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Also admitted in Massachusetts

September 1, 2022

**BY ELECTRONIC MAIL**

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

**RE: Docket 2022-20-NG – 2022 Gas Cost Recovery Filing  
Responses to Division Data Requests – Set 2**

Dear Ms. Massaro:

I have enclosed an electronic version of Rhode Island Energy's<sup>1</sup> responses to the Rhode Island Division of Public Utilities and Carriers' ("Division") Second Set of Data Requests in the above-referenced matter.

The following data requests as well as responses and attachments contain confidential gas pricing (the "Confidential Responses"). Therefore, the Company has provided redacted and confidential versions of these responses and attachments and has requested confidential treatment 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 has also provided confidential versions of these responses and attachments 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 401-709-3359.

Very truly yours,



Steven J. Boyajian

Enclosures

cc: Docket No. 22-20-NG Service List  
Al Mancini, Division (w/confidential versions)  
Jerome D. Mierzwa, Division Consultant (w/confidential versions)

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

STATE OF RHODE ISLAND

RHODE ISLAND PUBLIC UTILITIES COMMISSION

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	)	
Annual Gas Cost Recovery Filing	)	Docket No. 22-20-NG
2022	)	
	)	
	)	

**MOTION OF THE NARRAGANSETT ELECTRIC  
COMPANY D/B/A RHODE ISLAND ENERGY FOR PROTECTIVE  
TREATMENT OF CONFIDENTIAL INFORMATION**

Rhode Island Energy<sup>1</sup> 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 810-RICR-00-00-1.3(H) (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 also respectfully 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 August 11, 2022<sup>2</sup> the Rhode Island Division of Public Utilities and Carriers (“Division”) issued its Division Data Requests to Rhode Island Energy (2nd Set) in this docket (the “Data Requests”). Division Data Request 2-1 requested the production of the Company’s responses to certain informal data requests that the Company had responded to confidentially pursuant to a Non-Disclosure Agreement (the “Informal Responses”) because the Informal

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<sup>1</sup> The Narragansett Electric Company d/b/a Rhode Island Energy (“Rhode Island Energy” or the “Company”).

<sup>2</sup> The Company’s Annual Gas Cost Recovery Filing 2022 is being filed contemporaneously with this motion and accompany data request responses. The Data Requests were issued to the Company pre-filing.

Responses contain commercially sensitive and confidential gas pricing information. Division Data Requests 2-2, 2-3, 2-4 and 2-5 (the “Confidential Requests”) contained confidential gas cost pricing information from the Informal Responses in the questions themselves. Additionally, certain of the Company’s responses to the Data Requests, and attachments to those responses, contain commercially sensitive and confidential contract terms and gas cost pricing information. Taken together, the following materials, including Data Requests, responses and attachments to responses contain commercially sensitive and confidential gas pricing information and contract terms: the Confidential Requests, the Company’s responses to Division 2-2, 2-3, 2-4 and 2-5 (the “Confidential Responses”) and Attachments Division 2-1 and 2-2 (the “Confidential Attachments”)

In accordance with Rule 1.3(H)(3), Rhode Island Energy has provided a redacted public version of the Confidential Requests, the Confidential Responses and the Confidential Attachments and unredacted, confidential versions.

Therefore, the Company requests that, pursuant to Rule 1.3(H), the PUC afford confidential treatment to the gas cost pricing information and contract terms contained in the Confidential Requests, Confidential Responses and Confidential Attachments.

## **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 gas cost pricing information and confidential contract terms– which are provided in the Confidential Requests, the Confidential Responses and the Confidential Attachments – are confidential and privileged information of the type that Rhode Island Energy would not ordinarily make public. As such, the information should be protected from public disclosure. Public disclosure of such information could impair Rhode Island Energy's ability to obtain advantageous commodity pricing or other advantageous contract terms in the future, thereby causing substantial competitive harm to the detriment of the Company and its customers. Accordingly, Rhode Island Energy is providing the information on a voluntary basis to assist the

PUC with its decision-making in this proceeding, but respectfully requests that the PUC provide confidential treatment to the information.

#### IV. CONCLUSION

For the foregoing reasons, Rhode Island Energy respectfully requests that the PUC grant its Motion for Protective Treatment of Confidential Information.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC  
COMPANY d/b/a RHODE ISLAND ENERGY**

By its attorneys,



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Dated: September 1, 2022

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-20-NG  
In Re: 2022 Annual Gas Cost Recovery Filing  
Responses to the Division's Second Set of Data Requests  
Issued on August 11, 2022

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Division 2-1

Request:

Kindly provide the informal responses that Rhode Island Energy provided to the Division of Public Utilities and Carriers on July 20, 2022 concerning NGPMP activity during February 2022.

Response:

The Company is providing a copy of these informal responses as Attachment Division 2-1. Attachment Division 2-1 contains confidential information that was provided to the Division subject to the terms of a non-disclosure agreement. Therefore, the Company is providing a redacted version of Attachment Division 2-1 and an unredacted confidential version subject to a motion for protective treatment.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
Docket No. 4038  
In Re: Natural Gas Portfolio Management Plan (NGPMP)  
Responses to Division's Informal Data Requests  
Issued July 7, 2022

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DIV 1-1

Request:

With respect to Tennessee Gas Pipeline baseload purchases, please explain how the Company was able to reduce its baseload purchases on the following days and explain how the daily baseload reduction quantity was determined:

- a. February 1;
- b. February 3;
- c. February 7;
- d. February 9;
- e. February 12;
- f. February 17; and
- g. February 21.

Response:

- a. February 1 - Baseload supply was cut due to supplier error.
- b. February 3 - Due to a Force Majeure, baseload supply was cut.
- c. February 7 - Monday, baseload supply was reduced and injected into storage to balance the unrateable gate for the weekend trading period.
- d. February 9 - Wednesday, baseload supply was reduced and injected into storage intra-day due to decreased customer demand.
- e. February 12 - Saturday, baseload supply was reduced and injected into storage to balance the unrateable gate for the weekend trading period. Due to decreased customer demand, baseload supply was reduced and injected into storage intra-day.
- f. February 17 - Thursday, baseload supply was reduced and injected intra-day due to decreased customer demand.
- g. February 21 - Monday, baseload supply was reduced and injected intra-day due to decreased customer demand.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
Docket No. 4038

In Re: Natural Gas Portfolio Management Plan (NGPMP)  
Responses to Division's Informal Data Requests  
Issued July 7, 2022

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DIV 1-2

Request:

With respect to Algonquin Gas Transmission baseload purchases, please explain how the Company was able to reduce its baseload purchases on the following days and explain how the daily baseload reduction quantity was determined:

- a. February 2;
- b. February 3;
- c. February 7;
- d. February 10;
- e. February 12;
- f. February 18;
- g. February 21;
- h. February 22; and
- i. February 26.

Response:

- a. February 2 - Wednesday, baseload supply was reduced and injected into storage intra-day due to decreased customer demand.
- b. February 3 - Thursday, baseload supply was reduced and injected into storage intra-day due to decreased customer demand.
- c. February 7 - Monday, baseload supply was reduced and injected into storage to balance the unrateable gate for the weekend trading period.
- d. February 10 - Thursday, baseload supply was reduced and injected into storage intra-day due to decreased customer demand.
- e. February 12 - Saturday, baseload supply was reduced and injected into storage to balance the unrateable gate for the weekend trading period. Due to decreased customer demand, baseload supply was reduced and injected into storage intra-day.
- f. February 18 - Friday, baseload supply was reduced injected into storage intra-day due to decreased customer demand.
- g. February 21 - Sunday, part of a 4-day President's Day holiday trading period, baseload supply was reduced and injected into storage intra-day due to decreased customer demand.



- h. February 22 - Tuesday, part of a 4-day President's Day holiday trading period, baseload supply was reduced and injected into storage to balance the unrateable gate.  
and
- i. February 26 - Saturday, baseload supply was reduced and injected into storage intra-day due to decreased customer demand.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
Docket No. 4038  
In Re: Natural Gas Portfolio Management Plan (NGPMP)  
Responses to Division's Informal Data Requests  
Issued July 7, 2022

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DIV 1-3

Request:

Please explain the following Tennessee Gas Pipeline daily swing adjustments and explain how the quantities were determined:

- a. February 2;
- b. February 5;
- c. February 14;
- d. February 19; and
- e. February 22.

Response:

- a. February 2 - Due to a Force Majeure at Sta 261 Discharge East we purchased primary gas to ensure flow. We were unable to guarantee gas purchased at Zone 4 would flow through the outage.
- b. February 5 - Saturday, purchased unrateable for one day only during Friday trading.
- c. February 14 - Monday, purchased unrateable for one day only during Friday trading.
- d. February 19 - Saturday, purchased unrateable for one day only during Friday trading.
- e. February 22 - Tuesday, part of 4 day holiday weekend, purchased unrateable for one day only during Friday trading.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
Docket No. 4038  
In Re: Natural Gas Portfolio Management Plan (NGPMP)  
Responses to Division's Informal Data Requests  
Issued July 7, 2022

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DIV 1-4

Request:

Please explain the following Algonquin Gas Transmission daily swing adjustments and explain how the quantities were determined:

- a. February 1;
- b. February 5; and
- c. February 13.

Response:

- a. February 1 - Purchased Tetco-Leidy as pass through and lowered the amount of M3 purchased.
- b. February 5 - Purchased Tetco-Leidy as pass through and lowered the amount of M3 purchased to 3,753 dth. Additional adjustments were unratable purchases for Saturday made during Friday trading.
- c. February 13 - Sunday, purchased unratable for one day only during Friday trading.

REDACTED

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
Docket No. 4038  
In Re: Natural Gas Portfolio Management Plan (NGPMP)  
Responses to Division's Informal Data Requests  
Issued July 7, 2022

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DIV 1-5

Request:

With respect to Tennessee Gas Pipeline daily swing purchases:

- a. February 5. Please explain why lower-cost Dawn purchases were adjusted down by 998. Also explain the [REDACTED] line item.
- b. February 12. Please explain why lower-cost Zone 4 ConneXion purchases were not maximized as either baseload or swing supplies.
- c. February 13. Please explain why [REDACTED] purchases were made and lower-cost Dawn purchases were adjusted/not maximized.
- d. February 19. Please explain why [REDACTED] purchases were made and lower-cost Zone 4, Niagara, and Dawn purchases were adjusted/not maximized.
- e. February 22. Please explain why lower cost Zone 4 ConneXion, and Zone 4 purchases were adjusted/not maximized.
- f. February 26. Please explain why lower cost Zone 4 ConneXion and Zone 4 purchases were not maximized.

Response:

- a. February 5 - The Dawn purchases were adjusted down because they were not needed for the 3 day trading strip and could not be taken unrateably. The [REDACTED] call was used to balance the unrateable gate for this weekend.
- b. February 12 - All Zone 4 was maximized for this day. However, this gas was injected intraday to accommodate a lower gate demand.
- c. February 13 - The Dawn purchases were not maximized because they were not needed for the 3 day trading strip and could not be taken unrateably. The [REDACTED] call was used to balance the unrateable gate for this weekend.
- d. February 19 - The Zone 4 and Niagara were maximized for this day but labeled OPERATIONAL as pass through since they were not needed for all 4 days of the holiday trading strip. The Dawn was not taken because it was not needed for February 22 and could not be taken unrateably.
- e. February 22 - The Zone 4 purchases were not maximized because they were not needed for the 4 day holiday trading strip and could not be taken unrateably. The NYMEX 115% call was used to balance the unrateable gate for this weekend.
- f. February 26 - All Zone 4 was maximized for this day, we injected intraday to accommodate lower demand and this supply was adjusted down.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
Docket No. 4038  
In Re: Natural Gas Portfolio Management Plan (NGPMP)  
Responses to Division's Informal Data Requests  
Issued July 7, 2022

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DIV 1-6

Request:

With respect to Algonquin Gas Transmission daily swing purchases:

- a. February 3. Please explain why lower-cost Tetco Zone M-2 (the third swing line item) purchases were not maximized.
- b. February 5. Please explain why the purchase of lower-cost supplies, swing line items 9-11, were not maximized and higher cost Algonquin citygate purchases were made.
- c. February 10. Please explain why lower-cost Tetco Zone M-2 (The third swing line item) purchases were not maximized.
- d. February 13 and 14. Please explain why higher cost citygate purchases were made in lieu of purchases under the arrangements which were adjusted downward.
- e. February 15. Please explain why higher cost citygate purchases were made in lieu of maximizing Tetco Zone M-3 purchases.
- f. February 26. Please explain why higher cost citygate purchases were made in lieu of maximizing Tetco Zone M-3 purchases.

Response:

- a. February 3 - The Tetco Zone M-2 purchases were maximized. The gate was reduced by 6,500dt for downswing on 2/4/22 for the last hour of Gas Day 3. The M2 supply was used to inject into storage.
- b. February 5 - The higher cost Algonquin citygate purchases were unratable calls that were used for the weekend days Sat 2/5 and Sun 2/6 and not Mon 2/7/22. The swing line items that were not maximized were not needed on Mon 2/7/22 but were purchased on Sat 2/5 and Sun 2/6 and were adjusted to be passthrough to customer as the volume was purchased outside normal trading for the weekend strip.
- c. February 10 - Tetco Zone M-2 purchases were maximized. The gate was reduced by 6,584dt for downswing on 2/10/22 in the evening of Gas Day 10. The M2 supply was used to inject into storage.
- d. February 13 and 14 - The higher cost Algonquin citygate purchases were unratable calls that were used for the weekend days Sun 2/13 and Mon 2/14 and not Sat 2/12/22. The swing line items that were not maximized were not needed on Sat 2/12/22 but were purchased on Sun 2/13 and Mon 2/14 and were adjusted to be passthrough to customer as the volume was purchased outside normal trading for the weekend strip.

- e. February 15 - The Tetco Zone M-3 volume was maximized on this day. 3,753dt was adjusted to be passthrough to customer as it was purchased cheaper.
- f. February 26 - The Tetco Zone M-3 volume was maximized on this day. 3,753dt was adjusted to be passthrough to customer as it was purchased cheaper.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
Docket No. 4038  
In Re: Natural Gas Portfolio Management Plan (NGPMP)  
Responses to Division's Informal Data Requests  
Issued July 7, 2022

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DIV 1-7

Request:

The file shows Tennessee Gas Pipeline Everett swing purchases being made on February 5, 14 and 28. However, the file "Feb 2022 Purchases\_pw.xlsx," which was also provided on May 13, 2022 shows no Tennessee delivered purchases being made at prices comparable to the prices paid for the Everett supplies. Please explain why the higher priced Everett purchases were reflected in the RI-Gas Summary – February 2022.xlsx file when no such purchases were made. Identify the alternative supplies purchased which were used in lieu of the Everett purchases on these three days to meet customer requirements.

Response:

The 115% Everett calls were used for customer requirements for the three days mentioned and are reflected on the "Feb 2022 Purchases\_pw.xlsx" file in the tab NGPMP Purchases:

February 5 – Rows 702 & 713

February 14 – Rows 704 & 715 for NYMEX – 711 for Z6

February 28 – Rows 707 & 719

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
Docket No. 4038  
In Re: Natural Gas Portfolio Management Plan (NGPMP)  
Responses to Division's Informal Data Requests  
Issued July 7, 2022

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DIV 1-8

Request:

Please explain why the following off-system sales were made as identified in the file "Sales Feb 22\_pw.xlsx" at a cost which was lower than the cost of citygate purchases made on the same day as identified in the file "RI-Gas Summary-February 2022.xlsx".

- a. February 5. Portland sales and Tennessee Everette purchases;
- b. February 28. Portland sales and Tennessee Everette purchases; and
- c. February 28. Algonquin sales and Algonquin citygate purchases.

Response:

- a. February 5 - Saturday, did not need the Dawn supply for full strip, Everett taken unrateable to accommodate gate demand.
- b. February 28 - Sales were made Monday intraday after supply was purchased the previous Friday.
- c. February 28 - Sales were made Monday intraday after supply was purchased the previous Friday.



The Narragansett Electric Company  
d/b/a Rhode Island Energy  
Docket No. 4038  
In Re: Natural Gas Portfolio Management Plan (NGPMP)  
Responses to Division's Informal Data Requests  
Issued July 7, 2022

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DIV 1-9

Request:

Please explain why additional gas supplies were not withdrawn under the Company's Algonquin storage arrangements to displace Algonquin citygate purchases on the following days:

- a. February 6;
- b. February 13;
- c. February 26;
- d. February 27; and
- e. February 28.

Response:

- a. February 6 - Saturday, additional storage withdrawals were preserved for upswing intra-day capabilities.
- b. February 13 - Sunday, additional storage withdrawals were preserved for upswing intra-day capabilities.
- c. February 26 - Saturday, storage withdrawals were scheduled day-ahead and additional storage withdrawals were preserved for upswing intra-day capabilities. Due to decreased customer requirements, storage withdrawals were reduced intra-day.
- d. February 27 - Saturday, storage withdrawals were scheduled day-ahead and additional storage withdrawals were preserved for upswing capabilities intra-day. Due to decreased customer requirements, storage withdrawals were reduced intra-day. and
- e. February 28 - Monday, all available storage withdrawals were scheduled day-ahead. Due to decreased customer requirements, storage withdrawals were reduced intra-day.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
Docket No. 4038  
In Re: Natural Gas Portfolio Management Plan (NGPMP)  
Responses to Division's Informal Data Requests  
Issued July 7, 2022

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DIV 1-10

Request:

Please explain why additional gas supplies were not withdrawn under the Company's Tennessee delivered storage arrangements (including 501 swing-on storage) to displace Everett purchases on the following days:

- a. February 5, and
- b. February 28.

Response:

- a. February 5 - Saturday, the available 10,836 Dth of storage withdrawals were scheduled day-ahead. The 501 swing-on storage field is preserved for system balancing at the close of the gas day.
- b. February 28 - Monday, the available 10,836 Dth of storage withdrawals were scheduled day-ahead. Due to decreased customer requirements, storage withdrawals were reduced intra-day. The 501 swing-on storage field is preserved for system balancing at the close of the gas day.

**Redacted**  
Division 2-2

Request:

Reference informal response to 1-5(a) provided in response to Div 2-1:  
Please provide a copy of the transaction confirmation (Exhibit A) for the [REDACTED]  
contract;

- a. Please explain why no adjustment for Dawn is indicated for February 7, 2022, which would indicate that the supplies could be taken unratably; and
- b. Please explain why the [REDACTED] supplies could not have been adjusted to accommodate the Dawn purchase adjustments.

Response:

Please see Attachment Division 2-2 for a copy of the transaction confirmation. Please note that this Data Request, response and accompanying Attachment Division 2-2 contain confidential gas pricing information. Therefore, the Company is providing a redacted version of this response and an unredacted confidential version subject to a motion for protective treatment.

- a. The informal response to Informal Data Request Division 1-5(a) references Saturday, February 5<sup>th</sup>. On Friday, February 4<sup>th</sup>, the Company was planning for the upcoming the 3 days, with Monday, February 7<sup>th</sup> not forecasted to be as cold as Saturday, February 5<sup>th</sup> and Sunday, February 6<sup>th</sup>, so customer demand was lower. Dawn is a ratable must take volume for all three days. The smaller Dawn purchases were adjusted down because they were not needed for the 3 day trading strip and could not be taken unrateably.
- b. The [REDACTED] is the only unratable call which was used to balance the customer demand for this weekend.

Contract ID # 4863

104358

Season 1:  
Option # 294462  
Fee # 294465

100000 Y299

TRANSACTION CONFIRMATION

<p><b>ENGIE Gas &amp; LNG LLC</b></p>	<p>Date: June 26 2018 Transaction Confirmation: NSB042-16</p>
<p>This Transaction Confirmation is subject to the Base Contract between Seller, formerly known as GDF SUEZ Gas NA LLC, and Buyer dated December 19, 2011, as amended. The terms of this Transaction Confirmation are binding unless disputed in writing within two (2) Business Days of receipt unless otherwise specified in the Base Contract.</p>	
<p><b>Seller or Party A:</b></p> <p>ENGIE Gas &amp; LNG LLC 1990 Post Oak Blvd Suite 1900 Houston TX 77056 Attn: Contract Administration Telephone: (713) 636-1742 Facsimile: (713) 636-1247 Email: <a href="mailto:jason.austin@engie.com">jason.austin@engie.com</a> Base Contract No.: NSB042</p>	<p><b>Buyer or Party B:</b></p> <p>The Narragansett Electric Company d/b/a National Grid c/o National Grid 100 East Old Country Road Hicksville, NY 11801 Attn: Director - Gas Contracting and Regulatory Compliance Telephone: (516) 545-3108 Email: <a href="mailto:john.allocca@Nationalgrid.com">john.allocca@Nationalgrid.com</a></p>
<p><b>Contract Price:</b> Buyer shall pay to Seller a Contract Price per MMBtu of Gas equal to the following two components:</p> <p>1. <u>Commodity Rate:</u> For each MMBtu of Gas delivered to Buyer during the Delivery Period, Buyer will pay to Seller a rate per MMBtu equal [REDACTED]</p> <p>2. <u>Demand Charge:</u> Additionally, Buyer shall make annually, a non-refundable demand charge payment to Seller based on the applicable Contract Season, in four monthly installments for December, January, February and March of each Contract Season:</p> <p><u>Contract Season 1:</u> [REDACTED] or [REDACTED]  <u>Contract Season 2:</u> [REDACTED] or [REDACTED]  <u>Contract Season 3:</u> [REDACTED] or [REDACTED]  <u>Contract Season 4:</u> [REDACTED] or [REDACTED]</p> <p>The Commodity Rate and the Demand Charge components, each as stated on a per MMBtu basis, are hereinafter collectively referred to as the "Contract Price" (per MMBtu).</p> <p>[REDACTED]</p>	
<p><b>Delivery Period:</b> The total term of this Transaction Confirmation shall be December 1, 2018, at 10:00 am Eastern Time (ET) through and including 9:59 am ET on April 1, 2022, with the following annual Contract Seasons:</p> <p><u>Contract Season 1:</u> December 1, 2018 at 10:00 am ET through 9:59 am ET on April 1, 2019  <u>Contract Season 2:</u> December 1, 2019 at 10:00 am ET through 9:59 am ET on April 1, 2020  <u>Contract Season 3:</u> December 1, 2020 at 10:00 am ET through 9:59 am ET on April 1, 2021  <u>Contract Season 4:</u> December 1, 2021 at 10:00 am ET through 9:59 am ET on April 1, 2022</p>	



4863

**Performance Obligation and Contract Quantity: Firm Gas service.**

**Firm (Variable) Quantity:** On any day during the applicable Contract Season, Buyer shall have the right, but not the obligation, to purchase on a Firm basis a "Maximum Daily Quantity" or "MDQ" of Gas not to exceed as follows:

- Contract Season 1: 15,000 MMBtu
- Contract Season 2: 20,000 MMBtu
- Contract Season 3: 20,000 MMBtu
- Contract Season 4: 20,000 MMBtu

and a total Contract Quantity of Gas during the duration of the four Contract Seasons of **2,255,000 MMBtu**, not to exceed the total Delivery Period quantities for each Contract Season as follows:

- Contract Season 1: 321,000 MMBtu
- Contract Season 2: 632,000 MMBtu
- Contract Season 3: 651,000 MMBtu
- Contract Season 4: 651,000 MMBtu

**Delivery Point(s):**

For Firm delivery service of Gas at the point of interconnection between Distrigas of Massachusetts LLC's ("DOMAC") facilities and the Tennessee Gas Pipeline system at Meter No. 412513 located in Everett, Massachusetts.

**Special Conditions:**

1. **Scheduling:** All Notices and communications given in connection with Nominations pursuant to Section 4 of the Base Contract may be provided by 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. Eastern Time (ET) 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. **Dodd-Frank Compliance:** The parties agree that for purposes of this Transaction Confirmation and as of the Trade Date each party is a producer, processor, commercial user of, or a merchant handling the commodity that is the subject of the Transaction Confirmation and is entering into this Transaction Confirmation solely for purposes related to its business as such. The parties confirm their intention that if any such commodity option transaction be physically settled, such that if exercised, it results in the sale of a commodity for either immediate or deferred delivery.
3. In the event of a conflict between the terms and conditions of the (i) Transaction Confirmation, (ii) Special Provisions, and (iii) Base Contract, the terms and conditions of the documents shall govern in the priority listed in this proviso.

- 4. Capitalized terms used herein and not otherwise defined shall have the meaning set forth in the Base Contract, as amended, and as supplemented and modified by the Special Provisions.
- 5. Buyer's Condition Precedent: If Buyer is unable to obtain necessary approvals from its executive management and/or board of directors for the execution of this Transaction Confirmation by **July 1, 2018**, then Buyer shall have the right, to be exercised by written notice no later than **July 15, 2018**, to terminate this Transaction Confirmation for all Delivery Periods without liability.

If after Buyer has obtained necessary approvals from its executive management and/or board of directors for the execution of this Transaction Confirmation, Buyer is unable to obtain any input, guidance and/or informal or formal approvals and orders or other authorizations or consents as determined to be acceptable by Buyer, in its commercially reasonable discretion, from the Rhode Island Division of Public Utilities and Carriers by **May 31, 2019**, then Buyer shall have the right, to be exercised by written notice no later than **June 15, 2019**, to terminate this Transaction Confirmation, without liability for the Delivery Periods commencing on December 1, 2019 through the end of the Term. For avoidance of doubt, if Buyer has received the necessary approvals from its executive management and/or board of directors but is unable to obtain approval of the Rhode Island Division of Public Utilities and Carriers by **May 31, 2019**, Buyer's right to terminate this Transaction Confirmation without liability shall not apply to Contract Season 1 (the Delivery Period December 1, 2018 through March 31, 2019).

①  
SVP  
JK

Seller: ENGIE Gas & LNG LLC	Buyer: The Narragansett Electric Company d/b/a National Grid
By: <u>Rudolph R. Adamiak</u>	By: <u>[Signature]</u> <span style="float: right;">orc</span>
Name: <u>RUDOLPH R ADAMIAK</u>	Name: <u>John V. Vaughn</u> <span style="float: right;">JK</span>
Title: <u>SVP - COMMERCIAL</u>	Title: <u>Authorized Signatory</u>
Date: <u>June 26, 2018</u>	Date: <u>06/01/2018</u>

**Redacted**  
Division 2-3

Request:

Reference informal response to 1-5(c) provided in response to Div 2-1. Please explain why the [REDACTED] supplies could not have been adjusted to accommodate both Dawn purchase adjustments.

Response:

On February 13, the Dawn purchases were not maximized because they were not needed for each day of the 3-day trading period (February 12<sup>th</sup>, 13<sup>th</sup>, and 14<sup>th</sup>) and could not be taken unratably. The [REDACTED] call was used to balance the fluctuations in customer demand over this weekend period.

Please note that this Data Request and response contain confidential gas pricing information. Therefore, the Company is providing a redacted version of this response and an unredacted confidential version subject to a motion for protective treatment.

**Redacted**  
Division 2-4

Request:

Reference informal response to 1-5(d) provided in response to Div 2-1. Please explain why the [REDACTED] supplies could not have been adjusted to accommodate the Dawn purchase adjustments.

Response:

On February 19<sup>th</sup>, the Company relied on [REDACTED] supply to meet customer demand. The Dawn supply is ratable and would have had to be taken for the full trading period which included February 19<sup>th</sup> – February 22<sup>nd</sup> (4 trading days for President’s Day). This supply was not needed to meet customer requirements for the warmer February 22<sup>nd</sup> gas day. The Company purchased Zone 4 and Zone 5 gas for February 19<sup>th</sup> – February 21<sup>st</sup> gas days to meet customer requirements. The unrateable [REDACTED] supply was used to meet fluctuating customer requirements for the weekend in question.

Please note that this data request and the Company’s response contain confidential gas pricing information. Therefore, the Company is providing a redacted version of this response and an unredacted confidential version subject to a motion for protective treatment.



**Redacted**  
Division 2-5

Request:

Reference the informal response to 1-5(f) provided in response to Div 2-1. Please explain why the [REDACTED] supplies were not adjusted down.

Response:

On February 26<sup>th</sup>, actual customer requirements were less than forecasted customer requirements for the day. The Company had to inject gas into storage in order to balance the daily requirements. When gas is injected into storage, the volume is taken from the baseload zone 4 purchase since that is the supply that is physically transported into storage. The [REDACTED] supply is not able to be redirected from the citygates and thus, remains in the supply stack for the day.

The Narragansett Electric Company  
d/b/a Rhode Island Energy  
RIPUC Docket No. 22-20-NG  
In Re: 2022 Annual Gas Cost Recovery Filing  
Responses to the Division's Second Set of Data Requests  
Issued on August 11, 2022

Division 2-6

Request:

Reference the informal response to 1-9(a-d) provided in response to Div 2-1. For each day, please identify the scheduled day-ahead storage withdrawal volume and identify the volume preserved for upcoming swing capabilities intraday. Also, identify the maximum intraday capability for each storage arrangement for which supplies are delivered by Algonquin.

Response:

The table below provides the scheduled day-ahead storage withdrawal volume and the volume preserved for intraday swing capabilities (volumes = Dth/day).

	AGT Day Ahead Scheduled Withdrawals	AGT Preserved Intraday Upswing
2/6/2022	22,075	5,957
2/13/2022	23,075	4,957
2/26/2022	21,872	5,957
2/27/2022	21,872	5,957

The table below provides the maximum intraday capability for each storage arrangement for which supplies are delivered by Algonquin (volumes = Dth/day).

AGT Storage Capacity	2/6/2022	2/13/2022	2/26/2022	2/27/2022
EGTS GSS-TE 600045*	5,479	5,479	5,479	5,479
EGTS GSS 300169*	2,001	2,001	2,001	2,001
EGTS GSS 300171*	2,550	2,550	2,347	2,347
TCO FSS 9630*	2,472	2,472	2,472	2,472
TETCO FSS-1 400515*	916	916	916	916
TETCO SS-1 400185	657	657	657	657
TETCO SS-1 400221	13,957	13,957	13,957	13,957
Total:	28,032	28,032	27,829	27,829

\*Intraday upswing capability dependent on pipeline conditions.