

*Via Electronic Mail and Hand Delivery*

September 26, 2019

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

Re: **Docket 4963 - 2019 Gas Cost Recovery Filing  
Responses to Division Data Requests - Set 2**

Dear Ms. Massaro:

Enclosed please find 10 copies of National Grid's<sup>1</sup> responses to the Division of Public Utilities and Carriers' (Division) Second Set of Data Requests issued on September 5, 2019 in the above referenced docket.

This filing also contains a Request for Protective Treatment of Confidential Information in accordance with Rule 810-RICR-00-001.3(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 of certain confidential and privileged information contained in the response to Division 2-2 and Attachments DIV 2-3-1 and 2-3-2. National Grid has provided the PUC with one complete unredacted copy of the confidential materials in a sealed envelope marked "**Contains Privileged and Confidential Materials – Do Not Release,**" and has included redacted copies of the materials for the public filing.

Thank you for your attention to this matter. If you have any questions, please contact me at 401-709-3359.


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

# Robinson+Cole

Luly E. Massaro, Commission Clerk  
September 26, 2019  
Page 2

Very truly yours,

A handwritten signature in blue ink, appearing to read "Steven J. Boyajian". The signature is fluid and cursive, with a large initial "S" and "B".

Steven J. Boyajian  
Enclosures

Copy to: Docket 4963 Service List  
Leo Wold, Esq.  
Al Mancini, Division  
John Bell, Division  
Jerome D. Mierzwa, Consultant to the Division

**Docket No. 4963 – National Grid – 2019 Annual Gas Cost Recovery Filing (GCR) - Service List as of 8/30/2019**

<b>Name/Address</b>	<b>E-mail</b>	<b>Phone</b>
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Jerome D. Mierzwa Exeter Associates 10480 Little Patuxent Parkway, Suite 300 Columbia, Maryland 21044	<a href="mailto:jmierzwa@exeterassociates.com">jmierzwa@exeterassociates.com</a> ;	410-992-7500
<b>File an original &amp; nine (9) copies w/:</b> Luly E. Massaro, Commission Clerk Margaret Hogan, Commission Counsel 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:Margaret.hogan@puc.ri.gov">Margaret.hogan@puc.ri.gov</a> ;	
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Office of Energy Resources Christopher Kearns Nicholas Ucci	<a href="mailto:Christopher.Kearns@energy.ri.gov">Christopher.Kearns@energy.ri.gov</a> ;	
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	<a href="mailto:Alan.nault@nationalgrid.com">Alan.nault@nationalgrid.com</a> ;	

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS**  
**RHODE ISLAND PUBLIC UTILITIES COMMISSION**

	)	
	)	
Annual Gas Cost Recovery Filing	)	Docket No. 4963
2019	)	
	)	
	)	

**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-00-001.3(H) (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 September 26, 2019, the Company submitted responses to the Second Set of Data Requests from the Division of Public Utilities and Carriers in this docket (Division Set 2). Division Set 2 includes requests that require confidential and privileged information to be included in the responses. The response to Division 2-2 and Attachments DIV 2-3-1 and 2-3-2 include confidential gas pricing information that is commercially sensitive. The Company ordinarily does not make such information public, and in some cases is contractually obligated to maintain the information as confidential. Further, such information has historically been

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

maintained as confidential when provided in PUC filings. Therefore, the Company requests that, pursuant to Rule 1.2(H), the PUC afford confidential treatment to the information contained in the response to Division 2-2 and Attachments DIV 2-3-1 and 2-3-2.

## **II. LEGAL STANDARD**

Rule 1.2(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 are deemed to be "public records," 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 APRA, the PUC has the authority 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 gas pricing information contained in the response to Division 2-2 and Attachments DIV 2-3-1 and 2-3-2 is commercially sensitive and contains confidential commercial 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 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,



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Steven J. Boyajian (#7263)  
Robinson & Cole LLP  
One Financial Plaza, Suite 1430  
Providence, RI 02903  
Tel. (401) 709-3359  
Fax. (401) 709-3399  
sboyajian@rc.com

Dated: September 26, 2019

The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4963  
2019 Annual Gas Cost Recovery Filing  
Responses to the Division's Second Set of Data Requests  
Issued September 5, 2019

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Division 2-1

Request:

Reference page 8, lines 17-19 of the testimony of witnesses Arangio and Jaffe. Please identify, by contract, those contracts that have a 1/24<sup>th</sup> hourly flow rate limit and those that have a 6 percent hourly flow rate limit.

Response:

Please see below a listing of the Company's Algonquin contracts, including the contractual maximum daily quantity (MDQ) and hourly flow rate limit for each contract.

<b>Contract</b>	<b>City Gate MDQ</b>	<b>Hourly Flow Limit</b>
9001	11,063	1/24
90106	19,465	1/24
90107	26,129	6%
933005	2,061	1/24
93001ESC	2,384	6%
93011E	56,035	6%
93401S	335	1/24
96004SC	1,695	1/24
9B105	8,539	1/24
9S100S	187	1/24
9W009E	6,812	6%
510801	18,000	1/24
510985	96,000	1/24



REDACTED

Division 2-2

Request:

Are there any incremental costs included in the proposed GCR that were incurred by Narragansett Electric as a result of the shutdown and operational problems encountered at the Providence LNG facility on January 21, 2019? If so, please identify, explain, and include a schedule showing the incremental amount and showing how it was calculated. For purposes of answering this question, the incremental costs should be the difference between what the supply costs would have been had the Providence LNG facility not shutdown or encountered vaporization problems, compared to the supply costs actually incurred on that day.

Response:

When the operational problems occurred at the Providence LNG facility, supplies that would have otherwise been dispatched from the facility had to be purchased at the Algonquin city gate. The Company purchased [REDACTED] Dth at the Algonquin city gate on the intra-day market at a price of \$[REDACTED]/Dth. Below is a comparison of the cost of the citygate supply compared to the cost of the supply had it come from the Providence LNG facility at the Company's weighted average cost of gas in inventory. The incremental cost to purchase the Algonquin citygate supply totals \$193,902.44. These costs were included in the GCR reconciliation balance, which is a component of the proposed GCR rates.

		<u>Volume (Dth)</u>	<u>Price per Dth</u>	<u>Cost</u>
a.	Algonquin Citygate	[REDACTED]	[REDACTED]	[REDACTED]
b.	NG LNG	[REDACTED]	[REDACTED]	[REDACTED]
c.	Incremental Costs (a-b)		\$ [REDACTED]	\$193,902.44

Division 2-3

Request:

Are there any other incremental costs (if any) included in the proposed GCR that relate to the Company's attempt to address the low-pressure conditions that were being experienced on Aquidneck Island on January 21, 2019 (other than incremental costs incurred as a result of the Providence LNG facility shutdown on January 21, 2019)? If so, please identify, explain, and include a schedule showing the incremental amount and showing how it was calculated.

Response:

For the month of January 2019 the Company incurred incremental costs of approximately \$80,000 to deploy portable LNG vaporization equipment on Aquidneck Island in response to the low-pressure conditions experienced on January 21, 2019. Attachment DIV 2-3-1 presents two invoices charged to the Company for these portable LNG services. These costs were included in the GCR reconciliation balance, which is a component of the proposed GCR rates.

Additionally, for the month of March 2019 the Company incurred incremental costs of approximately \$44,000 to deploy portable LNG vaporization equipment on Aquidneck Island. This deployment was intended to ensure adequate pressure in anticipation of colder than normal weather during the week of March 4, 2019. Attachment DIV 2-3-2 presents one invoice charged to the Company for these portable LNG services. These costs were inadvertently included in the Company's inventory balance and are therefore not distinctly part of the GCR reconciliation balance included in the proposed GCR rates. Instead, these costs contribute to the weighted average cost of gas used to calculate costs as LNG is withdrawn from inventory, vaporized and delivered to customers. Therefore, these costs were not charged to customers in a discrete month, but over time as LNG inventory is utilized.

Attachments DIV 2-3-1 and 2-3-2 contain commercially sensitive and confidential information that is subject to a Motion for Protective Treatment. The Company is providing confidential and redacted versions of the both attachments.

REDACTED

✓  
1/30/19  
cc



TRANSGAS Inc. • 87 Industrial Avenue East • Lowell, Massachusetts 01852-5193  
978-856-2900 • www.transgasLNG.com • email: info@transgasLNG.com

### INVOICE

✓

NATIONAL GRID  
PAUL LOIACONO-GAS CONTROL  
55 BEARFOOT ROAD  
NORTHBORO, MA 01532

DATE: 01/23/2019

INVOICE NO: 390105  
CUSTOMER NO: [REDACTED]  
PO NO:

#### PORTABLE PIPELINE BILLING

SHEET DATES  
1 OF 1 01/21/19-01/21/19

SITE(S)  
Portsmouth, RI  
Re-directed to Providence, RI

TOTAL  
AMOUNT  
[REDACTED]

[REDACTED] ✓

#### WIRE TRANSFER INFORMATION:

RECIPIENT NAME: TRANSGAS INC  
RECIPIENT BANK: [REDACTED]  
RECIPIENT BANK ABA # (ACH): [REDACTED]  
RECIPIENT ACCOUNT #: [REDACTED]  
TYPE OF ACCOUNT: COMMERCIAL CHECKING

#### INVOICE INQUIRY:

PLEASE CONTACT BILLING DEPARTMENT AT (978) 856-2904  
OR [REDACTED]

Due Date 2-26-19  
Amount \$ [REDACTED]  
Signature [Signature]  
Signature [Signature]  
Date 3/23

DETAILED PORTABLE PIPELINE BILLING SHEETS

REDACTED

✓



2/7/19  
cc

TRANSGAS Inc. • 87 Industrial Avenue East • Lowell, Massachusetts 01852-5193  
978-856-2900 • www.transgasLNG.com • email: info@transgasLNG.com

### INVOICE

✓

NATIONAL GRID  
CHRIS CLOONEY-GAS CONTROL  
55 BEARFOOT ROAD  
NORTHBORO, MA 01532

DATE: 02/04/2019

INVOICE NO: 390213  
CUSTOMER NO: [REDACTED]  
PO NO:

### PORTABLE PIPELINE BILLING

SHEET	DATES	Site Visit	SITE(S)	TOTAL AMOUNT
1 OF 2	01/22/19-01/22/19		Portsmouth, RI	[REDACTED]
2 OF 2	1/30/19 - 1/31/19		Portsmouth, RI	[REDACTED]

[REDACTED]

✓

### WIRE TRANSFER INFORMATION:

RECIPIENT NAME:	TRANSGAS INC
RECIPIENT BANK:	[REDACTED]
RECIPIENT BANK ABA # (ACH):	[REDACTED]
RECIPIENT ACCOUNT #	[REDACTED]
TYPE OF ACCOUNT:	COMMERCIAL CHECKING

### INVOICE INQUIRY:

PLEASE CONTACT BILLING DEPARTMENT AT (978) 856-2904  
OR [REDACTED]

Due Date: 2-26-19  
 Amount \$ [REDACTED]  
 Signature: [Signature]  
 Signature: [Signature]  
 Date: 2/22

DETAILED PORTABLE PIPELINE BILLING SHEETS ATTACHED



TRANSGAS Inc. • 87 Industrial Avenue East • Lowell, Massachusetts 01852-5193  
978-856-2900 • www.transgasLNG.com • email: info@transgasLNG.com

# INVOICE

NATIONAL GRID  
CHRIS CLOONEY-GAS CONTROL  
55 BEARFOOT ROAD  
NORTHBORO, MA 01532

DATE: 03/11/2019

INVOICE NO: 390318  
CUSTOMER NO: [REDACTED]  
PO NO:

## PORTABLE PIPELINE BILLING

SHEET	DATES	SITE(S)	TOTAL AMOUNT
1 OF 1	03/05/19-03/08/19	Portsmouth, RI	[REDACTED]
			[REDACTED]

### WIRE TRANSFER INFORMATION:

RECIPIENT NAME: TRANSGAS INC  
RECIPIENT BANK: [REDACTED]  
RECIPIENT BANK ABA # (ACH): [REDACTED]  
RECIPIENT ACCOUNT NO: [REDACTED]  
TYPE OF ACCOUNT: COMMERCIAL CHECKING

INVOICE INQUIRY: PLEASE CONTACT BILLING DEPARTMENT AT (978) 856-2904  
OR [REDACTED]

**TRANSGAS INC**

FINAL

REDACTED

BILLING SHEET PAGE NUMBER: 1 OF 1		SUN	MON	TUE	WED	THU	FRI	SAT	TOTALS	RATE	TOTAL AMOUNT
WEEK BEGINNING: 03/03/2019		03/03	03/04	03/05	03/06	03/07	03/08	03/09			
CUSTOMER: National Grid											
LOCATION(S): Portsmouth, RI											
<b>EQUIPMENT RATES</b>											
1a.	LNG TRAILERS										
1b.	HEATED VAPORIZERS (250 MCFH)										
1c.	AMBIENT VAPORIZERS (60 MCFH)										
1d.	AMBIENT VAPORIZER (30 MCFH)										
1e.	TRIM HEATER										
1f.	TRACTOR										
<b>MANPOWER RATES</b>											
2a.	SUPERVISORS										
2b.	HEATED VAPORIZER TECHNICIANS										
2c.	DRIVER / OPERATORS										
<b>OTHER</b>											
3a.	TRAILER MILEAGE										
3a.	VAPORIZER MILEAGE										
3a.	TRACTOR MILEAGE										
3b.	SUPPORT VEHICLES										
3b.	SUPPORT VEHICLE MILEAGE										
3c.	PER DIEM EXPENSES										
3d.	MOTEL COST										
3d.	AIR FARE COST										
3d.	CAR RENTAL COST										
3d.	OTHER MISCELLANEOUS EXPENSES										
3e.	PLANNING, PROCEDURES, & PREPARATION (HOURS)										
<b>SURCHARGES</b>											
4a.	WINTER SURCHARGE (NOVEMBER - MARCH)										
4b.	SHORT NOTICE SURCHARGE (< 24 HRS NOTICE)										
4c.	SUNDAY SURCHARGE										
4c.	SATURDAY SURCHARGE										
4c.	HOLIDAY SURCHARGE										
4d.	WEEKLY DIESEL FUEL SURCHARGE RATE =										
* Note: 4d. is included in the three (3a.) lines above, "OTHER MILEAGE" rates											
ALPHA CODES WHEN LISTED: Y = APPLICABLE N/A = NOT APPLICABLE NC = NO CHARGE										SHEET TOTAL:	



The Narragansett Electric Company  
d/b/a National Grid  
RIPUC Docket No. 4963  
2019 Annual Gas Cost Recovery Filing  
Responses to the Division's Second Set of Data Requests  
Issued September 5, 2019

Division 2-4

Request:

Referring to the table on page 10 of 27 of the Testimony of Arangio and Jaffe and the column for 2019/20 labeled "Total Firm Peak Hour Balance, (-) = Shortfall, (+) = Surplus," for each row containing a negative balance (shortfall), please separately explain what actions or commitments the Company has undertaken or will be taking to assure that these shortfalls can be met for the winter of 2019/20.

Response:

				2019/20		
Pipeline/LNG	Lateral	Take Station	Meter No.	Total Supply Deliveries Company & Marketers (Dth/hr)	Total Firm Peak Hour Model Flow (DTH/hr)	Total Firm Peak Hour Balance (-) = Shortfall (+) = Surplus (DTH/hr)
AGT	G	Barrington	00064	0	0	0
AGT	G	Warren	00012	811	794	17
AGT	G	Burrillville	00044	0	30	-30
AGT	G	Cray St	00842	0	2,060	-2,060
AGT	G	Dey St	00004	5,540	2,077	3,463
AGT	G	Cumberland	00083	42	49	-8
AGT	G	Portsmouth	00013	1,045	1,210	-164
AGT	G	Tiverton	00033	56	68	-12
AGT	G	E Providence	00010	1,698	2,221	-523
AGT	E	Westerly	00008	144	112	32
AGT		Montville	00059	208	233	-25
TGP	Cranston	Cranston	420750	2,794	2,107	687
TGP	Cranston	Lincoln	420758	1,283	1,053	230
TGP	Cranston	Smithfield	420910	450	1,608	-1,158
TGP		Cumberland	420135	1,343	1,823	-480
LNG		Exeter		1,000	1,000	0
LNG (incl. KLNG)		Providence		3,958	4,750	-792
LNG		Cumberland		750	750	0
			<b>Total:</b>	21,122	21,944	-821

Although not all gate stations show a negative balance (shortfall), the Company has sought to eliminate the hourly shortfalls on both Algonquin and Tennessee, at the specific gate station if possible, or across the specific pipeline system. On Algonquin, as was the case last winter, the Company is contracting for 14,100 Dth/day of city gate supplies delivered via Algonquin to the Company's Dey Street gate station (13,100 Dth/day and 546 Dth/hour) and Warren gate station (1,000 Dth/day and 42 ds/hour)<sup>1</sup>. In addition, the Company has contracted for a multi-year agreement for portable LNG storage and vaporization services on Aquidneck Island at Old Mill

<sup>1</sup> The contract term for city gate supplies delivered via Algonquin is for the 2019/20 through 2022/23 heating seasons and will be presented to the Division for review.



Lane which can provide up to 650 Dth/hour. The overall balance across the Algonquin G-6 system, which includes the Dey Street, Crary Street, Warren, and East Providence gate stations, shows a surplus of 897 Dth/hour. The Company is continuing discussions with Algonquin to enable some, if not all, of the deliveries to balance across their G-6 system, with the excess volumes at Dey Street to be taken at Crary Street. The Westerly gate station and Montville gate station feed the same load pocket, located off Algonquin's E-system. The hourly imbalance at the NGLNG plant shows a shortfall of 798 Dth/hour, which serves the same load pocket with the Algonquin G-6 lateral. Therefore, this shortfall balances with the surplus with an estimated surplus of 101 Dth/hour.

On Tennessee, the Company has contracted for an additional 20,000 Dth/day of incremental capacity with a receipt point of Dracut, MA and a delivery point of Cranston, RI. The daily volume of 20,000 Dth/day provides for an hourly volume of 833 Dth. The Cranston gate station is the furthest-most gate station on the Cranston lateral, with both the Lincoln and Smithfield gate stations located upstream, therefore allowing volumes to be taken upstream of Cranston if needed, eliminating the shortfalls at those gate stations. As was done last year, the Company is also planning on deploying portable LNG at the former Cumberland LNG site.

In order to support the portable LNG storage operations at Cumberland and Old Mill Lane, the Company will need to pursue a supplemental winter only LNG purchase agreement and will also arrange for the necessary trucking resources. The Company may also need to purchase additional winter only liquid should it be determined that the Exeter and NGLNG/Providence LNG facilities will be utilized more actively for balancing purposes during the 2019/20 winter season. These volumes are not yet finalized.