

September 15, 2021

BY ELECTRONIC MAIL

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

**RE: Docket 5180 – 2021 Gas Cost Recovery Filing
Responses to Division Data Requests – Set 3**

Dear Ms. Massaro:

I have enclosed an electronic version of National Grid's¹ responses to the Rhode Island Division of Public Utilities and Carriers' ("Division") Third Set of Data Requests in the above-referenced matter.²

The Company is seeking confidential treatment of its responses to Division 3-1, Division 3-5, and Attachment DIV 3-5 pursuant to R.I. Gen. Laws § 38-2-2(4)(B) and Rule 810-RICR-00-00-1.3(H) of the PUC's Rules of Practice and Procedure. The Company is providing a redacted and confidential version of these responses and attachment.

The Company has also provided confidential versions of these responses and attachment to the Division pursuant to a non-disclosure agreement.

Thank you for your attention to this matter. If you have any questions, please contact me at 781-472-0531.

Very truly yours,



Raquel J. Webster

Enclosures

cc: Docket 5180 Service List
Al Mancini, Division (w/confidential versions)
Jerome D. Mierzwa, Division Consultant (w/confidential versions)

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

² Per Commission counsel's update on October 2, 2020, concerning the COVID-19 emergency period, the Company is submitting an electronic version of this filing. The Company will provide the Commission Clerk with five (5) hard copies and, if needed, additional hard copies of the enclosures upon request.

**STATE OF RHODE ISLAND
RHODE ISLAND PUBLIC UTILITIES COMMISSION**

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2021 Gas Cost Recovery Filing)	Docket 5180
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**NATIONAL GRID’S MOTON 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 this proceeding, as permitted by Rule 810-RICR-00-00-1.3(H) of the PUC’s Rules of Practice and procedure (Rule 1.3(H)) and R.I. Gen. Laws § 38-22(4)(B). The Company also 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 September 3, 2021, the Rhode Island Division of Public Utilities and Carriers (Division) served its third set of data requests upon the Company in this matter. The Company has completed its responses to the Division’s third set of data requests contemporaneously with the filing of this motion. The Company’s responses to data requests Division 3-1 and 3-5 contain certain confidential pricing information. Specifically, the Company’s response to Division 3-1 contains confidential demand charge pricing under certain of the Company’s gas supply contracts with counterparties. Similarly, Attachment DIV 3-5 is a transaction confirmation relating to a supply agreement between the Company and Constellation that contains confidential

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

pricing information. By filing the responses, the confidential pricing terms contained in the Company's response to data request 3-1 and in Attachment DIV 3-5 would become public unless protective treatment were granted. Therefore, in accordance with Rule 1.3(H)(3), National Grid has provided a redacted public versions and confidential unredacted versions of the subject response an attachment pursuant to Rule 1.3(H).

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 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*, 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 pricing information contained in the Company's response to Division 3-1 and in Attachment DIV 3-5 is confidential and commercially sensitive 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 from gas suppliers in the future, thereby causing substantial competitive harm to the Company. Further, any decision by suppliers to offer less favorable pricing to the Company in the future could ultimately have a negative impact on the Company's customers. Accordingly, National Grid requests that the PUC grant protective treatment of its response to Division data request 3-1 and Attachment DIV 3-5, and that the PUC preliminarily grant the Company's request for confidential treatment pursuant to Rule 1.3(H)(2) pending a final decision with respect to this motion.

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, appearing to read "Raquel Webster".

Raquel J. Webster, Esq. (Bar #9064)
40 Sylvan Road
Waltham, MA 02451
Tel. 781-472-0531
Raquel.Webster@nationalgrid.com;

Dated: September 15, 2021

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

September 15, 2021
Date

Docket No. 5180 – National Grid – 2021 Annual Gas Cost Recovery Filing (GCR) - Service List as of 8/5/2021

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The Narragansett Electric Company
d/b/a National Grid
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In Re: 2021 Annual Gas Cost Recovery Filing
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Issued on September 3, 2021

Redacted
Division 3-1

Request:

Reference Attachment DIV 1-4.

- a. Page 1. Please identify the monthly charges and billing determinants associated with this contract by component (including FT costs) for the period August 2020 through July 2021; and
- b. Pages 1-38. Please explain how each component of the costs associated with each of these contracts (including FT costs) were/are recovered from GCR, FT-2, and capacity-assigned FT-1 customers during the period November 2020 through October 2021. If costs associated with these contracts were not recovered from FT-2 or capacity-assigned FT-1 customers, explain why this is reasonable.
- c. Page 8. Please explain whether the Company exercised its right to terminate the contract; and
- d. Page 20. Please identify the contract under which the supplies are delivered.

Response:

- a. The table below summarizes the transactions provided in response to Division 1-4, including the Gas Supplier, term of the transaction, MDQ and total demand charges applicable under each transaction. The Company has provided total demand charges because each of these transactions were for terms greater than one month, and several of these transactions traversed the period of August 2020 through July 2021.

Gas Supplier	Term	Maximum Daily Quantity (dth)	Total Demand Charge	Recovery
Constellation LNG, LLC	11/1/21-3/31/22	14,100	██████████	Reallocated to the DAC
Constellation LNG, LLC	4/1/21-11/30/21	6,000	██████████	GCR / FT-1 Storage & Peaking / FT-2 Demand
Constellation LNG, LLC	12/1/20-3/31/21	19,950	██████████	GCR / FT-1 Storage & Peaking / FT-2 Demand & Partially reallocated to the DAC
Constellation LNG, LLC	12/1/20-3/31/21	5,000	██████████	Reallocated to the DAC
Constellation LNG, LLC	12/1/20-3/31/21	20,000	██████████	GCR / FT-1 Storage & Peaking / FT-2 Demand
Nextera Energy Marketing, LLC	4/1/21-11/30/21	2 Trucks Per Day	██████████	GCR / FT-1 Storage & Peaking / FT-2 Demand

Redacted

Division 3-1, page 2

- b. As shown in the table presented in subpart (a) of this response, each of the components of the costs associated with each of these contracts are recovered either from (1) all customers through the System Pressure component of the Distribution Adjustment Charge; or (2) from sales customers through the GCR and transportation customers (FT-1 and FT-2) through the FT-1 Storage & Peaking Charge and FT-2 Demand Rate. response..
- c. As a result of Seller having entered into a negotiated rate agreement with Algonquin for service during the second delivery period that was acceptable to the Company in order to continue access to this firm gas supply for the extended period, the Company determined that it would not exercise its right to terminate this agreement.
- d. The Company is able to reliably transport supplies from the facility owned by Constellation LNG, LLC at Everett, MA to its city-gates on each contract with Tennessee Gas Pipeline Company that lists this facility as a primary receipt meter. The firm transportation agreements with Tennessee Gas Pipeline Company that include Everett, MA as a primary point of receipt are 330580 and 330581.

Division 3-2

Request:

Reference the Attachment DIV 1-6-1, page 135.

- a. Please update this exhibit to reflect the most recent data available; and
- b. Please provide an explanation and calculation showing how the release percentages were determined.

Response:

- a. Please see Attachment DIV 3-2a for the most recent data reflecting the September 2021 pools.
- b. Please see the Attachment DIV 3-2b showing the calculations described below.

There are three pages in the attachment. The first page is the 'Path' page, which illustrates how the Company allocates the paths in the portfolio. There are three sections; transportation, storage, and peaking. Within the transportation section, there are four paths, which the Company does not release: Niagara, Dawn via Waddington, Transco and Eastern. The Company also does not release storage and peaking. The total of the assets in the portfolio is 413,368, shown on this page.

The next page shows the Releases by Contract, exactly as shown in Attachment DIV 3-2a.

The third page shows the formulas from the Release by Contract page.

The Company takes the Peak Day portfolio City gate quantity for transportation assets, which total 214,067 dts/day and allocates each of the nine city gate release paths by a percentage of the total. For example, the TGP Long Haul path represents 29,335 dts/day to the gate or 13.7% of the total. The Company then takes the pool total of each marketer and applies that percentage to marketer pool to determine capacity release for that path. In this example, shown in aggregate, the four marketers would receive 5,312 dts/day on this path, or 13.7% multiplied by 38,765. The Company does this for each of the listed paths.

Where there are upstream contracts involved, on the Dawn via PNGTS path for example, the Company allocates a portion of the upstream assets on PNGTS, TCPL and Enbridge based on the MDQ of each segment. On the TCPL path, the formula shows

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Division 3-2, page 2

29,058/29,000 which represents the MDQ of the TCPL contract divided by the total PNGTS contract. The same type of formula is shown on the Enbridge path, 29,056/29,000, to reflect how much of the path is to be released to the marketers.

**National Grid Rhode Island
Customer Choice Proposed Releases
2021/22**

Paths	Peak Day City Gate MDQ (Dth/day)	Contract	Release % of Design Day Quantity	Release Volume (Dth/day)	City Gate Release (Dth/day)
TGP Long Haul	29,335	TGP 1597	13.7%	5,312	5,312
TGP ConneXion	11,600	TGP 64026	5.4%	2,101	2,101
Dawn via PNGTS	29,000	PNGTS 233317	13.5%	5,252	
		TCPL 64273	13.6%	5,262	
		ENBRIDGE M12274	13.6%	5,262	
		TGP 62930	13.5%	5,252	5,252
AIM	18,000	MPL 210165	4.2%	1,630	
		AGT 510801	8.4%	3,260	3,260
TETCO CDS Long Haul	45,934	TETCO 800303	21.5%	8,318	
		AGT 93011E	21.5%	8,318	8,318
		AGT 510985	21.5%	8,318	
TCO Appalachia	40,000	TCO 31524	18.7%	7,244	
		AGT 90106	18.7%	7,244	7,244
		AGT 510985	18.7%	7,244	
AGT M3	18,099	AGT 93011E	6.7%	2,578	2,578
		AGT 510985	8.5%	3,278	
		AGT 90107	1.8%	699	699
Dracut	20,000	TGP 62930	9.3%	3,622	3,622
TETCO SCT Long Haul	2,099	TETCO 800156	1.0%	380	
		AGT 93001ESC	1.0%	380	380

Customer Choice Design Day Transportation Requirement

38,765

*Based on September 2021 Pools

**National Grid Rhode Island
Customer Choice Capacity Allocation**

2021/22

Paths	Peak Day City Gate MDQ (Dth/day)	City Gate Contracts	Upstream	Percent of Portfolio
TGP Long Haul	29,335	TGP 1597		7.1%
TGP ConneXion	11,600	TGP 64025, TGP 64026		2.8%
Dawn via PNGTS	29,000	TGP 62930, TGP 330580	Enbridge M12274, TCPL 64273, PNGTS 233317	7.0%
AIM	18,000	AGT 510801	MPL 210165	4.4%
TETCO CDS Long Haul	45,934	AGT 93011E	TETCO 800303	11.1%
TCO Appalachia	40,000	AGT 90107, AGT 90106, AGT 9001	TCO 31524, TCO 31523	9.7%
AGT M3	18,099	AGT 93011E, AGT 90106, AGT 93401S, AGT 90107, AGT 9001		4.4%
Dracut	20,000	TGP 349449		4.8%
TETCO SCT Long Haul	2,099	AGT 93001ESC	TETCO 800156	0.5%
Niagara	1,067	TGP 39173		0.3%
Dawn via Waddington	1,000	TGP 95345	Enbridge M12164, TCPL 42386, IGTS 50001	0.2%
Transco	1,240	AGT 90106, AGT 96004SC	Transco 9081767	0.3%
Eastern	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%

**National Grid Rhode Island
Customer Choice Proposed Releases
2021/22**

Paths	Peak Day City Gate MDQ (Dth/day)	Contract	Release % of Design Day Quantity	Release Volume (Dth/day)	City Gate Release (Dth/day)
TGP Long Haul	29,335	TGP 1597	13.7%	5,312	5,312
TGP ConneXion	11,600	TGP 64026	5.4%	2,101	2,101
Dawn via PNGTS	29,000	PNGTS 233317	13.5%	5,252	
		TCPL 64273	13.6%	5,262	
		ENBRIDGE M12274	13.6%	5,262	
		TGP 62930	13.5%	5,252	5,252
AIM	18,000	MPL 210165	4.2%	1,630	
		AGT 510801	8.4%	3,260	3,260
TETCO CDS Long Haul	45,934	TETCO 800303	21.5%	8,318	
		AGT 93011E	21.5%	8,318	8,318
		AGT 510985	21.5%	8,318	
TCO Appalachia	40,000	TCO 31524	18.7%	7,244	
		AGT 90106	18.7%	7,244	7,244
		AGT 510985	18.7%	7,244	
AGT M3	18,099	AGT 93011E	6.7%	2,578	2,578
		AGT 510985	8.5%	3,278	
		AGT 90107	1.8%	699	699
Dracut	20,000	TGP 62930	9.3%	3,622	3,622
TETCO SCT Long Haul	2,099	TETCO 800156	1.0%	380	
		AGT 93001ESC	1.0%	380	380

Customer Choice Design Day Transportation Requirement

38,765

*Based on September 2021 Pools

National Grid Rhode Island
Customer Choice Proposed Releases
2021/22

Paths	Peak Day City Gate MDQ (Dth/day)	Contract	Release % of Design Day Quantity	Release Volume (Dth/day)	City Gate Release (Dth/day)
TGP Long Haul	29335	TGP 1597	=B7/(SUM(\$B\$7:\$B\$26))	=ROUND(\$E\$29*D7,0)	=E7
TGP ConneXion	11600	TGP 64026	=B8/(SUM(\$B\$7:\$B\$26))	=ROUND(\$E\$29*D8,0)	=E8
Dawn via PNGTS	29000	PNGTS 233317	=B9/(SUM(\$B\$7:\$B\$26))	=ROUND(\$E\$29*D9,0)	
		TCPL 64273	=(29058/29000)*D9	=ROUND(\$E\$29*D10,0)	
		ENBRIDGE M12274	=(29056/29000)*D9	=ROUND(\$E\$29*D11,0)	
		TGP 62930	=D9	=ROUND(\$E\$29*D12,0)	=E12
AIM	18000	MPL 210165	=D14/2	=ROUND(\$E\$29*D13,0)	
		AGT 510801	=B13/(SUM(\$B\$7:\$B\$26))	=ROUND(\$E\$29*D14,0)	=E14
TETCO CDS Long Haul	45934	TETCO 800303	=B15/(SUM(\$B\$7:\$B\$26))	=ROUND(\$E\$29*D15,0)	
		AGT 93011E	=D15	=ROUND(\$E\$29*D16,0)	=E16
		AGT 510985	=D16	=ROUND(\$E\$29*D17,0)	
TCO Appalachia	40000	TCO 31524	=B18/(SUM(\$B\$7:\$B\$26))	=ROUND(\$E\$29*D18,0)	
		AGT 90106	=D18	=ROUND(\$E\$29*D19,0)	=E19
		AGT 510985	=D19	=ROUND(\$E\$29*D20,0)	
AGT M3	18099	AGT 93011E	=B21/(SUM(\$B\$7:\$B\$26))-D23	=ROUND(\$E\$29*D21,0)	=E21
		AGT 510985	=D21+D23	=ROUND(\$E\$29*D22,0)	
		AGT 90107	=7455/Paths!B24	=ROUND(\$E\$29*D23,0)	=E23
Dracut	20000	TGP 62930	=B24/(SUM(\$B\$7:\$B\$26))	=ROUND(\$E\$29*D24,0)	=E24
TETCO SCT Long Haul	2099	TETCO 800156	=(2099/B25)*D26	=ROUND(\$E\$29*D25,0)	
		AGT 93001ESC	=B25/(SUM(\$B\$7:\$B\$26))	=ROUND(\$E\$29*D26,0)	=E26

Customer Choice Design Day Transportation Req
*Based on September 2021 Pools

=28960.52+40.41+8897.92+866.11

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Division 3-3

Request:

Reference Attachment DIV 1-7, page 11, and the February 2021 dispatch spreadsheet, Tab 1. Please explain why the AGT baseload quantities differ and identify any cost implications.

Response:

Attachment DIV 1-7, page 11, shows the total estimated requirements, which are discussed during the monthly planning meeting that typically occurs ten days before the start of the month. Following the monthly planning meeting, the baseload transactions are executed. The RI Gas Summary (Feb 2021 dispatch sheet, or gas summary) shows slightly different volumes because they are adjusted for customer choice volumes for the month. There are no cost implications because marketers provide the volumes needed to serve their customers, and the Company purchased the volumes need to serve remaining customers.

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Division 3-4

Request:

Reference Division 1-17. Please provide cash-in and cash-out volumes and prices separately for FT-1 and FT-2 customers.

Response:

Please see the table below for FT-1 imbalances for the period April 2020 through July 2021, as well as the cash out index rate by month. The FT-1 imbalances are cashed out using tier rates as described in the Company's response to Division 1-17

Month	Imbalances in Dekatherms	Over Delivery Rate	Under Delivery Rate
Apr-20	(37,562.3)	\$ 1.70	\$ 1.90
May-20	(46,344.1)	\$ 1.45	\$ 1.59
Jun-20	(48,790.7)	\$ 1.54	\$ 1.64
Jul-20	20,677.4	\$ 1.69	\$ 1.87
Aug-20	(31,010.5)	\$ 1.57	\$ 1.71
Sep-20	(33,093.0)	\$ 1.45	\$ 1.75
Oct-20	(25,801.8)	\$ 2.01	\$ 4.18
Nov-20	(4,583.3)	\$ 2.16	\$ 3.00
Dec-20	115,208.2	\$ 4.28	\$ 8.07
Jan-21	109,363.7	\$ 4.82	\$ 8.17
Feb-21	114,600.5	\$ 8.40	\$ 11.56
Mar-21	62,359.3	\$ 3.44	\$ 5.97
Apr-21	12,156.1	\$ 2.38	\$ 2.86
May-21	30,091.7	\$ 2.41	\$ 2.66
Jun-21	(2,131.6)	\$ 2.94	\$ 3.98
Jul-21	8,426.2	\$ 3.24	\$ 3.44

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Division 3-4, page 2

Please see the table below for FT-2 imbalances for the period April 2020 through July 2021, as well as the cash out index rate by month. The FT-2 imbalances are separated into appropriate months using degree days, then multiplied by the average of the daily indices for the relevant month

Month	Imbalances in Dekatherms	Index Rate
Apr-20	(43,670.4)	\$ 1.70
May-20	(86,882.2)	\$ 1.45
Jun-20	(22,252.1)	\$ 1.54
Jul-20	(15,152.8)	\$ 1.69
Aug-20	(32,000.0)	\$ 1.57
Sep-20	(12,010.2)	\$ 1.45
Oct-20	(25,484.9)	\$ 2.01
Nov-20	(14,616.2)	\$ 2.16
Dec-20	(9,226.5)	\$ 4.28
Jan-21	10,479.6	\$ 4.82
Feb-21	37,562.7	\$ 8.40
Mar-21	(83,723.5)	\$ 3.44
Apr-21	(9,047.8)	\$ 2.38
May-21	(6,709.9)	\$ 2.41
Jun-21	115,361.2	\$ 2.94
Jul-21	(84,523.1)	\$ 3.24

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Redacted
Division 3-5

Request:

Reference the response to Division 1-20. Update this response to include any supplemental response and provide a copy of the contract.

Response:

In addition to the information provided in response to Division 1-20, the Company has finalized the following transaction for winter of 2021/22.

Gas Supplier	Path/Receipt Point	Gas Supply Purchase/AMA	Term	Maximum Daily Quantity (dth)	Maximum Contract Quantity (dth)	Total AMA fee	Total Demand Charge	Gas Supply Requirements	Commodity Price
Constellation LNG, LLC	Winter Vapor Purchase at Everett	Gas Supply Purchase	12/1/21-4/1/22	5,000	100,000	N/A	██████	Daily Call	██████

The Company is continuing to negotiate transactions for winter 2021/22 and will supplement this response once these transactions have been fully executed. Please see Confidential Attachment DIV 3-5.



REDACTED

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410.470.3500 Telephone
www.constellation.com

CONFIRMATION AGREEMENT

This Confirmation Agreement ("Confirmation Agreement") is subject to the NAESB Base Contract for Sale and Purchase of Natural Gas between CONSTELLATION LNG, LLC ("Seller") and The Narragansett Electric Company ("Buyer") dated December 19, 2011. This will confirm the agreement reached on **August 23, 2021** between Seller and Buyer (each individually a "Party" and collectively the "Parties") regarding the sale and purchase of natural gas on the following terms and conditions:

1. **Commercial Terms.** The "Commercial Terms" of this Confirmation Agreement are as set forth below:

Seller: CONSTELLATION LNG, LLC ✓
1310 POINT STREET
8TH FLR
BALTIMORE, MD 21231

Buyer: THE NARRAGANSETT ELECTRIC COMPANY ✓
c/o National Grid
100 Old East County Road
Hicksville, NY 11801

Delivery Period/Term December 1, 2021 through March 31, 2022 ✓

Type of Transaction: Firm (Variable) Quantity ✓

Maximum Daily Quantity: Up to 5,000 MMBtus per day ✓

Total Contract Quantity: Up to 100,000 MMBtus ✓

Delivery Points: The interconnection of the Seller's affiliate Distrigas of Massachusetts LLC's LNG Terminal ("LNG Terminal") and Tennessee Gas Pipeline facilities located in Everett, MA. MTR # 412513 ✓

Contract Price: Commodity Rate: For each MMBtu of Gas nominated by and delivered to Buyer during the Delivery Period, Buyer shall pay to Seller a Contract Price per MMBtu equal to [REDACTED] ✓

Demand Charge: In addition to the Contract Price, Buyer shall pay Seller a demand charge of [REDACTED] or [REDACTED]. Demand Charges to be paid in equal monthly installments of [REDACTED] during the four (4) months ✓

of the Delivery Period. **REDACTED**

[REDACTED]

Damages:

[REDACTED]

Other Terms:

1. All Notices and communications given in connection with Nominations pursuant to Section 4 of the Base Contract may be provided by electronic mail, 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 10:00 a.m. 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]
2. Each party represents and warrants that:
 - (i) As of the date hereof, the party that is the offeree of this option represents that it is: (i) a producer, processor, commercial user of, or a merchant handling, the commodity that is the subject of this option, or the products or byproducts thereof; and (ii) entering into this option solely for purposes related to its business as such.
 - (ii) As of the date hereof, the party that is the offeror of this option represents that it is an Eligible Contract Participant (as that term is defined in section 1a(18) of the Commodity Exchange Act, as amended, and Commodity Futures Trading Commission Regulation 1.3(m)), or (i) a producer, processor, commercial user of, or a merchant handling, the commodity that is the subject of this option, or the products or byproducts thereof; and (ii) offering or entering into this option solely for purposes related to its business as such.
 - (iii) As of the date hereof, each party represents to the other that this option, if exercised, contains a binding obligation that results in the sale of a non-financial commodity for immediate or deferred shipment or delivery.

REDACTED

3. The Parties acknowledge and agree that Seller will source the delivery of vaporized Gas hereunder from the LNG Terminal). As a result thereof, the definition of "Force Majeure" in Section 11.2 of the Base Contract shall be deleted in its entirety and replaced with the following:

Force Majeure shall include, but not be limited to, the following:
(i) physical events such as acts of God, landslides, lightning, earthquakes, fires, storms or storm warnings, such as hurricanes, which result in evacuation of the affected area, floods, washouts, explosions, breakage or accident or necessity of repairs to machinery or equipment or lines of pipe; (ii) weather related events affecting an entire geographic region, such as low temperatures which cause freezing or failure of wells or lines of pipe; (iii) interruption and/or curtailment of Firm transportation and/or storage by Transporters; (iv) acts of others such as strikes, lockouts or other industrial disturbances, riots, sabotage, insurrections or wars, or acts of terror; (v) governmental actions such as necessity for compliance with any court order, law, statute, ordinance, regulation, or policy having the effect of law promulgated by a governmental authority having jurisdiction; (vi) explosions, breakage, or accident to machinery, lines of pipe, at the LNG Terminal; (vii) the necessity of making repairs or required alterations to machinery, lines of pipe, at the LNG Terminal; (viii) unplanned outages at the LNG Terminal; (ix) an event qualifying as Force Majeure hereunder which prevents or impedes performance on the part of a third party transporting or delivering LNG to or on behalf of Seller. Seller and Buyer shall make reasonable efforts to avoid the adverse impacts of a Force Majeure and to resolve the event or occurrence once it has occurred in order to resume performance.

All provisions contained or incorporated by reference in the Base Contract will govern this Confirmation Agreement except as expressly modified herein. Any capitalized terms used herein and not defined shall have the meaning set forth in the Base Contract. In the event of a conflict between the terms and conditions of the (i) Confirmation Agreement, (ii) LNG Annex, (iii) Special Provisions, and (iv) Base Contract, the terms and conditions of the documents shall govern in the priority listed in this provision.

Please confirm that the foregoing correctly sets forth the terms and conditions of our Confirmation Agreement by returning via facsimile to the number 410-468-3540 to the attention of Operations Contract Administration.

We are pleased to have concluded this Confirmation Agreement with you and look forward to your confirmation of this Transaction.

Regards,

CONSTELLATION LNG, LLC



By: Ravi Ganti
Title: Vice President



ACKNOWLEDGED AND AGREED:

REDACTED



Eboni Troupe

THE NARRAGANSETT ELECTRIC COMPANY

By: Eboni Troupe

Title: Authorized Signatory

Division 3-6

Request:

Reference Division 1-24.

- a. Please confirm that the winter load factor of low-load factor customers would be 43.1% and 45.5% for high-load factor customers;
- b. Please confirm that the annual load factor of low-load factor customers would be 24.9% and 33.5% for high-load factor customers; and
- c. Please explain how these load factor differences justify the differential between the high- and low-load factor GCR rates.

Response:

- a. Confirmed.
- b. Confirmed.
- c. On a design day or during a design winter, lower load factor customers utilize a greater relative share of their annual design capacity than higher load factor customers, who exhibit a flatter load curve throughout the year. In terms of cost causation, this relationship supports the conclusion that Low Load Factor customers should pay a higher proportional share of the fixed demand costs included in the GCR because these customers cause the Company to incur relatively more of these fixed demand costs in order to meet total gas supply requirements on a peak day or peak season. Therefore, low load factor customers pay a higher fixed GCR charge than high load factor customers, with costs allocated based on their proportionate share of peak season usage. The variable GCR charge to recover variable costs is not differentiated between high-load and low-load factor customers because these costs are incurred and recovered on a per-unit basis.

The calculation of the fixed component of high-load and low-load factor GCR rates is explained in greater detail in the Company's tariff (RIPUC NG-GAS No. 101, Section 2, Schedule A, Sheet 3.)

Division 3-7

Request:

Reference Page 22, lines 3-7 of the Gas Supply Panel testimony. Please explain why the Company did not include the Portland and Tennessee capacity in the AMA.

Response:

As the Company explains in its testimony, in order to supply the path of up to 29,000 Dth/day, the Company issued RFPs soliciting proposals for AMAs to manage both its Canadian and/or domestic transportation capacity. Through the RFP process, the Company was willing to consider AMAs that only required assignment of the Company's capacity on Enbridge and TransCanada to East Hereford as well as arrangements that included a release of the Company's capacity on the downstream Portland and Tennessee assets for deliveries into the Company's Tennessee citygate; each structure accounted for the Company's ability to assign the path to its retail choice program. Based on the responses the Company received to the RFPs and the Company's analysis of the extrinsic value of the assets, the Company determined that it would maintain access to the Portland and Tennessee capacity.

Division 3-8

Request:

Reference page 14, lines 4-11 of the Gas Supply Panel testimony.

- a. Please explain how it was determined that these four assets should be assigned to peak hour.
- b. Please explain why only a portion of the transportation contract on Tennessee with an Everett MA receipt point is included in the system pressure factor charge.

Response:

- a. The Company assigned Portable LNG supplies and associated trucking costs, a portion of the Company's transportation contract on Tennessee (Everett, MA) and associated supplies, and the Company's citygate delivered supply arrangement on Algonquin to peak hour because they are the most recent additions to the gas supply portfolio and the need for these resources was driven by the Company's peak hour analysis. The maximum daily quantity of these resources is approximately equal to the difference between: (1) forecast design hour firm throughput multiplied by twenty hours; and (2) forecast design day planning load, which includes the requirements of sales customers, FT-2 customers, and capacity-eligible FT-1 load.
- b. As explained in the Company's response to data request DIV 1-35, the Company contracted for 20,000 Dth/day of supplies at Everett pursuant to multi-year deal to meet forecast design day customer requirements. This deal was executed in advance of the Company's current design hour planning process and, therefore, is not designated on the list of the supplies allocated to the design hour for this reason.

Division 3-9

Request:

Reference Attachment DIV 1-6-1, page 135 and Exhibit 16, page 1 of the 2021/22 to 2025/26 informational Gas Long-Range Supply Plan.

- a. Exhibit 16. Please identify each contract by number reflected in each TGP and TET/AGT resource line item and the applicable MDQs.
- b. Please reconcile the contracts and MDQs identified in subpart (a) with those reflected in Attachment DIV 1-6-1.
- c. If a contract identified in subpart (a) is not assigned as reflected in Attachment DIV 1-6-1, please explain why assignment would not be reasonable.

Response:

- a. Please see Attachment DIV 3-9.
- b. Please see Attachment DIV 3-9.
- c. There are several contracts in the portfolio that Marketers do not receive as part of their capacity release from part a. There are four managed paths, which have very small Citygate quantities. Therefore, it would be inefficient for marketers to manage.

Paths	Peak Day City	City Gate Contracts
Niagara	1,067	TGP 39173
Dawn via Waddington	1,000	TGP 95345
Transco	1,240	AGT 90106, AGT 96004SC
Dominion	537	AGT 96004SC

The Company provides marketers with access to the above contracts through their managed service.

The Company also does not release contracts associated with storage on either TGP or AGT.

For management of capacity releases and for management of contracts on the marketer side, when developing the Customer Choice release program that went into effect in November 2020, the Company combined like contracts and gave out capacity on fewer contracts if possible. For example, the Company released both the Dawn via PNGTS and the Dracut path on Tennessee contract 62930.

Exhibit 16			Attachment DIV 1-6-1
			Page 135
	<i>Contract Number</i>	<i>Daily MDQ</i>	
TGP	Dawn PNGTS	330580	24,000
		62930	15,000
	Dawn Iroquois	95345	1,000
	Niagara	39173	1,067
	Zone 4	64025	5,220
		64026	6,380
		1597	29,335
	Dracut	349449	20,000
	TGP Citygate	N/A	-
	Everett Multi Year	330580	24,000
		330581	15,000
	Everett Swing	330580	24,000
		330581	15,000
	Storage	10807	10,836
	TET/AGT	M2	93011E
		93001ESC	2,384
Dominion South Point		96004SC	1,695
TCO Appalachia		9001	11,063
		90106	19,465
		90107	26,129
Transco Leidy		96004SC	1,695
		90106	19,465
AIM (Ramapo)		510801	18,000
AIM (Millennium)		510801	18,000
M3		93011E	56,035
		90106	19,465
		93401S	335
		9001	11,063
		90107	26,129
AGT Citygate		N/A	14,100
Storage		90106	19,465
		933005	2,061
	93401S	335	
	9B105	8,539	
	9S100S	187	
	9W009E	6,812	

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 5180
In Re: 2021 Annual Gas Cost Recovery Filing
Responses to the Division's Third Set of Data Requests
Issued on September 3, 2021

Division 3-10

Request:

Please explain if the Company will update its proposed GCR rates to reflect the most recent NYMEX prices.

Response:

No, the Company has no plans to update its proposed GCR factors to reflect the most recent NYMEX prices. While the NYMEX prices have increased from August 3, 2021, the Company's hedging activities reduce the impact of the NYMEX price increases such that the observed increase in NYMEX prices would not likely result in a material increase in the Company's proposed GCR factors. This is because the Company's hedges account for approximately 80 percent of its projected winter (November 2021 to March 2022) gas purchases and approximately 72 percent of its total projected gas purchase for the year (November 1 to October 31).

The Company will continue to monitor actual and projected over- or under-recovery of 2021-2022 gas costs in its monthly Deferral Report and may request to adjust its GCR factors should the projected deferrals exceed five percent of total projected gas costs pursuant to the GCR provision of its tariff.