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February 23, 2023

VIA HAND DELIVERY & ELECTRONIC MAIL

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

**RE: Application and Statement by The Narragansett Electric Company
d/b/a Rhode Island Energy Regarding Issuance of New Long-Term Debt
Responses to Advocacy Section Data Requests – Set 2**

Dear Ms. Massaro:

On behalf of Rhode Island Energy,¹ enclosed are the Company's responses to the Advocacy Section's Second Set of Data Requests in the above-referenced matter.

Thank you for your time and attention to this matter. If you have any questions, please contact me at 401-316-7429.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Jennifer Brooks Hutchinson".

Jennifer Brooks Hutchinson

Enclosures

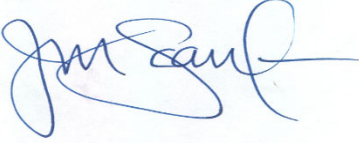
cc: Docket No. D-22-18 Service List
John Bell, Division
Gregory Schultz, Esq.

¹ The Narragansett Electric Company d/b/a Rhode Island Energy ("Rhode Island Energy" or the "Company").

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

February 23, 2023

Date

**Docket No. D-22-18 The Narragansett Electric Co. d/b/a Rhode Island Energy –
Application to Issue Long-Term Debt
Service List Updated 1/9/2023**

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AS 2-1
Follow-up to the Company's response to AS 1-6

Request:

Does the Company consider the senior notes that it has outstanding to be actively traded with issuer information publicly available and current?

Response:

Historically, the Company has made issuer information publicly available by posting their financial statements on its prior owner, National Grid USA's, website. Although the Company has complied with the requirement of public disclosure and expects to continue to make financial statements publicly available, the bonds are not actively traded primarily as a result of the size of total portfolio, the respective size of each issuance and the general illiquidity observed in the utility sector as many investors purchase with the intent to hold to maturity.

AS 2-2
Follow-up to the Company's response to AS 1-6

Request:

Does the Company anticipate issuing any debt in addition to the planned \$400 million in 2023 (AS 1-2) before January 2025?

Response:

It is plausible that the Company could issue debt in addition to the planned \$400 million issuance before January 2025. The timing of debt issuances is dependent on many factors including, but not limited to, market conditions, the interest rate environment, "blackout" windows, liquidity position and competing supply. As a result, the Company needs to maintain flexibility to be strategic in the timing of long-term debt issuances to ensure the Company is getting the most effective execution and efficient cost of debt.

AS 2-3
Follow-up to the Company's response to AS 1-6

Request:

The Company states: "Issuers that do not want to make the information publicly available may need to consider the impact of broker-dealers not being able to publish quotations on their debt securities, which would likely impact the liquidity of those debt securities and may affect investor interest in and cost of accessing the Rule 144A debt market for future debt offerings."

- a. Does the Company, as security issuer in compliance with Rule 144A, intend not to make information publicly available, and if so,
- b. Would the Company provide specifics about what it anticipates to be the likely impact on the liquidity of these debt securities?

Response:

- a. No, the Company intends to make its financial information publicly available.
- b. Since the Company anticipates making its financial information publicly available, the Company does not expect a material liquidity impact on the Company's outstanding senior notes, or any senior notes issued prospectively.

The Narragansett Electric Company
d/b/a Rhode Island Energy
Docket No. D-22-18
In Re: Application Regarding Issuance of New Long-Term Debt
Responses to Advocacy Section's Second Set of Data Requests
Issued on February 10, 2023

AS 2-4
Follow-up to the Company's response to AS 1-13

Request:

Please provide in executable form (preferably in an excel spreadsheet) the data used in the attached chart. Specifically, please provide the yields for the two RIE debt issues along with the comparable yield to obtain the G-Spread. Also, if available, please provide the yields for the two senior unsecured notes: 1) due March 15, 2040 (5.638%), and 2) due December 10, 2042 (4.170%).

Response:

Please see Attachment AS 2-4 for the yields and G-Spread for the debt issuances identified as "RIE 3.919%" due 2028, "RIE 3.395%" due 2030 and the senior unsecured note identified as "RIE 5.638%" due 2040. The Company was not able to source the data for the 4.170% note due 2042 given they are sub-index eligible, and thus do not have sufficient liquidity and trading data.

Date	G-Spread		
	RIE 3.919 08/01/2028	RIE 3.395 04/09/2030	RIE 5.638% 03/15/2040
1-Mar-22	114	120	176
2-Mar-22	108	120	179
3-Mar-22	116	119	183
4-Mar-22	117	118	183
7-Mar-22	112	126	185
8-Mar-22	117	127	185
9-Mar-22	113	134	182
10-Mar-22	110	133	190
11-Mar-22	117	134	190
14-Mar-22	121	136	189
15-Mar-22	123	142	193
16-Mar-22	117	130	194
17-Mar-22	116	121	186
18-Mar-22	116	124	187
21-Mar-22	121	123	196
22-Mar-22	122	122	185
23-Mar-22	122	126	185
24-Mar-22	120	126	185
25-Mar-22	122	122	171
28-Mar-22	121	125	171
29-Mar-22	122	128	183
30-Mar-22	130	122	183
31-Mar-22	134	121	191
1-Apr-22	136	120	188
4-Apr-22	130	127	188
5-Apr-22	129	120	188
6-Apr-22	123	120	191
7-Apr-22	117	118	190
8-Apr-22	119	127	187
11-Apr-22	116	122	193
12-Apr-22	115	128	197
13-Apr-22	117	130	195
14-Apr-22	116	132	198
18-Apr-22	124	137	195
19-Apr-22	134	126	194
20-Apr-22	141	134	205
21-Apr-22	128	131	199
22-Apr-22	136	132	204
25-Apr-22	141	138	204
26-Apr-22	148	136	207
27-Apr-22	140	129	196
28-Apr-22	147	137	196
29-Apr-22	144	134	206
2-May-22	143	138	201
3-May-22	145	139	209
4-May-22	136	140	202
5-May-22	133	141	196
6-May-22	139	143	198
9-May-22	144	136	218
10-May-22	150	149	210
11-May-22	135	150	213
12-May-22	140	144	215
13-May-22	140	151	202
16-May-22	143	153	206
17-May-22	141	148	204
18-May-22	144	149	205
19-May-22	149	152	206
20-May-22	155	152	206
23-May-22	159	148	206
24-May-22	139	148	218
25-May-22	133	149	215
26-May-22	129	145	207
27-May-22	129	145	207
31-May-22	125	125	199
1-Jun-22	119	117	197
2-Jun-22	114	118	198
3-Jun-22	114	115	191
6-Jun-22	113	117	195
7-Jun-22	113	118	202
8-Jun-22	114	116	195
9-Jun-22	115	119	195
10-Jun-22	117	121	194
13-Jun-22	125	115	193
14-Jun-22	117	112	192
15-Jun-22	126	122	194
16-Jun-22	118	130	194
17-Jun-22	119	113	194

Date	Yield		
	RIE 3.919 08/01/2028	RIE 3.395 04/09/2030	RIE 5.638% 03/15/2040
1-Mar-22	2.79	2.89	3.87
2-Mar-22	2.92	3.08	4.06
3-Mar-22	2.95	3.02	4.05
4-Mar-22	2.86	2.90	3.97
7-Mar-22	2.86	3.03	4.04
8-Mar-22	2.98	3.10	4.08
9-Mar-22	3.04	3.17	4.12
10-Mar-22	3.06	3.31	4.26
11-Mar-22	3.15	3.34	4.25
14-Mar-22	3.34	3.50	4.37
15-Mar-22	3.38	3.59	4.42
16-Mar-22	3.36	3.49	4.41
17-Mar-22	3.36	3.42	4.37
18-Mar-22	3.31	3.40	4.32
21-Mar-22	3.55	3.56	4.54
22-Mar-22	3.63	3.63	4.50
23-Mar-22	3.56	3.59	4.39
24-Mar-22	3.60	3.65	4.44
25-Mar-22	3.78	3.75	4.40
28-Mar-22	3.76	3.76	4.37
29-Mar-22	3.70	3.72	4.42
30-Mar-22	3.73	3.62	4.39
31-Mar-22	3.77	3.59	4.44
1-Apr-22	3.86	3.64	4.42
4-Apr-22	3.82	3.74	4.46
5-Apr-22	3.97	3.82	4.59
6-Apr-22	3.91	3.85	4.67
7-Apr-22	3.88	3.87	4.70
8-Apr-22	3.95	4.02	4.74
11-Apr-22	3.98	4.04	4.90
12-Apr-22	3.86	4.01	4.90
13-Apr-22	3.85	4.00	4.87
14-Apr-22	3.98	4.16	5.01
18-Apr-22	4.07	4.23	5.01
19-Apr-22	4.28	4.21	5.07
20-Apr-22	4.28	4.21	5.07
21-Apr-22	4.23	4.24	5.06
22-Apr-22	4.30	4.25	5.13
25-Apr-22	4.27	4.23	5.07
26-Apr-22	4.24	4.12	5.04
27-Apr-22	4.24	4.13	5.01
28-Apr-22	4.33	4.23	5.00
29-Apr-22	4.40	4.29	5.19
2-May-22	4.46	4.40	5.20
3-May-22	4.48	4.41	5.26
4-May-22	4.28	4.33	5.16
5-May-22	4.35	4.45	5.23
6-May-22	4.50	4.57	5.36
9-May-22	4.43	4.39	5.49
10-May-22	4.46	4.48	5.36
11-May-22	4.27	4.44	5.31
12-May-22	4.27	4.33	5.32
13-May-22	4.32	4.45	5.26
16-May-22	4.30	4.42	5.28
17-May-22	4.40	4.48	5.33
18-May-22	4.33	4.39	5.22
19-May-22	4.35	4.39	5.22
20-May-22	4.36	4.33	5.15
23-May-22	4.48	4.37	5.24
24-May-22	4.17	4.26	5.25
25-May-22	4.07	4.25	5.22
26-May-22	4.03	4.20	5.14
27-May-22	4.03	4.21	5.13
31-May-22	4.11	4.12	5.18
1-Jun-22	4.14	4.12	5.18
2-Jun-22	4.07	4.12	5.18
3-Jun-22	4.10	4.12	5.15
6-Jun-22	4.19	4.24	5.29
7-Jun-22	4.13	4.19	5.29
8-Jun-22	4.20	4.22	5.28
9-Jun-22	4.23	4.26	5.27
10-Jun-22	4.41	4.42	5.31
13-Jun-22	4.72	4.58	5.50
14-Jun-22	4.75	4.66	5.58
15-Jun-22	4.64	4.58	5.46
16-Jun-22	4.50	4.59	5.41
17-Jun-22	4.53	4.43	5.40

Source: J.P. Morgan DataQuery

