



STATE OF RHODE ISLAND

DIVISION OF PUBLIC UTILITIES & CARRIERS
89 Jefferson Boulevard
Warwick, Rhode Island 02888
(401) 941-4500
(401) 941-9207 - Fax

October 7, 2022

Via Electronic Mail

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

RE: Re: Rhode Island Energy's BTU Content Factor Filing

Dear Ms. Massaro:

On behalf of the Division of Public Utilities and Carriers ("Division"), please accept for filing the enclosed memorandum from Division Chief Regulatory Analyst Alberico Mancini in the above referenced matter. The Division adopts his analysis and recommendation and supports approval of the change in the BTU conversion factor as filed, for effect on November 1, 2022.

Thank you for your attention to this submission.

Very truly yours,

/s/ Christy Hetherington

Christy Hetherington, Esq.
Chief of Legal Services
Division of Public Utilities and Carriers

Enclosure

cc: Docket 22-20-NG Service List



STATE OF RHODE ISLAND

DIVISION OF PUBLIC UTILITIES & CARRIERS
Accounting Section
89 Jefferson Boulevard
Warwick, Rhode Island 02888
(401) 941-4500
(401) 941-9248 - Fax

**To: Linda George, Esq., Administrator
Division of Public Utilities and Carriers**

**From: Alberico Mancini, Chief Regulatory Analyst
Division of Public Utilities & Carriers**

**CC: John Spirito, Esq., Deputy Administrator
Christy Hetherington, Esq., Chief Legal Counsel
Paul Roberti, Esq., Chief Economic & Policy Advisor
Division of Public Utilities and Carriers**

Date: October 7, 2022

Re: Rhode Island Energy BTU Content Factor Update

On October 5, 2022, National Grid filed its Semi-Annual BTU content factor update in accordance with its gas tariff.¹ The intent of tracking the BTU content is to reflect the actual BTU content of the gas coming through the pipelines in billings to customers. BTU content can vary based on the source and processing of the gas. The Company's tariffs are based on a rate per therm, while the customers' meter readings are based on measurements of cubic feet of gas (volume) through the meter. A ccf to BTU conversion is therefore applied on the bills to convert the metered measure of volume use to the equivalent amount of therms, based on actual daily MMBtu readings at the various gate stations where the gas enters National Grid's distribution system. The Company

¹ Per the Company's tariff, the BTU content factor is defined as follows: "One British thermal unit, (i.e., the amount of heat required to raise the temperature of one pound of water one-degree Fahrenheit at sixty degrees (60°) Fahrenheit). A Therm is one hundred thousand Btus. The BTU content factor for a given volume shall be calculated by the Company on a seasonal basis at the end of October and the end of April based upon an average of the Transporting Pipeline's prior six-month experience of recorded BTU factors."

submitted actual BTU content data totaling 31,790,195 MMBtus with a volume of 30,846,310 Mcfs for the six-month period November 1, 2021 through April 30, 2022 resulting in a BTU content factor of 1.031 ($31,790,195/30,846,310 = 1.031$).

I reviewed the filing and found it consistent with the approved tariff and prior filings and recommend the Division support the change in the BTU conversion factor from 1.028 to 1.031 (1 ccf will now equate to 1.031 therms) effective November 1, 2022.