

**STATE OF RHODE ISLAND PUBLIC UTILITIES COMMISSION**

**IN RE: THE NARRAGANSETT ELECTRIC  
COMPANY D/B/A NATIONAL GRID’S REQUEST  
FOR INTERPRETATION OF RIPUC NG-GAS NO.  
101 REGARDING INTERNATIONAL PACKAGING  
CORPORATION’S REQUEST TO CONVERT  
CAPACITY EXEMPT LOAD TO CAPACITY  
ASSIGNED LOAD**

Docket No. 4999

**INTERNATIONAL PACKAGING CORPORATION’S STIPULATED SUPPLEMENTAL  
STATEMENT OF FACTS AND LIMITED OBJECTION TO FACTS SET FORTH  
IN PETITION OF NARRAGANSETT ELECTRIC COMPANY  
D/B/A NATIONAL GRID (“NATIONAL GRID”) FOR DECLARATORY JUDGMENT**

International Packaging Corporation (“Interpak”) submits this Stipulated Supplemental Statement of Facts and Limited Objection to Facts Set Forth in Petition of Narragansett Electric Company d/b/a National Grid for Declaratory Judgment in response to the Petition and in advance of the proceeding pending before the Rhode Island Public Utilities Commission (the “PUC”) in Docket No. 4999. Interpak identifies below its limited objection by specific reference to certain paragraphs asserted by National Grid in its Petition. Interpak also supplements the facts set forth in the Petition with the additional facts asserted herein. Interpak believes these facts to be material to the PUC’s consideration of the Petition and National Grid has stipulated to these facts.<sup>1</sup>

**A. Objections to Certain Facts Asserted by National Grid in the Petition**

Interpak objects to the following paragraphs of the Statement of Facts set forth in the Petition for the reasons stated below.

8. Interpak objects to the statements in paragraph 8 as immaterial to the question pending before the PUC in this Docket. Interpak has not requested that National Grid permit it to convert its exempt account to an assigned account. In fact, it has informed National Grid that it would like to terminate its exempt service.

9. Interpak objects to the statements set forth in paragraph 9 as immaterial to the question pending before the PUC in this Docket for the reasons set forth above.

13. Interpak objects to the statements set forth in paragraph 13 as immaterial to the question pending before the PUC in this Docket. Interpak has not requested that National Grid permit it to convert its exempt account to an assigned account.

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<sup>1</sup> For ease of reference, Interpak commences its supplemental facts at paragraph 18 so that the numbering is consistent with and follows on the numbering used by National Grid in the Petition.

14. Interpak objects to the statements set forth in paragraph 14 as immaterial to the question pending before the PUC in this Docket. Interpak has not requested that National Grid transfer load from an existing capacity exempt account. On the contrary, Interpak has requested that National Grid increase its capacity on its capacity assigned account.

17. Interpak objects to the statement set forth in paragraph 17 because, based on the filings by National Grid in response to the Data Request, National Grid no longer disputes whether Interpak should receive an increased capacity assignment for the capacity assigned account.

**B. Supplemental Facts**

Interpak asserts the following supplemental facts which are material to the issue pending before the PUC in this Docket and which are not disputed.

18. Interpak conducts its primary manufacturing operations in a single interconnected building located at 517 and 543 Mineral Spring Avenue (“Mineral Spring Building”). The Mineral Spring Building is a single structure, serviced by two gas meters. **Exhibit 1** attached hereto is a schematic of Interpak’s facility and its current service.

19. It is Interpak’s plan to satisfy its gas requirements at the facility through its capacity assigned service to the building. National Grid will lay a four-inch pipe from the street and install a new meter at the capacity assigned intake location.

20. **Exhibit 2** attached hereto is a schematic of Interpak’s facility and a diagram of the internal changes it will make to deliver the requested service inside the facility. Interpak will make the modest infrastructure improvements shown on Exhibit 2.

21. The capacity assigned service will continue to supply gas to the boiler shown on **Exhibit 2** as “A” and additional pipe will be laid within the building to run to boilers B1 and B2 as shown on **Exhibit 2**.

22. Interpak is the only National Grid customer with a capacity assigned account at one customer facility and a capacity exempt account at another adjacent facility and, in this case, the two intake locations service one building structure. Interpak’s requested increase in capacity assignment does not require loads of unusual characteristics which might adversely affect the quality of service applied to other customers, the public safety or the safety of National Grid’s personnel.

23. National Grid’s analysis has confirmed that it has sufficient capacity to provide the requested increase in capacity assignment to Interpak.

Respectfully submitted,  
International Packaging, Corp.  
By its Attorney,

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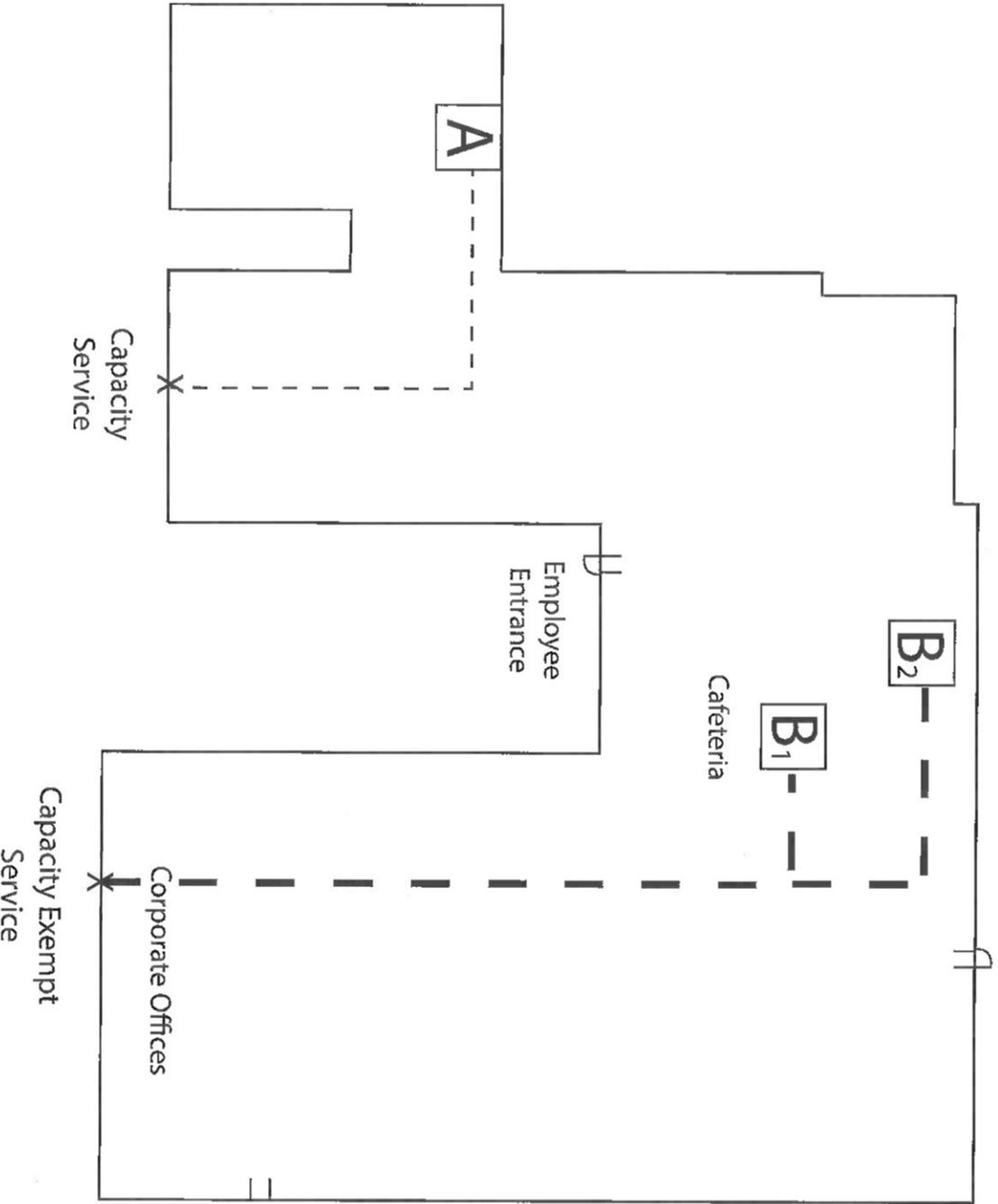
Dated: April 21, 2020

**Docket No. 4999 – Narragansett Electric Co. d/b/a National Grid (Gas) Petition for Declaratory Judgment - Service List 4/21/2020**

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# EXHIBIT 1

Employee Parking      Employee Entrance



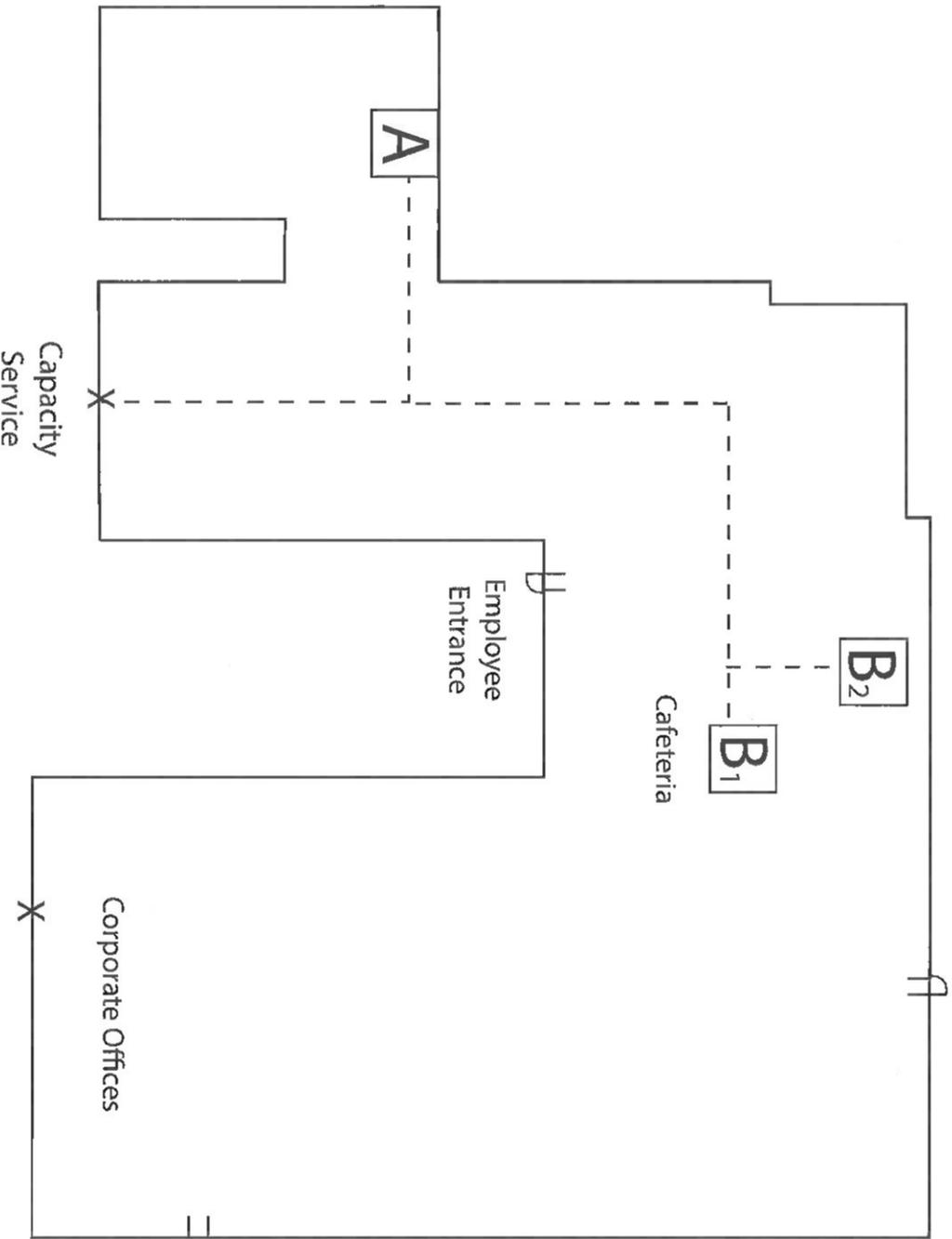
MINERAL SPRING AVENUE

CURRENT

# EXHIBIT 2

Employee Parking →

Employee Entrance →



MINERAL SPRING AVENUE

FUTURE