

November 25, 2020

**VIA FIRST CLASS MAIL & ELECTRONIC MAIL**

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

**RE: Docket 5079 – National Grid’s Tariff Advice Filing  
To Amend RIPUC NG-GAS-No. 101  
Response to PUC Data Request - Set 1**

Dear Ms. Massaro:

On behalf of National Grid,<sup>1</sup> enclosed is an electronic version of the Company’s response to the Public Utilities Commission’s First Set of Data Request in the above-referenced matter. This filing is also accompanied by a Motion for Protective Treatment 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). The Company seeks protection from public disclosure five studies listed in Attachments PUC 1-1-2 and 1-1-3 that contain proprietary models, data, and data analysis of third-party contractors who are engaged to conduct these studies. Accordingly, the Company has provided the PUC with one un-redacted copy of the confidential materials for its review and has otherwise included redacted copies of its response.

Thank you for your attention to this filing. If you have any questions, please contact me at 401-709-3337.

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

# Robinson+Cole

November 25, 2020

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Sincerely,

A handwritten signature in black ink that reads "Leticia Pimentel". The script is cursive and elegant.

Leticia C. Pimentel

cc: Docket 5079 Service List

**Docket No. 5079 – National Grid –Tariff Advice Filing to Amend DAC (AGT Provision) - Service List as of 11/5/2020**

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
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<b>Division of Public Utilities</b> Leo Wold, Esq. Division of Public Utilities & Carriers 89 Jefferson Boulevard Warwick, RI 02888	<a href="mailto:Leo.Wold@dpuc.ri.gov">Leo.Wold@dpuc.ri.gov</a> ;	401-780-2130
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John Bell Division of Public Utilities & Carriers	<a href="mailto:John.bell@dpuc.ri.gov">John.bell@dpuc.ri.gov</a> ;	
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<b>File an original &amp; nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	<a href="mailto:Luly.massaro@puc.ri.gov">Luly.massaro@puc.ri.gov</a> ;	401-780-2107
	<a href="mailto:Patricia.lucarelli@puc.ri.gov">Patricia.lucarelli@puc.ri.gov</a> ;	
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	<a href="mailto:Alan.nault@puc.ri.gov">Alan.nault@puc.ri.gov</a> ;	

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**

**RHODE ISLAND PUBLIC UTILITIES COMMISSION**

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The Narragansett Electric Company d/b/a National Grid Tariff Advice Filing to Amend RIPUC NG-GAS No. 101 )  
Docket No. 5079 )

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

National Grid<sup>1</sup> 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-00-00-1.3(H)(3) (Rule 1.3(H)) and R.I. Gen. Laws § 38-2-2(4)(B). The Company also hereby requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to Rule 1.3(H)(2).

**I. BACKGROUND**

On October 30, 2020, the Company filed with the PUC a tariff advice seeking approval of revisions to the Company’s gas tariff, entitled Distribution Adjustment Clause, RIPUC NG-GAS No. 101. On November 25, 2020 the Company filed its response to the PUC’s First Set of Data Requests relating to the tariff advice. The Company’s response to Data Request PUC 1-1 contains information of which the Company now seeks protective treatment. Specifically, Attachments PUC 1-1-2 and 1-1-3 contains information regarding past and ongoing studies relating to the decarbonization of natural gas that are not known to the public. The Company is seeking protective treatment with respect to five specific studies, one listed in Attachment PUC

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

1-1-2 and four in Attachment PUC 1-1-3, because these five studies contain proprietary models, data, and data analysis of third-party contractors who are engaged to conduct these studies. Therefore, the Company requests that, pursuant to Rule 1.3(H), the PUC afford confidential treatment to the five studies included in Attachments PUC 1-1-2 and 1-1-3.

## **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 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**

As noted, the Company has redacted the information relating to five specific decarbonization studies because they contain proprietary models, data, and data analysis of third-party contractors who are engaged to conduct these studies. If such information were revealed, National Grid and its affiliates could be harmed in future engagements with these contractors who may be dissuaded from conducting future studies with National Grid. Moreover, the contractors who own the proprietary models, data, and data analysis would be harmed if such information were disclosed. For these reasons, the Company would not customarily release this information to the public. *See Providence Journal*, 774 A.2d at 47. The absence of confidential treatment would negatively influence the Company's ability to work with these and other similar contractors. Accordingly, the Company seeks protection for such confidential information.

### **IV. CONCLUSION**

For the foregoing reasons, the Company 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,

*Leticia Pimentel*

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Leticia C. Pimentel, Esq. (#9332)  
Robinson & Cole LLP  
One Financial Plaza, 14<sup>th</sup> Floor  
Providence, RI 02903  
401-709-3337

PUC 1-1

Request:

Please provide a list of all studies that have been performed or are scheduled to be performed by the Company and any of its National Grid affiliates in the U.S. or the U.K. which relate directly to the decarbonization of natural gas with the goal of reduced greenhouse gas emissions. Please provide the following on the list: (a) name of study, (b) date of study commencement, (c) date of study completion, (d) name of National Grid entity that sponsored, funded, and/or performed the study, (e)<sup>[1]</sup> a concise description of the study, (f) cost of the study (estimated or actual if known), and (g) a note indicating whether the study was directly funded by ratepayers or funded by the entity in the ordinary course of business (if funded by ratepayers, describe the mechanism).

Response:

Attachments PUC 1-1-1 through 1-1-3 contain the information requested on all Company-sponsored or Company-affiliated studies in the U.S. and the U.K. related to the decarbonization of natural gas and/or the gas network for the purpose of reducing greenhouse gas ("GHG") emissions with corresponding headers (a) through (g). These attachments reflect all of the studies known to the Company at this time. For several studies, certain information requested remains unknown or the Company has not been able to confirm certain information.

The Company has organized these studies into the following three categories:

- Attachment PUC 1-1-1: Pathways Studies
- Attachment PUC 1-1-2: Potential Studies
- Attachment PUC 1-1-3: Engineering Studies

National Grid's Pathways Studies consider possible future outcomes by analyzing several alternative pathways, each grounded by a different set of assumptions related to technical potential, economics, regulatory and legislative mandates, etc. National Grid's work evaluating the possible options for meeting regional or jurisdictional GHG reduction targets fall within this group of studies. The "Potential Studies" entail work aimed at determining the viability of a new service or product, the current and likely future availability of the service or product, along with the benefits imputed to customers and communities. For example, this category includes National

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<sup>1</sup> The PUC's original data request had two items designated as subsection "(d)"—the Company believes this may have been a typographical error and has, therefore, replaced the consecutive "(d)" with an "(e)" and continued with the alphabetical designation of the subsections.



Grid's efforts to assess the technical and economic potential for renewable natural gas ("RNG") feedstocks and demand across jurisdictions, as well as determining the future capacity and ability of the gas distribution system to store and distribute hydrogen in a cost competitive manner to other options.

These first two types of studies often precede – and may even be necessary prerequisites for moving forward with – the final category: Engineering Studies. A Potential Study might even be used to identify a candidate site for an Engineering Study. Once a site is identified, a front-end engineering and design ("FEED") study will be conducted to determine the feasibility and viability of a specific project site, equipment specifications, preliminary design, and preliminary budget numbers. The Engineering Study, "Newtown Creek FEED Study," listed in Attachment PUC 1-1-3, is an example of this type of work, and it is similar in estimated scope and cost to the gas decarbonization FEED study the Company proposes to develop for Rhode Island, subject to the PUC's approval of the Company's proposed tariff changes. As indicated in the Company's Tariff Advice Filing, the Company is developing a FEED study suitable for a competitive bidding process or Request for Proposals from experienced engineering consultants. The Company intends to consult with the Rhode Island Division of Public Utilities and Carriers ("Division") regarding the proposed scope of the FEED study and will present the FEED study to the PUC and to the Division for the necessary approvals.

The majority of the studies referenced were or are funded via base distribution rates (or the equivalent in the U.K.) yet are cross-jurisdictional in scope. National Grid believes it is now at a juncture where it's imperative to begin rigorously studying each of its U.S. jurisdictions individually because no two gas networks are the same, nor are the needs of the customers within these territories. This is especially true in Rhode Island, where the governor launched the Heating Sector Transformation Initiative in 2019 with the goal of reducing emissions from the heating sector. And while state-level decarbonization targets across National Grid's territories have started to converge, their economies have not. National Grid recognizes the ever-present balancing act between decarbonization and affordability is even more challenging as a result of the COVID Pandemic. Consequently, the Company will continue to carefully endeavor to propose and engage in gas decarbonization studies that not only reduce GHG emissions to further propel the state to achieve its goals, but also lead to truly affordable products and services being available to all customers in Rhode Island.

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 5079  
Attachment PUC 1-1-1

Pathways Studies

Study Name [a]	Commencement Date [b]	Completion Date [c]	Entity that Sponsored, Funded and/or Performed the Study [d]	Study Description [e]	Actual/Estimated Study Cost [f]	Funding Mechanism? [g]	Reason for Incomplete Information	Co.	Confidential? Y/N
Future of Gas: How Gas Can Support a Low Carbon Future		March 2018	<u>Sponsored:</u> National Grid UK <u>Funded:</u> National Grid UK <u>Performed:</u> National Grid UK	Report highlighted the committed actions the Company will take, and made recommendations to policy-makers to help UK transition to a low-carbon economy.		RIIO-1 (Equivalent of US Base Rates)	Unable to confirm commencement date and study cost.	UK	N
National Grid 80x50 White Paper		June 2019	<u>Sponsored:</u> National Grid USA <u>Funded:</u> National Grid USA <u>Performed:</u> National Grid USA	Northeast 80x50 Pathway white paper examining and highlighting the actions and paths the Company can and will take to reduce GHG emissions and meet state's low-carbon goals.			Unable to confirm commencement date, study cost, and funding mechanism.	US	N
Pathways to Net-zero: Decarbonizing the Gas Networks in Great Britain		October 2019	<u>Sponsored:</u> UK Energy Networks Assoc. (National Grid UK is a member) <u>Funded:</u> National Grid UK & Assoc. Members <u>Performed:</u> Navigant	Navigant report commissioned by UK Energy Networks Association focused on identifying options for decarbonizing the gas networks in Great Britain.		Base Rates	Unable to confirm commencement date and study cost.	UK	N
Aquidneck Island Long Term Gas Capacity Study	June 2020	September 2020	<u>Sponsored:</u> National Grid USA <u>Funded:</u> National Grid USA <u>Performed:</u> National Grid USA and Guidehouse	Examines potential solutions specific to Aquidneck Island to address the gas capacity constraint and vulnerability needs faced by the island. Aims to inform discussions and enable gathering of feedback from a variety of stakeholders, so National Grid can then provide a recommendation for the most prudent path forward and pursue a long-term solution for Aquidneck Island. Included an option to pursue hydrogen production and blending, with only a high-level preliminary cost estimate prepared by National Grid staff.	\$290K	Company		US	N
Future Energy Scenarios		July 2020	<u>Sponsored:</u> National Grid ESO <u>Funded:</u> National Grid ESO <u>Performed:</u> National Grid ESO	Annual long-term scenario exercise by the UK electricity system operator (ESO) to outline a range of different, credible ways to decarbonize the UK energy system working toward the country's net zero target. Includes scenarios which decarbonize gas.	No specific cost associated as it is not done as a stand alone project or study.	RIIO-1 (Equivalent of US Base Rates)	Unable to confirm commencement date.	UK	N
New York City Pathways Study	April 2018	February 2021	<u>Sponsored:</u> New York City Mayor's Office, ConEd, National Grid USA <u>Funded:</u> New York City Mayor's Office, ConEd, National Grid USA <u>Performed:</u> ICF, Energy Futures Initiative, Drexel University	Integrated system analysis of deep decarbonization scenarios for New York City through 2050. Rigorous modeling of cost and feasibility by sector. Emphasis on decarbonizing buildings / heat, with deep dive into implications per typology for energy efficiency, electrification and low carbon fuels.	\$500K	Base Rates		US	N
Enabling the Gas Markets Plan 2019/2020	2019	Ongoing	<u>Sponsored:</u> National Grid UK <u>Funded:</u> National Grid UK <u>Performed:</u> National Grid UK	The UK Enabling the Gas Market Plan is a 2-10 year look ahead that follows on from the 2018 Future of Gas report.	There is no direct cost as it is a programme of work that includes 4 employees, and released annual publications.	RIIO-1 (Equivalent of US Base Rates)		UK	N

REDACTED

Potential Studies

Study Name [a]	Commencement Date [b]	Completion Date [c]	Entity that Sponsored, Funded and/or Performed the Study [d]	Study Description [e]	Actual/Estimated Study Cost [f]	Funding Mechanism? [g]	Reason for Incomplete Information	Co.	Confidential? Y/N
Renewable Gas - Vision for a Sustainable Gas Network	Q3 2009	July 2010	<u>Sponsored:</u> National Grid USA <u>Funded:</u> National Grid USA <u>Performed:</u> National Grid USA	2010 National Grid study that looked at regional potential of RNG.	\$150K	Base Rates		US	N
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Potential for Pipeline Quality Gas from Renewable Sources	March 2010	September 2011	<u>Sponsored:</u> National Grid USA <u>Funded:</u> National Grid USA <u>Performed:</u> GTI	A study of potential and practical RNG feedstocks in New England and NY. Study modeled scenarios for RNG production from various feed stocks and economics to develop and deliver RNG to market.	\$35K	Base Rates		US	N
Hydrogen Addition to Natural Gas Feasibility Study (HyStart Report)		August 2016	<u>Sponsored:</u> National Grid Gas Transmission (UK), Northern Gas Networks <u>Funded:</u> National Grid Gas Transmission (UK), Northern Gas Networks <u>Performed:</u> DNV-GL	Hydrogen blending feasibility study.			Unable to confirm commencement date, study cost, and funding mechanism.	UK	N
Renewable Sources of Natural Gas: Supply & Emissions Reductions Assessment	April 2019	December 2019	<u>Sponsored:</u> American Gas Foundation (AGF) <u>Funded:</u> National Grid USA & AGF Members <u>Performed:</u> ICF	RNG market assessment study conducted by ICF on behalf of AGF. This is a was a national study for which Grid provided funding.	\$50K	Base Rates		US	N
Policy Options to Facilitate Renewable Natural Gas Use & Development	Q1 2019	July 2019	<u>Sponsored:</u> Downstream Initiative (DSI) <u>Funded:</u> National Grid USA & DSI Members <u>Performed:</u> DSI	Document I of IV prepared by Downstream Initiative (DSI) in Summer of 2019. National Grid is a member of DSI.	Annual dues of \$45K	Base Rates		US	N
Natural Gas Utility Business Models or Facilitating Renewable Natural Gas Development & Use	Q1 2019	July 2019	<u>Sponsored:</u> Downstream Initiative (DSI) <u>Funded:</u> National Grid USA & DSI Members <u>Performed:</u> DSI	Document II of IV prepared by Downstream Initiative (DSI) in Summer of 2019. National Grid is a member of DSI.	Annual dues of \$45K	Base Rates		US	N
Renewable Natural Gas: Potential Supply & Benefits	Q1 2019	July 2019	<u>Sponsored:</u> Downstream Initiative (DSI) <u>Funded:</u> National Grid USA & DSI Members <u>Performed:</u> DSI	Document III of IV prepared by Downstream Initiative (DSI) in Summer of 2019. National Grid is a member of DSI.	Annual dues of \$45K	Base Rates		US	N
Renewable Natural Gas Project Economics	Q1 2019	July 2019	<u>Sponsored:</u> Downstream Initiative (DSI) <u>Funded:</u> National Grid USA & DSI Members <u>Performed:</u> DSI	Document IV of IV prepared by Downstream Initiative (DSI) in Summer of 2019. National Grid is a member of DSI.	Annual dues of \$45K	Base Rates		US	N
Heating our Homes in a Net-Zero Future: Understanding What Matters to Consumers		September 2020	<u>Sponsored:</u> National Grid UK <u>Funded:</u> National Grid UK <u>Performed:</u> ICS & Economics for the Environment Consultancy Ltd (eftec)	Study focuses on understanding what really matters to consumers when thinking about how they will heat their homes in a net zero future.	\$330K		Unable to confirm commencement date and study cost.	UK	N
Hydrogen Blending Demonstration Project w/ NYSERDA and Stony Brook University	December 2019	December 2021	<u>Sponsored:</u> NYSERDA <u>Funded:</u> National Grid USA, NYSERDA <u>Performed:</u> Stony Brook/I-GIT	This project will determine the future capacity and ability gas distribution and related systems to store and distribute hydrogen in a cost competitive manner to other options.	\$445K	Base Rates		US	N

