

July 10, 2020

VIA ELECTRONIC MAIL

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

**RE: Docket 4978 - 2021 Last Resort Service Procurement Plan
Responses to Record Requests**

Dear Ms. Massaro:

On behalf of National Grid¹ enclosed please find the Company's responses to the Record Requests that were issued at the PUC's evidentiary hearing on June 30, 2020 in the above-referenced matter.²

Thank you for your attention to this matter. If you have any questions, please contact me at 401-784-4263.

Very truly yours,



Andrew S. Marcaccio

Enclosure

cc: Docket 4978 Service List
John Harrington, Esq.
Christy Hetherington, Esq.
John Bell, Division

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

² Per practice during the COVID-19 emergency period, the Company is providing a PDF version of the responses to the Record Requests in this matter. The Company will provide the Commission Clerk with a hard copy and, if needed, additional hard copies of the filing at a later date.

Record Request No. 1

Request:

- A.) In Massachusetts, when a municipal aggregator has selected a supplier, are there notice requirements to National Grid before the supplier begins? If so, what are the requirements?
- B.) In Massachusetts, before a municipality switches back to basic service, are there notice requirements? If so, what are the requirements?

Response:

- A.) Pursuant to the Massachusetts Electric Company and Nantucket Electric Company Terms and Conditions for Municipal Aggregators, M.D.P.U. No. 1421 (MA Municipal Aggregator Tariff), “[t]he Municipal Aggregator shall designate a Competitive Supplier, and notify the Company of its designation. If at any time the Municipal Aggregator changes Competitive Supplier, it shall provide notice of such change to the Company. Notice shall be as provided in writing or by electronic mail, as provided in the Service Agreement.”

There are no specific time requirements for the Municipal Aggregator to provide notice prior to the designation of the Competitive Supplier and enrollment period.

- B.) The Massachusetts Department of Public Utilities requires municipalities operating a municipal aggregation program to provide the local distribution company with: (1) a 90-day notice prior to a planned termination of the municipal aggregation plan (Plan); (2) a 90-day notice prior to the end of the anticipated term of the Plan's Competitive Electric Service Agreement; and (3) four-business-day notice of the successful negotiation of a new power purchase agreement that extends the date at which aggregation participants would otherwise return to basic service. See Town of Lanesborough, D.P.U. 11-27, at 24 (2011); see also Town of Becket, et. al, D.P.U. 18-133 through D.P.U. 18-146, at 37 (2020) (citing D.P.U. 11-27 for the notice requirements to local distribution company).

The MA Municipal Aggregator Tariff also provides that the aggregator shall “[p]rovide as much notice as possible of an event of default by the Competitive Supplier or Municipal Aggregator under the supply contract between the two which would trigger the suspension or early termination of the supply contract, so that the Company can prepare to return the Customers to Basic Service.”

Record Request No. 2

Request:

RR-2. For Massachusetts, please provide the costs (plus or minus) associated with the socialization of the billing adjustment up through the most recent date. Please include the amount of kWh and dollars.

Response:

The socialization of Massachusetts Basic Service billing adjustments for residential and commercial customers began in April 2015. Billing adjustments for industrial customers are not socialized. Following are two tables which show the kWh and amounts of Massachusetts Basic Service billing adjustments from January 2018 through June 2020. The Company has provided amounts related to municipal aggregations as well as individual customers leaving Basic Service for competitive supply. The Company is still compiling the data prior to January 2018 and will supplement this response once the additional data is available.

Table 1: kWh

| Month | Individual Customer | Municipal Aggregation | Total |
|--------------|----------------------------|------------------------------|-------------------|
| 201801 | 3,143,848 | 21,384,506 | 24,528,354 |
| 201802 | 2,644,131 | 4,880,217 | 7,524,348 |
| 201803 | 3,273,236 | 3,974,908 | 7,248,144 |
| 201804 | 2,529,158 | 1,984,746 | 4,513,904 |
| 201805 | 2,284,330 | 985,696 | 3,270,026 |
| 201806 | 2,301,869 | 1,244,465 | 3,546,334 |
| 201807 | 2,197,112 | 380,884 | 2,577,996 |
| 201808 | 2,447,882 | 829,931 | 3,277,813 |
| 201809 | 2,198,716 | 516,523 | 2,715,239 |
| 201810 | 2,500,660 | 302,791 | 2,803,451 |
| 201811 | 2,572,467 | 708,396 | 3,280,863 |
| 201812 | 4,194,033 | 10,070,442 | 14,264,475 |
| 201901 | 4,289,294 | 11,910,903 | 16,200,197 |
| 201902 | 3,562,855 | 6,195,851 | 9,758,706 |
| 201903 | 3,551,876 | 1,506,660 | 5,058,536 |

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| Month | Individual Customer | Municipal Aggregation | Total |
|--------------------|----------------------------|------------------------------|--------------------|
| 201904 | 4,247,953 | 153,865 | 4,401,818 |
| 201905 | 3,042,806 | 1,228,109 | 4,270,915 |
| 201906 | 2,056,896 | 11,620,499 | 13,677,395 |
| 201907 | 2,349,005 | 6,274,659 | 8,623,664 |
| 201908 | 2,290,343 | 1,275,463 | 3,565,806 |
| 201909 | 1,823,236 | 173,674 | 1,996,910 |
| 201910 | 1,611,993 | 315,062 | 1,927,055 |
| 201911 | 1,794,383 | 2,825,493 | 4,619,876 |
| 201912 | 2,399,612 | 13,893,576 | 16,293,188 |
| 202001 | 2,664,282 | 6,085,111 | 8,749,393 |
| 202002 | 2,212,100 | 31,397,402 | 33,609,502 |
| 202003 | 2,381,120 | 1,998,230 | 4,379,350 |
| 202004 | 1,186,908 | 3,786,695 | 4,973,603 |
| 202005 | 787,940 | 1,196,924 | 1,984,864 |
| 202006 | 694,224 | 159,088 | 853,312 |
| Grand Total | 75,234,268 | 149,260,769 | 224,495,037 |

Table 2: Amount

| Month | Individual Customer | Municipal Aggregation | Total |
|--------------|----------------------------|------------------------------|-----------------------|
| 201801 | (\$38,566.67) | (\$387,027.87) | (\$425,594.54) |
| 201802 | \$22,200.98 | (\$231.22) | \$21,969.76 |
| 201803 | \$52,237.86 | \$75,884.98 | \$128,122.84 |
| 201804 | \$16,408.59 | \$28,687.32 | \$45,095.91 |
| 201805 | \$1,363.45 | \$1,040.72 | \$2,404.17 |
| 201806 | \$4,816.53 | \$1,678.62 | \$6,495.15 |
| 201807 | (\$1,693.84) | (\$225.57) | (\$1,919.41) |
| 201808 | (\$12,533.52) | (\$4,488.97) | (\$17,022.49) |
| 201809 | (\$14,673.14) | (\$4,514.52) | (\$19,187.66) |
| 201810 | (\$7,318.99) | (\$1,605.14) | (\$8,924.13) |
| 201811 | (\$25,654.78) | (\$7,418.10) | (\$33,072.88) |
| 201812 | (\$78,386.02) | (\$203,695.09) | (\$282,081.11) |
| 201901 | (\$49,764.28) | (\$73,899.47) | (\$123,663.75) |

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| Month | Individual Customer | Municipal Aggregation | Total |
|--------------------|----------------------------|------------------------------|-----------------------|
| 201902 | \$39,628.17 | \$52,730.14 | \$92,358.31 |
| 201903 | \$66,029.96 | \$40,986.74 | \$107,016.70 |
| 201904 | \$14,940.45 | \$3,915.06 | \$18,855.51 |
| 201905 | (\$224,177.24) | \$6,194.46 | (\$217,982.78) |
| 201906 | \$20,013.27 | \$107,004.85 | \$127,018.12 |
| 201907 | \$7,850.29 | \$25,200.47 | \$33,050.76 |
| 201908 | (\$1,896.24) | (\$2,864.46) | (\$4,760.70) |
| 201909 | (\$7,073.73) | (\$1,914.75) | (\$8,988.48) |
| 201910 | (\$3,914.87) | (\$2,889.34) | (\$6,804.21) |
| 201911 | (\$12,202.22) | (\$20,749.20) | (\$32,951.42) |
| 201912 | (\$34,387.08) | (\$204,570.16) | (\$238,957.24) |
| 202001 | (\$13,268.50) | (\$33,706.01) | (\$46,974.51) |
| 202002 | \$30,885.45 | \$320,267.69 | \$351,153.14 |
| 202003 | \$46,805.07 | \$40,332.54 | \$87,137.61 |
| 202004 | \$10,213.41 | \$27,733.97 | \$37,947.38 |
| 202005 | \$2,971.88 | \$2,263.16 | \$5,235.04 |
| 202006 | \$5,582.78 | \$2,300.67 | \$7,883.45 |
| Grand Total | (\$183,562.98) | (\$213,578.48) | (\$397,141.46) |

Record Request No. 3

Request:

Please provide the exact reference to the ISO requirement or rule regarding reconstituting distributed generation in load for the purposes of transmission charges.

Response:

The language pertaining to the reconstitution of distributed generation for transmission customers is found in Schedule 21 of the New England Power Company, which is part of the ISO-NE Open Access Transmission Tariff, or OATT. The clause enabling this is underlined below, as it appears in the tariff:

1.15 Network Load: The load interconnected (not reduced for any generation behind the meter) to the PTF, Non-PTF or Distribution Facilities of NEP or its New England Affiliates either directly or through Distribution Facilities or Non-PTF Facilities of other entities that a Network Customer designates to receive Local Network Service under Schedule 21 and this Schedule. For purposes of establishing rates and charges under this Schedule, the Network Load will be subdivided into one of three categories:

A. PTF Network Load shall be the load over NEP's Local Network and shall equal the load of Network Customers directly interconnected with NEP's PTF or indirectly utilizing NEP's PTF through Non-PTF or Distribution Facilities of NEP or its New England Affiliates.

B. Non-PTF Network Load shall be the load over NEP's Non-PTF either directly interconnected with NEP's Non-PTF or indirectly utilizing NEP's Non-PTF through Distribution Facilities of NEP or its New England Affiliates.

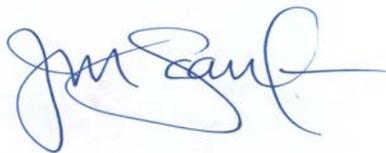
C. Distribution Facilities Network Load shall be the load interconnected to the Distribution Facilities of NEP, its New England Affiliates or other entities.

Based on this, the Company's practice for calculating Local Network Service and Regional Network Service charges is to reconstitute the load of transmission customers by adding back any generation amount that is known to have occurred at the time of the monthly system peak which occurred behind the service meter of the transmission customer.

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

July 10, 2020

Date

Docket No. 4978 - National Grid – 2021 Last Resort Service Procurement Plan
Service List updated 5/7/2020

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