

December 20, 2010

VIA HAND DELIVERY & ELECTRONIC MAIL

Luly E. Massaro, Division Clerk
Rhode Island Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

**RE: Complaint of Benjamin Riggs
Docket No. D-10-126**

Dear Ms. Massaro:

I have enclosed for filing five (5) copies of National Grid's responses to the Division's Second Set of Data Requests in the above-referenced matter.

This filing also contains a Motion for Protective Treatment in accordance with Rule 3(d) of the Division's Rules of Practice and Procedure and R.I.G.L. § 38-2-2. The Company seeks protection from public disclosure for customer billing records that are provided as attachments to a number of these data requests. To that end, the Company has provided the Division with one (1) copy of the confidential materials for its review, and has included redacted copies of these attachments in the filing.

Thank you for your attention to this transmittal. If you have any questions, please feel free to contact me at (401) 784-7667.

Very truly yours,



Thomas R. Teehan

Enclosure

cc: Jon Hagopian, Esq.
Steve Scialabba, Division

Certificate of Service

I hereby certify that a copy of the cover letter and / or any materials accompanying this certificate has been electronically transmitted, sent via U.S. mail or hand-delivered to the individuals listed below.



Joanne M. Scanlon

December 20, 2010

Date

**Complaint Relating to the Town of Portsmouth Generator Facility – NetMetering
Docket No. D-10-126 Updated 11/16/10**

| Parties/Address | E-mail Distribution | Phone |
|--|--|------------------------------|
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| File original and four (4) copies w/: Luly E. Massaro, Clerk Division of Public Utilities & Carriers 89 Jefferson Blvd. Warwick, RI 02888 | lmassaro@puc.state.ri.us | 401-780-2107 |
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STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
RHODE ISLAND DIVISION OF PUBLIC UTILITIES AND CARRIERS

In RE: Complaint of Benjamin Riggs

Docket No. D-10-126

**NATIONAL GRID’S REQUEST
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

National Grid ¹ hereby requests that the Rhode Island Division of Public Utilities and Carriers (“Division”) provide confidential treatment and grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by Division Rule 3(d) and R.I.G.L. § 38-2-2(4)(i)(B).

I. BACKGROUND

On December 20, 2010, National Grid filed with the Division responses to the Division’s Second Set of Data Requests in the above-referenced matter. Attachments to Responses 2-1, 2-2, 2-3, and 2-7 to National Grid’s responses contain confidential customer billing information for which National Grid is requesting confidential treatment.

II. LEGAL STANDARD

The Division's Rule 3(d) provides that access to public records shall be granted in accordance with the Access to Public Records Act ("APRA"), R.I.G.L. §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.G.L. §38-2-2(4). Therefore, to the extent that information provided to the Commission falls within one of the designated exceptions to the public records law, the Commission has the authority under the terms of APRA to deem such information to be confidential and to protect that information from public disclosure.

In that regard, R.I.G.L. §38-2-2(4)(i)(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 Company has redacted and seeks protective treatment relative to the attachments that contain customer billing information records. This information is confidential to the customers in questions and could have negative commercial impacts for those customers if it became public.

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

III. CONCLUSION

Accordingly, the Company requests that the Commission grant protective treatment to those previously identified attachments to its responses to data requests.

Respectfully submitted,

NATIONAL GRID

By its attorney,



Thomas R. Teehan, Esq. (RI Bar #4698)
National Grid
280 Melrose Street
Providence, RI 02907
(401) 784-7667

Dated: December 20, 2010

The Narragansett Electric Company
d/b/a National Grid
Docket No. D-10-126
In Re: Complaint of Benjamin Riggs
Relating to Town of Portsmouth Generator Facility – Net Metering
Division Data Requests – Set 2
Issued on November 30, 2010

Division 2-1

Request:

Are the meters used to measure electricity consumption at Portsmouth High School (“PHS”), Portsmouth Middle School (“PMS”), the Hathaway School (“HS”), and the two accounts at Portsmouth Town Hall (“PTH”) read at the same time as the meter that measures the output of the PWT? If not, provide the meter reading schedules used.

Response:

No, the meters for the at Portsmouth High School (“PHS”), Portsmouth Middle School (“PMS”), the Hathaway School (“HS”), and the two accounts at Portsmouth Town Hall (“PTH”) are not read at the same time as the PWT. The reading dates can be found in the following attachments: Attachment 1, DIV 2-1 and Attachment 2, DIV 2-1.

Prepared by or under the supervision of: Timothy Roughan

The Narragansett Electric Company
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Attachment 1, DIV 2-1

REDACTED

The Narragansett Electric Company
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Docket No. D-10-126
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Attachment 2, DIV 2-1

REDACTED

The Narragansett Electric Company
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Division 2-2

Request:

Provide the meter reading data for the PWT since March 2009. Provide the read date, meter reading in KWH, and KWH used since last read.

Response:

Meter reading data for the PWT since March of 2009 can be found on the bills on Attachment 1, DIV 2-2 and a summary of the data is included as Attachment 2, DIV 2-2.

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Attachment 1, DIV 2-2

REDACTED

The Narragansett Electric Company
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Attachment 2, DIV 2-2

REDACTED

The Narragansett Electric Company
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Division 2-3

Request:

Provide copies of the electric bills for PHS, PMS, HS, and the two accounts at PTH from March 2009 to the present? Include meter reading dates, meter reading in KWH, KWH used since last read, and the calculations of the month bill. Also show how these bills include any reductions from net metering and any credits.

Response:

Meter reading dates, meter readings in kWh, kWh used since last read, and bill calculations are all found on the bills in the following attachments: Attachment 1, DIV 2-3 (PHS), Attachment 2, DIV 2-3 (HS), Attachment 3, DIV 2-3 (PMS), Attachment 4, DIV 2-3 (PTH), and Attachment 5, DIV 2-3 (PTH-Light).

The bills from March of 2009 through December of 2009 have credits allocated to them which appear on the last page of the bill as a "transferred credit" or "net metering credit". After December of 2009 the net metering credits do not appear on the attached bills because the Town of Portsmouth began to receive net metering credits through a monthly check.

Attached is a summary of billing, identified as Attachment 6, DIV 2-3.

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Attachment 1, DIV 2-3

REDACTED

The Narragansett Electric Company
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Attachment 2, DIV 2-3

REDACTED

The Narragansett Electric Company
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Attachment 3, DIV 2-3

REDACTED

The Narragansett Electric Company
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Attachment 4, DIV 2-3

REDACTED

The Narragansett Electric Company
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Attachment 5, DIV 2-3

REDACTED

The Narragansett Electric Company
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Attachment 6, DIV 2-3

REDACTED

The Narragansett Electric Company
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Relating to Town of Portsmouth Generator Facility – Net Metering
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Division 2-4

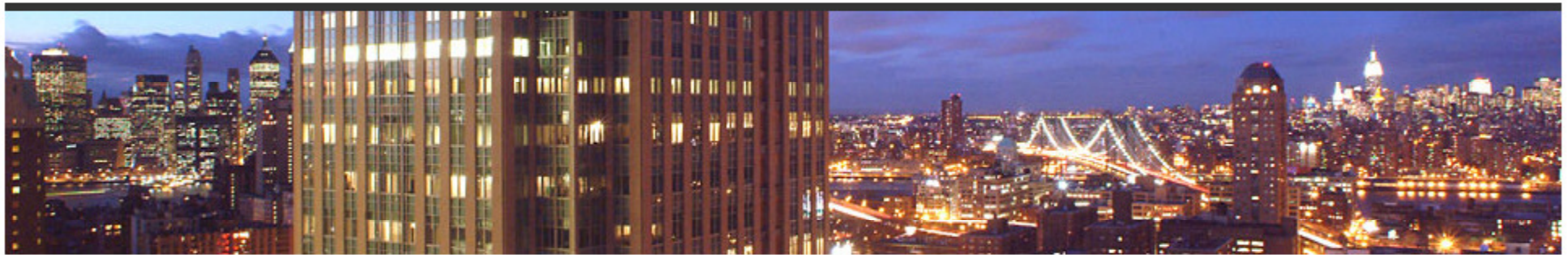
Request:

To the extent not provided above, provide the calculation of any net metering credits, including all work papers and assumptions.

Response:

The net metering calculation is included on the bills provided in Attachment 1, DIV 2-2 (PWT). The net metering credit amount is the sum of the distribution charge, transmission charge, transition charge, and standard offer multiplied by the kWh exported over the billing period. Attachment 1, DIV 2-4 provides data from our website that provides the delivery service rates. Attachment 2, DIV 2-4 provides data from our website that provides the monthly standard offer rate.

Prepared by or under the supervision of: Timothy Roughan

Address https://www.nationalgridus.com/narragansett/business/rates/4_g32.asp**Rhode Island-Electric**[Home](#)[Outage Central](#)[About Us](#)[Safety](#)[FAQ](#)[Site Help](#)[Contact Us](#)[Your Account](#)[For Your Home](#)[For Your Business](#)[Ways to Pay](#)[Rates & Pricing](#)[Energy Efficiency](#)[Energy Choice](#)[Programs & Services](#)[Economic Development](#)[Service Rates](#)[Supply Costs](#)[Small Commercial](#)[Gen'l Commercial](#)[200kW Demand](#)[3000kW Demand](#)[Other](#)

200 KW Demand (G-32)

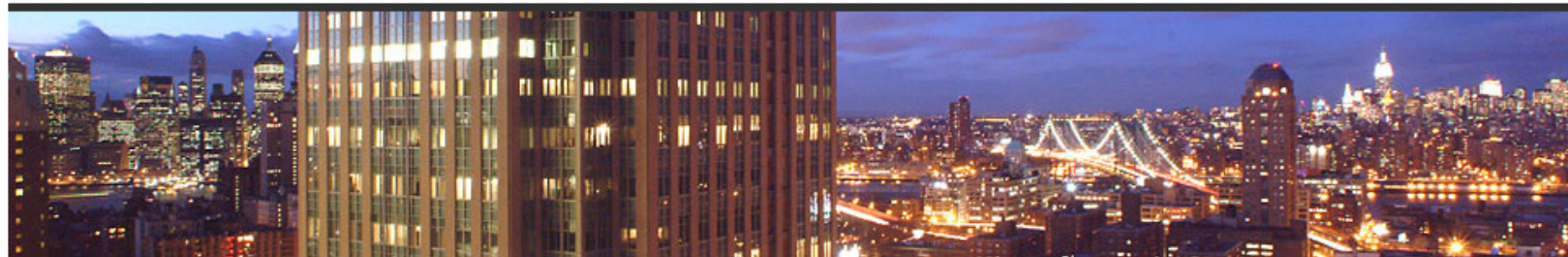
This service is primarily available for large commercial and industrial customers with a 12-month average demand of 200 kW or greater.

Rates for Delivery Service

| | |
|----------------------------|----------------|
| Customer Charge | \$750.00/month |
| Distribution Charge | |
| Demand in excess of 200 kW | \$2.00/kW |
| Energy | 0.873¢/kWh |
| Transmission Charge | |
| Demand | \$2.28/kW |
| Transmission Charge | 0.575¢/kWh |
| Transition Charge | 0.068¢/kWh |
| Conservation Charge | 0.350¢/kWh |

Related Information

[Rate Tariff](#) (pdf)

Address https://www.nationalgridus.com/narragansett/business/rates/4_standard.asp[Rhode Island-Electric](#)[Home](#)[Outage Central](#)[About Us](#)[Safety](#)[FAQ](#)[Site Help](#)[Contact Us](#)[Your Account](#)[For Your Home](#)[For Your Business](#)[Ways to Pay](#)[Rates & Pricing](#)[Energy Efficiency](#)[Energy Choice](#)[Programs & Services](#)[Economic Development](#)[Service Rates](#)[Supply Costs](#)[Standard Offer Service](#)[Last Resort Service](#)[Capacity Update](#)

Standard Offer Service

This service is available to all customers who have not chosen an alternate energy supplier.

Current Rate:

Small Customer Class (A-16, A-60, C-06, S-06, S-10, S-14):

March 1, 2010 through September 30, 2010 -- 9.532¢/kWh*

October 1, 2010 through March 31, 2011 -- 9.366¢/kWh*

Large Customer Class (G-02, B-32, G-32, B-62, G-62 and X-01):

January 1, 2010 through January 31, 2010 -- 7.891¢/kWh

February 1, 2010 through February 28, 2010 -- 8.138¢/kWh

March 1, 2010 through March 31, 2010 -- 8.344¢/kWh **

April 1, 2010 through April 30, 2010 -- 7.939¢/kWh **

May 1, 2010 through May 31, 2010 -- 7.796¢/kWh **

June 1, 2010 through June 30, 2010 -- 7.750¢/kWh **

July 1, 2010 through July 31, 2010 -- 7.019¢/kWh **

August 1, 2010 through August 31, 2010 -- 7.372¢/kWh **

September 1, 2010 through September 30, 2010 -- 6.830¢/kWh **

October 1, 2010 through October 31, 2010 -- 6.901¢/kWh **

November 1, 2010 through November 31, 2010 -- 7.148¢/kWh **

December 1, 2010 through December 31, 2010 -- 7.571¢/kWh **

* includes Standard Offer Adjustment Factor of 0.134¢/kWh and Standard Offer Service Administrative Cost Factor of 0.117¢/kWh

** includes Standard Offer Adjustment Factor of 0.144¢/kWh and Standard Offer Service Administrative Cost Factor of 0.102¢/kWh

Related Information

[Rate Tariff](#) (pdf)

[The Disclosure Label](#) (pdf)

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Division 2-5

Request:

Does NGRID have QF rates for the purchase of power from QFs? If so, please provide these rates that were in effect from March 2009 to the present, and the basis for them.

Response:

In accordance with Section III.A of the Company's Qualifying Facilities Power Purchase Rate, R.I.P.U.C. No. 2035, effective September 14, 2009 (and its predecessor tariff, R.I.P.U.C. No. 2010-A, effective January 1, 2009), the Company pays QFs not eligible for net metering at rates equal to the payments received by the Company for the sale of the QF's output into the ISO-NE administered markets for the hours in which the qualifying facility generated electricity in excess of its requirements.

The QF credits are calculated for each customer for each hour of the month. The formula used to calculate the credit is as follows:

$$\text{Monthly credit} = (\text{hourly wholesale price} + \text{congestion} + \text{Losses}) * \text{QF energy}.$$

This credit is calculated for each hour of the entire month and totaled. The hourly wholesale price is the same for each customer, however, the congestion and loss values differ by ISO-NE reliability zone and node and may be different for each customer depending on each customer's location. These values are provided by ISO-NE. The ISO-NE also provides us with a forward capacity credit, if any, by facility, and that credit is added to the total amount paid to the generator as well.

Prepared by or under the supervision of: Jeanne A. Lloyd

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Division 2-6

Request:

Does NGRID charge QFs for the delivery of their output across the NGRID distribution system. For example, assume that a QF located within the NGRID service territory interconnects at a distribution voltage (i.e., 14KV or 4Kv) and wishes to sell its output into the ISO-NE energy markets. Does NGRID charge the QF to wheel power across its distribution system to the nearest transmission node (i.e., 115 KV bus)? If so, provide the rates charged and the basis for them.

Response:

No, Narragansett Electric does not charge QFs to wheel power across its distribution system to the nearest transmission node.

Prepared by or under the supervision of: Jeanne A. Lloyd

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Division 2-7

Request:

Provide a list of all QFs that interconnect to NGRID and indicate the voltage at which they interconnect.

Response:

Please see attachment DIV 2-7.

Prepared by or under the supervision of: Timothy Roughan

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Attachment DIV 2-7

REDACTED