
Jul-17	6.899	100%	6.847	100%	7.052	100%
Aug-17	6.743	100%	6.787	100%	6.997	100%
Sep-17	6.271	100%	6.996	100%	6.603	100%
Oct-17	5.609	100%	7.776	100%	7.111	100%
Nov-17	6.391	100%	8.114	100%	7.944	100%
Dec-17	8.356	100%	9.511	100%	9.343	100%
Jan-18	10.867	100%	11.682	100%	11.669	100%
Feb-18	10.549	100%	11.788	100%	11.727	100%
Mar-18	7.912	100%	9.239	100%	8.969	100%
Apr-18	6.565	100%	8.252	100%	7.720	100%
May-18	6.048	100%	7.681	100%	7.179	100%
Jun-18	7.426	100%	8.846	100%	8.328	100%
Jul-18	8.018	100%	8.106	100%	8.392	100%
Aug-18	7.995	100%	8.115	100%	8.295	100%
Sep-18	7.569	100%	8.834	100%	8.331	100%
Oct-18	8.389	100%	10.062	100%	9.506	100%
Nov-18	8.748	100%	10.101	100%	9.908	100%
Dec-18	11.320	100%	11.321	100%	11.691	100%
Jan-19	15.568	100%	13.838	100%	13.886	100%
Feb-19	15.079	100%	14.347	100%	14.370	100%
Mar-19	10.895	100%	11.127	100%	10.951	100%

REDACTED DOCUMENT

	Industrial		Residential		Commercial	
	Monthly Rate	Award %	Monthly Rate	Award %	Monthly Rate	Award %
Apr-19	10.996	100%	10.579	100%	10.323	100%
May-19	9.705	100%	9.876	100%	9.451	100%
Jun-19	6.862	100%	7.531	100%	6.876	100%
Jul-19	6.808	100%	7.134	100%	7.111	100%
Aug-19	6.299	100%	6.938	100%	6.908	100%
Sep-19	7.013	100%	7.555	100%	6.959	100%
Oct-19	7.567	100%	8.733	100%	7.180	100%
Nov-19	7.893	100%	9.061	100%	7.968	100%
Dec-19	9.551	100%	10.562	100%	10.030	100%
Jan-20	12.053	100%	12.777	100%	12.128	100%
Feb-20	11.937	100%	13.111	100%	12.240	100%
Mar-20	9.384	100%	9.924	100%	9.058	100%
Apr-20	8.521	100%	8.972	100%	8.011	100%
May-20	6.316	100%	8.429	100%	7.355	100%
Jun-20	5.565	100%	7.110	100%	5.892	100%
Jul-20	5.173	100%	6.603	100%	6.258	100%
Aug-20	4.875	100%	6.896	100%	6.196	100%
Sep-20	4.829	100%	7.591	100%	5.962	100%
Oct-20	4.765	100%	7.532	100%	5.795	100%
Nov-20	5.771	100%	8.048	100%	6.799	100%
Dec-20	7.303	100%	9.370	100%	8.368	100%
Jan-21			11.319	100%	10.042	100%
Feb-21			11.479	100%	9.961	100%
Mar-21			8.695	100%	7.746	100%
Apr-21						
May-21						
Jun-21						
Jul-21						
Aug-21						
Sep-21						
Oct-21						
Nov-21						
Dec-21						
Jan-22						
Feb-22						
Mar-22						


Industrial Solicitations



NOTE:
 FRS solicitations that have been purchased are shown in yellow - 2019 & 2020 SOS Plan.
 Approved FRS solicitations are shown in green - 2020 SOS Plan.
 Solicitations shaded in gray are illustrative of the 2021 Last Resort Service plan.

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.



Joanne M. Scanlon

October 8, 2020
Date

**Docket No. 4935 - National Grid – 2020 Standard Offer Service (SOS) and
2020 Renewable Energy Standard (RES) Procurement Plans
Service List updated 7/17/2020**

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