

September 24, 2020

BY ELECTRONIC MAIL

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

RE: Docket 5066 – 2020 Gas Cost Recovery Filing
Responses to Division Data Requests – Set 2

Dear Ms. Massaro:

I have enclosed an electronic version of National Grid's¹ responses to the Division of Public Utilities and Carriers' Second Set of Data Requests in the above-referenced docket.²

This filing also contains a Request for Protective Treatment of Confidential Information pursuant to Rule 810-RICR-00-00-1.3(H) of the Public Utilities Commission's (PUC) Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B).

National Grid seeks protection from public disclosure certain confidential gas-cost pricing information and commercial contract terms, which are provided in responses to the following data requests: DIV-2-3, DIV 2-5, DIV 2-6, DIV 2-8, DIV 2-9 and 2-10.

Accordingly, National Grid is providing the PUC with one complete unredacted copy of the confidential materials electronically via the Company's encryption software, Egress Switch. National Grid has included electronic redacted copies of these materials for the public filing.

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 PDF versions of the enclosures. The Company will provide the Commission Clerk with hard copies and, if needed, additional hard copies of the enclosures at a later date.

Luly E. Massaro, Commission Clerk
Docket 5066 – Responses to Division Data Requests – Set 2
September 24, 2020
Page 2 of 2

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

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 5066 Service List
Leo Wold, Esq.
John Bell, Division
Al Mancini, Division (w/Confidential versions via Egress Switch)
Jerome D. Mierzwa, Division Consultant (w/Confidential version via Egress Switch)

STATE OF RHODE ISLAND

RHODE ISLAND PUBLIC UTILITIES COMMISSION

_____)	
)	
Annual Gas Cost Recovery Filing)	Docket No. 5066
2020)	
)	
_____)	

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

National Grid¹ respectfully requests that the Rhode Island Public Utilities Commission (PUC) grant protection from public disclosure certain confidential, competitively sensitive, and proprietary information submitted in the Company’s responses (Data Request Responses) to the Division’s Data Requests Directed to National Grid (2nd Set) (Division’s Data Requests), as permitted by 810-RICR-00-00-1.3(H) (Rule 1.3(H)) of the PUC’s Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B). The Company also respectfully requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment of the designated Data Request Responses pursuant to Rule 1.3(H)(2).

I. BACKGROUND

On September 1, 2020, the Company submitted its 2020 Annual Gas Cost Recovery (GCR) filing in the above-captioned docket. On September 3, 2020 the Rhode Island Division of Public Utilities and Carriers (Division) served the Division’s Data Requests. The Division’s Data Requests seek a significant volume of confidential gas cost pricing information and contract terms, which are provided in the following Data Request Responses or the accompanying

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

attachments: 2-3², 2-5, 2-6, 2-8, 2-9 and 2-10. In accordance with Rule 1.3(H)(3), National Grid has provided redacted public versions of the Data Request Responses and unredacted, confidential versions.

The Company requests that, pursuant to Rule 1.3(H), the PUC afford confidential treatment to the gas cost pricing information and contract terms contained in the following Data Request Responses or accompanying attachments: 2-3, 2-5, 2-6, 2-8, 2-9 and 2-10.

II. LEGAL STANDARD

Rule 1.3(H) 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 the APRA, all documents and materials submitted in connection with the transaction of official business by an agency are deemed to be “public record[s],” 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

² With respect to Attachment DIV 2-3, the agreements provided in response to the Division’s request require the Company to seek confidential treatment of the entire agreement.

position of the person from whom the information was obtained. *Providence Journal*, 774 A.2d 40 (R.I. 2001).

The first prong of the test is satisfied when information is 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 gas cost pricing information and confidential contract terms – which are provided in Data Request Responses 2-3, 2-5, 2-6, 2-8, 2-9 and 2-10 or the accompanying attachments – are confidential and privileged information of the type that National Grid would not ordinarily make public. As such, the information should be protected from public disclosure. Public disclosure of such information could impair National Grid's ability to obtain advantageous pricing or other terms in the future, thereby causing substantial competitive harm. Accordingly, National Grid is providing the information 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.

[SIGNATURE ON NEXT PAGE]

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY d/b/a NATIONAL GRID**

By its attorney,

A handwritten signature in blue ink that reads "Raquel Webster". The signature is fluid and cursive, with the first name "Raquel" being more prominent than the last name "Webster".

Raquel J. Webster (Bar #9064)
National Grid
40 Sylvan Road
Waltham, MA 02451
Tel. 781-907-2121
Raquel.webster@nationalgrid.com

Dated: September 24, 2020

Division 2-1

Request:

Reference pages 8 and 9 of the Gas Supply Panel testimony. Please explain the reasons for the decline in design day, heating season, and annual transportation volumes.

Response:

Comparing the Company's forecasts for planning years 2019/20 and 2020/21, the decline in design volumes, commensurate with the decline in normal volumes, can be attributed to the economic impact of the COVID-19 Pandemic on the Rhode Island economy and the impact of the Company's energy efficiency programs, as discussed on page 5 in the Testimony of Theodore Poe, Jr.

The total demand in the region is considerably driven by the macro-economic scenario. The Company uses macro-economic variables obtained from Moody's forecasts in its gas forecasting models.

For Rhode Island, economic outlook is a severe COVID-19 recession in 2020. Lockdowns that began in March caused an estimated 6% drop in Rhode Island first quarter gross domestic product ("GDP"), and the forecast anticipated another 20% drop in the second quarter as the lockdowns are expected to continue through May. The forecast assumed that some businesses would be allowed to re-open beginning June 1. This would cause third and fourth quarter GDP to rise sharply from its second quarter lows, but only approximately half the loss is recovered by the end of the year. Until a vaccine or effective medical treatment is available for COVID-19, travel, tourism, hospitality and other important industries will remain severely curtailed, preventing a full economic rebound. The forecast assumes a vaccine by summer 2021. This would allow the Rhode Island economy to fully reopen and recover. However, the economy does not get back to full employment until 2023.

Division 2-2

Request:

Please identify the extent to which the assets the Company reserved to meet peak hour requirements were actually used to meet peak hour requirements during the winter of 2019/20. Identify the asset and applicable dates, volumes, and costs.

Response:

The Company did not experience peak (or design) hour demand during winter 2019/20 due to mild weather. While not required to meet peak hour demand, the Company dispatched LNG from the Cumberland and Portsmouth portable LNG locations for training, testing, and to empty the LNG trailers at the end of the season. Similarly, pipeline supplies were not needed to meet peak hour requirements specifically, but were used to generally meet customer requirements during the 2019/20 winter. Once pipeline supplies are procured for the winter they are dispatched based on least cost and operational factors.

Division 2-3

Request:

Reference page 12, line 18 through page 13, line 1 of the Gas Supply Panel testimony:

- a. Please provide a copy of the contracts for the portable LNG equipment, the LNG to be delivered to and used, and city gate supplies from Constellation; and
- b. Please identify the peak hour and peak day deliverability associated with each resource.

Response:

- a. Attachment DIV 2-3 contains copies of the contracts for the portable LNG equipment and city gate supplies from Constellation that have been executed. Attachment DIV 2-3 contains commercially sensitive information and, therefore, the Company is submitting a redacted public version and a confidential version subject to a motion for protective treatment. At this time, the Company is finalizing its LNG requirements for the Winter 2020/21 season and will supplement this response with information concerning additional LNG supply transactions as they are executed.
- b. The deliverability associated with each resource referenced at page 12, lines 18 through page 13, line 1, and already contracted for, is summarized below:

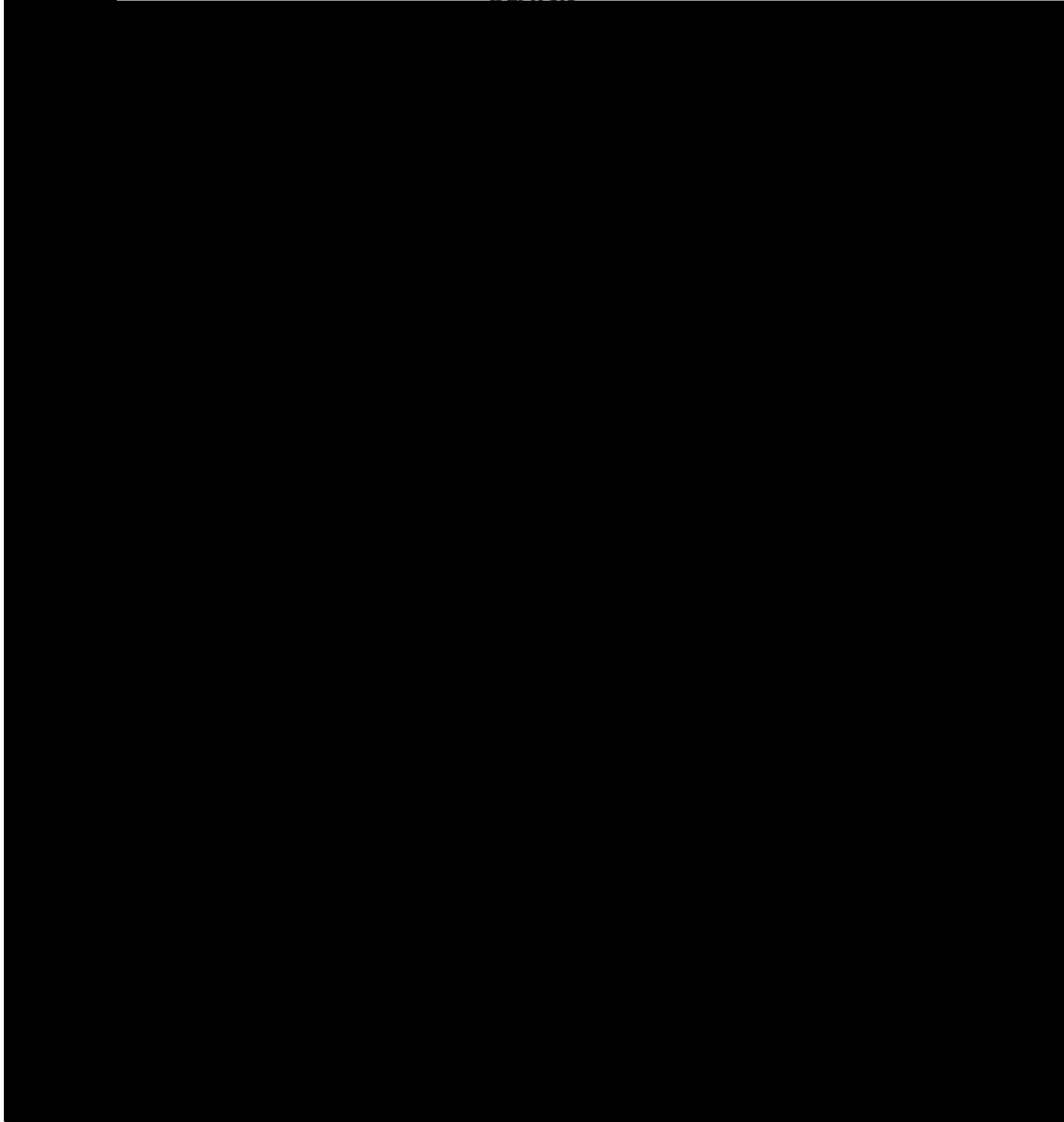
Counterparty	Location	MDQ (dth/day)	MHQ (dth/hour)
Constellation	AGT Citygate	14,100	587.5
Stabilis	Cumberland	6,000	750
Stabilis	Old Mill Lane	15,600	650

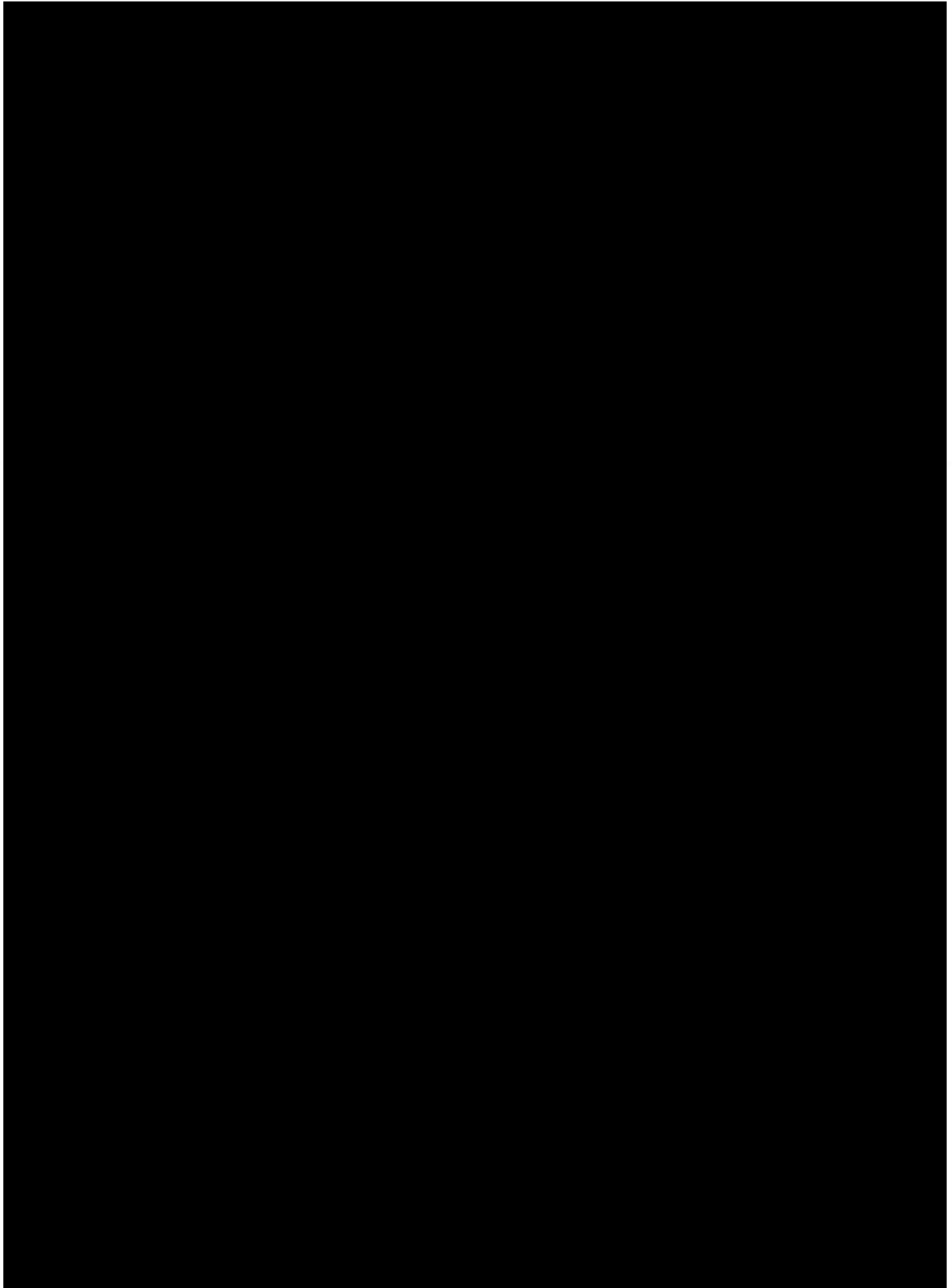
With respect to the Constellation agreement, the Company assumes that, on any day the Company exercises the call option with the Counterparty, Algonquin may limit shippers to 1/24th of their MDQ. With respect to the Stabilis agreement at Cumberland, for planning purposes, the Company assumes it will only operate the sites during the morning and evening peak periods. At Old Mill Lane, however, the Company's agreement with Stabilis allows the Company to vaporize for 24 hours per day if necessary.

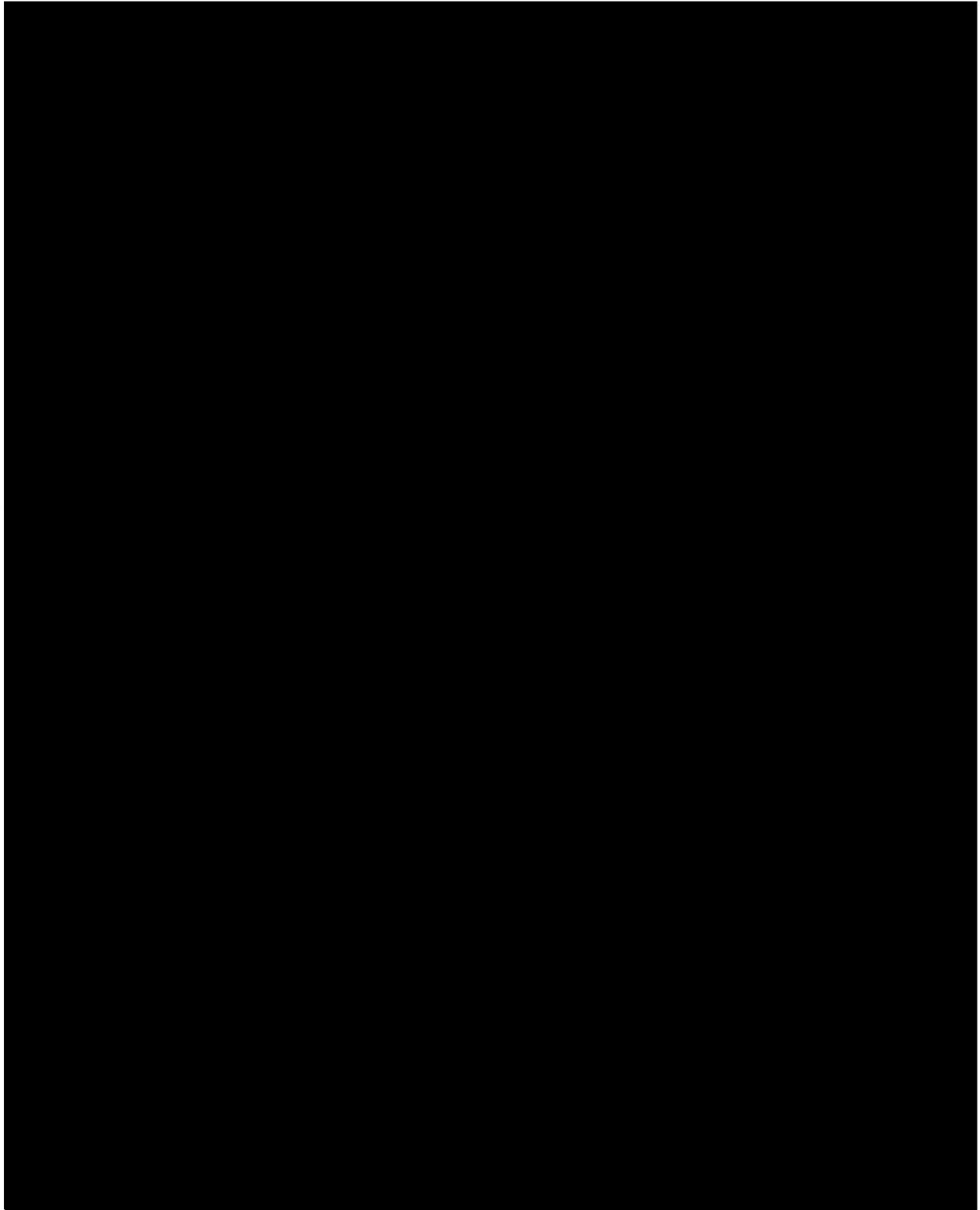
Equipment Rental and Support Services Agreement

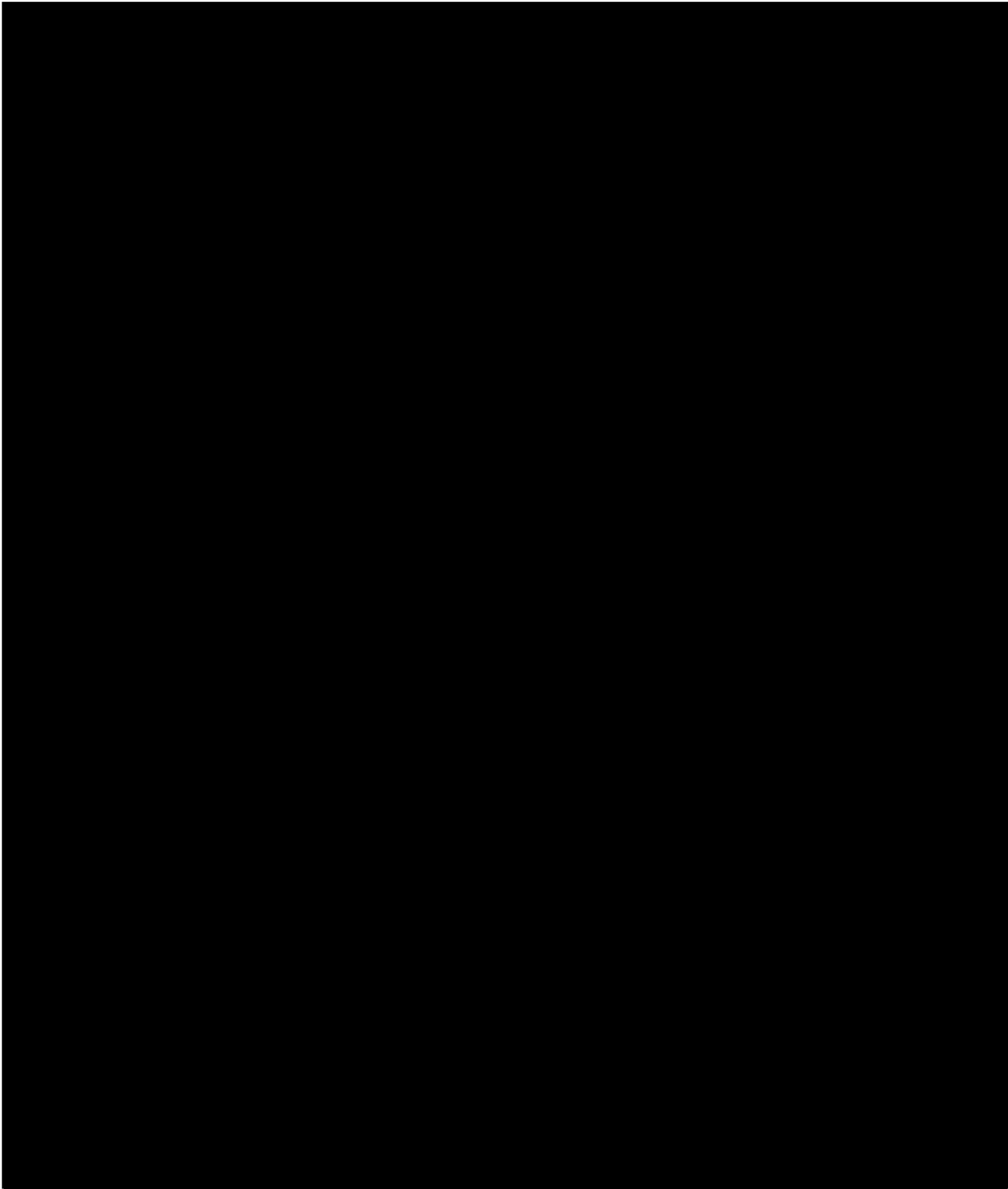
This Equipment Rental and Support Services Agreement (this “Agreement”) is entered into this 14th day of August 2019 (the “Effective Date”) by and between Prometheus Energy Group Inc., a Delaware corporation (“Prometheus”) and its affiliates, and The Narragansett Electric Company d/b/a National Grid (“Customer”). Prometheus and Customer are sometimes hereinafter referred to individually as “Party” and collectively as the “Parties”.

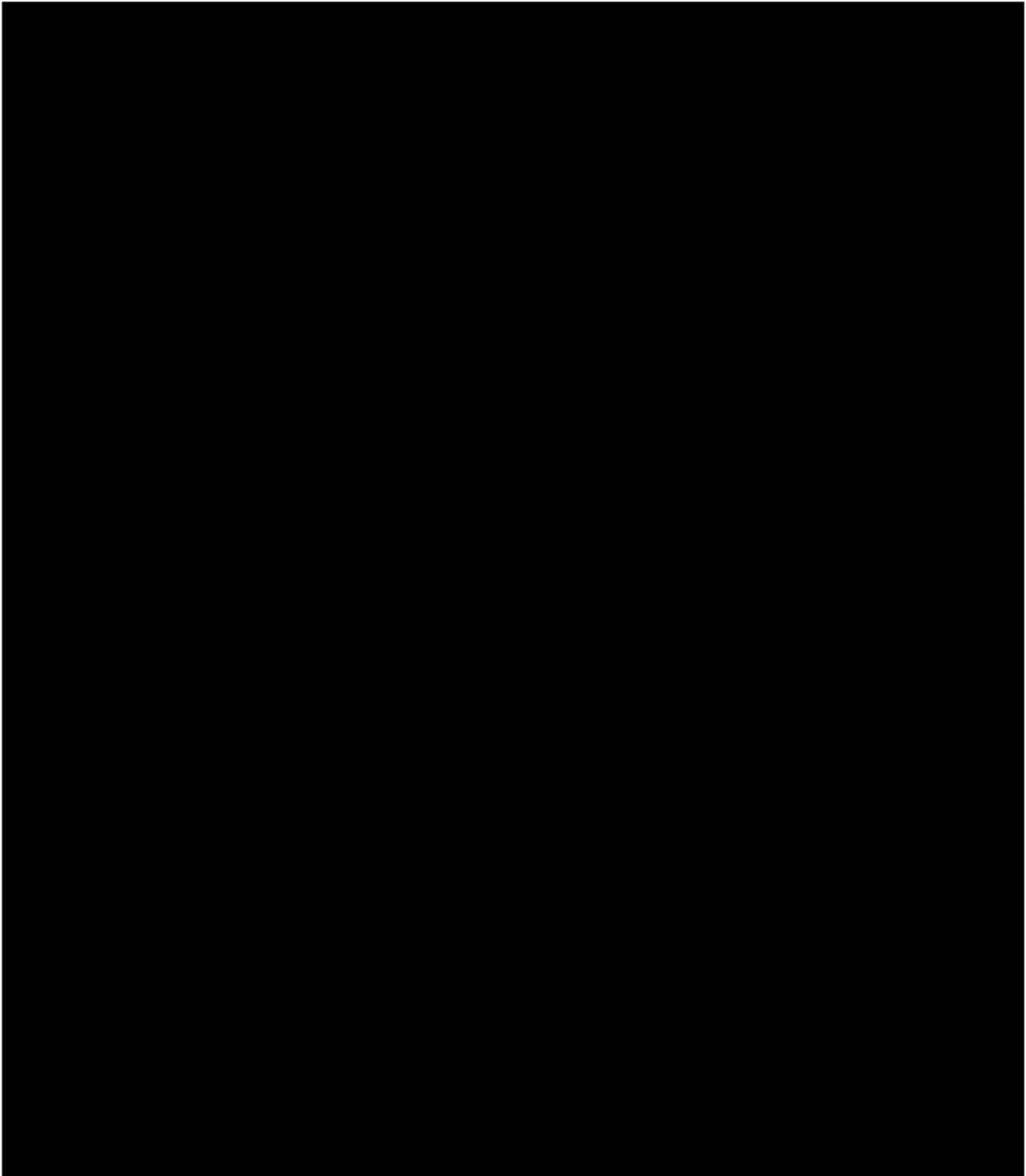
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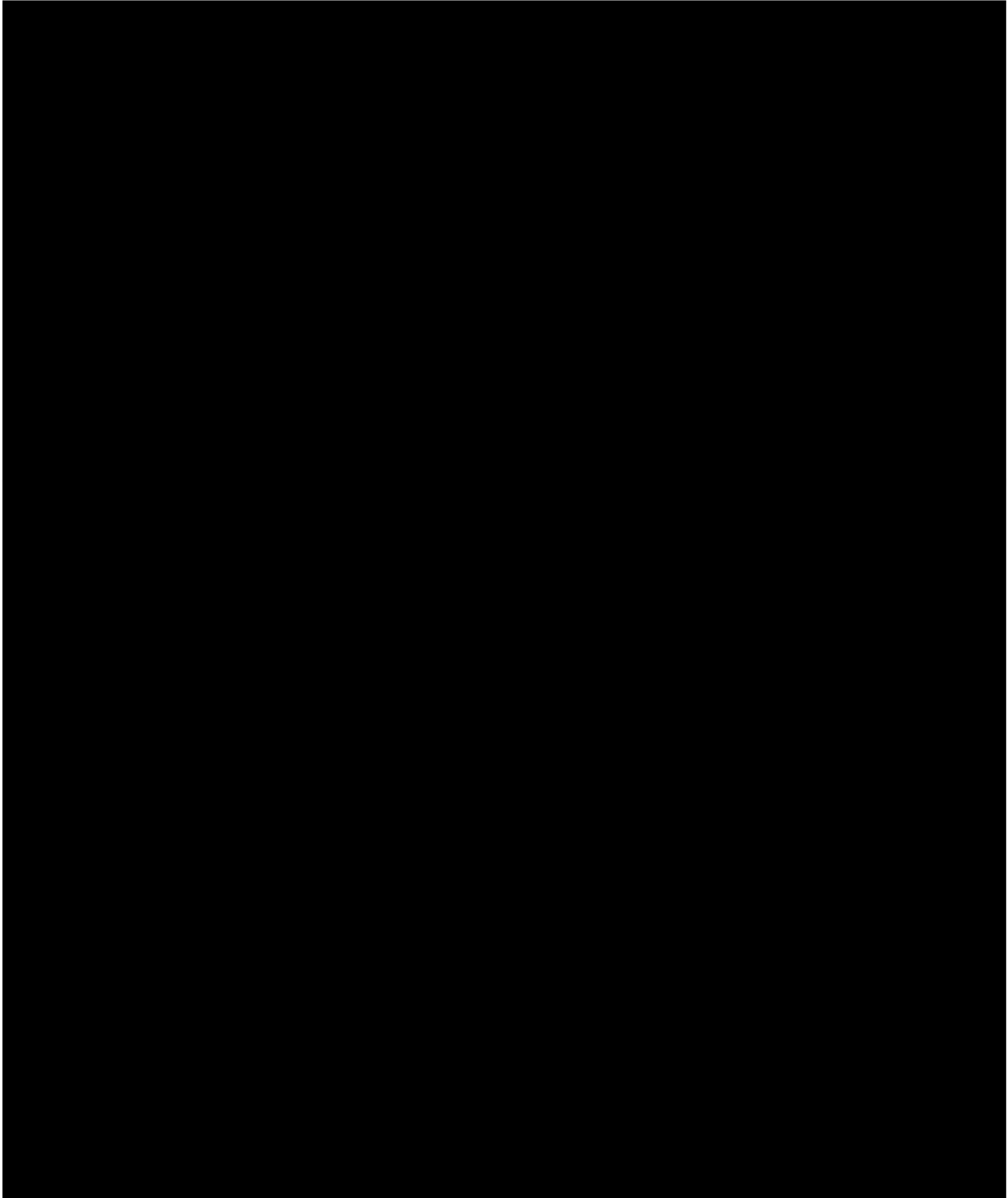


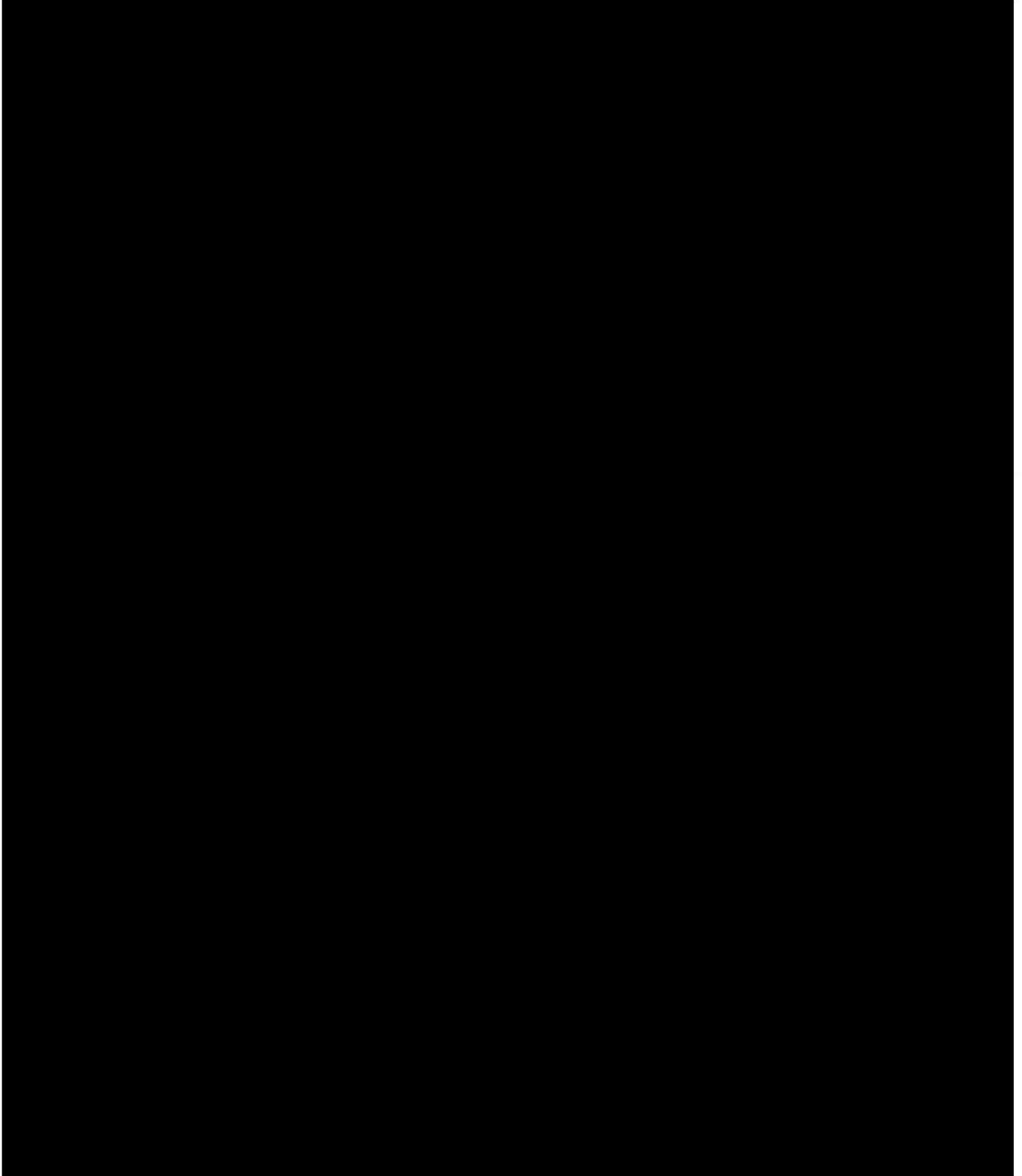


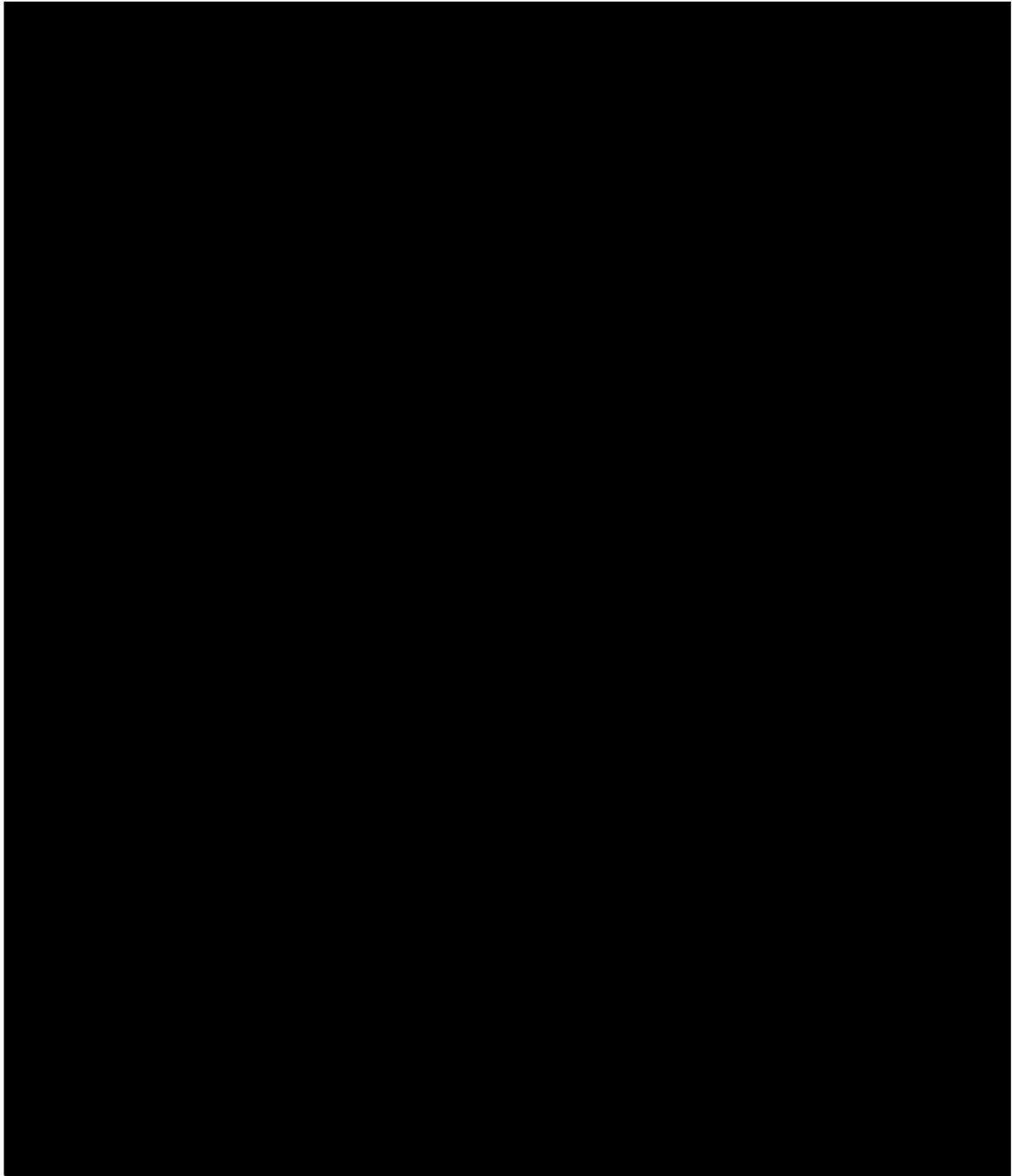


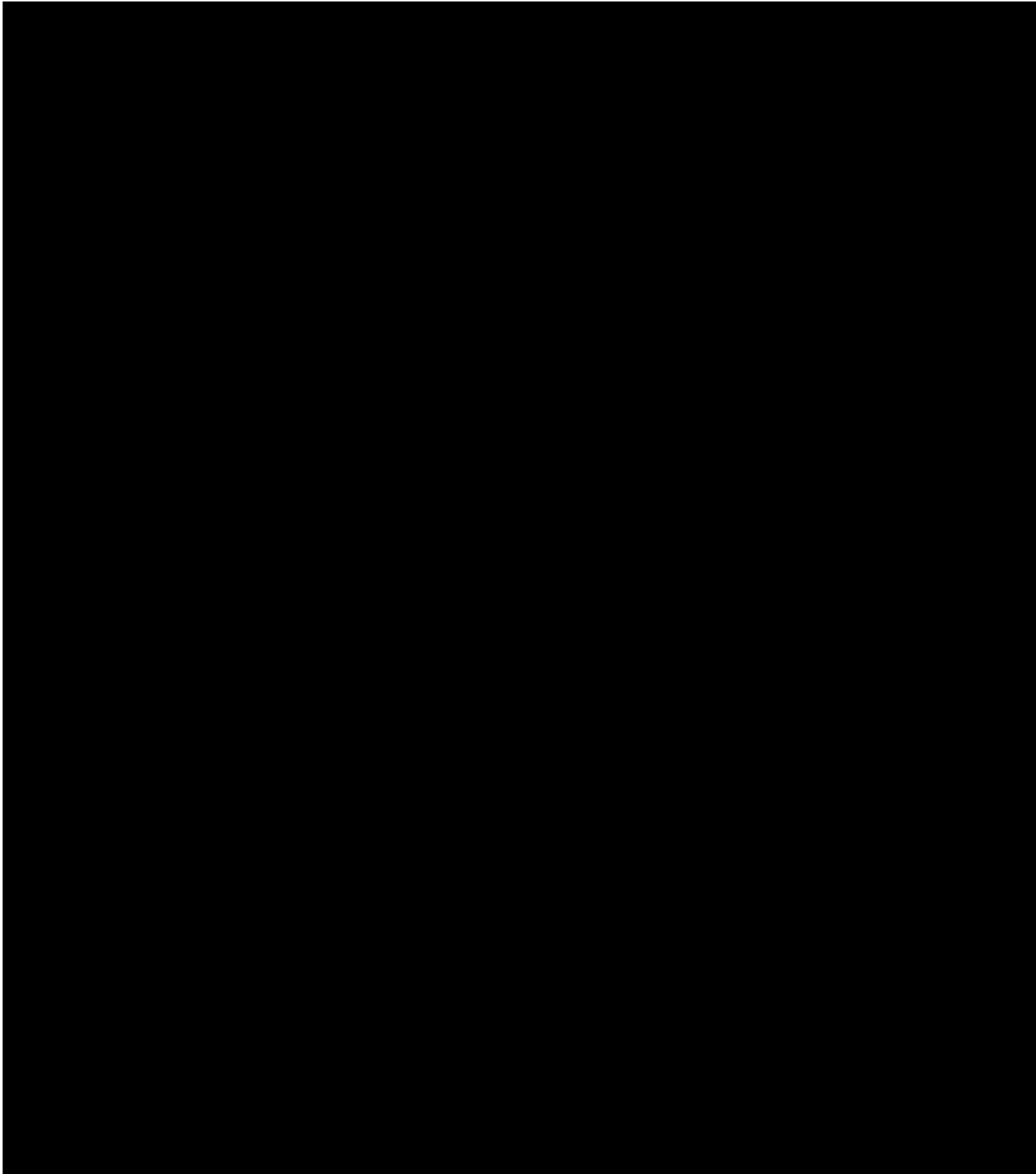


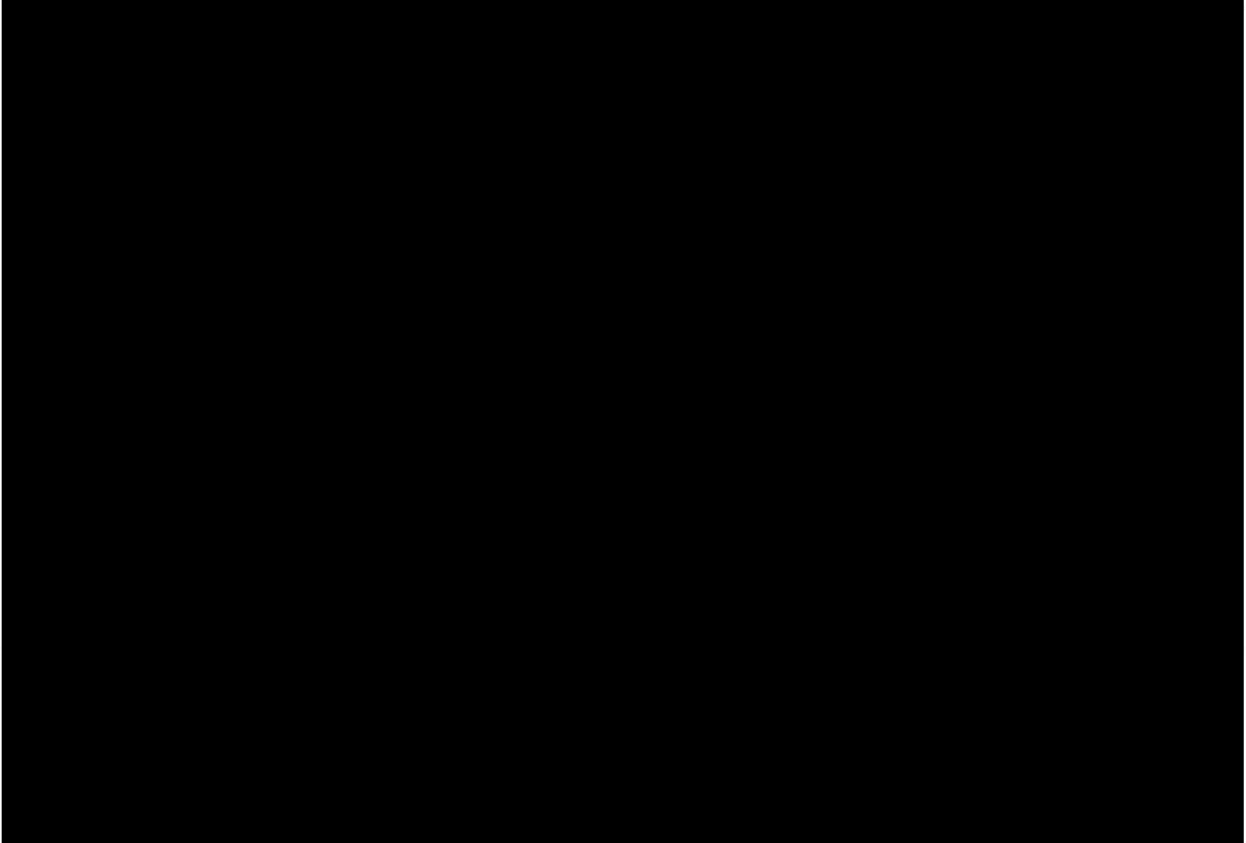








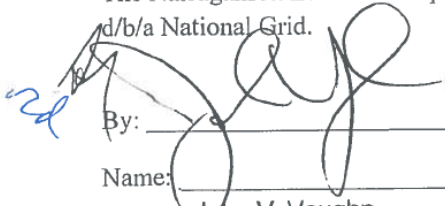




IN WITNESS WHEREOF, the Parties have caused this Agreement to be executed on the date set forth above.

The Narragansett Electric Company
d/b/a National Grid.

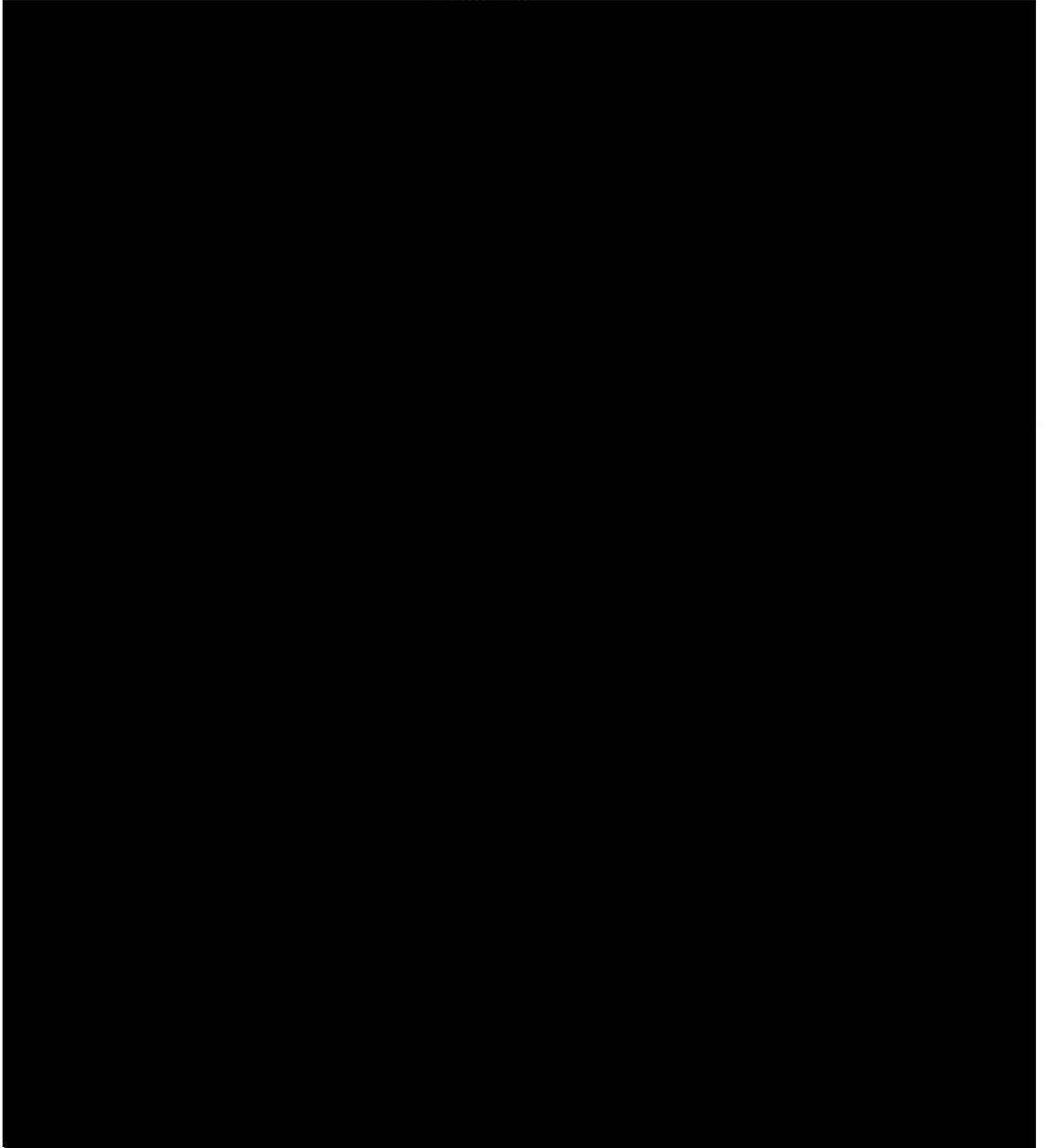
Prometheus Energy Group, Inc. & affiliates

By: 
Name: John V. Vaughn
Title: Authorized Signatory

By: 
Name: Jim Aivalis
Title: COO

Exhibit A

Equipment



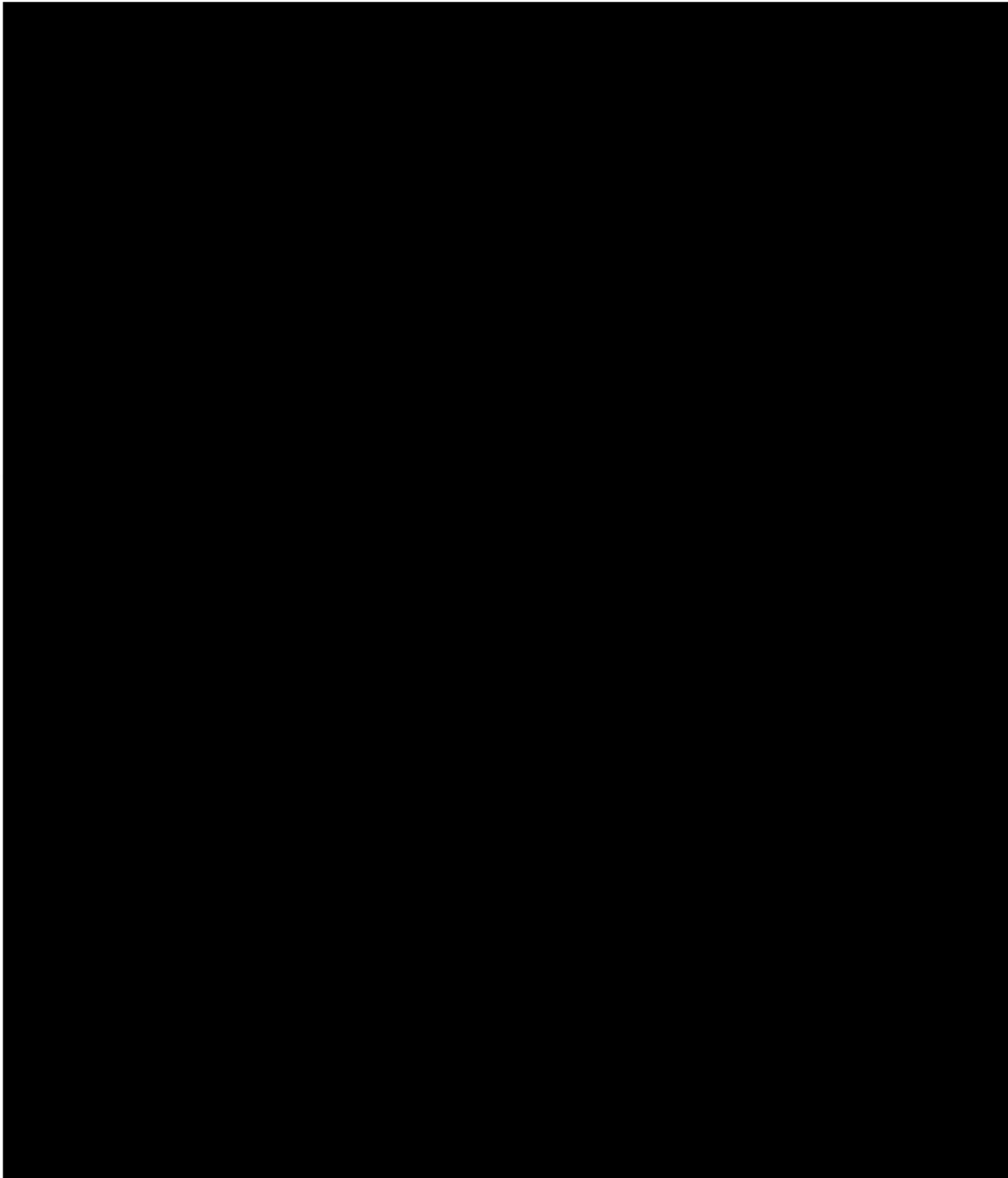
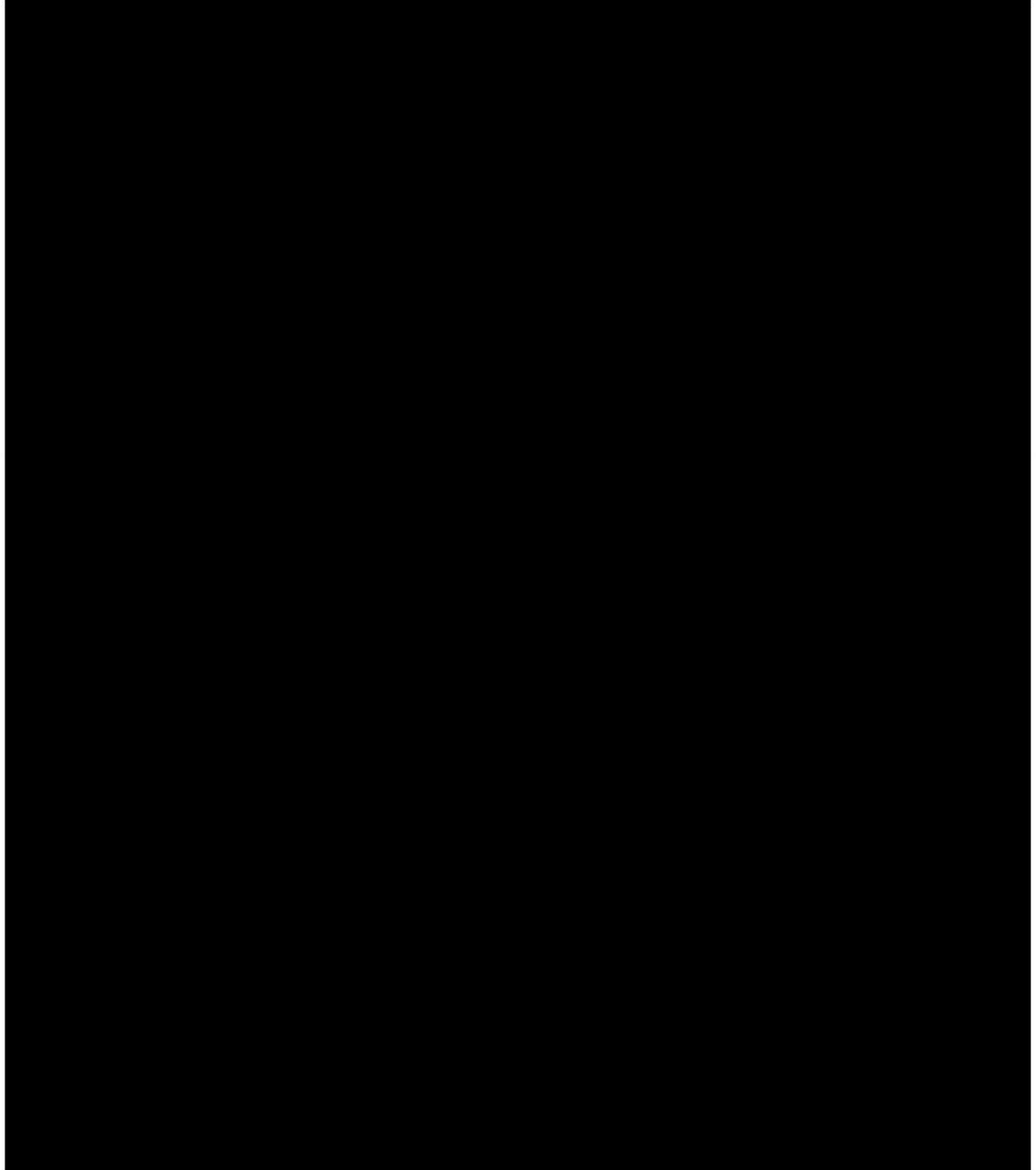


Exhibit B

Pricing

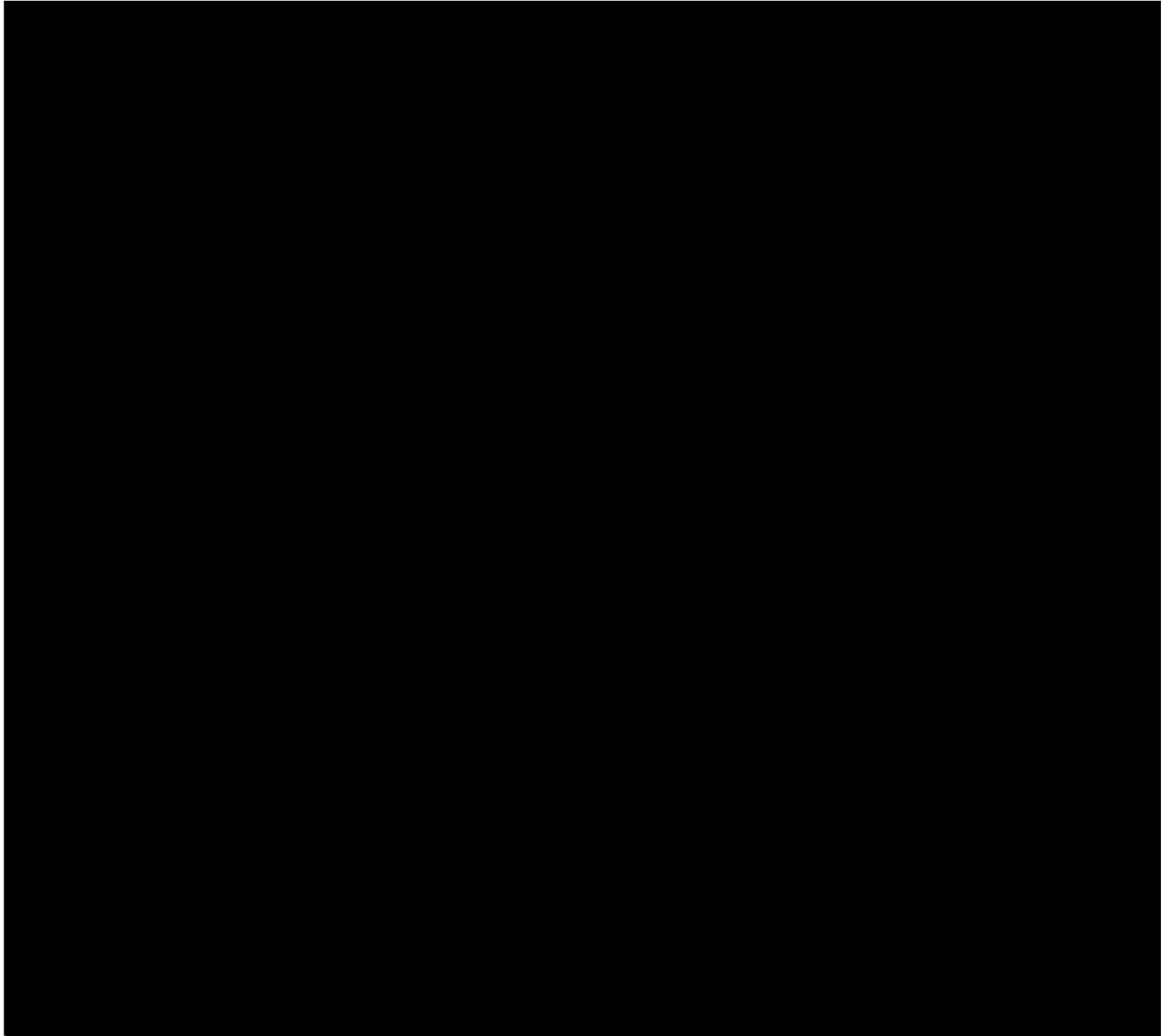


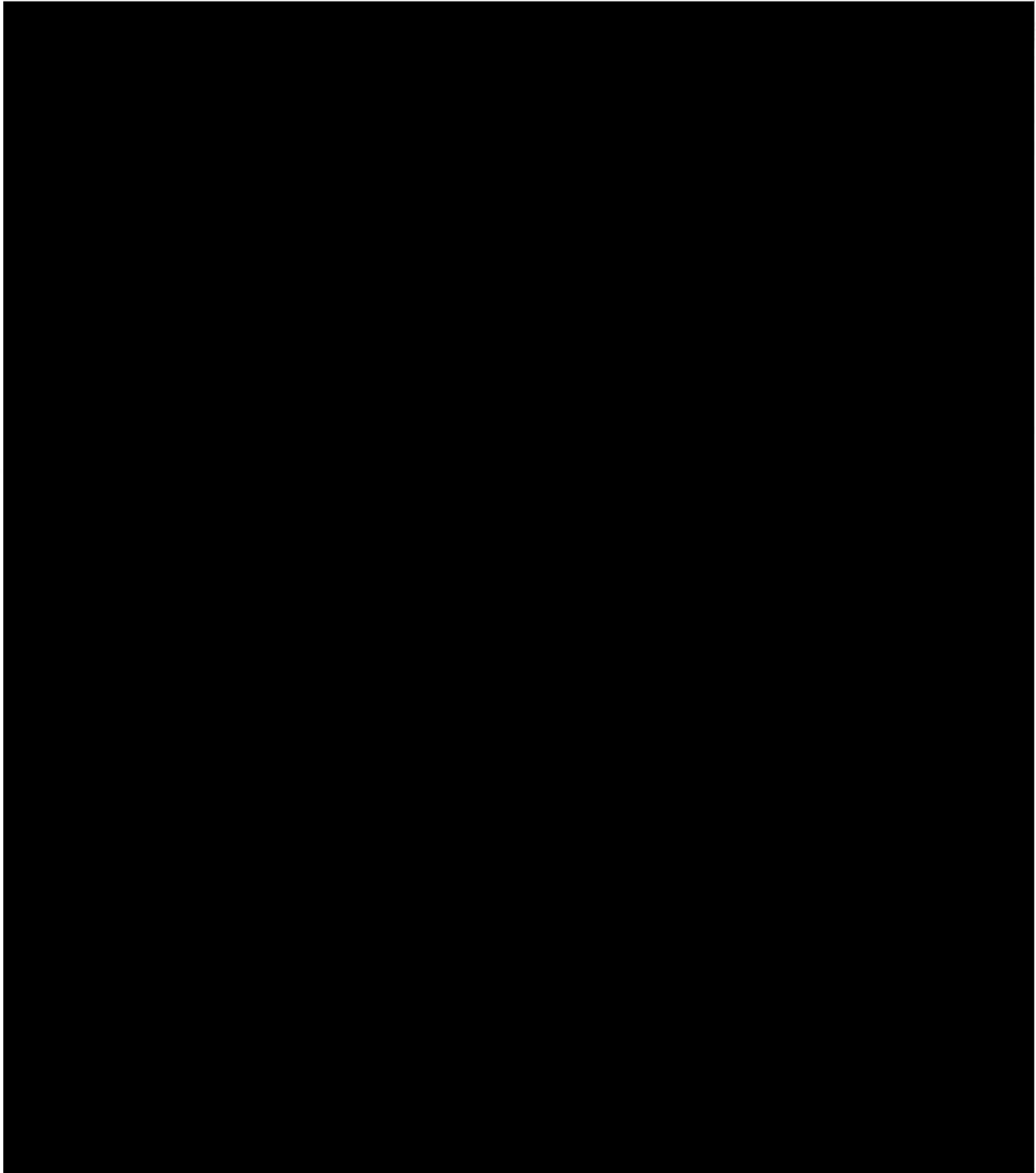
Exhibit C

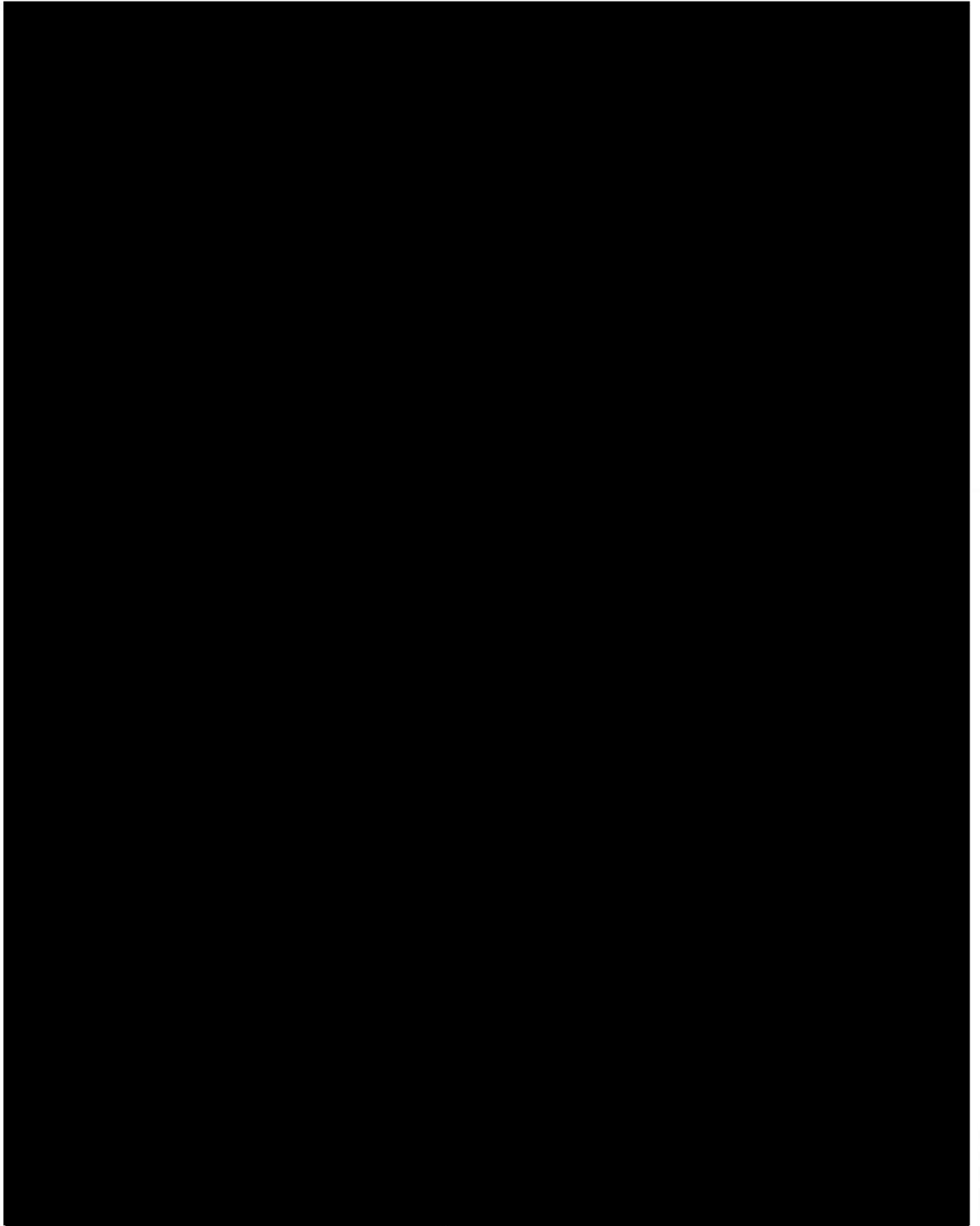


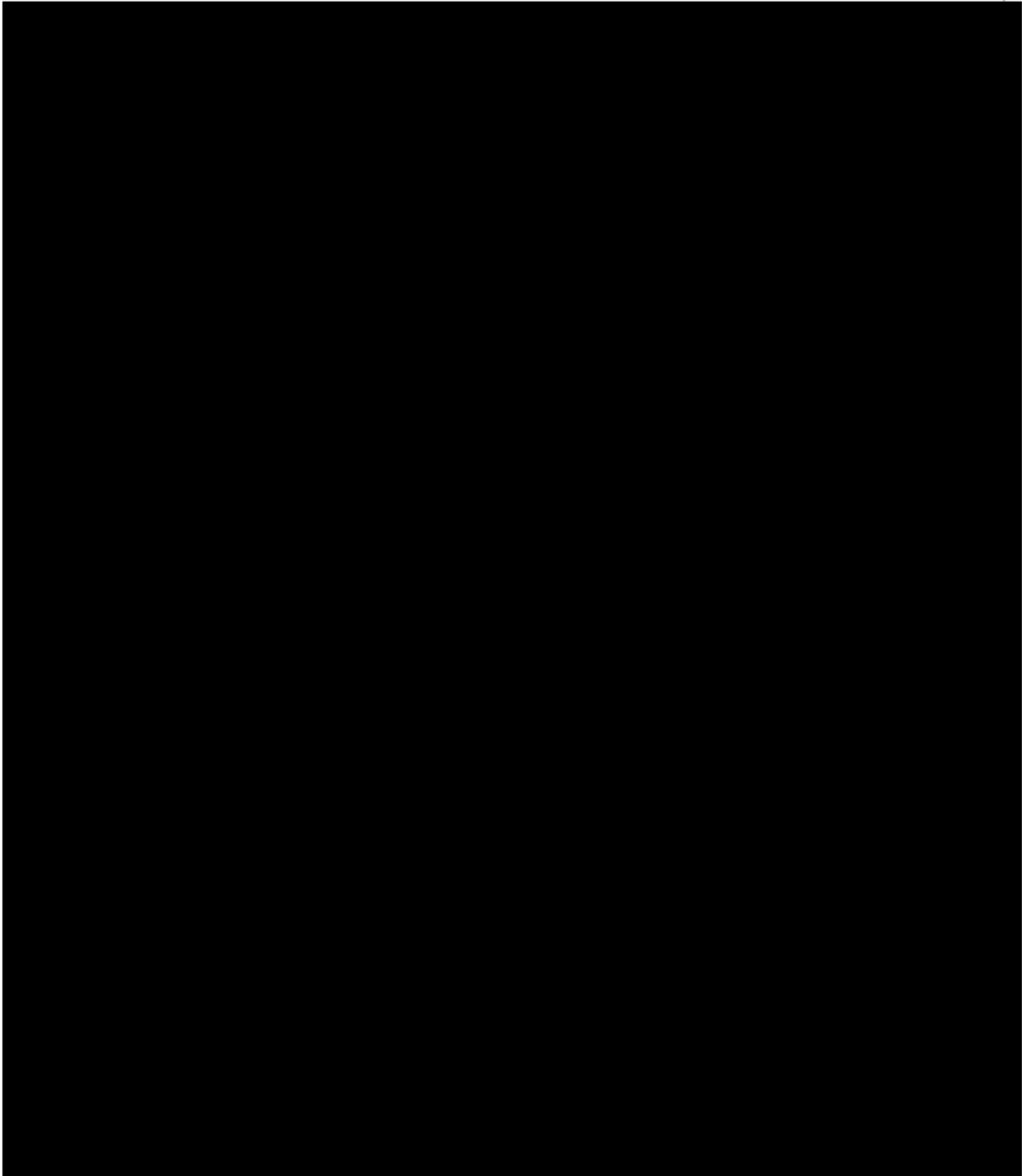
Equipment Rental and Support Services Agreement

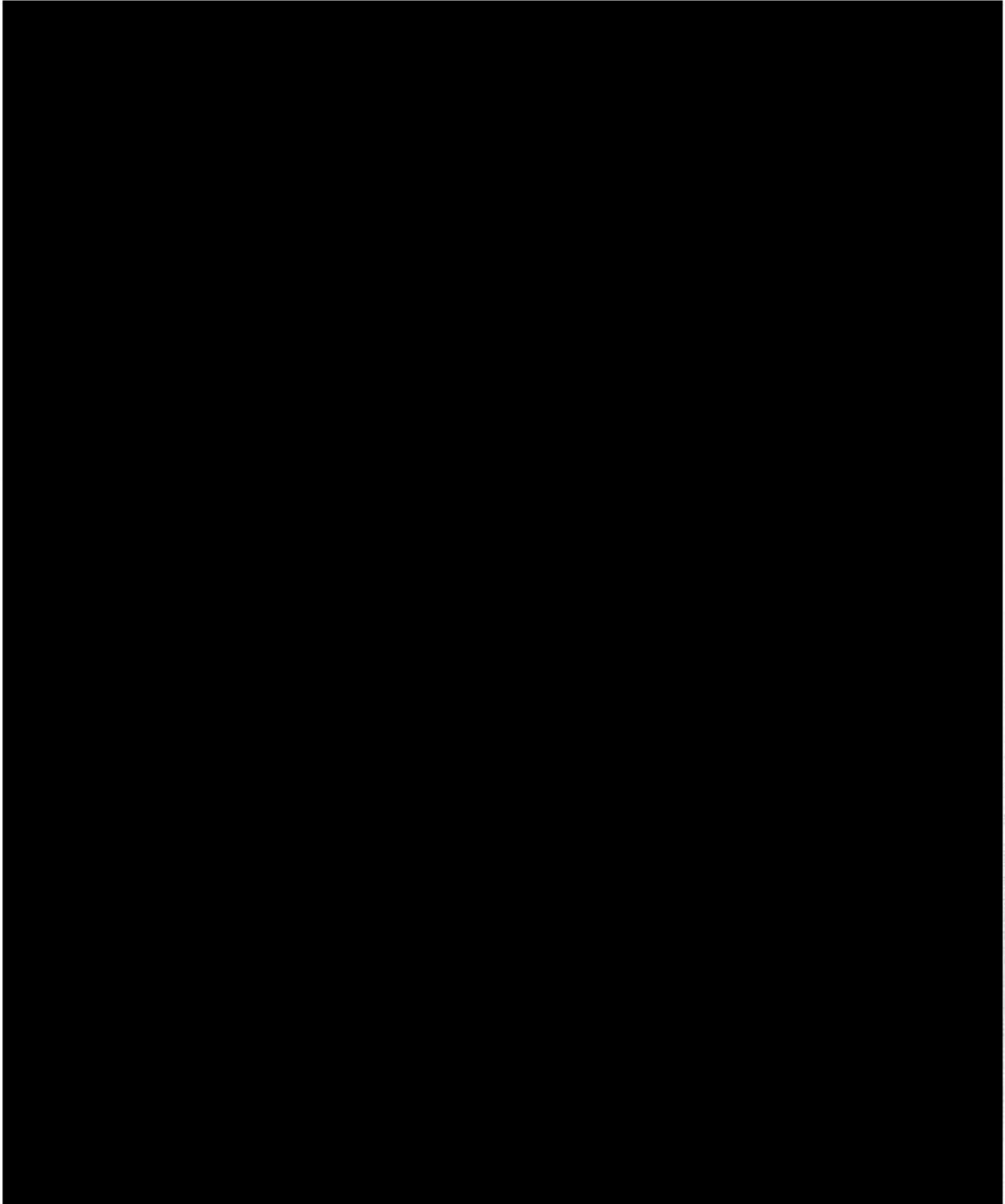
This Equipment Rental and Support Services Agreement (this “Agreement”) is entered into this 12th day of September, 2018 (the “Effective Date”) by and between Prometheus Energy Group Inc., a Delaware corporation (“Prometheus”), and The Narragansett Electric Company d/b/a National Grid (“Customer”). Prometheus and Customer are sometimes hereinafter referred to individually as “Party” and collectively as the “Parties”.

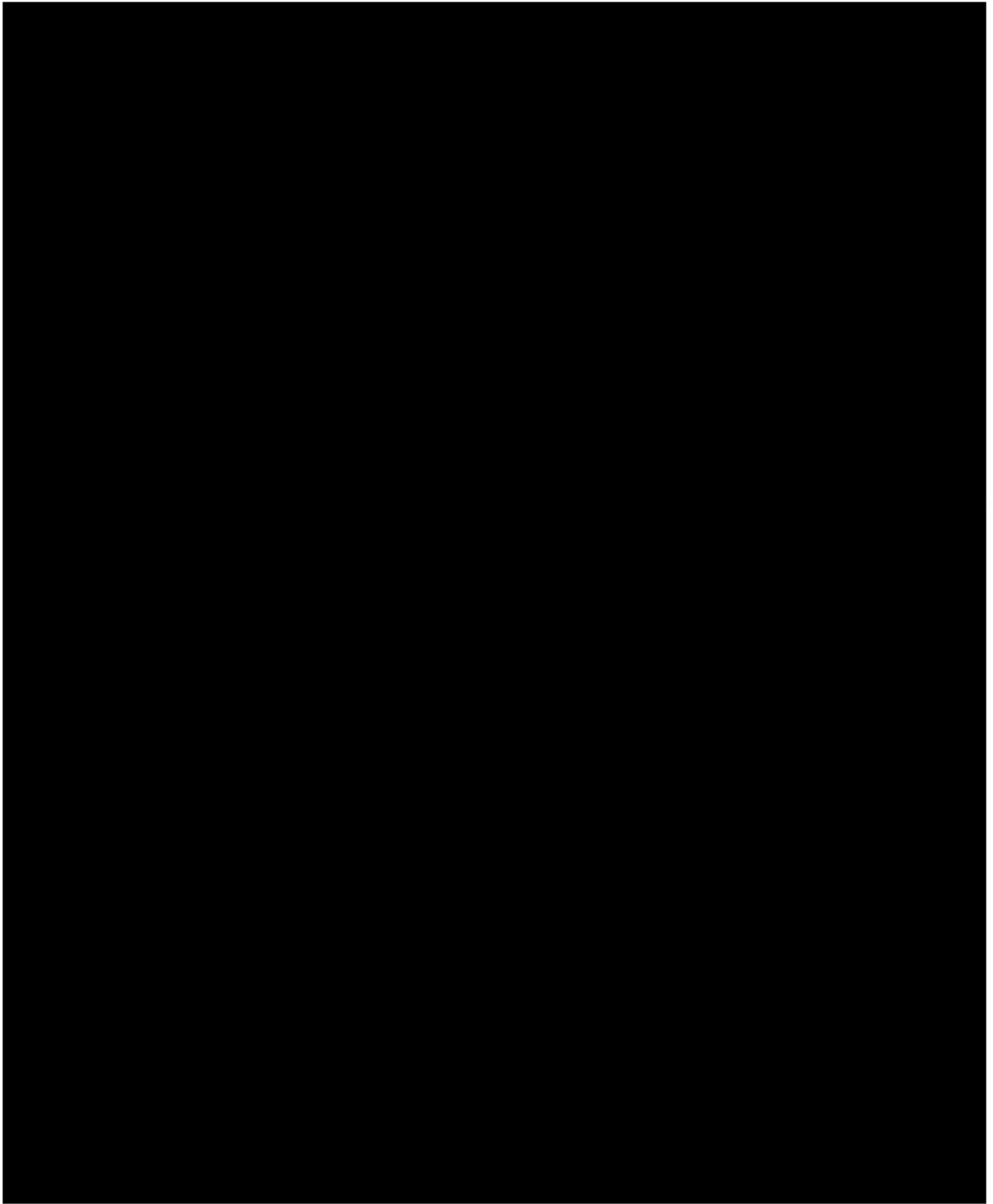


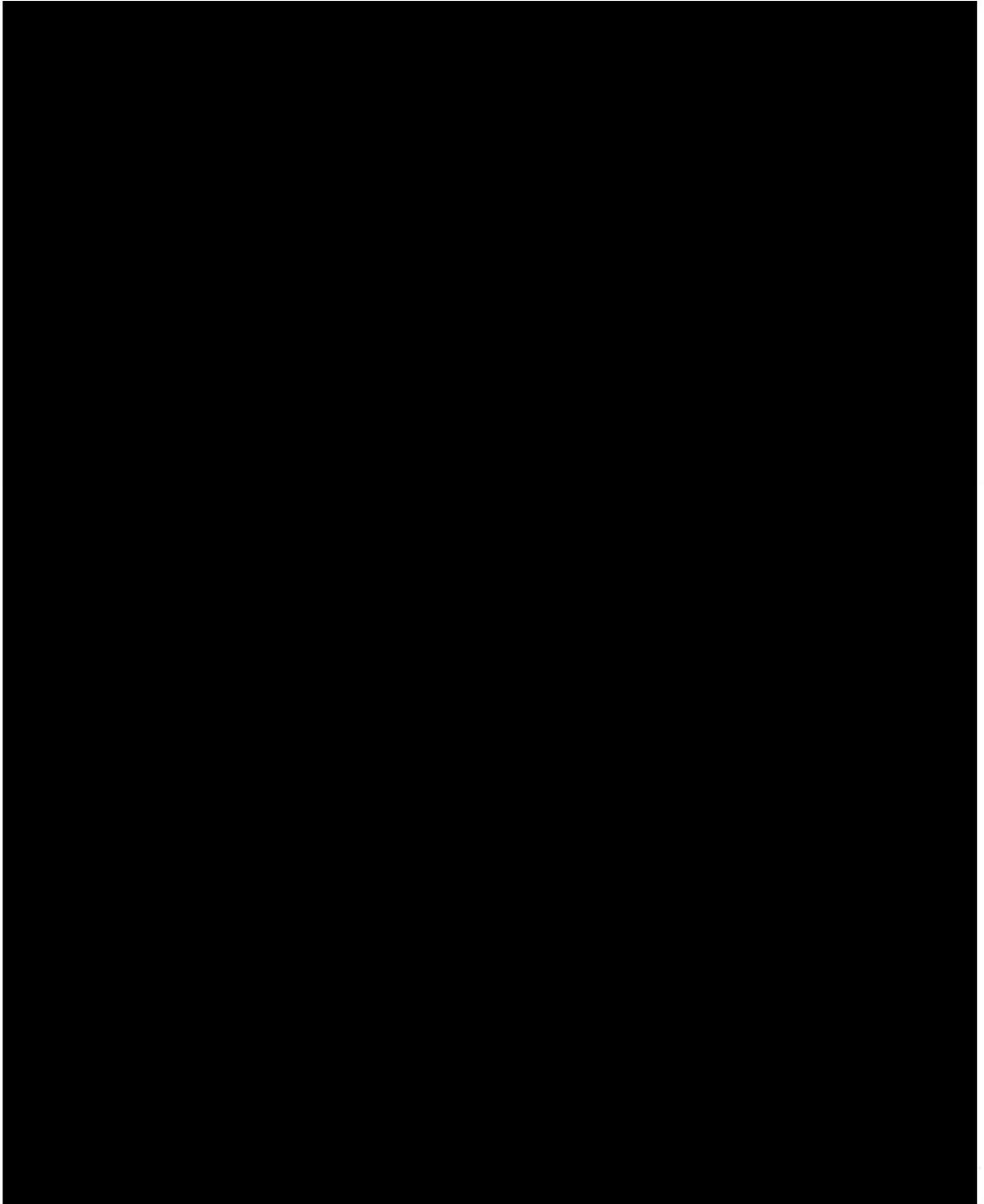


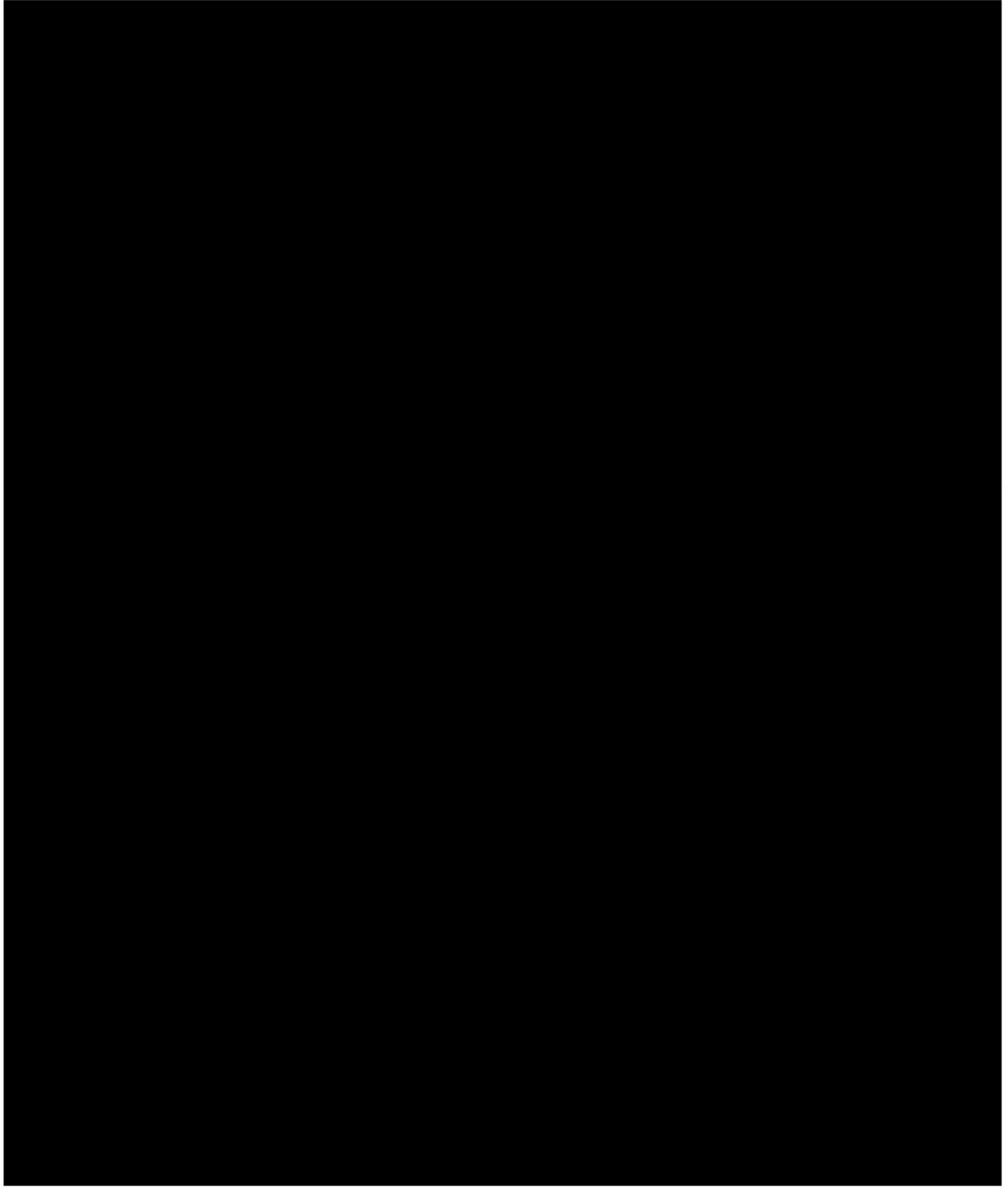


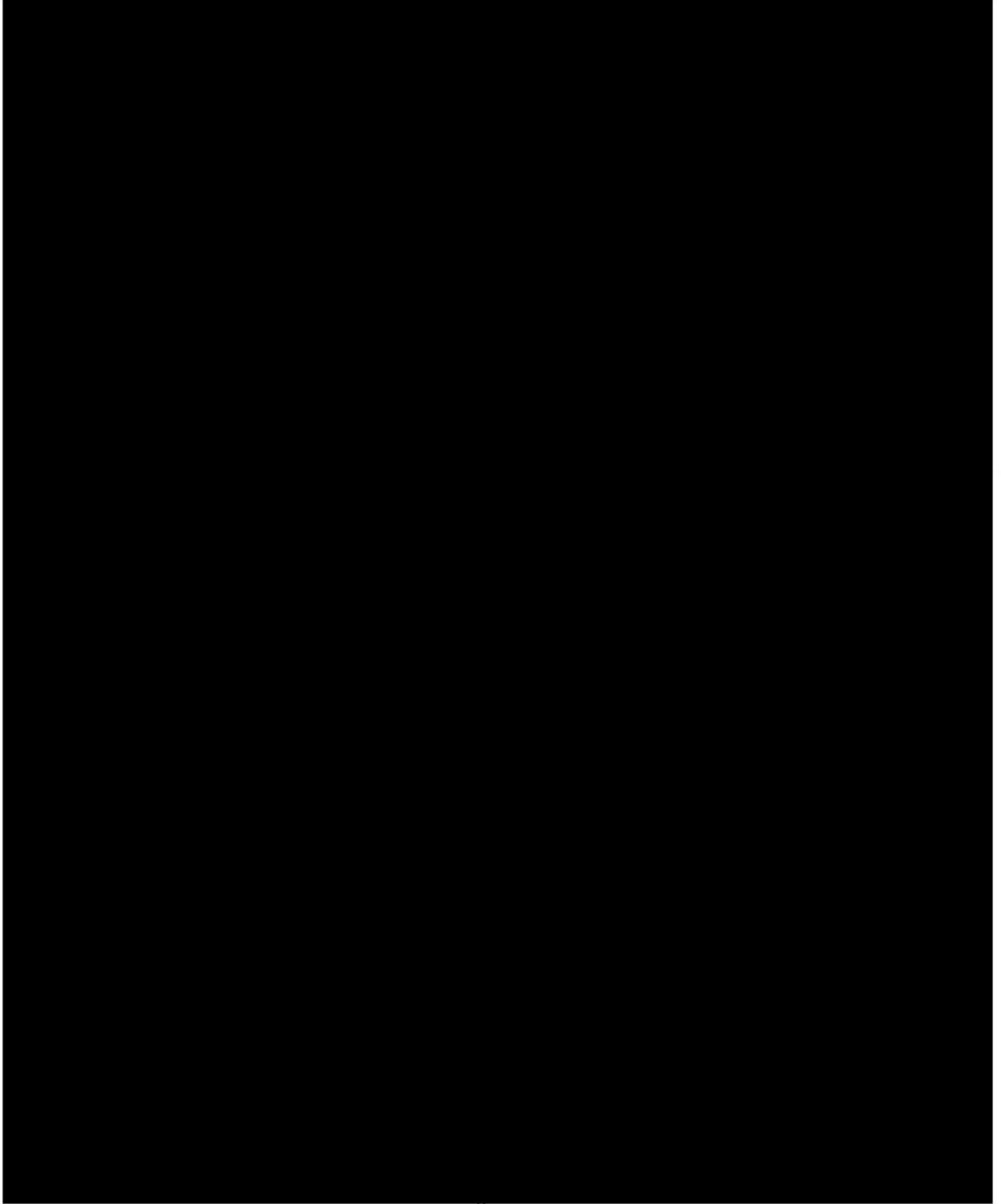


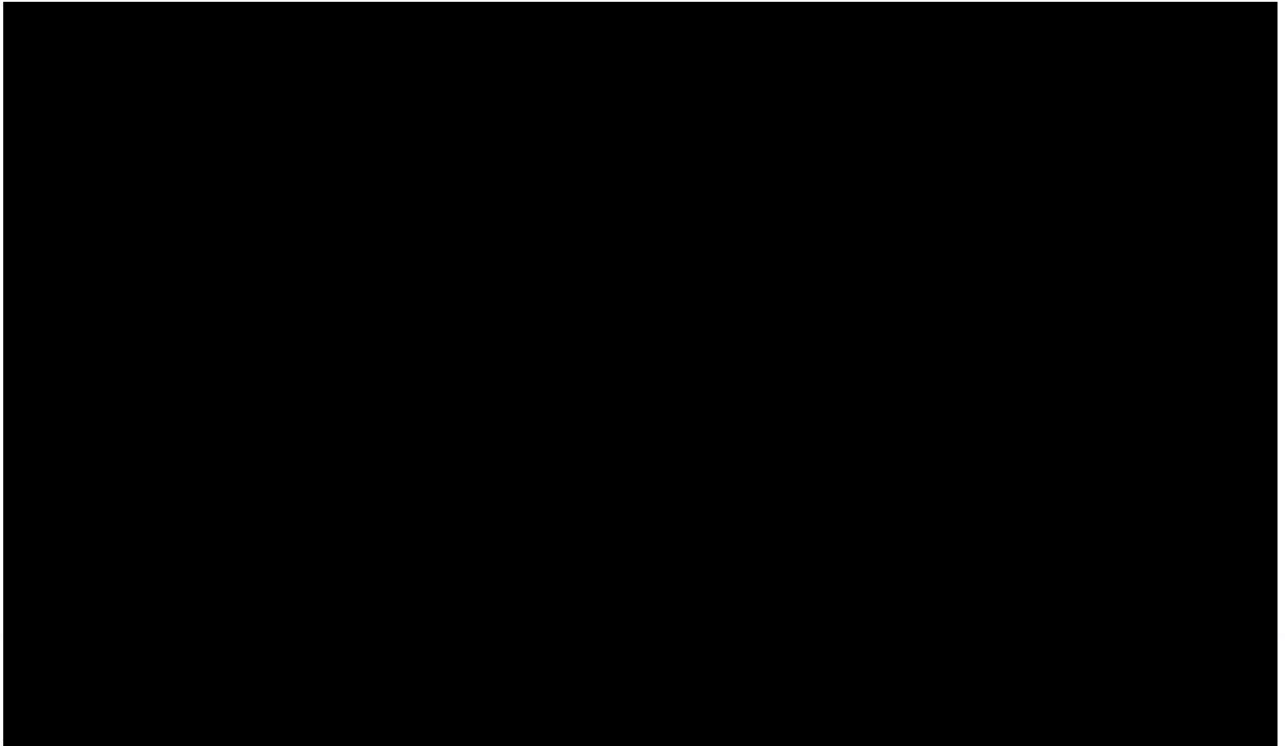












IN WITNESS WHEREOF, the Parties have caused this Agreement to be executed on the date set forth above.

The Narragansett Electric Company
d/b/a National Grid

Prometheus Energy Group, Inc.

By:  _____

By:  _____

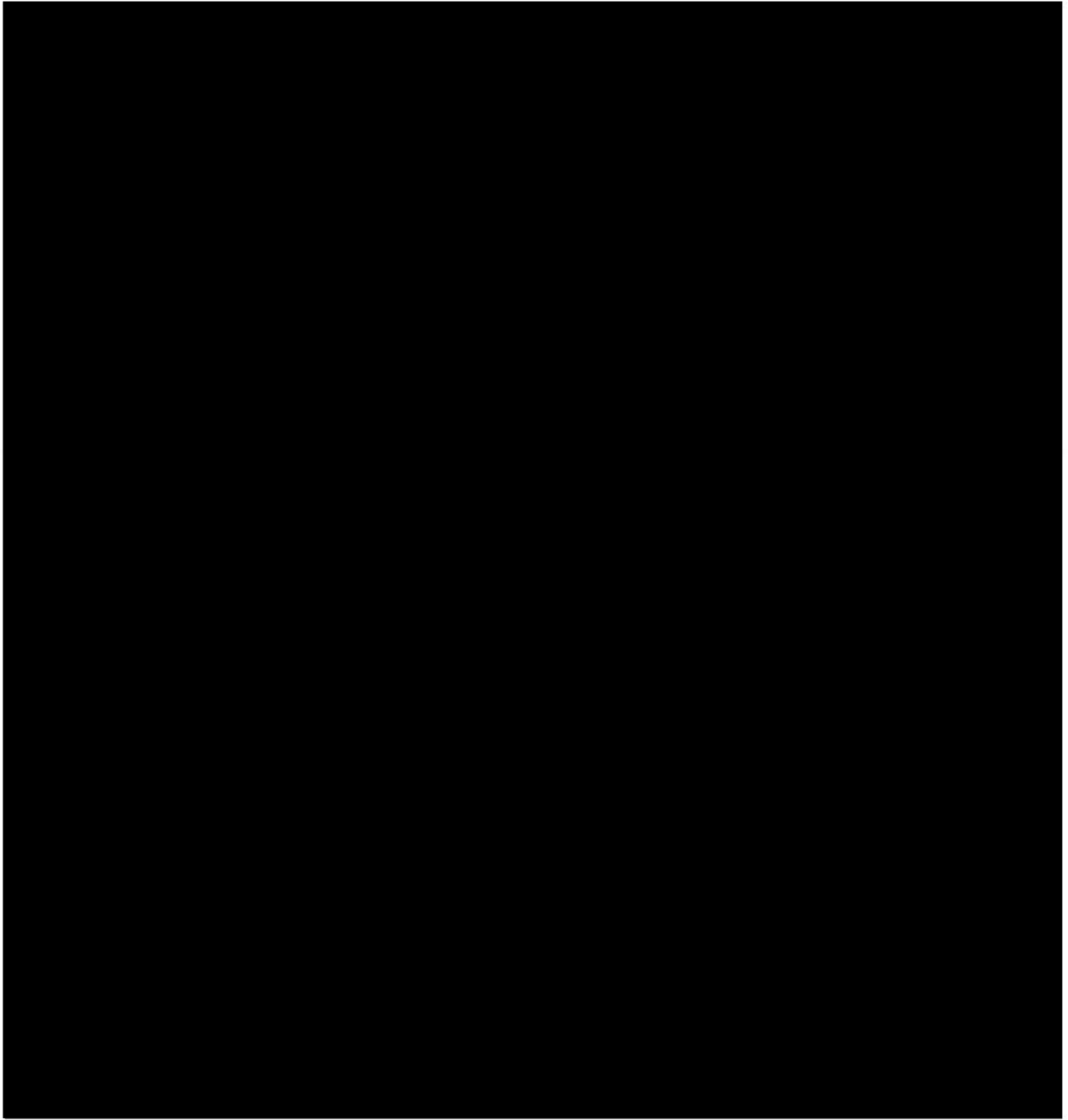
Name: John V. Vaughn

Name: Jim Aivalis

Title: Authorized Signatory

Title: CEO & President

Exhibit A



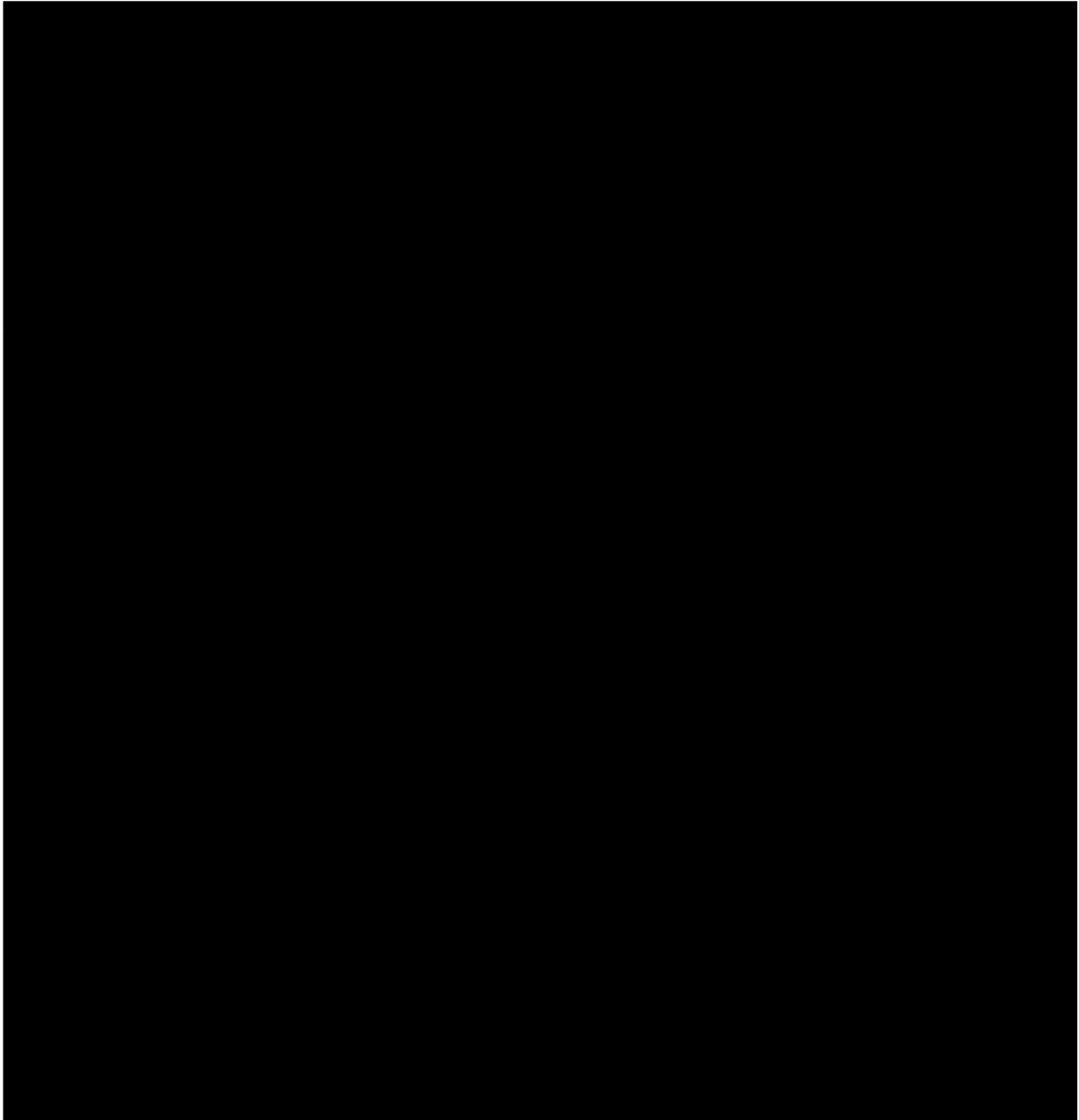


Exhibit B

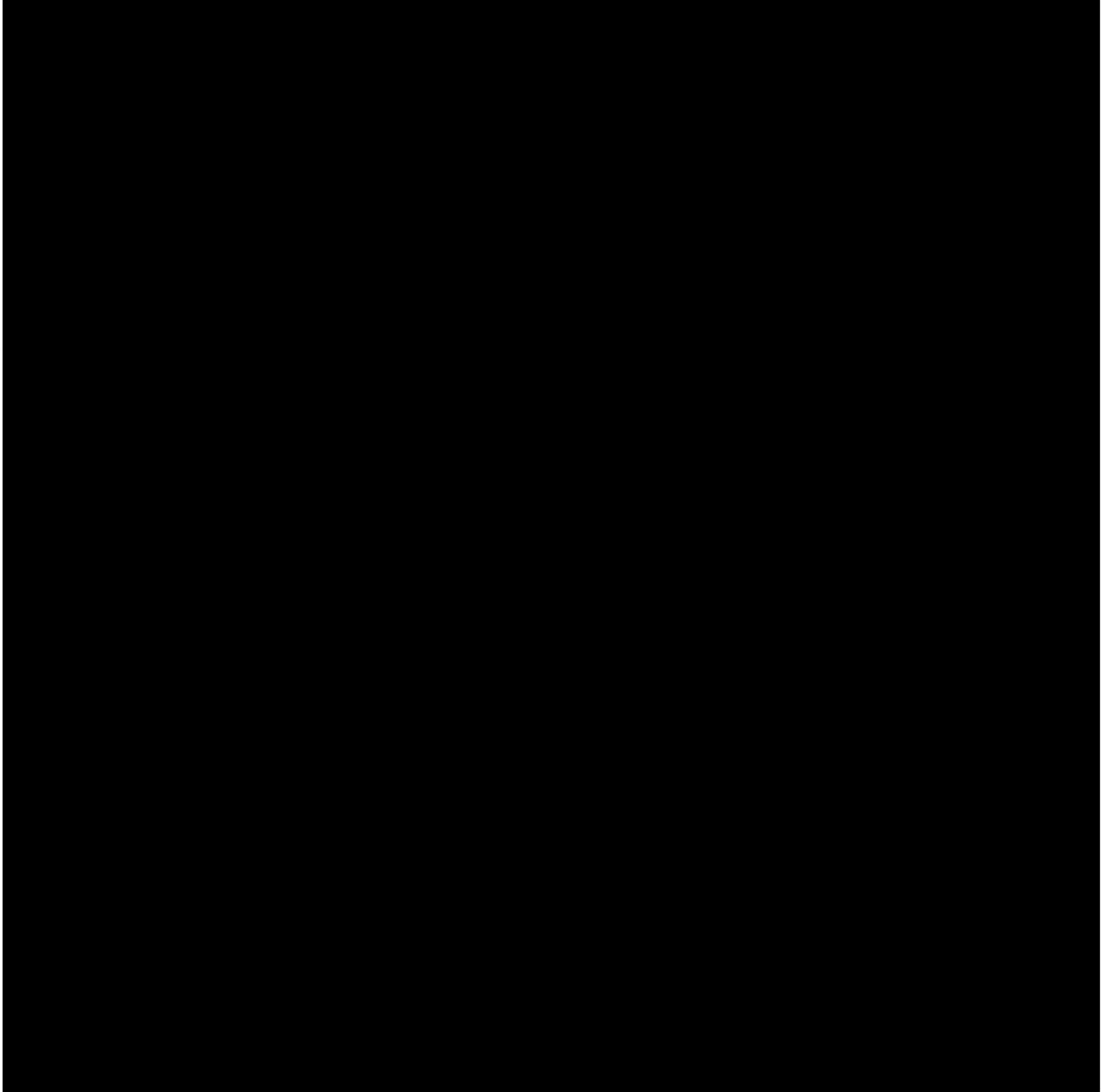
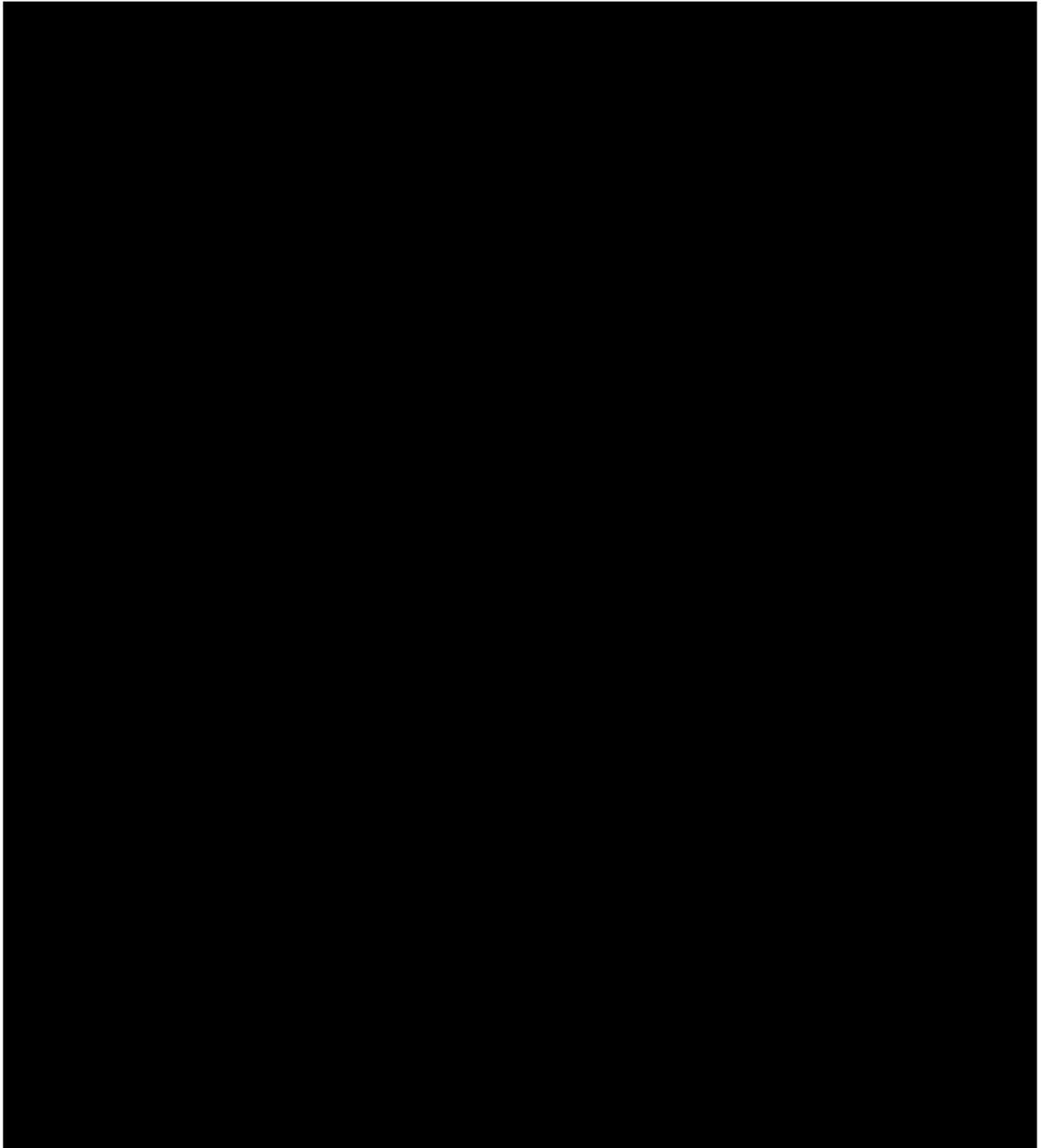


Exhibit C



REDACTED VERSION

Performance Obligation and Contract Quantity: Firm Gas service.

Firm (Variable Quantity): On any day during the months of November through March of the Delivery Period, Buyer shall have the right, but not the obligation, to purchase on a Firm basis a "Maximum Daily Quantity" or "MDQ" of Gas not to exceed 14,100 MMBtu/day and a Maximum Seasonal Quantity or "MSQ" of 507,600 MMBtu during the applicable Winter Season. "Winter Season" shall mean the period from November 1 of one year through and inclusive of March 31 of the following calendar year

Delivery Point(s): For Firm delivery service of Gas to Narragansett Gas and Electric Company delivery points on the Algonquin Gas Transmission, LLC ("Algonquin") at a primary firm point at Meter No. 00012 (Warren) in the maximum amount of 1,000 MMBtu/Day; at a secondary firm in-path point with primary delivery point at Meter No. 00018 (Bourne) in the maximum amount of 13,100 MMBtu/Day.

Special Conditions:

Conditions Precedent:

Buyer and Seller: Buyer and Seller are each party to settlement discussions with Algonquin related to the pipeline's cost of service in FERC Docket No. RP19-57-000. If Algonquin and the parties to the case are unable to reach a settlement agreement in the proceeding, or in any Section 4 rate proceeding that is filed by Algonquin, by [REDACTED], then either party to this Transaction Confirmation may terminate this Transaction Confirmation without liability for the Second Delivery Period.

Buyer: If Buyer is unable to obtain any input, guidance and/or informal or formal approvals and orders or other authorizations or consents as determined to be acceptable by Buyer, in its commercially reasonable discretion, from the Rhode Island Division of Public Utilities Commission by [REDACTED], then Buyer shall have the right, to be exercised by written notice no later than [REDACTED], to terminate this Transaction Confirmation, without liability for any period after the date such notice is tendered, provided however such notice date shall not be before [REDACTED].

Buyer shall have the right to terminate this Transaction Confirmation effective [REDACTED], without liability for the Second Delivery Period, if Seller has not entered into a negotiated rate agreement or discounted rate agreement with Algonquin for Pipeline Transportation Charges applicable during the Second Delivery Period that is deemed acceptable by Buyer by [REDACTED]; such termination right to be exercised by written notice to Seller by [REDACTED].

Seller: If Seller is unable to obtain a commitment from Exelon's senior management to extend the term of Seller's Algonquin contract No. 511057-R1 at least through [REDACTED] upon terms satisfactory to Seller in Seller's sole and absolute discretion by [REDACTED], then Seller shall have the right, to be exercised by written notice no later than [REDACTED], to terminate this Transaction Confirmation effective [REDACTED], without liability for the Second Delivery Period.

Scheduling: All Notices and communications given in connection with Nominations pursuant to Section 4 of the Base Contract may be provided by telephone [or instant messaging]. Buyer shall make all Nominations for deliveries of gas occurring on any weekday, weekend day (Saturday, Sunday and Monday), and any Holiday prior to [REDACTED] prevailing Eastern Standard Time on the Business Day prior to the Day of Gas flow; for purposes herein, "Holiday" shall mean any day that the Intercontinental Exchange ("ICE") designates as a holiday. [REDACTED].

Damages: On any Day Buyer nominates a quantity of Gas to at Meter No. 00012 (Warren) in accordance with this Transaction Confirmation and Seller fails to deliver the nominated quantity other than as a result of Force Majeure or the actions or inactions of Buyer, Seller shall reimburse Buyer for each undelivered MMBtu [REDACTED]

On any Day Buyer nominates a quantity of Gas to Algonquin Meter No. 00018 (Bourne) in accordance with this Transaction Confirmation and Seller fails to deliver the nominated quantity other than as a result of Force Majeure or the actions or inactions of Buyer, Seller shall reimburse Buyer for each undelivered MMBtu [REDACTED]

Dodd-Frank Compliance: The parties agree that for purposes of this Transaction Confirmation and as of the Trade Date each party is a producer, processor, commercial user of, or a merchant handling the commodity that is the subject of the Transaction

<p>Confirmation and is entering into this Transaction Confirmation solely for the purposes related to its business as such. The parties confirm their intention that if any such commodity option transaction be physically settled, such that if exercised, it results in the sale of a commodity for either immediate or deferred delivery.</p> <p><u>Document Conflict.</u> In the event of a conflict between the terms and conditions of the (i) Transaction Confirmation, (ii) Special Provisions, and (iii) Base Contract, the terms and conditions of the documents shall govern in the priority listed in this provision.</p> <p><u>Capitalized Terms:</u> Capitalized terms used herein and not otherwise defined shall have the meaning set forth in the Base Contract, as amended, and as supplemented and modified by the Special provisions.</p>	
<p>Seller: Constellation LNG, LLC</p> <p>By: <u>JJM</u></p> <p>Title: <u>SVP- Wholesale Trading</u></p> <p>Date: <u>9/26/19</u></p>	<p>Buyer: The Narragansett Electric Company d/b/a National Grid</p> <p>By: <u>[Signature]</u></p> <p>Title: <u>John V. Vaughn</u> <u>Authorized Signatory</u></p> <p>Date: <u>10/16/2019</u></p>

[Handwritten initials]

Division 2-4

Request:

Reference page 27, lines 17-19. Please explain how it will be determined that the LNG will be utilized more actively for balancing and why additional balancing will be required.

Response:

The Company anticipates that LNG will be utilized for balancing supply and demand under design or near-design conditions. As discussed in the Company's response to Division 1-4 in this docket, the Company reasonably expects that, should near-design day weather conditions arise, the pipelines will look to hold the Company to its contractual limits to minimize imbalances across their systems to ensure reliable service to the Company and other shippers up to contracted quantities. The Company's LNG facilities are critical to minimizing pipeline imbalances because the Company has full control over the timing of when these assets are dispatched. To ensure that the Company has sufficient inventory to meet forecast customer requirements and to provide hourly balancing capability, the Company intends to secure 125,000 Dth of LNG for the 2020/21 winter.

Division 2-5

Request:

Reference Attachment GSP-1, page 19. Please provide all calculations and workpapers supporting each of the costs and volumes reflected in the Attachment. The calculations should include/identify the:

- a. Applicable pipeline contracts as identified in Exhibit 13 of the 2020/21 to 2024/25 Long-Range Resource and Requirement Plan (“LRP”); and
- b. Applicable pipeline/supply contract billing determinants, rates, and costs by rate schedule/zone.

Response:

Attachment GSP-1, page 19 is in the GCR to represent a comparison of Transportation Fixed Costs between the sales only and the proposed customer choice program. The attachment is broken down into three components: Sales & Customer Choice, Sales only, and Customer Choice.

Attachment DIV 2-5 shows the formulas behind the values shown in Attachment GSP-1, page 19 on the tab labeled “Calc GSP -1 page 19”, and all associated figures are linked within the workbook.

Calc GSP-1, page 19

<u>Row</u>				
<u>Number</u>	<u>Value</u>	<u>Source</u>		<u>Description</u>
6	\$ 67,983	Tab: Div 2-5 Sales Customer Choice	Sales & Customer Choice	Annual Transportation Demand (\$000)
7	3,844	Tab: GSP-1 Pipeline Paths	Sales & Customer Choice	Managed Capacity (Dth/day)
8	\$ 553	Tab: Div 2-5 Sales Customer Choice	Sales & Customer Choice	Annual Managed Capacity Demand (\$000)
9	217,911	Tab: GSP-1 Pipeline Paths	Sales & Customer Choice	Design Day Transportation (Dth)
10	\$ 0.855	Formula	Sales & Customer Choice	Daily Demand Per Design Day Dth
13	\$ 55,536	Tab: Div 2-5 Sales	Sales	Annual Transportation Demand (\$000)
14	3,473	Formula	Sales	Managed Capacity (Dth/day)
15	\$ 499	Formula	Sales	Annual Managed Capacity Demand (\$000)
16	178,042	Formula	Sales	Design Day Transportation (Dth)
17	\$ 0.854	Formula	Sales	Daily Demand Per Design Day Dth
20	\$ 12,447	Formula	Customer Choice	Annual Transportation Demand (\$000)
21	371	Tab: GSP-1 Pipeline Paths	Customer Choice	Managed Capacity (Dth/day)
22	\$ 53	Formula	Customer Choice	Annual Managed Capacity Demand (\$000)
23	39,498	Tab: GSP-1 Pipeline Paths	Customer Choice	Design Day Transportation (Dth)
24	\$ 0.859	Formula	Customer Choice	Daily Demand Per Design Day Dth
26	\$ (0.01)	Formula		Difference between Sales only and Customer Choice only Demand Dollars

Division 2-5, page 2

The Sales and Customer Choice Annual Transportation Demand cost (row 6) is the result of a SENDOUT Model optimization that included the fixed costs of the full gas supply portfolio without any Customer Choice releases reflected. The total annual transportation demand cost of \$67,983,987 is in the Excel version of Attachment DIV 2-5 on the tab labeled "Div 2-5 Sales Customer Choice" in cell C53. This tab also includes the applicable transportation rates (columns D:O) and billing determinants (columns Q:AB) used to calculate the annual transportation demand cost. The contracts listed in column B correspond to those identified in Exhibit 13.

The managed capacity volume listed on row 7 of tab "Calc GSP -1 page 19" is the sum of the Peak Day City Gate MDQ (Dth/day) for the Niagara, Dawn via Waddington, Transco, and Dominion paths from exhibit 22 in the LRP.

Immediately following that line (row 8), is the sum of the demand charges associated with managed capacity listed on row 7. These demand charges can be identified in the Excel version of Attachment DIV 2-5 on the "Div 2-5 Sales Customer Choice" tab on the rows with an asterisk next to the contract in column B.

The Design Day Transportation volume found on row 9 of "Calc GSP -1 page 19" is also from Exhibit 22 in the LRP; it is the sum of the transportation pipeline paths in the Company's portfolio and is equal to 217,911 Dth/Day.

The Daily Demand Per Design Day Dth (\$0.855) is calculated by taking the total Annual Transportation Demand listed on row 6 (\$67,983) multiplied by 1,000 then divided by the design day transportation number listed on row 9 (217,911) divided by 365 days per year.

The next section from this attachment is the Sales only section. The supporting documentation for the Annual Transportation Demand is in the Excel version of Attachment DIV 2-5 in the tab labeled "Div 2-5 Sales" with the applicable transportation rates and pipeline contracts as found in Exhibit 13. The total Annual Transportation Demand for Sales only is in cell C54. This tab also includes the applicable transportation rates (columns E:P) and billing determinants (columns R:AC) used to calculate the annual transportation demand cost. The contracts listed in column B correspond to those identified in Exhibit 13.

The only difference between \$55,536 and the \$67,983 from the first calculation is that the Company backed out expected capacity releases and expected demand dollars based on estimated releases for November 1st.

Division 2-5, page 3

The managed capacity number, 3,473 Dth/day on row 14 is the difference between 3,844 Dth/day found on row 7 in the Sales & Customer Choice section less the 371 Dth/day found on row 21 in the Customer Choice section. 371 Dth/day is an estimate of the managed capacity that was based on an estimate for customer choice releases for November 1st.

The annual managed capacity demand number of \$499 on row 15 is the same demand dollars from the Sales and Customer Choice section less the dollars associated with the estimated customer choice release numbers as show on row 22.

Design day Transportation (Dth) of 178,042 on row 16 is the estimated remaining Dth/day left after estimated marketer releases for November 1st.

The Daily Demand Per Design Day Dth of \$0.854 on row 17 is a calculation to estimate how much the sales customers would pay based on estimated marketer releases for November 1st.

The entire Customer Choice section, rows 20 through 24, is based on the two sections above, Sales & Customer Choice and Sales only. It is also based on capacity release load factor estimates which can be seen on the tab labeled GSP-1 Pipeline Paths, rows 26 through 29.

The attachment to this response contains commercially sensitive and confidential information; therefore, the Company is providing confidential and redacted versions of this attachment, subject to a Motion for Protective Treatment.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5066
In Re: 2020 Annual Gas Cost Recovery Filing
Responses to the Division's Second Set of Data Requests
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Attachment DIV 2-5

CONFIDENTIAL

Please see the confidential version of Attachment DIV 2-5 in Excel version.

The Company is providing the redacted version of Attachment DIV 2-5 in PDF format.

**National Grid Rhode Island
Customer Choice Transportation Fixed Costs
2020/21**

Sales & Customer Choice

Annual Transportation Demand (\$000)	=Div 2-5 Sales Customer Choice!C53
Managed Capacity (Dth/day)	=SUM('GSP-1 Pipeline Paths'!B15:B18)
Annual Managed Capacity Demand (\$000)	=SUM('Div 2-5 Sales Customer Choice'!C16:C22,'Div 2-5 Sales Customer Ch
Design Day Transportation (Dth)	=GSP-1 Pipeline Paths!B19
Daily Demand Per Design Day Dth	=(B6*1000)/B9/365

Sales Only

Annual Transportation Demand (\$000)	=Div 2-5 Sales!C54
Managed Capacity (Dth/day)	=B7-B21
Annual Managed Capacity Demand (\$000)	=B8-B22
Design Day Transportation (Dth)	=B9-B23-B21
Daily Demand Per Design Day Dth	=(B13-B22)*1000/B16/365

Customer Choice

Annual Transportation Demand (\$000)	=B6-B13
Managed Capacity (Dth/day)	=GSP-1 Pipeline Paths!B26*SUM('GSP-1 Pipeline Paths'!E15:E18)
Annual Managed Capacity Demand (\$000)	=(B8/B7)*B21
Design Day Transportation (Dth)	=GSP-1 Pipeline Paths!B26-B21
Daily Demand Per Design Day Dth	=(B20+B22)*1000/(B23+B21)/365

Difference	=B17-B24
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REDACTED VERSION

National Grid Rhode Island
Customer Choice Capacity Allocation Proposal
2020/21

Paths	Peak Day City Gate MDQ (Dth/day)	City Gate Contracts	Upstream	Percent of Portfolio	Percent of Release
TGP Long Haul	29,335	TGP 1597		7.1%	13.7%
TGP ConneXion	11,600	TGP 64025, TGP 64026		2.8%	5.4%
Dawn via PNGTS	29,000	TGP 62930, TGP 330580	Union M12274, TCPL 60659, TCPL 58577, PNGTS 210203	7.0%	13.5%
AIM	18,000	AGT 510801	MPL 214129	4.4%	8.4%
TETCO CDS Long Haul	45,934	AGT 93011E	TETCO 800303	11.1%	21.5%
TCO Appalachia	40,000	AGT 90107, AGT 90106, AGT 9001	TCO 31524, TCO 31523	9.7%	18.7%
AGT M3	18,099	AGT 93011E, AGT 90106, AGT 93401S, AGT 90107, AGT 9001		4.4%	8.5%
Dracut	20,000	TGP 62930		4.8%	9.3%
TETCO SCT Long Haul	2,099	AGT 93001ESC	TETCO 800156	0.5%	1.0%
Niagara	1,067	TGP 39173		0.3%	
Dawn via Waddington	1,000	TGP 95345	Union M12164, TCPL 42386, IGTS 50001	0.2%	
Transco	1,240	AGT 90106, AGT 96004SC	Transco 9081767	0.3%	
Dominion	537	AGT 96004SC		0.1%	
	217,911			52.7%	
Storage	37,357	TGP 10807, AGT 9W009E, AGT 9B105, AGT 933005, AGT 90106, AGT 9B105, AGT 9S100S		9.0%	
	37,357			9.0%	
Peaking	158,100	TGP 330581; TGP 330580; NGLNG; Exeter; DOMAC		38.2%	
	158,100			38.2%	
TOTAL	413,368			100.0%	

Estimated Allocation Based on Projected November 1st Releases (Subject to change):

Transportation 39,869

Redacted
Division 2-6

Request:

Reference Attachment GSP-1, page 1. Please reconcile each FIXED COST line item with the other pages provided in Attachment GSP-1.

Response:

Attachment DIV 2-6 contains several pages extracted from Attachment GSP-1. These pages provide the backup for each Fixed Cost line item provided in Attachment GSP-1.

The details of the Total Transportation fixed costs are included in the "GSP-1 Trans Fixed Detail" tab and exclude the total storage delivery fixed costs and total liquefaction fixed costs as listed on the subsequent rows on Attachment GSP-1. Total storage delivery fixed costs are on page 2 of Attachment DIV 2-6. Because the liquefaction projects have been delayed, liquefaction fixed costs are not included in Attachment GSP-1. The details of the Total Storage Fixed Costs are included in the 'GSP-1 Storage Fixed Detail' tab.

The AMA Credit calculation is annual estimated credit that the Company will receive from the AMAs and is allocated evenly across each month in the GCR period consistent with expected cash flows under the proposed transactions.

The formula used to calculate the total expected AMA credit of \$1,296,899 is:

[REDACTED]

Subsequent paragraphs refer to various elements of this formula. All AMA credits are estimates and subject to final transaction confirmations.

In the formula above, [REDACTED] represents an AMA awarded to Emera Energy for [REDACTED] per dekatherm multiplied by the remaining estimated volume of 4,588 dekatherms after customer choice releases times 365 days per year. This AMA includes assets on Union and TransCanada pipelines which deliver into East Hereford. This represents an estimated [REDACTED].

The formula [REDACTED] represents the AMA awarded to Twin Eagle for [REDACTED] per dekatherm times 15,757 times 365 days per year. This AMA includes assets on Union and TransCanada which deliver into East Hereford. This represents [REDACTED] in an asset management fee.

Redacted
Division 2-6, page 2

The formula [REDACTED] represents the AMA awarded to Emera Energy for [REDACTED] per dekatherm times 365 days per year. The AMA includes assets on Union and TransCanada which deliver into East Hereford. This is for Phase III of the PNGTS and payments will be adjusted if the project is delayed. This represents [REDACTED] in an asset management fee.

The AMA Package on Union, TransCanada, Iroquois to Tennessee for 1,000 dekatherms was awarded to Emera energy for an asset management fee of [REDACTED].

The Company's Dracut to Citygate AMA on Tennessee was awarded to Emera in two packages of 7,500 dekatherms each, one for an asset management fee of [REDACTED] and the other for a fee of [REDACTED].

The total estimated AMA credits come to \$1,296,898.80 for gas year November 2020 through October 2021.

The details on the Hourly Peaking Fixed Costs can be found on the 'GSP-1 Hrly Peaking Fixed Costs' tab.

Total Fixed Costs are equal to the sum of:

- transportation fixed costs;
- storage delivery fixed costs;
- storage fixed costs;
- liquefaction fixed costs; and
- supplier fixed costs.

Less the sum of:

- AMA fixed cost credits; and
- hourly peaking fixed costs.

This response contains commercially sensitive and confidential information; therefore, the Company is providing confidential and redacted versions of this response, subject to a Motion for Protective Treatment.

National Grid Rhode Island
Transportation Fixed Costs
Normal Year
(\$000)

Transportation Costs													
	11/1/2020	12/1/2020	1/1/2021	2/1/2021	3/1/2021	4/1/2021	5/1/2021	6/1/2021	7/1/2021	8/1/2021	9/1/2021	10/1/2021	Grand Total
Dracut	\$ 85.0	\$ 85.0	\$ 85.0	\$ 85.0	\$ 85.0	\$ 85.0	\$ 85.0	\$ 85.0	\$ 85.0	\$ 85.0	\$ 85.0	\$ 85.0	\$ 1,020.3
Everett	\$ 106.3	\$ 106.3	\$ 106.3	\$ 106.3	\$ 106.3	\$ 106.3	\$ 106.3	\$ 106.3	\$ 106.3	\$ 106.3	\$ 106.3	\$ 106.3	\$ 1,275.4
LNG	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Manchester Lateral	\$ 209.8	\$ 209.8	\$ 209.8	\$ 209.8	\$ 209.8	\$ 209.8	\$ 209.8	\$ 209.8	\$ 209.8	\$ 209.8	\$ 209.8	\$ 209.8	\$ 2,517.1
Niagara	\$ 6.8	\$ 6.8	\$ 6.8	\$ 6.8	\$ 6.8	\$ 6.8	\$ 6.8	\$ 6.8	\$ 6.8	\$ 6.8	\$ 6.8	\$ 6.8	\$ 82.1
Storage Delivery	\$ 449.2	\$ 449.2	\$ 449.2	\$ 463.7	\$ 463.7	\$ 432.9	\$ 432.9	\$ 432.9	\$ 432.9	\$ 432.9	\$ 432.9	\$ 432.9	\$ 5,305.3
Yankee Interconnect													
AIM	\$ 756.9	\$ 756.9	\$ 756.9	\$ 756.9	\$ 756.9	\$ 756.9	\$ 756.9	\$ 756.9	\$ 756.9	\$ 756.9	\$ 756.9	\$ 756.9	\$ 9,082.4
Transco	\$ 9.4	\$ 9.4	\$ 9.4	\$ 9.4	\$ 9.4	\$ 9.4	\$ 9.4	\$ 9.4	\$ 9.4	\$ 9.4	\$ 9.4	\$ 9.4	\$ 113.1
TCO (Pool)	\$ 515.3	\$ 515.3	\$ 515.3	\$ 695.7	\$ 695.7	\$ 695.7	\$ 695.7	\$ 695.7	\$ 695.7	\$ 695.7	\$ 695.7	\$ 695.7	\$ 7,807.3
TETCO SCT Long Haul	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.0	\$ 18.0	\$ 215.8
AGT M3	\$ 126.8	\$ 126.8	\$ 126.8	\$ 126.8	\$ 126.8	\$ 126.8	\$ 126.8	\$ 126.8	\$ 126.8	\$ 126.8	\$ 126.8	\$ 126.8	\$ 1,521.5
TETCO CDS Long Haul	\$ 1,001.6	\$ 1,001.4	\$ 1,001.4	\$ 1,001.4	\$ 1,001.4	\$ 1,001.4	\$ 1,001.4	\$ 1,001.4	\$ 1,001.4	\$ 1,001.4	\$ 1,001.4	\$ 1,001.4	\$ 12,017.1
Dominion	\$ 7.1	\$ 7.1	\$ 7.1	\$ 7.1	\$ 7.1	\$ 7.1	\$ 7.1	\$ 7.1	\$ 7.1	\$ 7.1	\$ 7.1	\$ 7.1	\$ 85.6
Dawn via Waddington	\$ 22.6	\$ 22.6	\$ 22.6	\$ 22.6	\$ 22.6	\$ 22.6	\$ 22.6	\$ 22.6	\$ 22.6	\$ 22.6	\$ 22.6	\$ 22.6	\$ 271.8
Dawn via PNGTS	\$ 996.8	\$ 996.8	\$ 996.8	\$ 996.8	\$ 996.8	\$ 996.8	\$ 996.8	\$ 996.8	\$ 996.8	\$ 996.8	\$ 996.8	\$ 996.8	\$ 11,962.0
TGP Long Haul	\$ 459.0	\$ 459.0	\$ 459.0	\$ 459.0	\$ 459.0	\$ 459.0	\$ 459.0	\$ 459.0	\$ 459.0	\$ 459.0	\$ 459.0	\$ 459.0	\$ 5,507.6
TGP ConneXion	\$ 214.8	\$ 214.8	\$ 214.8	\$ 214.8	\$ 214.8	\$ 214.8	\$ 214.8	\$ 214.8	\$ 214.8	\$ 214.8	\$ 214.8	\$ 214.8	\$ 2,577.6
Portable LNG													
Grand Total													\$ 63,155.1

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5066
In Re: 2020 Annual Gas Cost Recovery Filing
Responses to the Division's Second Set of Data Requests
September 3, 2020

Division 2-7

Request:

Reference Attachment GSP-1, page 5. Please reconcile each line item with the contracts identified in Exhibit 12 of the LRP.

Response:

Please see the table below. The following line items do not appear on the schematic AGT Citygate, Const Summer Refill, Const Winter Refill, Nextera Summer Refill, and Proposed Summer Refill. These items are not on the schematic because the schematic includes pipeline and underground storage contracts. These items are supply deals at citygates or LNG sites.

<u>Label on GSP-1, page 5</u>	<u>Contracts from Exhibit 12 in LRP</u>
AGT Citygate	Not on schematic
AIM at Ramapo	Algonquin Contract #510801
Const Summer Refill	Not on schematic
Const Winter Refill	Not on schematic
Dawn via IGTS	Union Contract #M12164, TransCanada Contract #42386, Iroquois Contract #50001, Tennessee Contract #95345
Dawn via PNGTS	Union Contract #M12274, TransCanada Contracts #60659 & 58577, PNGTS Contract #225805, Tennessee Contracts #330580 & #62930
Dominion SP	Dominion Contract #100118, Texas Eastern Contract #330845, Algonquin Contract #96004SC
Dracut Supply	Tennessee Contract #349449
Everett Long-Term	Tennessee Contracts #330580 & #330581
Everett Swing	Tennessee Contracts #330580 & #330581
Millennium	Millenium Contract #210165
Niagara	Tennessee Contract #39173
TCO Appalachia	Columbia Contracts #31523 & #31524, Algonquin Contract #9001
Tetco M3	Algonquin Contracts #90107, #93001ESC & 93011E
Transco Leidy	Transco Contract #9081767, Algonquin Contracts #90106 & #96004SC
Waddington	Iroquois Contract #50001
Nextera Summer Refill	Not on schematic
Tetco M2 CDS	Tetco Contract 800303, Algonquin Contract #93011E
Tetco M2 SCT	Tetco Contract 800156, Algonquin Contract #93001ESC
TGP Z4 Cnx	Tennessee Contracts #64025 & #64026
TGP Z4 LH	Tennessee Contract #1597
Proposed Summer Refill	Not on schematic

Division 2-8

Request:

Reference Attachment GSP-1, page 10. Please provide all calculations supporting each of the costs and volumes reflected in the Attachment. The calculations should include/identify the:

- a. Applicable pipeline contracts as identified in Exhibit 13 of the 2020/21 to 2024/25 LRP;
and
- b. Applicable pipeline/supply contract billing determinants, rates, and costs by rate schedule/zone.

Response:

The costs included in GSP-1, page 10 are calculated within the SENDOUT model environment.

The Company has replicated the storage fixed cost calculations in Attachment DIV 2-8.

The following information is included in the Excel version of Attachment DIV 2-8:

- Columns A through F: contain billing determinants and storage labels, which correspond to Exhibit 13;
- Columns I through T: contain the monthly D1 demand rates, which apply to the Maximum Daily Withdrawal Quantity ("MDWQ") for each contract;
- Columns V through AG: contain the monthly D2 demand rates, which apply to the Annual Storage Quantity for each contract;
- Columns AI through AT: contain the monthly product of the D1 Rates and MDWQ;
- Columns AV through BG: contain the monthly product of D2 Rate and Annual Quantity.
- Column G contains the total storage fixed costs for Gas Year 2020/21, generated by summing Columns AI through AT and Columns AV through BG.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5066
In Re: 2020 Annual Gas Cost Recovery Filing
Responses to the Division's Second Set of Data Requests
September 8, 2020

Attachment DIV 2-8

CONFIDENTIAL

Please see the confidential version of Attachment DIV 2-8 in Excel version.

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5066
In Re: 2020 Annual Gas Cost Recovery Filing
Responses to the Division's Second Set of Data Requests
September 3, 2020

Redacted
Division 2-9

Request:

Reference Attachment GSP-1, page 11, Everett Supply Deal and Deal 2. Please identify the applicable billing determinants and rates.

Response:

Please see the table below for the billing determinants and rates associated with Everett Supply Deal and Deal 2. Everett Supply Deal 2 is an estimate.

Supply Deal	MSQ	Demand Rate (\$/Dth)	Total (\$)
Everett Supply Deal	651,000		
Everett Supply Deal2	100,000		

This response contains commercially sensitive and confidential information; therefore, the Company is providing confidential and redacted versions of this response, subject to a Motion for Protective Treatment.

Division 2-10

Request:

Reference Attachment GSP-1, page 9. Please provide all calculations supporting each of the costs and volumes reflected in the Attachment. The calculations should include/identify the:

- a. Applicable pipeline contracts as identified in Exhibit 13 of the 2020/21 to 2024/25 LRP; and
- b. Applicable pipeline/supply contract billing determinants and rates by rate schedule/zone.

Response:

The costs included in GSP-1, page 9 are calculated within the SENDOUT model environment. The Company has replicated the transportation fixed cost calculations in the Excel version of Attachment DIV 2-10.

- Columns A through C contain model segment, path, and contract labels
- Columns F through Q contain the monthly demand rates (D1 Rates)
- Columns S through AD contain the monthly billing determinants (D1 Volumes)
- Columns AF through AQ contain the monthly product of D1 Rate and D1 Volume
- Column D contains the fixed costs for Gas Year 2020/21, generated by summing Columns AF through AQ

To enable reporting costs by Path, the Company has aligned the fixed costs of downstream Algonquin capacity to upstream paths by applying a weighting scheme. The weighting scheme does not change the total transportation fixed costs or how the Company is invoiced. It is solely in place to allow the Company to report fixed costs by Path. This the weighting scheme is applied to 9 Algonquin transport segments: A9001_P, A90106_P, A90107_P, A93011E_L_Wa, A93011E_L_We, A93011ELPrM3, A93001ESCHWa, A93001ESCLWa, and A93401S_Wa. In the SENDOUT model, fixed transportation costs are calculated by multiplying the D1 Rate with D1 Volume. The D1 Volume defaults to the maximum daily quantity (MDQ) of the transport segment unless it is manually overridden. The Company applied the weighting by overriding the D1 Volumes of the aforementioned contracts. As a result, the D1 Volumes of those contracts will not match the MDQs found in Exhibit 13. However, the D1 Volumes are used only to calculate fixed costs and do not impact the MDQ of the transport segment.

This response contains commercially sensitive and confidential information; therefore, the Company is providing confidential and redacted versions of this response, subject to a Motion for Protective Treatment.

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Attachment DIV 2-10

CONFIDENTIAL

Please see the confidential version of Attachment DIV 2-10 in Excel version.

The Company is providing the redacted version of Attachment DIV 2-10 in PDF format.

Transport Labels

Transport Segment	GSP-1, page-10 Label	Exhibit 13 Contract	Gas Year 2020/21	
				Fixed Costs (\$000s)
A510801_P	AIM	AGT 510801		2418.920
A510801_Wa	AIM	AGT 510801		2232.847
A510801_We	AIM	AGT 510801		186.072
A510801_Yank	AIM	AGT 510801		2507.172
A9001_P	TCO (Pool)	AGT 9001		3429.097
A90106_C_P	Transco	AGT 90106		1.134
A90106_C_We	Transco	AGT 90106		6.290
A90106_L_We	Storage	AGT 90106		10.930
A90106_P	Storage	AGT 90106		218.176
A90106_STR_P	Storage	AGT 90106		636.410
A90106_We	Storage	AGT 90106		9.589
A90107_P	AGT M3	AGT 90107		639.098
A93001ESCHWa	TETCO SCT Long Haul	AGT 93001ESC		34.745
A93001ESCLWa	TETCO SCT Long Haul	AGT 93001ESC		32.192
A93001ESCM3H	AGT M3	AGT 93001ESC		0.000
A93001ESCM3L	AGT M3	AGT 93001ESC		0.000
A93011E_H_Pr	TETCO CDS Long Haul	AGT 93011E		0.000
A93011E_H_Wa	TETCO CDS Long Haul	AGT 93011E		0.000
A93011E_H_We	TETCO CDS Long Haul	AGT 93011E		0.000
A93011E_L_Pr	TETCO CDS Long Haul	AGT 93011E		0.000
A93011E_L_Wa	TETCO CDS Long Haul	AGT 93011E		2946.934
A93011E_L_We	TETCO CDS Long Haul	AGT 93011E		861.987
A93011EHPrM3	AGT M3	AGT 93011E		0.000
A93011ELPrM3	AGT M3	AGT 93011E		882.384
A933005_V	Storage	AGT 933005		102.751
A933005_Wa	Storage	AGT 933005		83.537
A933005_We	Storage	AGT 933005		25.482
A93401S_Wa	Storage	AGT 93401S		26.896
A96004SCC_Wa	Transco	AGT 96004SC		47.762
A96004SCL_Wa	Dominion	AGT 96004SC		22.149
A98105_P	Storage	AGT 98105		872.331
A98105_We	Storage	AGT 98105		8.146
A9S100S_Wa	Storage	AGT 9S100S		7.713
A9W009E_H_P	Storage	AGT 9W009E		0.000
A9W009E_H_We	Storage	AGT 9W009E		0.000
A9W009E_L_P	Storage	AGT 9W009E		674.252
A9W009E_L_We	Storage	AGT 9W009E		28.150
AIM_Yank2Wes	Yankee Interconnect	Yankee Interconnect		
C31523_Broad	TCO (Pool)	TCO 31523		1345.080
C31524_FSS	Storage	TCO 31524		0.000
C31524_Maum	TCO (Pool)	TCO 31524		3033.155
C9631_CH	Storage	TCO 9631		341.078
Cumber_PLNG	Portable LNG	Portable LNG		
DT1100118_ST	Dominion	DETI 100118		0.000
DT1100118_Wa	Dominion	DETI 100118		26.857
DT1700086	Storage	DETI 700086		42.948
DT1700087	Storage	DETI 700087		110.944
IGT_50001	Dawn via Waddington	IGT 50001		63.582
Manchest_Lat	Manchester Lateral	Manchester Lateral		2517.098
ML_214129	AIM	MPL 214129		1737.352
NGLNG_LIQUEF	LNG	LNG		
OldMill_PLNG	Portable LNG	Portable LNG		

REDACTED VERSION

Transport Labels			6460.227
PN_210203	Dawn via PNGTS	PNGTS 210203	
ProvAGT2LNG	LNG	LNG	
ProvTGP2LNG	LNG	LNG	
T_62930_P	Dawn via PNGTS	TGP 62930	179.775
T_62930_V	Dawn via PNGTS	TGP 62930	119.884
T_95345_V	Dawn via Waddington	TGP 95345	76.948
T10807_V_Z6	Storage	TGP 10807	949.299
T1597_P	TGP Long Haul	TGP 1597	0.000
T1597_V	TGP Long Haul	TGP 1597	0.000
T1597STR_IN	TGP Long Haul	TGP 1597	5507.586
T330580_VZ6D	Dawn via PNGTS	TGP 330580	714.202
T330580_VZ6E	Everett	TGP 330580	510.144
T330581_PZ6E	Everett	TGP 330581	765.216
T349449	Dracut	TGP 349449	1020.288
T39173_V_Z5	Niagara	TGP 39173	82.103
T64025_P	TGP ConneXion	TGP 64025	0.000
T64025_V	TGP ConneXion	TGP 64025	0.000
T64025STR_IN	TGP ConneXion	TGP 64025	1425.348
T64026_P	TGP ConneXion	TGP 64026	0.000
T64026_V	TGP ConneXion	TGP 64026	0.000
T64026STR_IN	TGP ConneXion	TGP 64026	1152.293
TC_42386	Dawn via Waddington	TCPL 42386	96.335
TC_58577	Dawn via PNGTS	TCPL 58577	3684.965
Te330844_Han	Storage	TET 330844	0.000
Te330844_Lam	Storage	TET 330844	434.733
Te330845_Han	Dominion	TET 330845	0.000
Te330845_Lam	Dominion	TET 330845	36.608
Te330867_Lam	Storage	TET 330867	58.887
Te330870_Lam	Storage	TET 330870	72.432
Te330907_Lam	Storage	TET 330907	17.963
Te331722_Han	Storage	TET 331722	0.000
Te331722_Lam	Storage	TET 331722	48.284
Te331801_Han	Storage	TET 331801	0.000
Te331801_Lam	Storage	TET 331801	6.948
Te331802_Han	Storage	TET 331802	0.000
Te331802_Lam	Storage	TET 331802	16.446
Te331819_Han	Storage	TET 331819	0.000
Te331819_Lam	Storage	TET 331819	417.655
Te800156_ELA	TETCO SCT Long Haul	TET 800156	13.238
Te800156_ETX	TETCO SCT Long Haul	TET 800156	3.785
Te800156_Han	TETCO SCT Long Haul	TET 800156	0.000
Te800156_Lam	TETCO SCT Long Haul	TET 800156	105.042
Te800156_STX	TETCO SCT Long Haul	TET 800156	16.467
Te800156_WLA	TETCO SCT Long Haul	TET 800156	10.283
Te800303_ELA	TETCO CDS Long Haul	TET 800303	664.694
Te800303_ETX	TETCO CDS Long Haul	TET 800303	230.084
Te800303_M2H	TETCO CDS Long Haul	TET 800303	0.000
Te800303_M2L	TETCO CDS Long Haul	TET 800303	5691.626
Te800303_STI	TETCO CDS Long Haul	TET 800303	0.000
Te800303_STX	TETCO CDS Long Haul	TET 800303	998.190
Te800303_WLA	TETCO CDS Long Haul	TET 800303	623.577
Te800440_Han	Storage	TET 800440	35.736
Te800440_Lam	Storage	TET 800440	47.559
Tr9081767_Ce	Transco	TRA 9081767	57.961
U_M12164	Dawn via Waddington	UN M12164	34.890
U_M12274	Dawn via PNGTS	UN M12274	802.917

Division 2-11

Request:

Reference the Commodity line item reflected in Attachment GSP-1, pages 3,5, 9, and 14. Please reconcile these line items. Include the applicable pipeline contracts from Exhibit 13 of the LRP.

Response:

The TOTAL COMMODITY line on GSP-1, page 3 contains the delivered cost of gas at the citygate. It includes the cost of flowing gas purchases, the costs of storage withdrawals, and all the fuel and transportation rates incurred to deliver the gas to the citygate.

In contrast, the commodity costs outlined on page 5 are costs of gas at the receipt point that are flowed to the citygate. Page 5 does not include the cost of gas withdrawn from storage. Please see below for a table relating commodity line items from GSP-1, page 1, page 3 and page 5.

Commodity Costs (\$ 000s)	
Total Commodity Costs (Page 1 / Page 5)	73,181.90
Total Storage Withdrawal Value (Page 1)	9,790.40
Total Transportation Variable Costs (Page 1)	3,216.80
Total Storage Variable Costs (Page 1)	245.6
TOTAL COMMODITY (Page 3)	86,434.70

GSP-1, pages 9 and 14 do not contain Commodity line items. Page 9 contains Transportation Fixed Costs and page 14 contains volumes only.

Attachment DIV 2-11 contains a mapping of contracts to the labels found on GSP-1, page 3 and page 5. A transportation contract can be associated with multiple receipt points and paths and, as such, it is not possible to replicate the variable costs calculations outside the SENDOUT model environment.

Exhibit 13	GSP-1, page 3 (Receipt Point / Storage)	GSP-1, page 5 (Receipt Point)
AGT 510801	AIM	Millennium
AGT 510801	AIM	AIM at Ramapo
AGT 9001	TCO Appalachia	TCO Appalachia
AGT 90106	Dominion / Transco Leidy	Transco Leidy
AGT 90106	Storage Withdrawals	N/A
AGT 90107	AGT M3	Tetco M3
AGT 93001ESC	TETCO SCT Long Haul	Tetco M2 SCT
AGT 93001ESC	AGT M3	Tetco M3
AGT 93011E	TETCO CDS Long Haul	Tetco M2 CDS
AGT 93011E	AGT M3	Tetco M3
AGT 933005	Storage Withdrawals	N/A
AGT 93401S	Storage Withdrawals	N/A
AGT 96004SC	Dominion / Transco Leidy	Transco Leidy
AGT 96004SC	Dominion / Transco Leidy	Dominion SP
AGT 9B105	Storage Withdrawals	N/A
AGT 9S100S	Storage Withdrawals	N/A
AGT 9W009E	Storage Withdrawals	N/A
AGT Citygate	City Gate	AGT Citygate
DETI 100118	Dominion / Transco Leidy	Dominion SP
DETI 300168	Storage Withdrawals	N/A
DETI 300169	Storage Withdrawals	N/A
DETI 300170	Storage Withdrawals	N/A
DETI 300171	Storage Withdrawals	N/A
DETI 600045	Storage Withdrawals	N/A
DETI 700086	Storage Withdrawals	N/A
DETI 700087	Storage Withdrawals	N/A
IGT 50001	Dawn / Niagara / Waddington	Dawn via IGTS
LNG003	LNG Vapor	N/A
MPL 214129	AIM	Millennium
N/A	LNG Truck	Const Summer Refill
N/A	LNG Truck	Const Winter Refill
N/A	LNG Truck	Nextera Summer Refill
N/A	LNG Truck	Proposed Summer Refill
PNGTS 210203	Dawn via PNGTS	Dawn via PNGTS
TCO 31523	TCO Appalachia	TCO Appalachia
TCO 31524	TCO Appalachia	TCO Appalachia
TCO 31524	Storage Withdrawals	N/A
TCO 9630	Storage Withdrawals	N/A
TCO 9631	Storage Withdrawals	N/A
TCPL 42386	Dawn / Niagara / Waddington	Dawn via IGTS
TCPL 58577	Dawn via PNGTS	Dawn via PNGTS
TET 330844	Storage Withdrawals	N/A
TET 330845	Dominion / Transco Leidy	Dominion SP

Exhibit 13	GSP-1, page 3 (Receipt Point / Storage)	GSP-1, page 5 (Receipt Point)
TET 330867	Storage Withdrawals	N/A
TET 330870	Storage Withdrawals	N/A
TET 330907	Storage Withdrawals	N/A
TET 331722	Storage Withdrawals	N/A
TET 331801	Storage Withdrawals	N/A
TET 331802	Storage Withdrawals	N/A
TET 331819	Storage Withdrawals	N/A
TET 400185	Storage Withdrawals	N/A
TET 400221	Storage Withdrawals	N/A
TET 400515	Storage Withdrawals	N/A
TET 800156	TETCO SCT Long Haul	Tetco M2 SCT
TET 800303	TETCO CDS Long Haul	Tetco M2 CDS
TET 800440	Storage Withdrawals	N/A
TGP 10807	Storage Withdrawals	N/A
TGP 1597	TGP Long Haul	TGP Z4 LH
TGP 330580	Dawn via PNGTS	Dawn via PNGTS
TGP 330580	Everett	Everett Long-Term / Everett Swing
TGP 330581	Everett	Everett Long-Term / Everett Swing
TGP 349449	Dracut	Dracut Supply
TGP 39173	Dawn / Niagara / Waddington	Niagara
TGP 501	Storage Withdrawals	N/A
TGP 62918	Storage Withdrawals	N/A
TGP 62930	Dawn via PNGTS	Dawn via PNGTS
TGP 64025	TGP ConneXion	TGP Z4 Cnx
TGP 64026	TGP ConneXion	TGP Z4 Cnx
TGP 95345	Dawn / Niagara / Waddington	Dawn via IGTS
TRA 9081767	Dominion / Transco Leidy	Transco Leidy
UN M12164	Dawn / Niagara / Waddington	Dawn via IGTS
UN M12274	Dawn via PNGTS	Dawn via PNGTS